



DEPARTMENT
OF PUBLIC WORKS
CHICO

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May 6, 2022

Ms. Stacy S. Gotham, Senior Water Resource Control Engineer
Cal EPA - Water Quality Control Board, Central Valley Region
364 Knollcrest Drive, Suite 205
Redding, CA 96002

Subject: City of Chico - Order No. R5-2022-XXXX (NPDES No. CA0079081) Tentative
Draft NPDES Permit Review Comments

Dear Stacy:

The City of Chico (City) appreciates the opportunity to provide comments related to the tentative draft of Waste Discharge Requirements (WDR) Order No. R5-2022-XXX (National Pollutant Discharge Elimination System [NPDES] permit No. CA0079081). The comments included herein are submitted for your consideration in the development of the final Order.

1. Attachment D – Standard Provisions:

a. Twenty-Four Hour Reporting:

- i. Page D-9 (Provision V.E): Please consider removing the second and third paragraphs included with this provision, which summarizes reporting requirements for noncompliance events related to the sanitary sewer system. The City has coverage under General Order 2006-0003-DWQ, and thus, is subject to compliance and reporting requirements of that Order for the City's sanitary system. The tentative draft Order references the requirement to comply with General Order 2006-0003-DWQ on Page F-11 (Provision III.C.10), which should provide adequate compliance coverage without overlapping reporting requirements.

Please also remove related language from Page D-10 (Provision V.H).

2. Attachment E – Monitoring and Reporting Program (MRP):

a. Effluent Monitoring Requirements:

- i. Page E-6 (Table E-3): Please consider modifying the sample type for electrical conductivity monitoring from "24-hour composite" to "grab", consistent with the current permit Order.

b. Receiving Water Monitoring Requirements:

- i. Page E-14 (Provision VII.A.2.b): Please consider allowing hand-held analysis of turbidity, dissolved oxygen, and electrical conductivity in lieu of just pH and temperature.

c. Groundwater Monitoring Requirements:

- i. Page E-16 (Table E-8): Please consider reducing sampling frequency for groundwater monitoring from “1/Quarter” to “semi-annually”, consistent with current monitoring requirements.
- d. Effluent and Receiving Water Characterization:
 - i. Page E-25 (Table E-11/Non-Conventional Parameters): Please consider modifying the sample type for electrical conductivity monitoring from “24-hour composite” to “grab”.
- e. Recycled Water Policy Annual Reports:
 - i. Page E-33: Please remove the requirement for annual recycled water policy reporting as recycling specifications are not applicable to the discharge. Please remove related reporting details also from Table E-3 (pages E-37 and E-38).

Editorial Comments:

3. Best Management Practices and Pollution Prevention Specifications:

- a. Page 19 (Provision VI.C.3.a): Remove “sample results reported as DNQ when the effluent limitation is less than MDL” from the first sentence (it is repeated as Provision VI.C.3.a.i).

4. Construction, Operation and Maintenance Specifications:

- a. Page 21 (Provision VI.C.4.a.v and Provision VI.C.4.a.ix): Provisions are redundant. Please consider removing Provision VI.C.4.a.v or editing it to match Provision VI.C.4.a.ix, consistent with the existing permit Order.

5. Attachment D – Standard Provisions:

- a. Page D-10 (Provision V.F.2): Paragraphs are redundant. Please consider deleting first paragraph and including standard provisions that are consistent with existing permit Order.
- b. Chronic WET Reporting:
 - i. Pages E-10 and E-11: Please modify chronic WET reporting schedule to read “annual” in replacement of the current “quarterly” listing, consistent with annual chronic WET testing requirements included on Page E-8.
- c. Effluent and Receiving Water Characterization:
 - i. Page E-23 (Table E-11/Inorganics): Delete “asbestos” sampling, consistent with statements on pages E-17 and E-34 that indicate that asbestos sampling is not required.
- d. Technical Report Submittals:
 - i. Page E-37 (Table E-13): Table E-13 includes a column header “CIWQS Report Name”; however, the CIWQS report name is presented for Report #1 only and the

permit references are presented for the other reports. Please consider revising the column header name or adding a new column for permit references.

- ii. Page E-37 (Table E-13): Revise reference for Analytical Methods Report from MRP X.D.1 to MRP IX.D.1.
- iii. Page E-37 (Table E-13): Revise reference to “MRP VIII.D.2” for Analytical Methods Report Certification if renumbered per previous comment.
- iv. Pages E-37 and E-38 (Table E-13): Delete all references for “Recycled Water Policy Annual Report Submittal Confirmation” reporting (not applicable).

6. Attachment F – Fact Sheet:

- a. Page F-3 (top of page): Revise reference from “section II.B” to “section II.C”.
- b. Page F-17 (Table F-5 Note 1): Revise reference from “section IV.C.3.c” to “section IV.C.3.d”.
- c. Page F-82 (Provision VI.B.2.e): Revise reference for Antidegradation Re-evaluation from section VI.C.2.c to section VI.C.2.e.
- d. Page F-90 (Provision VIII.A): Please fill in notification process missing in brackets.

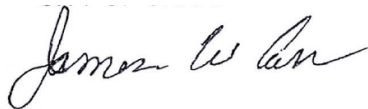
7. Attachment I – Requirements for Monitoring Well Installation Workplans and Monitoring Well Installation Reports:

- a. Pages I-3 and I-4 (Section 2): Requirements are missing for Water Sampling, Soil Sampling (if applicable), Well Completion Report(s), and Appendix. Please consider whether any of these requirements should be restored, consistent with the current permit Order.
- b. Pages I-3 and I-4 (Section 2.E-F): Revise subsection numbering to 2.D-E.

We appreciate the RWQCB’s consideration of these matters as the final permit is developed.

Sincerely,

CITY OF CHICO



James Carr, Wastewater Treatment Manager

cc: Scott Parker, Carollo
Beverly Hann, Carollo
Brianna Barton, Carollo