

Cutler – Orosi Joint Powers Wastewater Authority

TREATMENT PLANT

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March 20, 2023

Ms. Nicolette Dentoni
Water Resource Control Engineer
Central Valley Regional Water Quality Control Board
1685 E. Street
Fresno, CA 93706

via: electronic transmittal only

RE: COMMENTS TO TENTATIVE WASTE DISCHARGE REQUIREMENT/WDR R5-
2023-####
CUTLER-OROSI JOINT POWERS WASTEWATER AUTHORITY

Dear Ms. Dentoni:

On February 17, 2023, the Central Valley Regional Water Quality Control Board issued a Notice associated with Tentative Waste Discharge Requirements (TWDRs) for the Cutler-Orosi Joint Powers Wastewater Authority's (Authority) Wastewater Treatment Facility. Please find attached, for your review and consideration, the Authority's comments associated with the TWDRs.

Thank you for your consideration of our comments.

If you have any questions regarding our comments please do not hesitate to contact us.

Very truly yours,


Johnny Gandoval
President

JS:js
Enclosure

cc: Mr. Dennis R. Keller, Consulting Civil Engineer
Mr. Jim Koontz, Esq.
Mr. Jim Peacher, Chief Plant Operator

COMMENTS
WASTE DISCHARGE REQUIREMENTS
CUTLER-OROSI JOINT POWERS WASTEWATER AUTHORITY

The following summarizes the Cutler-Orosi Joint Powers Wastewater Authority's (Authority) comments to the proposed Waste Discharge Requirements (WDRs) (Tentative Order No. R5-2023-####):

1. The Assessor Parcel Numbers (APN) for the Facility need to be revised to the following:
032-260-007 – Treatment Facility and Field A;
032-030-013 – Fields B, C, D and E; and
032-030-014 – Supplemental Area to Field E, compensation for loss of area in Field A, not currently connected to irrigation system.

It should be noted that the following parcels are owned by Cutler P.U.D. and Orosi P.U.D., but have not been connected to the irrigation system:

- 032-040-015; and
032-040-016.
2. The total land use (cropland) acreage is described as both 118 and 118.8 acres in the Tentative WDRs. (See 5. below).
3. The February 16, 2023, Report of Waste Discharge was prepared by Dennis R. Keller Consulting Civil Engineer Inc. (Item 7).
4. The oxidation ditch treats the entire plant wastewater flow, including up to 0.5 MGD of wastewater flow that is initially diverted to the trickling filter treatment train (Item 10).
5. Field A has been modified to provide the required setback distance from the off-site domestic water supply well (Item 11). The revised usable acreage for Field A is approximately 10.5 acres. The Authority has the capability to use Field A if necessary. The revised acreage of the land use area should be 116.5 acres.
6. Current depth to first encountered groundwater is approximately 75 feet (Item 13). Except for the most recently constructed monitor well, the existing groundwater monitor wells are drilled to a depth of 70 feet (Table 5, page 8) and are dry.
7. The Authority's current irrigation monitoring and reporting requirements include documentation of rainfall measurements at the Facility. Current/local rainfall data should be documented in lieu of the Western Regional Climate Center (Item 29).
8. The Authority's monitor well network consists of both shallow (35 feet deep) and deep (70 feet deep) wells (Item 35). In October, 2022, the Authority completed a new 100-foot deep monitor well at MW-C. Groundwater has been measured at 75 feet deep. The Authority abandoned the damaged 70 foot deep well at MW-C.
9. The Tentative WDRs require the preparation and implementation of a "Salinity Evaluation and Minimization Plan" (Item 69 (5)). There are no other references to this requirement in the tentative WDRs. The Authority submitted a Salinity Evaluation and Minimization Plan in June, 2011. The reference should be to the "Salinity Action Level Report".

10. The Authority does not own or operate a sanitary sewer collection system; therefore, it is not subject to Order No. 2006-0003-DWQ (SSO General Order) (Item 74 and Item K (17)). Each contributing entity is responsible for its respective sewer collection system.
11. The Tentative WDRs establish that sludge shall not be stored more than six (6) months (Item J). This conflicts with EPA's annual (up to two (2) years) disposal requirements. EPA's authority regarding biosolids is referenced in Item 75. An increase in the sludge disposal frequency will increase the cost burden to the Authority. The revision will require the Authority to haul and dispose of stored sludge that may not be thoroughly dry. There does not appear to be a technical basis for this requirement.
12. The Monitoring and Reporting Program (MRP) related to the Tentative WDRs requires the submittal of Consumer Confidence Reports (CCRs) from the communities served by the Authority. Since the Authority is required to conduct public water supply monitoring under Location SPL-001, the CCR requirement is redundant and should be removed. Additionally, public water supply monitoring data and CCR reports are available through the State Water Resources Control Board – Division of Drinking Water data portal.
13. The MRP requires that all groundwater samples must be filtered prior to preservation and analysis. Sample bottles for metals analyses are prepared with preservative for sample collection. The filtration requirement significantly increases the level of effort when collecting groundwater samples and results in a significant cost burden as sample filtration measures will need to be completed in the field. This requirement is not consistent with historical sample collection requirements.
14. Table 1 of the MRP designates a monitoring location "Well PBs" for piezometer monitoring. This location does not currently exist within the current monitor well network. This location and associated monitoring should be removed from the MRP. The groundwater monitor well network developed under the Groundwater Installation Work Plan will be developed to provide sufficient information to establish groundwater levels under the ponds.