CITY OF MANTECA

PUBLIC WORKS DEPARTMENT
WASTEWATER QUALITY CONTROL FACILITY

March 2, 2015

Mr. Jim Marshall, P.E.
Senior Engineer
Water Quality Control Engineer
California Water Quality Control Board
Central Valley Division
11020 Sun Center Drive, #200
Rancho Cordova, CA 95870-6114

Via email only: RB5S - NPDES - Comments@waterboards.ca.gov

SUBJECT: CITY OF MANTECA WASTEWATER QUALITY CONTROL FACILITY – TENTATIVE ORDER NPDES PERMIT NO. CA0081558

Dear Mr. Marshall:

The City of Manteca (City) appreciates the opportunity to provide the following comments on the Tentative Order for the NPDES permit for the Manteca Wastewater Quality Control Facility (WQCF) distributed by the Central Valley Regional Water Quality Control Board (Regional Water Board) via email on January 29, 2015. The City is supportive of the permit and appreciative of the Regional Water Board staff for their efforts in developing the document over the past several months.

Ammonia Interim Limit

On January 20, 2015, the City submitted a Request for an In-Permit Ammonia Compliance Schedule. This request included a justification for a compliance schedule, due to the WQCF's infeasibility to immediately comply with the proposed final ammonia limits, especially during the summer season. It also presented the City's request for an interim average monthly ammonia effluent limit of 1.1 mg/L for the summer period (1 April – 30 November).

The Tentative Order includes an in-permit compliance schedule, but does not in fact include an interim ammonia limit until the time of compliance with the final ammonia limits stated as May 31, 2025 (Special Provision VI.C.7.b, page 26 of the Tentative Order).

The City respectfully requests that an interim ammonia limit be included in the Tentative Order. Per our January 20, 2015, submittal, the City requests an interim average monthly ammonia effluent limit of 1.1 mg/L for the summer period (1 April – 30 November) effective through May 30, 2025.

TDS Limitation for Irrigation Water

Provision IV.B.4 (page 7) of the Tentative Order includes a discharge specification for total dissolved solids (TDS). This is an effluent limit that applies to recycled water immediately before application to the use areas (as measured at LND-001). In addition to this requirement, the Tentative Order also includes groundwater limitations for both electrical conductivity (EC) and TDS, an EC effluent limit, and EC pollution prevention requirements. Considering that the Tentative Order also includes groundwater

limitations with respect to TDS, the City finds the TDS limit here to be unnecessary and inappropriate. Accordingly, the City respectfully requests deletion of Provision IV.B.4.

Manganese Groundwater Study

We respectfully request the removal for a Manganese Groundwater Study (Special Provision VI.C.2.c., page 19). The manganese in the City's groundwater wells is naturally present in this area and it is not caused by the City's irrigation practices. The manganese levels in the WQCF effluent are much lower than those found in the area groundwater. The City monitored manganese in previous NPDES permits (the constituent was removed in the 2009 NPDES permit after the Reasonable Potential Analysis). The last year of regular effluent monitoring for manganese was 2009. The 2009 annual average for effluent manganese was 18.7 µg/L, much lower than the manganese concentrations found in some of the City's groundwater monitoring wells.

As further support, the City has a drinking water well with a manganese removal system (Well 14 with a raw water average of 54 µg/L manganese in 2014). The City performed zone sampling of a drinking water test well in October 2006 and found 910 µg/L of manganese in one of the test zones. Oakwood Lake Water District, which is located directly southwest of Manteca, has two wells with manganese removal systems. The raw well water for those wells had an average of 111 µg/L and 78 µg/L in 2014. The City of Lathrop, which is located north of Manteca, has an out of service well (well 21) with a manganese removal system due to high manganese. In February 2014 Lathrop's well 21 had a raw water result of 350 µg/L manganese.

Most recently, manganese was one of the constituents monitored for an unrelated project characterizing groundwater quality for the South San Joaquin Irrigation District. The manganese concentrations for the temporary wells used in the Study, which were located all throughout Manteca, are listed in Table 1 below. The results further support that this geographical area is naturally high in manganese.

Table 1. Manganese Levels in Temporary Wells in the Manteca Area

Date	Well	Concentration (µg/L)	Date	Well	Concentration (µg/L)
9/17/14	B3	193	1/21/15	B8	97
9/17/14	B5	243	1/21/15	B10	105
9/17/14	B15	837	1/21/15	B12	147
9/17/14	B21	697	1/22/15	B13	389
9/17/14	B24	185	1/22/15	B16	917
1/20/15	B1	138	1/22/15	B17	830
1/20/15	B2	578	1/22/15	B18	509
1/20/15	B4	403	1/22/15	B19	193
1/20/15	B9	1649	1/22/15	B20	731
1/20/15	B14	219	1/23/15	B22	179
1/21/15	B6	495	1/23/15	B23	321
1/21/15	B7	907	1/23/15	B25	697

The information presented above supports the fact that the City's irrigation practices are not causing the high manganese levels present in some of the City's groundwater monitoring wells. The City believes that a manganese groundwater study is unnecessary at this time and it respectfully requests the removal of the Manganese Groundwater Study requirement from the Tentative Order.

Monitoring and Reporting Requirements

The following are a series of comments related to the Monitoring and Reporting Requirements in Attachment E of the Tentative Order.

1. Page E-23 Section X.B.6.c. The City respectfully requests that this requirement be eliminated. Laboratory analysis sheets are kept in-house and can be made available upon request, but we find the Tentative Order's requirement to include these reports with each SMR submittal onerous. The SMRs include many analytical results from both in-house analyses and contracted laboratories and it would be resource intensive to scan and upload all of these with each SMR submittal to CIWQS. Again, we respectfully request that this requirement be eliminated.

2. Page E-29 Section X.D.6.a.ii. The requirement to report irrigation flow to each check of each LAA field would be very labor intensive and time consuming for the farmer operating the fields as well as for City staff. The City respectfully requests this requirement to be modified to record daily flow from each wastewater source and supplemental irrigation water to each LAA field.

3. Page E-29 Section X.D.6.a.v. The site plan depicting the irrigation checks within each LAA field that will be used during the calendar year, including all water conveyance ditches and internal berms dividing each LAA (where applicable), would not change from month to month during the irrigation season. The City respectfully requests that this information be reported on an annual basis as part of the Nutrient Management Plan described on page E-30, Provision X.D.6.d.

4. Page E-29 Section X.D.6.a.vi. The requested information under this item will not be available on a monthly basis. It will be available at the end of the irrigation season after harvest. The City respectfully requests for this information to be reported on an annual basis as part of the Nutrient Management Plan described on page E-30, Provision X.D.6.d.

5. Page E-30 Section X.D.6.b.iv. This reporting requirement asks for summary data tables of historical and current groundwater elevations. The City requests clarification of the term "historical" in terms of time range expected; we recommend five years as an appropriate time range.

6. Page E-30 Section X.D.6.d. The City respectfully requests a change in the due date for the Nutrient Management Plan annual report from February 1 to March 1. The evaluation involved in this report requires analysis of information that the City records for its Self-Monitoring Reports, including the December SMR which is not produced until late January. As such, the information needed from the December SMR is difficult, if not impossible, to analyze in time for a February 1st deadline. If a March 1st due date is not feasible, the City proposes a February 1st due date with reporting on the 12-month period from November 1 through October 31. This alternative reporting timeframe would coincide with the planting cycles as crops harvested in spring are usually planted in the last two month of the previous year.

Minor errors

The City's review of the Tentative Order also noted a couple of minor errors for which we suggest the following corrections:

1. Page 7 Section IV.B.2. The Mx conversion factor in the nitrogen load equation is unnecessary. The conversion factor of 8.345 is the correct value for such a factor and it is already included in the equation.

2. Page 12 Section V.B.1.a Table 6. We propose the following changes to footnote 3: The water quality objectives for electrical conductivity and total dissolved solids are ~~to be determined~~ based on the site-specific study performed by the Discharger in October 2012~~, as required in Section Vi.C.2.c~~.

3. Page E-25 Section X.D.3. The requirement to include information on constituents in Table E-6 as part of the analytical methods report required in this provision appears to be an error. Table E-6

is a table of calculated land application requirements. We believe Table E-6 should not be listed in this provision.

Again, thank you for your consideration of our comments. We look forward to reviewing a revised version of the Tentative Order that addresses these matters. Please do not hesitate to contact me at mhoughton@ci.manteca.ca.us or 209-456-8400 if you have any questions or need additional information.

Sincerely,

Mark Houghton

Mark Houghton
Public Works Director

cc: Kari Holmes, Central Valley Regional Water Quality Control Board
Heather Grove, City of Manteca
Debbie Webster, CVCWA
Alina Constantinescu, Larry Walker Associates