

ITEM: 21

SUBJECT: City of Lodi, White Slough Water Pollution Control Facility, San Joaquin County

BOARD ACTION: *Consideration of NPDES Permit Renewal (NPDES Permit No. CA0077682) and Order Amending Waste Discharge Requirements Order R5-2007-0113*

BACKGROUND: The City of Lodi (Discharger) owns and operates the White Slough Water Pollution Control Facility (Facility) that provides wastewater treatment service to the City of Lodi and the San Joaquin County Flag City Service Area with a total population of approximately 63,000. The Facility is permitted to discharge 8.5 million gallons per day of tertiary treated wastewater to Dredger Cut within the Sacramento-San Joaquin Delta. Additionally, secondary treated effluent and untreated industrial wastewater are used to irrigate fodder, fiber or feed crops. The Discharger also supplies tertiary treated municipal wastewater (Recycled Water) to Northern California Power Agency (NCPA) and San Joaquin County (SJCo) Vector Control District. Discharges from the Facility are currently regulated by Waste Discharge Requirements Order R5-2007-0113. The proposed NPDES permit renewal includes new or revised effluent limits for electrical conductivity, methylmercury, and chronic toxicity, and removes effluent limits for aluminum, dichlorobromomethane, chlorodibromomethane, manganese, and nitrite.

Due to the complexities of the discharges to land for this Facility, separate permits are proposed for the surface water and land discharges. An order amending Order R5-2007-0113 is proposed to remove all NPDES permitting requirements so that it will act as separate waste discharge requirements to land. The proposed amended Order will regulate the Recycled Water delivered to NCPA and the SJCo Vector Control District, and the land application of industrial wastes, secondary treated domestic wastewater, and biosolids on the agricultural fields. The discharge limitations for land application and water reclamation remain essentially the same in amended Order R5-2007-0113 with the exception of: (1) remove all NPDES permit requirements; (2) add new monitoring requirements for the industrial influent, for dewatered biosolids, and for supplemental irrigation water; (3) update the California Code of Regulations Title 27 findings in accordance with amended State Water Resources Control Board WQ 2009-0005; (4) modify the daily biochemical oxygen demand (BOD) loading rate to the Agricultural Fields; and (5) update antidegradation findings and add a compliance schedule to meet groundwater limitations and a requirement to submit a Best Practicable Treatment or Control study for the land discharges. Some editorial and clarifying changes were also made to the Order.

ISSUES: Public comments on the proposed amendment were received from the Discharger and Central Valley Clean Water Association (CVCWA). All public comments and Central Valley Water Board staff responses are included in the Staff Response to Comments document included in the agenda package. The following are the major issues and Central Valley Water Board staff responses.

Minor comments were submitted by the Discharger and CVCWA on the NPDES permit and have been resolved. The major issues on the amendment to Order R5-2007-0113 are (1) the findings and conclusions on the Title 27 exemptions did not fully incorporate the findings and conclusions in the State Water Board Order WQ 2012-0005 and the Order did not fully consider all the submitted technical information; (2) the Effluent Storage Ponds are not a source of groundwater

degradation and do not need to be evaluated for best practical treatment or control (BPTC) and (3) several groundwater limits are not appropriate for this site.

- (1) **Title 27.** Discussion of Title 27 exemptions and applicability has been revised. Separate waste discharge requirements will be developed within the next few years and will include a thorough evaluation and discussion on Title 27, antidegradation of groundwater and BPTC as they relate to this site.
- (2) **BPTC.** The Central Valley Water Board staff is evaluating the groundwater data and will include their findings and conclusions in the separate waste discharge requirements.
- (3) **Groundwater Limits.** No changes to the groundwater limits are proposed at this time. However, due to compliance issues with the limits, a compliance schedule has been added to allow the Discharger to implement facilities and further evaluate groundwater quality.

RECOMMENDATION Adopt NPDES permit renewal and amending order

Mgmt. Review   AWL  

Legal Review           

3/4 October 2013

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