



# CITY OF RED BLUFF

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May 6, 2013

Greg Cash, Senior Engineering Geologist – South Regulatory Unit  
Central Valley Regional Water Quality Control Board  
364 Knollcrest Drive, Suite 205  
Redding, CA 96002

Subject: City of Red Bluff Wastewater Reclamation Plant (WRP) - Order No. R5-2013-XXXX Tentative Draft Review Comments

Dear Greg:

The City of Red Bluff (City) has reviewed the tentative draft of Order No. R5-2013-XXXX (NPDES CA0078891), and appreciates the opportunity to submit comments for consideration during the preparation of the final permit version. Our comments are as follows:

1. Section VI.C.2.a.ii) assigns a numeric toxicity monitoring trigger to initiate a toxicity reduction evaluation (TRE) of > 2.0 TUc. The existing permit allows >10 TUc, which is adequately supported by the results of the Mixing Zone and Dilution Study prepared for the discharger in 2012 (the results of the study indicate a minimum available dilution factor of 25:1 for the chronic condition. **The City requests that the numeric toxicity monitoring trigger remain at the currently permitted value of > 10 TUc.** The value allows for operational flexibility without detriment to downstream beneficial uses.
2. In Attachment I, Section 11.D, please modify the language within the paragraph to allow **"flow or time proportioned composite samples"** in order to maintain consistency for composite sampling requirements within the permit.

The City appreciates the Regional Water Quality Control Board's attention to the above comments, and respectfully requests modification to the Tentative Order as such.

Please feel free to contact Jerry Stephens ([jstephens@swwc.com](mailto:jstephens@swwc.com)) 530-527-1292 or Beverly Hann ([bhann@carollo.com](mailto:bhann@carollo.com)) 916-565-4888 if there are any questions about the above comments.

Sincerely,

City of Red Bluff

A handwritten signature in black ink, appearing to read "Bruce Henz". The signature is written in a cursive style with a large initial "B".

Bruce Henz, Public Works Director

cc: Katie Bowman, RWQCB  
Kathy Stone, Southwest Water Company  
Jerry Stephens, Southwest Water Company  
Beverly Hann, Carollo Engineers  
Scott Parker, Carollo Engineers