



TUOLUMNE UTILITIES DISTRICT

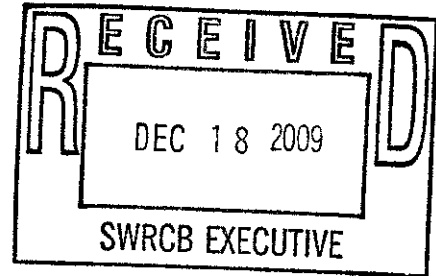
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Subject: COMMENTS to A-1967 – JANUARY 5, 2010, BOARD MEETING

The Tuolumne Utilities District (hereby referred to as "District") has received and reviewed a copy of the proposed order regarding the matter of motion by the Board for review of the District's Waste Discharge Requirements Order No. R5-2008-0162.

The District offers the following comments and clarifications for consideration by the Board:

1. The NPDES Permit cover sheet states, "Waste Discharge Requirements for Tuolumne Utilities District Sonora Regional Wastewater Treatment Plant and Jamestown Sanitary District Jamestown Wastewater Treatment Plant Tuolumne County". However the only facility listed under the Discharger Information is the Sonora Regional Wastewater Treatment Plant. Furthermore, it states that the Discharger subject to the waste discharge requirements set forth in this order is the Tuolumne Utilities District.

However, Jamestown Wastewater Treatment Plant also discharges to Quartz Reservoir. The new effluent limits for ammonia and possibly copper and zinc can only be achieved through source control and/or treatment process improvements **at both** TUD's SRWTP and JSD's JWTP. The Jamestown Sanitary District was not even sent a copy of the proposed Order.

Since this existing order is being remanded, the Tuolumne Utilities District respectfully requests that the WDR be extended to include JSD.

2. The proposed Order under question states that the 2008 Permit regulates seasonal surface water discharges from wastewater treatment plants owned and operated by the Tuolumne Utilities District (TUD) and Jamestown Sanitary District (JSD). This seems to contradict the fact that Jamestown Sanitary District is not listed as a discharger on the permit. If JSD is being regulated, has the Board collected the required TRE Workplan, Salinity Evaluation and Minimization Plan, Compliance Justification Schedules, and Pollution Prevention Plans?

3. Clarification: The active storage volume of Quartz Reservoir is 1,416 AF not 1,200 AF.
4. Clarification: The proposed Order states that, "When rain causes Quartz Reservoir to overflow, the wastewater is discharged into Woods Creek, a water of the United States." In reality, Quartz Reservoir has never been allowed to overflow. When storage capacity is inadequate to handle inflows the District has lowered the reservoir levels via a controlled release at its discharge point.

5. Conclusion No. 4: The Boards concern over the potential for short circuiting is already mitigated by the use of a submerged baffled inlet structure that is used from November 1st to May 15th annually. A 16-inch pipe extends approximately 615 lineal feet into the reservoir and discharges at an elevation of approximately 1,340 ft. This elevation coincides with the elevation of the bottom gate on the outlet tower. The high water surface elevation for Quartz is 1,386 ft so during times in which the District would be discharging to surface water the baffled inlet structure is submerged by 35-45 feet of water. The District drafts from the uppermost layer of the reservoir where dissolved oxygen levels are higher and suspended solids are lower. Consequently, by discharging at the bottom of the reservoir and drafting from the top we feel that short circuiting is not an issue.

Furthermore, we do not believe that significant temperature differences exist. Following secondary clarification, wastewater is conveyed to three effluent stabilization ponds with capacity of approximately 35 acre-feet. At average plant flow rates of 1.7 mgd, the residence time in the effluent ponds is approximately 6-7 days. During this time, the water would cool significantly.

6. Conclusion No. 6 states, "Order No. R5-2008-0162 must be revised to require continuous monitoring for chlorine residual." The District is requesting that the Board also add the option of continuous monitoring for a dechlorinating agent, only during periods of discharge, as an acceptable alternative to prove compliance.
7. Conclusion No. 7 forces the District to sample and measure chlorine residual using the new effluent limitations for one-hour and four-day averages. The Board is requesting that these tests be conducted for a period of one-year. The District is requesting approval to install a dechlorination system that is operated and monitored only during the times in which a surface water discharge is occurring.
8. Conclusion No. 8: As stated above, the District is requesting to measure the presence of a dechlorinating agent during periods of surface water discharge rather than embark on a 1-year study whose results may or may not be conclusive. If protection of aquatic life is

the primary objective, installation of a dechlorination system would provide fast, reliable, and effective results.

9. Conclusion No. 9: The inclusion of a reopener clause to allow for the Order to be reopened and modified based on the results of the one-year sampling data for chlorine residual implies that if the District was able to demonstrate that there is no chlorine residual in its discharge, and if the Board were to agree, the Order could be revised for less stringent effluent limits that would not constitute a violation of anti-backsliding. As an alternative to revising the chlorine residual effluent limits, the District would propose that the Board impose effluent limits requiring continuous monitoring for the presence of a dechlorinating residual. Dechlorination is much more practical, cost effective, easier to measure, easier to operate, and ensures that chlorine is not reaching the receiving waters.
10. Conclusion No. 10: As addressed in Comment No. 5 above, the District already utilizes a submerged baffled inlet structure to promote mixing and mitigate potential for short circuiting. Typically, the uppermost gate on the outlet tower is used to draw water because surface water is of superior quality, higher dissolved oxygen and lower suspended solids. By discharging to the bottom of the reservoir and drafting from the uppermost surface, the potential for short circuiting is minimized.

Thank you for the opportunity to comment on the draft proposed order. If Board staff has any questions, please contact me at (209) 532-5536 ext. 516 or tscesa@tuolumneutilities.com.

Respectfully,



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T.U.D.

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