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August 19, 2013

Via e-mail (mail Original)
James.Marshall@waterboards.ca.gov

Mr. Jim Marshall
Senior Water Resources Control Engineer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

NPDES Permit No. CA0079243

Subject: Comments on the Tentative Waste Discharge Requirements, NPDES No. CA0079243 for the City of Lodi White Slough Water Pollution Control Facility

Dear Mr. Marshall:

Thank you for providing the opportunity to review and submit comments on the Tentative Waste Discharge Requirements, NPDES No. CA0079243 (Tentative Order) for surface water discharge from the City of Lodi (City) White Slough Water Pollution Control Facility (WPCF). Your July 19, 2013 Notice of Public Hearing for the Tentative Order requested submittal of City comments on the Tentative Order to the Central Valley Regional Water Quality Control Board (Regional Board) by August 19, 2013. The City appreciates the time and effort you and your staff have devoted to developing the Tentative Order.

Regarding the Tentative Order, the City has several concerns that are detailed in Attachment A. The most significant concerns are summarized as follows:

- **Remove Temperature Effluent Limitation.** The proposed effluent limitation for temperature is not appropriate for the WPCF discharge. The State Water Resource Control Board's "Thermal Plan" indicates that treated wastewater effluent is an "Elevated Temperature Waste", as confirmed by language in the Fact Sheet of the Tentative Order, and that the 86°F maximum temperature is for "Thermal Waste Discharges." In addition, the Tentative Order includes a determination of "reasonable potential" for temperature, which would require a water quality-based effluent limitation. However, there is no water quality objective for temperature that is applicable to the WPCF discharge, so the City contends that the effluent cannot (and does not) demonstrate reasonable

potential to exceed any applicable water quality objective for temperature. In any case, the 86°F effluent limitation is not applicable to the WPCF discharge. Moreover, the City has completed extensive temperature studies and has demonstrated that the effluent has limited impacts on receiving water temperatures. For these reasons, the renewed NPDES permit should not include an effluent limitation for temperature.

- **Remove Special Provisions and Clarify Other Requirements for Effluent and Receiving Water Characterization Study.** The Effluent and Receiving Water Characterization Study is adequately addressed in the Monitoring and Reporting Program requirements and can be removed from the “Special Studies” (Section VI.C.2.c) listed in the Tentative Order.
- **Revise Chlorpyrifos and Diazinon Monitoring Requirements.** The Tentative Order indicates that only EPA analytical methods 8141A or 625M are allowed for chlorpyrifos and diazinon monitoring. The City requests that the permit be revised to *also* allow the City to use any method meeting 40 CFR 136 requirements and that provides a reporting limit less than the applicable water quality criterion.

If you have any questions regarding the City’s comments, please do not hesitate to contact Kathryn Garcia of my staff at (209) 333-6800 x2091 or Kathryn Gies of West Yost Associates at (925) 461-6795.

Sincerely,



Larry Parlin
Deputy Public Works Director – Utilities

LP/KG/myn

Enclosure: Attachment A - Comments on the Tentative Order

cc: Kathryn Gies, West Yost Associates, Walnut Creek (no enclosure)