

DELHI COUNTY WATER DISTRICT

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January 27, 2015

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California Regional Water Quality Control Board,
Central Valley Region
1685 E Street Fresno, CA
Central Valley Regional Water Quality Board

Jeff Pyle, Engineer
California Regional Water Quality Control Board,
Central Valley Region
1685 E Street Fresno, CA
Central Valley Regional Water Quality Board

RE: TENTATIVE WASTE DISCHARGE REQUIREMENTS FOR DELHI COUNTY WATER DISTRICT WASTEWATER TREATMENT FACILITY MERCED COUNTY

Dear Mr. Harvey and Mr. Pyle,

As requested in the December 31, 2014 cover letter, this follow-up letter includes the recommendations, comments and observations from Delhi County Water District staff and consultants.

We also appreciate your availability to meet with Delhi Staff on January 23, 2014 to discuss the tentative waste discharge requirements. Thank you for your input, feedback and collaborative approach on this matter.

Our primary comments are listed below:

Findings

Item 1-

Based on 2,300 actual sewer connections the population served by the District is likely closer to 7,500 residents. We believe that this figure represents a more reasonable approximation of the population currently being served by the District.

- Item 5-
The 2nd sentence should be changed to, “The WWTF consists of a headworks, two advanced facultative ponds (AFP’s) with one fermentation pit in each AFP that is divided into three cells, two high rate....”.
- Item 6-
Change to, “...coagulation equipment and upflow tube settlers in the outlet structure...”, and “...divided into three separate cells with upflow tube settlers in the outlet structure.”
- Item 7-
The 2012 date should be asterisked, or otherwise modified, and the following note of further explanation added, “*In October 2012 the existing faulty influent magmeter was replaced with a new magmeter. The flow readings prior to the installation of the new magmeter are not considered to be accurate.” The word “Averages” should be changed to “Averages (not including 2012)*”, and the monthly and daily flow averages should be changed to 17.58 and 0.589, respectively. Also the average flow in the last sentence should be changed from 0.66 to 0.59 mgd.
- Item 8-
The superscript on “umhos/cm” under the “Electrical Conductivity” heading should be changed from 1 to 2.
- Item 10-
The following sentence should be added to the end of the paragraph, “The discharge point may be changed to the southerly advanced facultative pond in the future.”
- Item 11-
Change the 1st sentence as follows, “...study that concludes that the WWTF...”
- Item 13-
The last sentence should be revised as follows, “...pumped to the south Advanced Facultative Pond.”
- Item 16-
The first sentence should be revised as follows, “..area covers approximately 1,642 acres, or ...”.
- Items 34-
We question whether MW-2 can be considered upgradient of the existing evaporation/percolation ponds and therefor provides upgradient groundwater quality results for the WWTF. The attached groundwater elevation chart for all

the MW's shows that the groundwater elevation at MW-6 is consistently higher than the elevation at MW-2. It would seem that MW-6 is upgradient of MW-2 and that the results from MW-2 results probably are influenced by irrigation water.

Item 36-

The third line should be changed to, "...of 1,600 umhos/cm and more than the effluent....".

Item 40b

It is our understanding that if the District can prove through testing that the concentration of Total N, arsenic and iron in the percolated effluent meets Title 22 requirements that this will be a sufficient demonstration that an effluent total nitrogen concentration greater than 10 mg/L is protective of the underlying groundwater quality. The testing will include taking samples from MW-6 for three consecutive months.

Item 52-

The last part of this sentence needs to be corrected as follows: "The District adopted a Mitigated Negative Declaration (SCH #2014021035) in accordance with the California Environmental Quality Act (CEQA) on 11 June 2014 for the proposed Wastewater Treatment Facility Improvement Project that will allow for a flow increase to 1.2 mgd upon approval by the Executive Officer of the engineering certification described in this Order."

Discharge Requirements (Starting on Page 13)

Item D.8.-

Change "Discharge Specification E.7,..." to "Discharge Specification D.7,..."

Item F.1.-

Change this sentence as follows, "as needed to ensure that discharge requirements are met at all times", in place of "as needed to ensure optimal plant operation".

Item F.2.-

Six months is not enough storage time for the biosolids. The District would prefer a two year storage period. This will allow bacteria, viruses and other harmful organisms to die off sufficiently so that the biosolids will meet Class "A" requirements. Also, land application of the aged biosolids generally can only occur each year from about August to October. The biosolids will be stored on cement concrete slabs and any storm water or water released from the biosolids will be collected and pumped to either the High Rate Pond or Advanced Facultative Ponds.

Item F.3.-

As we discussed at our meeting, in the past the District has sold dried algae to a company named Algix. The algae was shipped to a processing facility in Alabama to be used to make biodegradable plastic. The District has a letter from Lauren Fondahl of EPA approving the transport of dried algae out of state. We would like to confirm that this is also approved by the Executive Director and is consistent with Title 27, Division 2.

Item G.6.-

The reference to C.1 in the first line should be C.2.

If new WWTF improvements are needed in order to meet the Total Nitrogen requirement significant additional time will be required to: thoroughly research and analyze treatment alternatives; prepare a technical report and cost estimate; identify a source of funds; determine if a Prop 218 sewer rate increase will be needed; and go through the Prop 218 process if it is needed. Also, in order to prove that the new improvements are successful in meeting the Total Nitrogen requirement a one-year operational study will need to be run. We request 2 years for Task a, 4 years for Task b and 5 years for Task c.

Monitoring and Reporting Program

Effluent Monitoring, Page 3-

As we discussed at our January 23rd meeting at your office, the RWQCB will give the District 1 year to install an effluent flow metering system. This MRP for effluent monitoring should include language to that effect.

Source Water Monitoring, Page 3-

As we discussed at our January 23rd meeting at your office, you will modify this requirement so that the District can submit the general mineral test results that are part of the Title 22 testing it does on each of its wells every 3 years. Also, it is our understanding that the District can use its EC meter to determine the EC's of the water from each well, and that these EC's can then be used to compute a flow-weighted EC

Groundwater Monitoring, Page 4-

It is our understanding that the interval for general minerals testing will be changed from quarterly to annually.

Information Sheet

Please revise this section to be consistent with the comments above.

If you have any questions or follow-up inquiries, please contact me or Lee Fremming by phone

or email.

Sincerely,

A handwritten signature in black ink, appearing to read "Stan Feathers", with a long horizontal flourish extending to the right.

Stan Feathers, General Manager
Delhi County Water District
P.O. Box 639
Delhi CA, 95315