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February 21, 2012

Via Electronic Mail

Elizabeth Thayer
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670
ethayer@waterboards.ca.gov

**Reference: Comments on the Tentative Order Amending Order No. R5-2005-0040
Master Reclamation Permit for the City of Lincoln**

Dear: Ms. Thayer:

On behalf of the City of Lincoln we are submitting the following comments on the proposed amendments to Order R5-2005-0040. In general our comments address three issues:

- We would like the Irrigated lands waiver coverage to extend to all covered lands and not just be limited to rice crops.
- We request the pond pH limits be changed to reflect the natural variations that occur in the Central Valley climate due to algae respiration.
- We request the ability to maintain a chlorine residual in portions of the system that would supply typical urban uses (and be subject to only incidental run-off possibilities).

Specific changes we request are itemized below:

Page 3, Item 8 (also Page 2 of the Fact Sheet):

We request the language be changed to read:

The Discharger has also proposed to not utilize chlorine within the agricultural reclamation distribution system where the resultant agricultural tailwater may be released to surface waters. The absence of chlorine will eliminate a possible source of toxicity and the formation of trihalomethanes from the use of reclaimed water. The limitations and prohibitions in this Order are based on an absence of chlorine in the agricultural reclaimed water distribution system.

The Discharger may maintain a chlorine residual in the (isolated) portion of the reclamation distribution system serving only municipal, commercial, and industrial uses.

2. Page 5, Item 22

Field F6 is no longer serving as a flood control basin. Therefore the City can meet the prohibition of commingling of recycled water with storm water...*no change required.*

3. Pages 6 and 7, Items 25 through 28

We request the word "rice" be replaced by "crop". The intent is to allow any agricultural use of (non-chlorinated) reclaimed water on lands covered by the Irrigated Lands Program to be regulated by that program.

4. Page 17, Item B.3

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Comments on the Tentative Order Amending Order No. R5-2005-0040

Page 2 of 2

This pH limit is OK because it specifies it applies to the WWTF discharge. Please see other comments regarding *pond* pH limitations.

5. Page 18, Item C.6.b

Please revise the pH limits to read:

pH shall not be less than 6.0 or greater than 9.0 as a daily average, nor greater than 11.0 at any time.

This is required because in the Central Valley climate any retention pond with non-toxic waters (that algae can grow in) may typically experience natural diurnal pH ranges up to 11.0 due to the CO₂ respiration pattern of algae. Information regarding a similar pond pH issue (for the City of Dixon) was submitted to the Board staff on July 25, 2008. A copy of the July 25, 2008 information can be forwarded upon request.

6. Page 18, Item C.8

Please change "*rice*" to "*crops*".

As per Item 3 above.

7. Page 21, Item E.5

Please change the pH limit to read as Item 5 above.

8. Page 24, Item G.7

Please change "*rice*" to "*crop*"

As per Items 3 and 6 above.

9. Fact Sheet Page 1, bottom paragraph

Please change "*rice*" to "*crop*"

As per Items 3, 6, and 8 above.

10. Fact Sheet, Page 2 DISINFECTION USING ULTRAVIOLET (UV) LIGHT, last paragraph

Please change the language to read as in Item 1 above.

11. Fact Sheet, pages 3 and 5

Please change "*rice*" to "*crop*"

As per Items 3, 6, 8, and 9 above.

12. Fact Sheet, Page 10, pH, second paragraph

Please change the last sentence to read:

A pond pH limitation range of 6.5 to ~~8.5~~9.0 as a daily average helps to ensure that the Discharger's wastewater treatment activities do not cause the groundwater taste and odor objective to be violated.

To be consistent with Item 5 above.

Please review our comments and please call me or Robert Emerick if you have any questions or require additional information.

Very truly yours,


Joseph DiGiorgio, P. E.

Senior Engineer, Environment

cc. Bruce Burnworth, City of Lincoln; Robert Emerick, Stantec