
Public Works Department

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May 23, 2023

Danielle Goode, P.E.
Senior Water Resources Control Engineer
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, California 95670

Subject: Comments on the Tentative Order amending the Lathrop Consolidated Treatment Facility NPDES permit (CA0085359; Order No. R5-2022-0004)

Dear Ms. Goode:

The City of Lathrop (City) sincerely appreciates the opportunity to provide comments on the tentative order that would amend the Lathrop Consolidated Treatment Facility (CTF) National Pollutant Discharge Elimination System (NPDES) permit (Order R5-2022-0004; NPDES CA0085359). The proposed changes will, in part, allow the City to continue maximizing the production of Title 22 recycled water for distribution and use under the statewide Water Reclamation Requirements for Recycled Water Use (Water Quality Order WQ 2016-0068-DDW) after the City's current land disposal Waste Discharge Requirements are rescinded by the Central Valley Regional Water Quality Control Board (Central Valley Water Board). The City offers the following comments on the amending order and proposed changes to the NPDES permit.

Comment 1. Page 3, Item D. Provisions and Requirements Implementing State Law. The amended NPDES permit will include provisions that implement State law that are not currently referenced in this item. All of the new recycled water specifications of section IV.B.2 implement Title 22 of the California Water Code, not just subsection c of IV.B.2, as currently written in this item. Hence, the reference should be changed from section IV.B.2.c to IV.B.2. The revised factsheet language indicates that the biosolids production specifications are included to implement State law; hence, section VI.C.5.b.c should also be referenced in this item.

Comment 2. Page 7, Item 13. Temperature and pH Table Note. Table note 3 mistakenly lists the term "instantaneous maximum" two times. One of these terms should be changed to "instantaneous minimum."

Comment 3. Page 8, Item 13.s. Turbidity Table Note. The amended NPDES permit will specify turbidity monitoring for the final effluent in Table E-3, which is a table of monitoring requirements for final effluent at EFF-001. However, note "s" for Table E-3 should clarify that turbidity is monitored at location FIL-001.

Comment 4. Page 8, Item 14. Monitoring Frequency for pH and Temperature at EFF-002.

Staff from either the City's contract operator (Veolia) or the City's contracted water quality laboratory (FGL Environmental) will conduct the pH, Temperature, and DO monitoring at EFF-002. Though EFF-002 will be sampled seasonally when the CTF uses the effluent cooling ponds (e.g., November–April), neither contracted party will conduct the monitoring on holidays or weekends. Temperature of effluent from the cooling ponds will not vary considerably day-to-day. Therefore, the City requests that the monitoring frequency for pH and temperature at EFF-002 be reduced to 3/week. If the routine monitoring frequency is not reduced to 3/week, the City requests that the Regional Water Board consider a 3/week frequency during weeks that include a federal holiday.

Comment 5. Page 9, Item 2.b. Continuous Analyzers Table Note. It would be appropriate to combine table notes 2.b and 2.c for Table E-6 to help clarify that the continuous analyzer requirement pertains specifically to turbidity measurements, not flow. In making this change, the combined footnote will be consistent with the table note for turbidity (note "s") for Table E-3.

Comment 6. References.

- Page 15, Item 29. The reference to section VI.B.f should be revised to section VI.B.1.f.
- Page 17, Item 34.E.1. The reference to section VI.C.5.a should be revised to section VI.C.5.b

Thank you for considering our comments. If you have any questions, please do not hesitate to contact me at (209) 941-7454, or our consultant Paul Bedore (916) 405-8918 of Robertson-Bryan, Inc.

Sincerely,



Michael King, P.E.
Assistant City Manager
City of Lathrop

CC: Michael Bryan, Robertson-Bryan, Inc.
Paul Bedore, Robertson-Bryan, Inc