Cutler – Orosi
Joint Powers Wastewater Authority

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December 27, 2024

ELECTRONIC TRANSMITTAL ONLY

Ms. Nicolette Dentoni
Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706

RE: PERMIT RENEWAL: NPDES CA 0081485
CUTLER-OROSI JOINT POWERS WASTEWATER AUTHORITY

Dear Ms. Dentoni:

On behalf of the Cutler-Orosi Joint Powers Wastewater Authority (Authority), please find attached comments related to the Tentative Waste Discharge Requirements for the Authority's wastewater treatment and disposal facilities (NPDES CA 0081485).

If you have any questions regarding the attached comments, please do not hesitate to contact us.

Very truly yours,

Johnny Sandoval
Legally Responsible Official

cc: Mr. Jim Peacher, Chief Plant Operator
Dennis R. Keller Consulting Civil Engineer, Inc.
Mr. Jim Koontz, Attorney at Law
Cutler Public Utility District
Orosi Public Utility District

COMMENTS TO WDR/NPDES PERMIT RENEWAL
CUTLER-OROSI JOINT POWERS WASTEWATER AUTHORITY

The following lists the comments to the Waste Discharge Requirements:

1. Part VI – Provisions, C.4.c.iii. (page 24) – Paragraph refers to compliance with Section IX.A – Biosolids. Section IX.A indicates "Not Applicable";
2. Attachment E, Table E-3, Effluent Monitoring (Location 001 – Use Area) (page E-6) – Section V.A will require Chronic WET testing of water discharged to land. This requirement is not justified based on the information presented in Attachment F (Part IV – Rationale for Effluent Limitations and Discharge Specifications);
3. Attachment E, V.A.2, Toxicity Calendar Quarter (page E-10) – Quarterly reference needs to be changed from "April 1 to 30 May" to "April 1 to 30 June";
4. Attachment E, V.F, Most Sensitive Species Screening (page E-13) – Requirement for screening (once every 15 years) exceeds tentative WDR/NDPES permit term (5 years);
5. Attachment E, V.G.1, Toxicity Reduction Evaluations (TRE) (page E-14) – The statement "A TRE may also be required when there is no effluent available to complete a routine monitoring test or MMEL compliance test" does not make sense. Effluent will always be available. Sample collection requires sufficient volumes to conduct testing;

   Consider revising to read something like: "A TRE may also be required if a routine monitoring test or MMEL compliance test is not completed or conducted."

6. Attachment E, V.G.2, TRE Workplan (page E-15) – Consider revising "within 90 days of the first discharge to Sand Creek' to "at least 90 days before the first discharge to Sand Creek". This will ensure that the Workplan and Executive Officer review will be completed before the discharge window begins.
7. Attachment E, IX.C (page E-22) – Remove references to "Filtration System". The Facility does not use filters.
8. Attachment E, Table E-12, Monitoring Periods and Reporting Schedule (page E-30) – Sampling Frequency of 1/Three Years to be coincident with monitoring required by the Division of Drinking Water does not match/reflect the monitoring requirement established by Table E-9 (IX.B.1, page E-21).
9. Attachment F, Table F-6, Summary of Aluminum Effluent Data (page F-22) – Aluminum result associated with 7/6/2017 should indicate "45". This result should not have a "J".
10. Attachment F, Table F-7, Summary of Lead Effluent Data (page F-23) – Lead results associated with 6/23/2016 should read "Non-detect (< 5.0)".
11. Attachment F, Tables F-6 and F-7. The "J" listed in each table needs to be defined.

12/27/2024