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April 10, 2017

Mr. Jim Marshall, P.E.
Senior Engineer
Water Quality Control Engineer
California Regional Water Quality Control Board
Central Valley Division
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Emailed only: RB5S-NPDES-Comments@waterboards.ca.gov

SUBJECT: CITY OF MODESTO WATER QUALITY CONTROL FACILITY – TENTATIVE ORDER FOR RENEWAL OF NPDES PERMIT NO. CA0079103 – FOR DISCHARGE TO THE SAN JOAQUIN RIVER

Dear Mr. Marshall:

These comments are being submitted on behalf of the City of Modesto (City) regarding the Tentative Order (TO) Waste Discharge Requirements issued by the Central Valley Regional Water Quality Control Board (Regional Water Board) on March 10, 2017 for regulating the City of Modesto Water Quality Control Facility's discharge to the San Joaquin River (NPDES No. CA0079103).

The City supports the reissuance of the NPDES permit and does not have significant comments on the TO. However, we have compiled a few comments for your consideration that are included in Attachment A to this letter. These comments are primarily related to the electrical conductivity compliance schedule for final effluent limitations and the effluent and receiving water characterization studies. Thank you for your consideration of our comments. Please let us know if you have any questions regarding our comments or need additional materials.

Yours truly,

Brian Laurenson, P.E.
Larry Walker Associates, on behalf of City of Modesto

cc:
Larry Parlin, City of Modesto
Laura Anhalt, City of Modesto
William Wong, City of Modesto
Thomas Sinclair, City of Modesto

Attachment A. Comments on Tentative Order

1. Provision VI.C.7.a., Page 20, Compliance Schedule for Final Effluent Limitations for Electrical Conductivity. – Task Item No. iii in the compliance schedule requires construction of the North Valley Regional Recycled Water Program (NVRRWP) outfall pipeline to the Delta Mendota Canal. While the City agrees that this project is consistent with the Lower San Joaquin River Salt and Boron Total Maximum Daily Load (TMDL) and Basin Plan Amendments, the project does not remove salt from the waste stream and is not strictly a salt reduction measure. The City does expect the construction of the outfall pipeline to be complete by September 2018, however, the schedule should account for any unforeseen delays due to weather, permitting, or factors outside the control of the City. The City requests that this item be removed from the compliance schedule, and if it is not removed, to be modified to allow for completion consistent with the current Basin Plan requirements (i.e., July 2022 or July 2026).

2. Provision VI.C.7.a., Page 20, Compliance Schedule for Final Effluent Limitations for Electrical Conductivity. – Task Items Nos. iv. and v. in the compliance schedule require evaluation of real-time salinity management. While this is one means for the City to comply with the expected Basin Plan Amendment, flexibility should be provided to pursue other compliance options. The City requests that both compliance schedule items be modified to allow for evaluation and implementation of real-time salinity management "or otherwise demonstrate compliance with the Basin Plan electrical conductivity requirements in the Lower San Joaquin River."

3. Attachment E – Monitoring and Reporting Program. IX.D.1, Page E-10, Effluent and Receiving Water Characterization: Monthly Monitoring. The City plans to maximize reuse through the discharge to the Delta Mendota Canal, which is regulated through a separate NPDES permit that includes a separate effluent and receiving water characterization requirement. It is not technically possible to collect samples of effluent being discharged to the San Joaquin River during periods when no discharge is occurring. The City requests that effluent characterization not be required if the discharge of effluent to the San Joaquin River does not occur during the characterization month.

4. Attachment E – Monitoring and Reporting Program. IX.D.3, Table E-8, page E-14, Effluent and Receiving Water Characterization Monitoring. Because of short holding times, it may be logistically helpful to collect samples for sulfite and hexavalent chromium (Cr(VI)) as a grab or composite sample types. The City requests that Table E-8 be modified to allow collection of these constituents as either a grab or composite sample type.