From: JOANNE KIPPS
To: WB-RB5F-CentralValleyFresno
Cc: Dentoni, Nicolette@Waterboards
Subject: Comments on Cutler-Orosi tentative order
Date: Friday, December 27, 2024 2:50:18 PM

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This email transmits my comments on the tentative WDRs and NPDES Permit renewal for the Cutler-Orosi Joint Powers Wastewater Treatment Authority.

The tentative order's monitoring and reporting program (MRP) revises the current order's pond monitoring requirements (PND-001 and PND-002) to include the Parameter, Percolation Rate, with Units of in/day, Sample Type of Estimate, and Sample Frequency of 1/Year. Determining a pond's percolation rate typically requires tracking measurable or reference inputs (influent flow, rain) and outputs (evaporation) to calculate output by percolation.

Comment 1. Please describe how staff expects the Discharger to estimate pond percolation rate annually, and revise the MRP to include this description. Also, shouldn't the sample type for Percolation Rate be "Calculated"?

Table F-15 Summary of Monitoring Changes indicates two revisions to current groundwater monitoring requirements: annual monitoring each of Total Organic Carbon and Total Dissolved Solids as "Needed to characterize groundwater." The tentative order's Table E-8. Groundwater Monitoring Requirements includes quarterly monitoring each for Total Dissolved Solids and Arsenic, but no monitoring for Total Organic Carbon.

Comment 2. Please revise Table E.8 to include quarterly monitoring for Total Organic Carbon with a footnote stating frequency may be reduced to annually after three years upon written request and with technical justification.

Comment 3. Please revise Table E.8 to include quarterly monitoring each for iron and manganese and specify samples must be filtered prior to acidification. Same goes for arsenic.

Thank you for your time and consideration,

Jo Anne Kipps