



5150 N Sixth Street, Suite 124  
Fresno, CA 93710  
Phone 559.473.1371  
Fax 559.513.8449

August 28, 2023

Jeff Robins  
Water Resource Control Engineer  
Central Valley Regional Water Quality Control Board  
1685 E Street  
Fresno, CA 93706

**Re: City of Dinuba Tentative Waste Discharge Requirements - Comments**

Dear Jeff,

This letter is regarding the City of Dinuba Tentative Waste Discharge Requirements (TWDRs), and Tentative Monitoring and Reporting Program (TMRP), released for Public Comment on July 27, 2023. On behalf of the City of Dinuba, AM Consulting Engineers has reviewed the TWDRs and TMRP. AMCE does not have any comments to the TWDRs and provides the following comments regarding the TMRP:

1. The influent monitoring parameters include a monthly Total Nitrogen sample. The City would like to request that the Total Nitrogen sample be replaced with a Total Kjeldahl Nitrogen (TKN) sample since nitrate concentrations in raw wastewater are typically negligible.
2. The effluent monitoring parameters include nitrite and oil and grease. The City would like to request that these parameters be removed from the list of effluent monitoring parameters. Nitrite is an unstable constituent, and its concentrations are typically negligible. Oil and Grease are typically a concern in the sewer collection system and upstream processes. Oil and Grease are removed in the various treatment processes and the historical concentrations of oil and grease in the effluent are very low. Furthermore, there is not an effluent limitation on the oil and grease concentrations.
3. The effluent monitoring parameters and the frequency of sampling has been significantly increased from the previous order. The City would like to request that the frequency of metals and standard minerals monitoring be reduced as indicated in the following table:

Parameter	Frequency in TWDRs	Proposed Frequency
Metals	1/Quarter	Annually
Standard Minerals	1/Quarter	Annually

We appreciate the RWQCB's consideration of the City's requested changes to the TMRP. If you have any questions or require any additional information, please call me at (559) 288-9172.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alfonso Manrique", with a long horizontal flourish extending to the right.

Alfonso Manrique, PE  
Principal