

ITEM: 14

SUBJECT: City of Lathrop, Lathrop Consolidated Treatment Facility, San Joaquin County

BOARD ACTION: *Consideration of Revised Waste Discharge Requirements and Master Recycling Permit*

BACKGROUND: The City of Lathrop (City) owns and operates the Lathrop Consolidated Treatment Facility (CTF), which provides tertiary treatment and disinfection of domestic wastewater. The recycled water is used for irrigation to agricultural and public landscape Use Areas within a 15 square mile area. The City requested revised WDRs to accommodate future growth of the community and to update their Master Recycling Permit to regulate recycled water uses within the City's service area, including additional agricultural and planned landscape irrigation for public right-of-ways and parks.

ISSUES: Comments on the Tentative Order and Master Recycling Permit were received from the City and the Central Valley Clean Water Association (CVCWA). Several changes were made to address the combined comments; and the City concurs with the revised WDRs and Master Recycling Permit. Key issues are summarized below and discussed in detail in the attached Response to Comments.

**A. Discharger Comments:**

The City submitted comments requesting certain editorial changes to the Tentative Order, and increase to the flow limit to include eight percent to accommodate sewer inflow and infiltration (I/I). Editorial changes were incorporated as appropriate, and the flow limit was increased to 297 MGY.

**B. CVCWA's Comments:**

CVCWA submitted comments regarding applicable water quality objectives, performance-based effluent limit for TDS, and a number of Recycled Water Use Specifications. CVCWA requested certain changes to the tentative WDRs and Master Recycling Permit. Some of the changes were made as requested and some were not, as explained in the Response to Comments.

Existing and planned recycled water Use Areas are all located on historically agricultural land where shallow groundwater is highly spatially variable and salinity and nitrate concentrations equal or exceed their respective water quality objectives. Based on the effluent character and the fact that the majority of the existing and planned recycled water Use Areas are expected to receive only a portion of their irrigations supply from recycled water, the discharge of recycled water to these areas is unlikely to cause discernible degradation of groundwater quality.

RECOMMENDATION: Staff recommends adoption of the Revised WDRs and Master Recycling Permit.

Mgmt. Review RDB  
Legal Review PEP

5/6 Feb 2015  
11020 Sun Center Dr. #200  
Rancho Cordova, CA 95670