Central Valley Regional Water Quality Control Board
10 December 2026 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements Order for
City of Turlock
Regional Water Quality Control Facility
Stanislaus County

At a public hearing scheduled for 10 December 2026, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements (NPDES No. CA0078948) for the City of Turlock (Discharger) Regional Water Quality Control Facility (Facility). This document contains responses to written comments received from interested persons and parties in response to the tentative Order. Written comments from interested parties were required to be received by the Central Valley Water Board by 29 October 2026 in order to receive full consideration. Comments were received prior to the deadline from:

1. City of Turlock (Discharger) (received 28 October 2026)
2. Central Valley Clean Water Association (CVCWA) (received 29 October 2026)

Written comments from the above interested parties are summarized below, followed by the response of Central Valley Water Board staff.

DISCHARGER COMMENTS

The Discharger submitted editorial changes, clarifications, and typographical error corrections, including those noted in Comments #5 and #6 of the Discharger's comment letter, all of which were accepted by Central Valley Water Board staff.

DISCHARGER COMMENT #1 – Pyrethroid Monitoring, Reporting, Management Plan, and Conditional Discharge Prohibition

The tentative Order issued for the public comment period included requirements for pyrethroid pesticides monitoring, reporting, a management plan, and a conditional discharge prohibition. Basin Plan section 5.16.3 requires baseline pyrethroid monitoring for municipal wastewater treatment facilities that discharge at least 1 million gallons per day (MGD). The Facility does not meet this threshold for its discharge to the San Joaquin River on an annual average basis. The Facility discharged an annual average of less than 0.2 MGD to the San Joaquin River during 2021 through 2025, including days with no discharge. The Discharger's primary discharge location is the Delta

Mendota Canal, regulated under Order R5-2022-0034, an NPDES permit for the North Valley Regional Recycled Water Program. The Facility discharges to the San Joaquin River on an intermittent basis when the North Valley Regional Recycled Water Program conveyance or discharge facilities are temporarily unavailable. The Discharger requests that the Central Valley Water Board remove the pyrethroid requirements from the Tentative Order as pyrethroid pesticides baseline monitoring is anticipated to be included in the Delta Mendota Canal NPDES permit, under which the Facility discharges more regularly.

RESPONSE #1:

Central Valley Water Board staff concur and have deleted the language in the WDR section III.I, WDR section VI.C.3.b, Attachment E section IX.C, Attachment F section IV.A.10, Attachment F section VII.B.4, and Attachment F section VII.F.4 of the proposed Order accordingly.

The Facility's tertiary treated effluent discharge has limited potential to affect the San Joaquin River with respect to pyrethroids due to its infrequent discharges, which on an annual average are significantly less than 1 MGD. Furthermore, the Tentative Order authorizes discharges to two Turlock Irrigation District canals (Upper Lateral 4 and Lateral 5.5). Once the City of Turlock commences discharges into those two canals, the effluent discharge frequency to the San Joaquin River may decrease even further. Finally, the renewal for Order R5-2022-0034 is expected to include pyrethroid requirements.

DISCHARGER COMMENT #2 – Ammonia Average Weekly Effluent Limitation (AWEL)

The Discharger requests correction of the 1 November – 30 June AWEL for ammonia. Table 4 and the Fact Sheet specify an AWEL of 3.7 mg/L. However, Attachment H specifies an AWEL of 3.1 mg/L, and the values in Attachment H do not support 3.7 mg/L.

RESPONSE #2:

Central Valley Water Board staff verified the ammonia AWEL calculation and determined that the effluent limits in Attachment H are accurate. Table 4 in the WDRs, Attachment F section IV.C.3.c.i, and Table F-12 have been updated to reflect the correct AWEL of 3.1 mg/L.

DISCHARGER COMMENT #3 – Definition of Toxicity Calendar Month

The Discharger requests that the definition of the Toxicity Calendar Month be revised to be consistent with section III.C.4.a of the Statewide Toxicity Provisions, which requires the permit to specify the day that starts the Toxicity Calendar Month for facilities with monthly or more frequent routine monitoring.

RESPONSE #3:

Central Valley Water Board staff concur and have revised the definition of toxicity calendar month in Attachment E section V.A.1 accordingly.

DISCHARGER COMMENT #4 – Receiving Water Characterization Monitoring Frequency

The Discharger requests that the Central Valley Water Board reduce the receiving water characterization monitoring frequency in MRP section IX.D.1.b from quarterly to twice during 2029. The Discharger does not request a change to the quarterly effluent sampling required by Attachment E section IX.D.1.a. This change to receiving water characterization monitoring would be consistent with the current NPDES permit, which required two characterization monitoring events at the upstream receiving water stations. Moreover, the infrequent discharges to the San Joaquin River and the expected discharges to TID's Upper Lateral 4 and Lateral 5.5 may make quarterly receiving water monitoring not possible.

RESPONSE #4:

Central Valley Water Board staff concur and have revised Attachment E section IX.D.1.b (now section IX.C.1.b) to require receiving water monitoring at Monitoring Location RSW-001 twice per year during 2029. Staff also clarified in this section that receiving water samples at Monitoring Locations TID-001 and TID-003 shall be collected once per year in 2029 only if discharges to the TID laterals have commenced.

CVCWA COMMENTS

CVCWA COMMENT #1 – Toxicity Test Species

The Tentative Order requires the Discharger to conduct chronic toxicity tests with the water flea (*Ceriodaphnia dubia* or *C. dubia*) as the test species. Given the known issues with *C. dubia* test variability and low confidence in assessments of toxicity or non-toxicity, the Tentative Order appropriately provides the Executive Officer with discretion

to allow the temporary use of the next appropriate species as the most sensitive species. Unless and until laboratory performances using *C. dubia* chronic test results and recommendations improve, CVCWA recommends that the Tentative Order identify an alternative test species, or that the Executive Officer exercise discretion to allow dischargers to use the next appropriate test species.

RESPONSE #1:

Central Valley Water Board staff do not concur. While staff acknowledge that historically some dischargers have experienced unidentifiable problems with chronic toxicity test results when using *C. dubia* as the test species, *C. dubia* remains a test species of consideration in the Statewide Toxicity Policy. Therefore, under the guidance of the Statewide Toxicity Policy and from the current dataset, *C. dubia* was determined to be the most sensitive species to be used for chronic toxicity testing. The Discharger concurs with this determination and did not comment on the tentative Order in this regard. Furthermore, the tentative Order includes procedures for granting use of the "next appropriate species" if warranted (see Attachment E, Section V.F.2). As of the closing date of the public review period for the tentative Order, the Discharger has not provided the Central Valley Water Board with supporting information or a request to use the "next appropriate species," which is the outlined procedure referenced above to implement use of the "next appropriate species." No changes to the tentative Order have been made in response to this comment.

CVCWA COMMENT #2 – CV-SALTS

The Fact Sheet contains an inappropriate reasonable potential analysis for salinity. (Tentative Order, p. F-38.) A reasonable potential analysis is not required for Prioritization and Optimization (P&O) Study participants that are in compliance. The language on page F-38 discussing reasonable potential of salinity should revised accordingly.

RESPONSE #2:

Central Valley Water Board staff do not concur. The CV-SALTS Basin Plan Amendment (BPA) does not waive the requirement to conduct reasonable potential analyses for salinity but provides that dischargers in good standing with the P&O Study are deemed to be in compliance with effluent and receiving water limits for salinity. The BPA explicitly states that when a discharge is found to have reasonable potential for causing or contributing to an exceedance of a federally applicable water quality standard for salinity, "the Board may consider granting use of assimilative capacity by allowing for a

mixing zone and dilution credits" or "a salinity variance pursuant to the Salinity Variance Policy."

The R5-2020-0057 BPA says on page 24: "*Requirements for Ensuring Reasonable Protection of Beneficial Uses* - Full participation in the P&O study as documented and confirmed by the lead entity overseeing the P&O Study shall be found by the Central Valley Water Board to provide for in lieu or alternative compliance to receiving water limits or effluent limits based on salinity. To determine reasonable potential, the Board maintains its discretion to conduct such analysis by using the approach set forth in U.S. EPA's Technical Support Document for Water Quality-based Toxics Control, by using the approach set forth in the State Implementation Plan (SIP), or by using another approach that is consistent with applicable federal regulations. To the extent that the discharge in question is found to have reasonable potential for causing or contributing to a violation of an applicable salinity water quality objective pursuant to applicable federal regulations, the Board may consider granting use of assimilative capacity by allowing for a mixing zone and dilution credits. The permittee is also eligible for consideration of receiving a salinity variance pursuant to the Salinity Variance Policy."

CVCWA COMMENT #3 – Compliance

The language on page F-84 of the Tentative Order incorrectly refers to salinity "effluent limitations" for enforcement as applicable to the Discharger.

RESPONSE #3:

Central Valley Water Board staff concur and have revised Attachment F section IV.D.3.b.iii accordingly.

CVCWA COMMENT #4 – Groundwater Limitations

CVCWA requests that the Groundwater Limitations language in the Tentative Order be revised as follows:

> Release of waste constituents from any portion of the Facility shall not cause groundwater containing any of the following constituents greater than listed below or greater than natural background quality, whichever is greater.
>
> 1. Total coliform organism level of 2.2 MPN/100 mL over any seven-day period.
>
> 2. Constituents in concentrations that exceed either the Primary or Secondary MCLs established in Title 22 of the California Code of Regulations, excluding

salinity, constituents provided the Discharger complies with Provision VI.C.3.a.

3. Contain taste- or odor-producing substances in concentrations that cause nuisance or adversely affect beneficial uses or contain toxic substances that produce detrimental physiological responses in human, plant, animal, or aquatic life.

RESPONSE #4:

Central Valley Water Board staff do not concur. The groundwater limitations language in the Tentative Order is consistent with language in the Groundwater Quality Protection Program orders. Additionally, the current groundwater limitations language is designed to be consistent with multiple sections of the Basin Plan (Water Quality Objectives for Groundwaters, Sections 3.2.2, 3.2.4, and 3.2.5). Until further revisions to this language are considered and approved by Central Valley Water Board legal counsel and management across programs, no changes to the current groundwater limitations language are needed.