



GOUVEIA ENGINEERING, INC.
CONSULTING ENGINEERS

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October 6, 2014

Denise Soria, MSCE
Water Resources Control Engineer
Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706

Re: City of Livingston - Comments to Tentative Waste Discharge Requirements

Dear Denise,

This letter is in response to a request for comments dated September 3, 2014 regarding Tentative Waste Discharge Requirements (TWDRs) for the City of Livingston's (City) Wastewater Treatment Facility. On behalf of the City, Gouveia Engineering, Inc. has reviewed the TWDRs and would like the Central Valley Regional Water Quality Control Board to consider the following review comments:

1. Finding No. 4 – The City's disposal capacity (based on Ponds 7 and 8) is listed as 1.18 MGD according to WDRs Order No. 89-066. Ponds No. 7 and 8 were not constructed when WDRs Order No. 89-066 was written. The disposal capacity Ponds No. 7 and 8 appears to be adequate at this time but it should be confirmed based on current percolation rates.
2. Finding No. 9 – The City's proposed Pond Reconfiguration Project would permanently reduce the City's disposal area significantly. It appears that one of the goals of the Pond Reconfiguration Project was to maintain a buffer between the Merced River and the disposal ponds to prevent accidental spills due to an embankment failure. Alternatively, the City would like to maintain Ponds Nos. 1, 2 and 3 as shallow percolation/evaporation ponds. Maintaining a shallow depth (<2 ft) in those ponds would maintain most of the disposal capacity of the WWTF and significantly reduce the risk of an accidental spill.
3. Finding No. 45 – The proposed reclamation areas on the October 2003 Title 22 report are now planted in Almonds and Grapes. The City's WWTF produces undisinfected secondary which is not suitable to irrigate almonds or grapes. This finding should include this information.
4. Provision B.1 – The disposal capacity is limited to 1.18 MGD until the Pond Reconfiguration Project is completed. Alternatively, the City should be allowed to demonstrate the disposal capacity of Ponds 1, 2, 3, 7 and 8 by conducting percolation tests.

5. Provision G.3 – The City would like to reconsider the Pond Reconfiguration Project and maintain the use of Ponds 1, 2 and 3 as shallow percolation/evaporation ponds. The proposed depth for Ponds 1, 2, and 3 will be less than 2 ft.
6. Provision G.4 – The table does not contain a schedule for submission of the results of the characterization of the scum discharges. It would be helpful to have a deadline for this requirement.

We appreciate your consideration of these review comments in the Final WDRs. If you have any questions or if you require additional supporting information please call me at (559) 288-9172.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Manrique', with a long horizontal flourish extending to the right.

Alfonso Manrique, PE
Principal
