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ADMINISTRATION

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November 17, 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 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 the enclosed comments on the Tentative Waste Discharge Requirements for the City's Water Quality Control Facility (NPDES Permit No. CA0078948) ("Tentative Order").

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

Should you have any questions regarding this letter, please feel free to contact me at (209) 668-5590.

Sincerely,

Dan Madden
Municipal Services Director

cc: Michael Cooke, City of Turlock
Nicole Granquist, Downey Brand LLP
Brian Laurenson, Larry Walker Associates

1.¹ **Dissolved Copper Monitoring - Monitoring & Reporting Program, Attachment E, page E-5, Section IV.A.1., Table E-3, Effluent Monitoring.**

The effluent monitoring table at Table E-3 was modified by Regional Water Board staff to include additional constituents that correspond to effluent limitations. **The City requests that Regional Water Board staff also remove dissolved copper from Table E-3**, as results from dissolved copper sampling do not correspond to effluent or receiving water limitations, and would not be used for compliance purposes. Based on this one non-essential sampling requirement, the City of Turlock (“City”) would need to implement additional field procedures to meet the fifteen (15) minute hold time to filtration that would be unnecessary if the dissolved copper monitoring requirement is removed.

The City requests that the monitoring requirements for dissolved copper be removed from Table E-3 of the Monitoring and Reporting Program.

2. **Interim Effluent Limitation for Aluminum – Waste Discharge Requirements Section VI.C.h., Attachment F, Fact Sheet Sections IV.C.3 and VII.B.1.**

The City reiterates its request to include the compliance schedule and interim effluent limitations for aluminum in the tentative order rather than the Time Schedule Order (“TSO”). The final effluent limitations for aluminum (acute and chronic aquatic limitations) are derived from a new interpretation of the Basin Plan’s narrative toxicity water quality objective, applying USEPA developed National Recommended Ambient Water Quality Criteria. As stated in the Fact Sheet, this is a “new regulatory requirement.” Therefore, the compliance schedule and interim effluent limitations should be included in the tentative order pursuant to the State Water Resource Control Board’s recently adopted compliance schedule policy, State Water Board Resolution 2008-0025.

The City requests that the compliance schedule and interim effluent limitations for aluminum be included in the tentative order, and removed from the TSO.

¹ The City incorporates by reference herein prior comments made on earlier tentative versions of the City’s renewed NPDES Permit, to the extent still applicable.