

Central Valley Regional Water Quality Control Board
22 June 2023 Board Meeting

Response to Comments
for the
City of Lathrop Consolidated Treatment Facility
Tentative Waste Discharge Requirements

The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to comments submitted by interested persons and parties regarding the tentative Order amending Waste Discharge Requirements Order R5-2022-0004, National Pollutant Discharge Elimination System (NPDES) Permit CA0085359 for the City of Lathrop (Discharger) Consolidated treatment Facility (Facility).

The tentative amending Order was issued for a 30-day public comment period on 28 April 2023 with comments due by 30 May 2023. The Central Valley Water Board received public comments regarding the tentative amending Order by the due date from the Discharger. Some changes were made to the proposed amending Order based on public comments received.

The submitted comments were accepted into the record, and are summarized below, followed by Central Valley Water Board staff responses.

DISCHARGER COMMENTS

1. Page 3, Item D. Provisions and Requirements Implementing State Law

The amended NPDES permit will include provisions that implement State law that are not currently referenced in this item. All of the new recycled water specifications of section IV.B.2 implement Title 22 of the California Water Code, not just subsection c of IV.B.2, as currently written in this item. Hence, the reference should be changed from section IV.B.2.c to IV.B.2. The revised factsheet language indicates that the biosolids production specifications are included to implement State law; hence, section VI.C.5.b.c should also be referenced in this item.

RESPONSE: Central Valley Water Board staff concur and have revised the proposed amending Order accordingly and have also added subsection V.B to this finding for groundwater receiving water limitations.

2. Page 7, Item 13. Temperature and pH Table Note.

Table note 3 mistakenly lists the term "instantaneous maximum" two times. One of these terms should be changed to "instantaneous minimum."

RESPONSE: Central Valley Water Board staff concur and have revised the proposed amending Order accordingly.

3. Page 8, Item 13.s. Turbidity Table Note.

The amended NPDES permit will specify turbidity monitoring for the final effluent in Table E-3, which is a table of monitoring requirements for final effluent at EFF-001. However, note "s" for Table E-3 should clarify that turbidity is monitored at location FIL-001.

RESPONSE: Central Valley Water Board staff concur and have revised the proposed amending Order accordingly.

4. Page 8, Item 14. Monitoring Frequency for pH and Temperature at EFF-002.

Staff from either the Discharger's contract operator (Veolia) or the Discharger's contracted water quality laboratory (FGL Environmental) will conduct the pH, temperature, and dissolved oxygen monitoring at EFF-002. Though EFF-002 will be sampled seasonally when the Facility uses the effluent cooling ponds (e.g., November-April), neither contracted party will conduct the monitoring on holidays or weekends. Effluent temperature from the cooling ponds will not vary considerably day-to-day. Therefore, the Discharger requests that the monitoring frequency for pH and temperature at EFF-002 be reduced to 3/week. If the routine monitoring frequency is not reduced to 3/week, the Discharger requests that the Central Valley Water Board consider a 3/week frequency during weeks that include a federal holiday.

RESPONSE: Central Valley Water Board staff concur and have added a table note to Table E-4 to allow a minimum sampling frequency of 3/week on weeks with federal holidays for pH and temperature.

5. Page 9, Item 2.b. Continuous Analyzers Table Note.

It would be appropriate to combine table notes 2.b and 2.c for Table E-6 to help clarify that the continuous analyzer requirement pertains specifically to turbidity measurements, not flow. In making this change, the combined footnote will be consistent with the table note for turbidity (note "s") for Table E-3.

RESPONSE: Central Valley Water Board staff concur and have revised the proposed amending Order accordingly.

6. The Discharger requests corrections to the following section references:

- Page 15, Item 29. The reference to section VI.B.1.f should be revised to section VI.B.1.f.
- Page 17, Item 34.E.I. The reference to section VI.C.5.a should be revised to section VI.C.5.b

RESPONSE: Central Valley Water Board staff concur and have revised the proposed amending Order accordingly.

MISCELLANEOUS EDITS

Correction to last sentence of Finding 7 to state:

Issuance of this Order is also exempt from the provisions of CEQA in accordance with California Code of Regulations (CCR), title 14, section 15301.