



Dan Madden
MUNICIPAL SERVICES DIRECTOR
dmadden@turlock.ca.us

MUNICIPAL SERVICES
ADMINISTRATION

156 S. BROADWAY, SUITE 270 | TURLOCK, CALIFORNIA 95380 | PHONE 209-668-5590 | FAX 209-668-5695

January 9, 2009

James D. Marshall, P.E.
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

Subject: Comments on December 9, 2008 Tentative Waste Discharge Requirements
for City of Turlock Water Quality Control Facility (NPDES Permit No. CA0078948)

Dear Mr. Marshall:

The City of Turlock ("City") appreciates the opportunity to provide comment on the December 9, 2008 Tentative Waste Discharge Requirements for the City's Water Quality Control Facility (NPDES Permit No. CA0078948) ("Tentative Order"). Please find the City's detailed comments enclosed.

In accordance with prior discussions in early December between City staff, you, and Ken Landau, the City is requesting that adoption of the Tentative Order be briefly delayed, from the Regional Board's February 2009 meeting to the April 2009 or June 2009 meeting, to allow the City to gather additional data and provide additional technical information to Regional Board staff for purposes of re-calculating and adopting final effluent limitations for trihalomethanes, carbon tetrachloride, and nitrate-N. This will ensure that appropriate, yet protective, effluent limitations for these constituents are adopted in the final NPDES permit, and will avoid Regional Board staff from having to devote scarce resources to re-opening the City's NPDES permit shortly after adoption of the Tentative Order to modify these effluent limitations based on new technical information. While the City understands that Regional Board staff is under pressure to expeditiously adopt the City's renewed NPDES permit, a brief delay of 2-4 months is warranted and reasonable, as discussed below and in the City's enclosed comments.

Specifically, the City is requesting this brief delay in permit adoption in order to perform a low method detection level study that will likely result in re-calculation of the final effluent limitations for trihalomethanes and carbon tetrachloride. *See* enclosed Comment # 12. The City is also requesting permit adoption delay so that additional data and technical analysis can be gathered and performed over the next two months related to receiving water assimilative capacity for nitrate-N, which will likely result in re-calculation of the final effluent limitation for nitrate-N. *See* enclosed Comment # 6. Calculation of an appropriate final effluent limitation for nitrate-N is particularly important to the City, as any modification to the final effluent limitation will impact the magnitude and cost of actions and/or facilities necessary for compliance. Given the economic hardships being faced by agencies throughout California, including the City, reasonable regulation is especially appreciated at this time.

The City truly appreciates Regional Board staff efforts in drafting and negotiating the terms of the Tentative Order, and looks forward to continued cooperation amongst our agencies.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Madden', with a long horizontal flourish extending to the right.

Dan Madden
Municipal Services Director

Enclosure

cc: Pam Creedon, Executive Officer, Regional Board
Ken Landau, Asst. Executive Officer, Regional Board
Nicole Granquist, Downey Brand LLP
Brian Laurenson, Larry Walker Associates