

**Regional Water Quality Control Board  
Central Valley Region  
Board Meeting –13/14 October 2016**

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RESPONSE TO WRITTEN COMMENTS ON  
TENTATIVE WASTE DISCHARGE REQUIREMENTS FOR  
LATON COMMUNITY SERVICES DISTRICT  
LATON WASTEWATER TREATMENT FACILITY  
FRESNO COUNTY

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At a public hearing scheduled for 13/14 October 2016, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of Waste Discharge Requirements (WDRs), which were circulated as tentative on 4 August 2016, for the discharge of undisinfected secondary treated wastewater to land. The wastewater treatment facility and evaporation/percolation ponds are owned by the Laton Community Services District (District). Written comments were required to be received by the Regional Water Board by 5:00 p.m. on 5 September 2016 in order to receive full consideration. Comments were received from Mr. Jim Wegley, District Engineer, on 1 September 2016. This document contains the response to written comments received from the District.

Staff has made some minor changes to the proposed WDRs, Information Sheet, and the Monitoring and Reporting Program (MRP) based on the comments. Staff has also made changes to the proposed WDRs to increase clarity, reduce redundancies, and fix typographical errors. Where specific changes are presented below, additions are in bold text and deletions are in strike-out.

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**Laton Community Services District Comments**

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Below are the District's comments followed by staff's responses.

**District Comment 1:** Every three years the District has Title 22 testing conducted on each of their wells. The water quality history of the wells is well documented and available for review (historical results can be provided). The District requests that the present 3-year testing frequency be continued, in-lieu of requiring annual testing. Increasing the frequency of testing to annual would result in a substantial cost to the District.

**Response to Comment 1:** The request is reasonable. The Source Water Monitoring section of the Monitoring and Reporting Program will be changed as follows:

| <u>Frequency</u>                           | <u>Constituent/Parameter</u> | <u>Units</u> | <u>Sample Type</u> |
|--------------------------------------------|------------------------------|--------------|--------------------|
| Quarterly                                  | Flow-Weighted EC             | umhos/cm     | Computed Average   |
| Annually <b>Every 3 years</b> <sup>1</sup> | General Minerals             | mg/L         | Grab               |

1. Concurrent with required Title 22 drinking water testing

**District Comment 2:** Instead of requiring a 24-hour composite sampler for the influent and effluent streams at the wastewater treatment plant, the District requests to continue providing an hourly composite sample consisting of eight (8) grab samples.

**Response to Comment 2:** Given the small population of the community the request is reasonable. The Monitoring and Reporting Program and will be changed as follows:

## INFLUENT MONITORING

Influent samples shall be collected at the inlet of the headworks at INF-001. Time of collection of the sample shall be recorded. Influent monitoring shall include at least the following:

| <u>Frequency</u> | <u>Constituent/Parameter</u>   | <u>Units</u> | <u>Sample Type</u>  |
|------------------|--------------------------------|--------------|---------------------|
| Continuous       | Flow                           | mgd          | Meter               |
| Weekly           | pH                             | pH units     | Grab                |
| Weekly           | EC                             | umhos/cm     | 8 24-hour Composite |
| Weekly           | TSS                            | mg/L         | 8 24-hour Composite |
| Weekly           | BOD <sub>5</sub>               | mg/L         | 8 24-hour Composite |
| Monthly          | Monthly Average Discharge Flow | mgd          | Computed            |

## EFFLUENT MONITORING

The Discharger shall monitoring treated effluent at EFF-001 as follows. Effluent monitoring shall include at least the following:

| <u>Frequency</u> | <u>Constituent/Parameter</u> | <u>Units</u> | <u>Sample Type</u>  |
|------------------|------------------------------|--------------|---------------------|
| Continuous       | Flow                         | mgd          | Meter               |
| Weekly           | pH                           | pH Units     | Grab                |
| Weekly           | EC                           | umhos/cm     | Grab                |
| Monthly          | TDS                          | mg/L         | 8 24-hour Composite |
| Weekly           | BOD <sub>5</sub>             | mg/L         | 8 24-hour Composite |
| Weekly           | TSS                          | mg/L         | 8 24-hour Composite |
| Monthly          | TKN                          | mg/L         | 8 24-hour Composite |
| Monthly          | Nitrate (as Nitrogen)        | mg/L         | 8 24-hour Composite |
| Monthly          | Ammonia Nitrate              | mg/L         | 8 24-hour Composite |
| Monthly          | Total Nitrogen               | mg/L         | Computed            |
| Monthly          | Chloride                     | mg/L         | 8 24-hour Composite |
| Monthly          | Sodium                       | mg/L         | 8 24-hour Composite |
| Annually         | General Minerals             | mg/L         | 8 24-hour Composite |

The definition of 24-hour composite sample will be removed and 8-hour composite sample will be added to the Glossary in the Monitoring and Reporting Program (pg. 8) as follows:

248-Hour Composite Samples shall be a ~~flow-proportioned~~ composite **of grab samples** consisting of at least eight aliquots.

**District Comment 3:** The District has submitted a planning grant application to the State Water Resources Control Board and the application is currently being reviewed. The planning grant includes an evaluation of the metering upgrades at the wastewater treatment facilities, along

with a study on the potential for reuse of wastewater effluent on adjacent properties. The District requests that both the metering upgrades and the reuse study, as required in the Tentative Order, be delayed with completion being accomplished through the planning grant.

**Response to Comment 3:** Finding 14 has been added describing the District's grant application:

- 14. The District has submitted a planning grant application to the State Water Resources Control Board. The planning grant includes an evaluation of the metering upgrades at the wastewater treatment facilities, along with a study on the potential for reuse of wastewater effluent on adjacent properties.**

Provision 15 of the Order will be changed as follows:

**By 12 months following approval of the planning grant from the State Water Resources Control Board**, the Discharger shall submit a demonstration that it has determined the current land uses for each parcel within a 1 mile radius of the WWTF (including District-owned parcels), identified potential uses of recycled water for each parcel, and appropriately informed land owners and formally requested their consideration of accepting WWTF effluent for a recycled water project. The Discharger shall provide an explanation if no potential uses of recycled water are identified for a particular parcel. Notification of land owners must include pertinent effluent monitoring results and water quality goals for the recycled water uses identified. If the Discharger identifies a feasible recycled water project, the Discharger shall submit a Report of Waste Discharge and arrange for preparation of a Title 22 Engineering Report in accordance with Title 22, section 60323, and a copy of this report shall be provided to the State Water Board Division of Drinking Water. This provision shall be considered satisfied upon submittal by the Discharger of a complete Report of Waste Discharge and a letter from the Division of Drinking Water determining the corresponding Title 22 Engineering Report is complete, or when the Executive Officer concludes that the Discharger has provided sufficient justification for not using effluent for recycled water.

The Monitoring and Reporting Program will be changed to delete influent flow metering, effluent flow is currently metered and the effluent flow metering requirement will remain unchanged. See Response to Comment 2 above for change.

**District Comment 4:** As previously discussed, there is an emergency basin located west of the aeration tanks. It is the District's understanding that this basin was part of the original construction, since the piping allows the aeration tanks to be drained into the emergency basin. The District requests that the use of this basin be allowed for the emergency bypass of wastewater or draining of the treatment tanks.

**Response to Comment 4:** The following will be added to the Finding 6 and the Information Sheet regarding the emergency basin.

Finding 6:

The WWTF features secondary treatment and consists of a wet well with a grinder, two lift pumps, an aeration basin, clarifier, six evaporation/percolation ponds, **emergency basin**, ~~and~~ two concrete lined sludge drying beds, **and surrounding bermed land owned by the District which has been utilized for discharge in the past during**

**pond maintenance activities.** A current site map is included in Attachment A, which is attached hereto and made part of this Order by reference.

Information Sheet pg.1

The Laton Community Services District (District) owns and operates a wastewater treatment facility (WWTF) that produces undisinfected secondary treated wastewater. The WWTF consists of a grinder, two lift pumps, an aeration basin, six evaporation/percolation ponds, **emergency basin**, two concrete lined sludge drying beds, **and surrounding bermed land owned by the District which has been utilized for discharge in the past during pond maintenance activities.** The discharge from the WWTF ~~is~~ **was previously** regulated by Waste Discharge Requirements Order 85-253.

**District Comment 5:** The District has a "HIPPO" (pumping device) that collects the surface duckweed in the evaporation/percolation ponds and pumps it to the adjacent fields. The pumped duckweed is collected within a sock or a retention basin. After pumping, the District removes and disposes of the duckweed. In addition to the duckweed, there is a small amount of water that is also pumped onto the field. The District requests to be able to continue this process for the removal of the duckweed with the pumped discharge being to the fields located east and west of the evaporation/percolation ponds.

**Response to Comment 5:** The request is reasonable. The following will be added to the Information Sheet:

The District removes surface duckweed from the evaporation/percolation ponds using a HIPPO device. Pumped duckweed is collected in a sock or retention basin. As part of this process a small amount of water is pumped onto adjacent District owned fields.

**District Comment 6:** On Page 14, Paragraph E.b., it states that the Total Coliform Organisms shall not exceed 2.2 MPN/100 mL. This maximum for the allowable coliform level is typically associated with drinking water systems. The wastewater facilities will not be able to meet this standard. The District requests that the requirements contained in this provision be deleted.

**Response to Comment 6:** The groundwater limit is set at the Basin Plan objective because of the municipal/domestic beneficial use of groundwater. No changes will be made.

**District Comment 7:** On Page 10, reference is made to the Strathmore Public Utility District.

**Response to Comment 7:** The Order will be updated as follows:

**IT IS HEREBY ORDERED** that Waste Discharge Requirements Order 85-024 253 is rescinded and that ~~Strathmore Public Utility~~ **Laton Community Services** District, its agents, successors, and assigns, in order to meet the provisions contained in Division 7 of the Water Code and regulations adopted hereunder, shall comply with the following: