



# CITY OF REDDING

PUBLIC WORKS DEPARTMENT

FIELD OPERATIONS

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April 22, 2013  
W-010-560-500

Ms. Stacy S. Gotham  
California Regional Water Quality Control Board  
Central Valley Region  
364 Knollcrest Drive, Suite 200  
Redding, CA 96002

Dear Mrs. Gotham:

Subject: Final Comments on the Tentative Waste Discharge Requirements for the City of Redding Stillwater Wastewater Treatment Plant

This letter is being sent to communicate the City of Redding's (City) final comments on the tentative waste discharge requirements (WDRs) being considered for the Stillwater Wastewater Treatment Plant (SWTP). The City greatly appreciates the opportunity to comment on these tentative WDRs, as well as the time and effort expended by your office in answering questions and considering comments. Our office requests that the following comments be taken into consideration and that appropriate revisions be made to the tentative WDRs as outlined below.

### **Footnote Number 2 to Table 6 Effluent Limitations**

Footnote number 2 under Table 6, found on Page 12 of the WDRs, is not applicable and needs to be removed.

### **Effluent Limitations for Total Coliform**

The proposed total coliform effluent limitations found on Page 13 of the tentative WDRs, specifically the reduced seven-day compliance determination period, would place the facility at a risk of non-compliance if adopted immediately. The City expects, however, that the adoption of the language imposing this reduced compliance period "beginning on the first day of the fourth year following the effective date" proposed on Page 13 would allow sufficient time for the operational and monitoring changes necessary to ensure compliance. For this reason, our office does not contest the effluent limitations for total coliform organisms as currently proposed. It should be noted that the following minor revisions will be needed to ensure the tentative WDRs are internally consistent:

- The effluent limitation discussion on Page 13 needs to be revised to include the 30-day median limitation to apply during the initial three years of the permit;
- the compliance determination section on Page 34 needs to be revised to discuss determinations of compliance during the initial three years of the permit;
- Page E-16 needs to be revised to describe reporting protocols for total coliform during the initial three years of the permit;
- Page F-56 needs to be revised to discuss the retention of the 30-day median for total coliform during the initial three years of the permit;
- Footnote 7 to Table F-14, found on Page F-61, and Footnote 7 to Table F-15, found on Page F-68, need to be revised to note both the 7-day and 30-day compliance periods;
- The discussion of averaging periods on Page F-64 needs to be similarly revised;

#### **Effluent Limitations for Diazinon and Chlorpyrifos**

Effluent limitations are proposed for diazinon and chlorpyrifos, as shown on Page 13 of the tentative WDRs. These limitations involve a calculation that includes average monthly and maximum daily effluent limitations. Seemingly in conflict with this, the proposed Monitoring and Reporting Program only requires annual effluent monitoring of these pollutants. This inconsistency between annual monitoring and effluent limitation calculations requiring average monthly and maximum daily effluent limitations could cause substantial confusion with reporting and compliance determinations. It appears that Pages 13, 35, F-54, F-61 and F-68 of the tentative WDRs should be revised to account for the required annual effluent monitoring, or at the least a discussion of this discrepancy should be included with the section on compliance determinations.

#### **Discussion of Aldrin and Alpha-BHC**

The tentative WDRs do not include effluent limitations for aldrin or alpha-BHC because, as discussed in the Fact Sheet, those pollutants did not exhibit a reasonable potential for the facility's discharge to cause or contribute to an instream excursion. Aldrin and alpha-BHC are, however, discussed elsewhere in the tentative WDRs in a manner suggesting proposed effluent limits; the tentative WDRs need to be revised to remove these discussions, namely those found on Page 8 and in Attachment G of the tentative WDRs.

#### **Reclamation Monitoring Requirements**

The requirement for daily total coliform sampling of reclaimed water proposed on Page E-10 of the tentative WDRs would impose undue costs on the provision of reclaimed water, likely making this resource uneconomical for the City's reclaimed water user and resulting in the discontinuation of this beneficial reuse. Currently sampling is required weekly during periods of

reclaimed water provision, and this monitoring frequency has proven sufficient to determine whether the reclaimed water meets the requirements of Title 22 of the California Code of Regulations. Further, Title 22 does not require daily coliform sampling of reclaimed water used for the irrigation of pasture for animals not producing milk for human consumption. Reclaimed water produced at the SWTP receives a level of treatment greater than that required for this type of use, and weekly reclaimed water coliform sampling is therefore justified. The City requests that the tentative WDRs be revised to maintain the current requirement for weekly reclaimed water coliform sampling during periods of reclaimed water provision.

### **Receiving Water Limitation A(11)**

The City requests that receiving water limitation A(11) on Page 16 be removed from the tentative WDRs. This limitation appears to have been included in error, as the WDRs do not include a requirement to monitor salinity at Knights Landing and the City has no way to determine compliance with this provision. Also, the WDRs do not include a basis for this limitation, and the limitation appears to have no relation to the facility's discharge.

### **Monitoring Location RSW-001**

The City requests that Table E-1 on Page E-3 be revised to include the revised RSW-001 location proposed in the letter submitted to your office January 7, 2013. This revised location would provide year-round access for monitoring without the dangerous seasonal conditions that City staff encounter at the current RSW-001. Moreover, this revised monitoring location would allow for more representative sampling of upstream receiving water conditions, as the current RSW-001 location becomes shallow, slow, and largely separated from the main river flow and therefore unrepresentative of actual upstream conditions.

### **Effluent and Receiving Water Characterization Study**

Attachment I of the tentative WDRs requires an effluent and receiving water characterization study to be completed. This requirement is also discussed on Pages 23 and F-7, but there the study is labeled as a "Constituent Study" and the language is ambiguous and could be read as requiring a study other than that described in Attachment I. Moreover, labeling these sections "Constituent Study" may cause confusion between Attachment I and the separate requirement for a bis-2(ethylhexyl) phthalate study. The City requests that the discussions of the Effluent and Receiving Water Characterization Study on Pages 23 and F-7 be revised to include clear reference to Attachment I, similar to the language used on Pages E-18 and F-73.

### **Reopener Provision for Potential Future Construction**

The City has completed some of the facility modifications during the current Phase 1A/1B construction project that were originally intended for inclusion in the future Phase 1C construction project, and may decide to complete additional plant improvements during the 2013-2018 permit period. For example, a fourth secondary clarifier has been included in Phase 1A/1B, additional equalization capacity is being incorporated, and modifications to the mixed-

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liquor return system may be included. Changes such as these affect the facility description found in the tentative WDRs, and may affect the maximum daily flow listed on Page F-4. The City requests that a reopener provision be included in the tentative WDRs specifying that the Order may be reopened if modifications are made that affect the maximum daily flow or other facility characteristics.

### **Facility Description**

The facility description on Page F-4 needs to be revised. Your office has stated that the design average dry weather flow will be revised to 3.4 million gallons per day (MGD), but the average daily flow rate listed on Page F-4 needs to also be revised to 4.5 MGD and the maximum daily flow rate to 14.4 MGD. These revised flows correspond to the design capacity of the SWTP after the Phase 1A/1B improvements, as does the 3.4 MGD average dry weather flow listed on Page F-4.

### **Discharge Prohibitions**

Section IV(A)4 on Page F-12 relates to pollutant free wastewater and operation of the facility. The City requests that this prohibition be removed from the tentative WDRs, as 40 CFR 122.41 et seq. does not contain any such language or other language that applies to pollutant free wastewater and treatment plant operation. In addition, State Water Board Order 2006-0003 contains sufficient and substantial requirements relating to the design, operation and maintenance of the sanitary sewer collection system.

The City of Redding appreciates the willingness of the Regional Board to discuss these outstanding issues, and would like to note that staff at the local office provided considerable time to answer questions about and consider the City of Redding's concerns and ideas. The resultant tentative WDRs are largely satisfactory to the City while being protective of water quality and the beneficial uses of the Sacramento River.

Sincerely,

  
Josh Keener  
Wastewater Compliance Coordinator

c: Jon McClain, Assistant Director of Public Works  
John Szychulda, Wastewater Utility Supervisor-Stillwater WWTP