



April 14, 2014

Mr. Matthew Scroggins
Senior Engineer
Regional Water Quality Control Board, Central Valley Region
1685 E. Street
Fresno, CA 92306

Subject: Comments to Tentative Waste Discharge Requirements, NPDES NO. CA0079189, City of Visalia, Tulare County

Mr. Scroggins,

This letter serves as the City's comments to the Tentative Waste Discharge Requirements issued on 17 March 2014. We request you consider the following items.

Item 1: Electrical conductivity

IV.A.4 states:

The rolling 12-month average EC shall not exceed 1,000 umhos/cm or the flow-weighted average EC of the source water plus 500 umhos/cm, whichever is more stringent. The flow weighted average for the source water shall be based on the local private water supplier's annual state reporting. Compliance shall be determined at EFF-A, in accordance with Section VII.G.

Please note that the local water supplier's annual reporting includes a single EC value. It is not possible to calculate a rolling 12-month flow weighted average EC from a single data point. The water supplier has indicated that they are able to supply City with monthly flow data for each well, though it is unclear if this data are available for each of the past 12 months. Absent this historical data, it will not be possible to calculate a rolling 12-month flow weighted average during the first year of this permit.

City suggests the following edit. Please note that the first paragraph below comes directly from the current discharge permit Section B.7.

The EC of the discharge shall not exceed 1,000 umhos/cm or the flow-weighted average EC of the source water plus 500 umhos/cm, whichever is more stringent. The flow weighted average for the source water shall be based on the local private water supplier's annual state reporting.

Beginning not more than 12 months following adoption of this Order, the rolling 12-month average EC shall not exceed 1,000 umhos/cm or the flow-weighted average EC of the source water plus 500 umhos/cm, whichever is more stringent. The flow weighted average for the source water shall be based on monthly flow data provided by the local private water supplier.

Compliance shall be determined at EFF-A, in accordance with Section VII.G.

This edit will allow the City to continue the current practice of source water EC reporting until such time as 12 months of data are available; at which time City will begin calculating and reporting a 12-month rolling average. City has already contacted the private water supplier and they will begin supplying

monthly flow data beginning April 2014, which means that City will begin reporting the 12-month rolling average no later than April 2015.

Item 2: Source water monitoring, general minerals

Refer to IX.B.1, Table E-12

The tentative order states:

The Discharger shall monitor the public water supply at SPL-001 as follows. A sampling station(s) shall be established where representative sample(s) of the public water supply can be obtained. The results shall be reported as a flow-weighted annual average and be supplemented with supporting calculations.

Table E-12 indicates that General minerals are to be sampled once every three years.

The only location to establish a sampling station whereby a flow weighted average can be calculated is immediately downstream of the well pumps, prior to potential influences from other wells. Such facilities likely exist on many of the supply wells, but where they are absent, the City has no authority to install them: the system belongs to the private water supplier, not the City.

Each year, the City submits the water supplier's annual report to the RWQCB. The report lists average values for general minerals along with the data set range. The water supplier has informed the City that the listed values are not flow weighted. It is unclear whether the water supplier will provide the sample results from the more than 70 individual wells necessary for City to calculate a flow weighted average.

City requests that the general minerals of the supply water be reported as an average, not a flow weighted average.

Item 3: Groundwater limitations

Refer to V.B.1.

City believes that B.1.a and B.1.b should be edited to read as follows.

- a. "Total coliform **greater than** 2.2 MPN/100 m."
- b. "Chemical constituents in concentrations that adversely affect beneficial uses, such as nitrate (N) **greater than** 10 mg/l."

As the section currently reads, a sample result of 2.2 MPN/100 ml or a nitrate (as N) of 10.0 mg/l would be violations.

Item 4: Name of Facility

In Table F-1, the name of the Facility should be listed as "Water Conservation Plant" rather than "Wastewater Treatment Facility."

Overall, we find the tentative permit to be very reasonable and fair. Thank you.

We appreciate the opportunity to comment and welcome any questions you may have.



James Ross
Public Works Manager