

**Regional Water Quality Control Board  
Central Valley Region  
Board Meeting – 8-10 December 2010**

**Response to Written Comments for City of Reedley Wastewater Treatment Facility  
Tentative Waste Discharge Requirements**

---

At a public hearing scheduled for 8 to 10 December 2010, the Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) will consider adoption of Waste Discharge Requirements (WDRs) for the City of Reedley. This document contains responses to written comments received from interested parties regarding the Tentative WDRs (TWDRs) initially circulated on 30 September 2010. Written comments from interested parties were required by public notice to be received by the Central Valley Water Board by 1 November 2010 to receive full consideration. Comments were received only by Carollo Engineers on behalf of the City of Reedley (City letter).

Written comments from the above interested party are summarized below, followed by the response of the Central Valley Water Board.

---

**CITY OF REEDLEY (CITY) COMMENTS**

---

**CITY – COMMENT No. 1:** The City letter states that the monthly average flows in Finding 9, line three of the TWDRs are incorrect.

**RESPONSE:** The monthly average flow information has been corrected.

**CITY – COMMENT No. 2:** The City states it does not understand why data from the narrow window of 1999 and 2000 was provided in Finding 13 of the TWDRs.

**RESPONSE:** In August 2001, the City submitted a technical report, *Groundwater Assessment Wastewater Treatment Facility*. The technical report evaluated existing groundwater data and identified monitoring wells MW-1, MW-2, MW-3, and MW-21 as being impacted from historical use of unlined sludge drying beds. The Finding has been modified to reflect the findings are from the 2001 analysis.

**CITY – COMMENT No. 3:** The City letter requests modifications to Finding 15 of the TWDRs to note that the City removed concrete dikes and piping in the sludge beds, then filled in the vacated sludge beds with strippings from the orchard area north of Pond 7, where trees were removed to clear the land for new paved sludge beds. Any organic matter and nitrogen detected in this soil likely originated from the orchard and historic agricultural use of the land.

**RESPONSE:** In July 1997, the City submitted a technical report, *City of Reedley Sludge Storage Site Nitrogen Levels Investigation and Closure Plan*. The Closure Plan provided describes remediation measures such as planting crops to uptake the nitrogen from nitrate contaminated soils derived from pond bottom scrapings that had been stockpiled adjacent to the old sludge storage area and nitrate contaminated soils from the old sludge storage area.

On 30 September 1997, the City submitted a letter requesting the use of Eucalyptus trees instead of rotating crops. The Central Valley Water Board provided final approval of the Closure Plan in 27 October 1997.

The finding has not been changed. The information provided by Carollo Engineers regarding the investigation and closure of the old sludge drying beds does not comport with the approved closure plan and associated documentation in the City's Central Valley Water Board file. The City can address the discrepancies when it conducts the evaluation of the phytoremediation project required by Provision F.21 of the WDRs.

**CITY – COMMENT No. 4:** The City states that Safety-Kleen closed its business in April 2010, is no longer a Significant Industrial User (SIU), and requests that Finding 18 be modified accordingly.

**RESPONSE:** Finding 18 has been modified to reflect that Safety-Kleen is no longer an SIU discharging to the City sewer collection system.

**CITY – COMMENT No. 5:** The City requests deletion of Finding 20 since Safety-Kleen no longer discharges to the City.

**RESPONSE:** The finding has been deleted.

**CITY – COMMENT No. 6:** The City requests to add the following to the last sentence of Finding 26, "in the future to increase discharge capacity beyond 4.7 mgd."

**RESPONSE:** The change has been made.

**CITY – COMMENT No. 7:** The City requests to add the following sentence to Finding 37, "Ponds 4 and 5 can be used temporarily during the irrigation season in the event of an emergency."

**RESPONSE:** The change has not been made. Central Valley Water Board staff are concerned that high flows in the Kings River during the irrigation season eliminate the five feet of separation between the pond inverts and groundwater likely reducing the effectiveness of pathogen removal. The City is aware of this limitation and should implement operational measures and/or develop additional disposal capacity if necessary.

**CITY – COMMENT No. 8:** The City requests to add the following sentence to Finding 42, “The monitoring wells may also be impacted from the agricultural soils placed in the area, as noted in Finding 15.”

**RESPONSE:** The change has not been made. The statement is speculative and does not comport with information in the City’s Central Valley Water Board file. See Comment No. 3.

**CITY – COMMENT No. 9:** The City questions the validity of the data provided in Finding 47, stating that sampling locations have general markers and that actual sample points and depth vary from one sample time to the next. The City is concerned the data may be misinterpreted and requests that Finding 47 be deleted from the TWDRs.

**RESPONSE:** Finding 47 has not been deleted. The data provided in Finding 47 is from self-monitoring data submitted by the City. The City is required to ensure collected samples are representative of soil conditions being monitored. Problems with the data, if they exist, can be considered when the City conducts the evaluation of the phytoremediation project required by Provision F.21 of the WDRs.

**CITY – COMMENT No. 10:** The City requests to add information regarding the origin of the TWDRs chloride limit of 175 mg/L to Finding 57.b.

**RESPONSE:** The change has been made.

**CITY – COMMENT No. 11:** The City requests that the word “uses” be added to the end of the last sentence in Finding 61.a.

**RESPONSE:** The change has been made.

**CITY – COMMENT No. 12:** The City requests deletion of the last half of the first sentence of Finding 61.b be changed to (“Regarding nitrate (as N), the expanded WWTF is designed to remove total nitrogen and this Order includes effluent limits that require the effluent total nitrogen to be 10 mg/L or less”) to remove mention of the effluent total nitrogen limit of 10 mg/L.

**RESPONSE:** See response to comment No. 14 below.

**CITY – COMMENT No. 13:** The City requests deletion of the information in Finding 61.c regarding coliform and to generally delete the coliform groundwater limit in the TWDRs.

**RESPONSE:** No change to Finding 61.c has been made. The WWTF produces undisinfected secondary wastewater and relies on pathogen removal by the soil profile. While historic data has not yet revealed a pathogen problem in groundwater at the WWTF, the City has not monitored groundwater coliform for many years, and past performance is not necessarily a predictor of future performance, especially as the WWTF nears treatment and disposal capacity. *The Water Quality Control Plan for the Tulare Lake Basin, Second Editions, Revised January 2004* (Basin Plan) also contains a specific water quality objective for coliform in groundwater. Incorporation of this objective into the WDRs as a groundwater limit is appropriate.

**CITY – COMMENT No. 14:** The City requests removal of Effluent Limitation B.4 that requires the monthly average total nitrogen concentration of the effluent discharge to not exceed 10 mg/L. The City states that Finding 38 of the TWDRs shows how historical percolation practices, even with effluent total nitrogen concentrations exceeding 10 mg/L, have not impacted groundwater, because the concentration of nitrate (as NO<sub>3</sub>) in Finding 38 are below the MCL of 45 mg/L.

The City also expresses a concern that antibacksliding would prevent modification or removal of the limit in the future.

**RESPONSE:** Neither Finding 61.b, nor Effluent Limitation B.4 has been changed. The Report of Waste Discharge (RWD), dated September 2007, for the upgraded WWTF states it is designed to nitrify and denitrify the wastewater such that it will have an effluent total nitrogen concentration of less than 10 mg/L. To effect Best Practical Treatment or Control, as required by the State Antidegradation Policy, the WWTF needs to be operated as designed and produce an effluent total nitrogen concentration of less than 10 mg/L.

As noted therein, Finding 38 depicts average groundwater nitrate (as NO<sub>3</sub>) concentrations over a 13 year period. Individual quarterly groundwater data show that groundwater beneath the WWTF has on occasion exceeded a nitrate (as NO<sub>3</sub>) concentration of 45 mg/L. It is appropriate to provide an effluent total nitrogen limit of 10 mg/L.

Antibacksliding does not apply to discharges to land; it only applies to discharges under the National Pollutant Discharge Elimination System.

**CITY – COMMENT No. 15:** The City requests that Discharge Specification C.7.c be changed to read “Dead algae, vegetation, and other debris shall be minimized on the water surface to avoid odors and nuisances.”

**RESPONSE:** No change to Discharge Specification C.7.c has been made. The existing language is standard mosquito abatement language in most WDRs issued by the Central Valley Water Board.

**CITY – COMMENT No. 16:** The City requests that Discharge Specification C.9 be changed to read “Pond 4 and 5 can be used temporarily during the irrigation season in the event of an emergency.”

**RESPONSE:** No change to Discharge Specification C.9. See response to Comment No. 7.

**CITY – COMMENT No. 17:** The City letter requests removal of the words “...or natural...” from “...or natural background...” in Groundwater Limitations E.1.a. The letter cites difficulties in establishing “natural background” as its reason for the proposed change.

**RESPONSE:** The change has not been made. While it may be difficult to establish natural background quality, that is the standard in the Basin Plan.

**CITY – COMMENT No. 18:** The City requests to delete the coliform limit of Groundwater Limitations E.1.a.ii.

**RESPONSE:** No change has been made. See response to Comment 13.

**CITY – COMMENT No. 19:** The City requests Provision F.10 to be changed to require pond dissolved oxygen monitoring when offensive odors are detected by or reported to WWTF personnel.

**RESPONSE:** The provision has been changed to read:

“If offensive odors are detected by or brought to the attention of WWTF personnel, the Discharger shall monitor affected pond(s) daily in the morning prior to 9:00 a.m. until dissolved oxygen concentrations equal or exceed 1.0 mg/L.”

**CITY – COMMENT No. 20:** The City requests to change the upper discharge pH limit in Provision F.11 from 8.3 to 9.5 pH units.

**RESPONSE:** The change has been made.

**CITY – COMMENT No. 21:** Provision F.16 of the TWDRs requires the City to submit a technical report evaluating the effectiveness of the phytoremediation project. The City requests an extension of time until after July 2011 to allow enough time to budget for and hire a consultant to complete the evaluation.

**RESPONSE:** The deadline for submitting the technical report required by Provision F.16 has been changed from 120 days after adoption of the Order to 1 December 2011.

**CITY – COMMENT No. 22:** Provision F.17 of the TWDRs requires the City to evaluate land disposal options of its effluent. The City requests to extend the deadline for the evaluation to 120 days after adoption of the Order.

**RESPONSE:** The change has been made.

**CITY – COMMENT No. 23:** The City requests to have oil and grease (O&G) deleted from effluent monitoring. The City does not discharge to a surface water and has not had O&G related issues in the past.

**RESPONSE:** The change has been made.

**CITY – COMMENT No. 24:** The City requests to reduce the monitoring frequency of effluent TKN, nitrate (as N), and total nitrogen from weekly to monthly.

**RESPONSE:** The monitoring frequency for effluent TKN, nitrate (as N), and total nitrogen remains unchanged. A footnote has been added to the Monitoring and Reporting Program (MRP) stating that the City may request to reduce the monitoring frequency of these constituents after one year of weekly monitoring if the data shows the requested reduction is justified.

**CITY – COMMENT No. 25:** The City requests to reduce the monitoring frequency of effluent general minerals from quarterly to once per year.

**RESPONSE:** The monitoring frequency for effluent general minerals remains quarterly. A footnote has been added to the MRP stating that the City may request to reduce the monitoring frequency of these constituents after one year of quarterly monitoring if the data shows the requested reduction is justified.

**CITY – COMMENT No. 26:** The City requests to change the Pond Monitoring table in the TWDRs to match the Pond Monitoring table in the existing WDRs.

**RESPONSE:** The change has been made.

**CITY – COMMENT No. 27:** The City requests to change the sample type of groundwater total nitrogen to computed.

**RESPONSE:** The change has been made.

**CITY – COMMENT No. 28:** The City requests to delete the monitoring of groundwater arsenic.

**RESPONSE:** The monitoring frequency of groundwater arsenic has been reduced from quarterly to annually.

**CITY – COMMENT No. 29:** The City requests deletion of the monitoring of groundwater iron.

**RESPONSE:** The monitoring frequency of groundwater iron has been reduced from quarterly to annually.

**CITY – COMMENT No. 30:** The City states that manganese is included in the general minerals analysis and requests to delete manganese from the groundwater monitoring table.

**RESPONSE:** The list of general minerals is on page 9 of the MRP. The list does not include manganese, and the change has not been made.

**CITY – COMMENT No. 31:** The City requests deletion of groundwater total coliform monitoring.

**RESPONSE:** Occasional groundwater monitoring for coliform is required to confirm compliance with water quality objectives and test the integrity of the monitoring wells. Further, given the minimal separation between the inverts of pond Nos. 4 and 5 and groundwater, adjacent monitoring well MW-16 must be monitored for coliform to document adequate pathogen removal. The MRP has been changed to require quarterly coliform monitoring for MW-16 and annual coliform monitoring for the remaining monitoring wells. Also, see response to Comment No. 13.

**CITY – COMMENT No. 32:** The City requests to reduce the frequency of all groundwater monitoring from quarterly to annually.

**RESPONSE:** Quarterly groundwater data is required to monitor the impacts of the discharge on groundwater and to account for fluctuations in groundwater associated with changes in the flow of the Kings River. Quarterly groundwater data is also necessary to determine whether the five feet of separation between pond inverts and groundwater is being maintained.

**CITY – COMMENT No. 33:** The City requests to add the word “groundwater” at the start of the sentence of footnote 3 under Groundwater Monitoring.

**RESPONSE:** The change has been made.

**CITY – COMMENT No. 34:** The City requests to add a fourth footnote that provides the list of general minerals.

**RESPONSE:** The list of general minerals is on page 9 of the MRP and includes the following: alkalinity, bicarbonate, calcium, carbonate, chloride, hardness, magnesium, potassium, sodium, sulfate, and total dissolved solids.

**CITY – COMMENT No. 35:** The City requests reduction of the frequency of source water EC monitoring from quarterly to annually.

**RESPONSE:** Quarterly source water EC is needed to determined compliance with the WDRs.

**CITY – COMMENT No. 36:** The City requests to correct the first sentence of page 5 to “where”.

**RESPONSE:** The correction has been made.

**CITY – COMMENT No. 37:** The City requests to add a Pretreatment Monitoring section to the MRP

**RESPONSE:** Provisions requiring implementation of the City’s approved pretreatment program and monitoring of the pretreatment program were inadvertently left out of the

TWDRs. Implementation requirements have been added as Provision Nos. F.13 through F.17. Pretreatment monitoring requirements have also been added to the MRP.

**CITY – COMMENT No. 38:** The City requests the requirement to generate and submit groundwater contour maps on a quarterly basis be reduced to annually.

**RESPONSE:** No change has been made. See response to comment No. 32.

**CITY – COMMENT No. 39:** The City requests to produce and submit source water reports annually.

**RESPONSE:** The change has not been made. See response to Comment No. 35.

**CITY – COMMENT No. 40:** The City requests to add the two paragraphs from the “Pretreatment Program Monitoring” in the existing MRP.

**RESPONSE:** See response to Comment No. 37.

**CITY – COMMENT No. 41:** The City requests to only sample for 2,3,7,8-TCDD out of all the dioxin congeners in the list of Priority Pollutants.

**RESPONSE:** The request has been made.

**CITY – COMMENT No. 42:** The City requests to correct Attachment B-Process flow diagram.

**RESPONSE:** The applicable corrections have been made. The RWD indicates there is only one anoxic basin and not two as suggested. This particular change was not made.