Rio Alto Water District

22099 River View Drive, Cottonwood, California 96022
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August 23, 2010

Bryan Smith
Senior WRC Engineer, Chief N. Regulatory Unit
California Regional Water Quality Control Board
Central Valley Region
415 Knollcrest Drive, Suite 100
Redding, CA 96002

Re: Comments of Rio Alto Water District's Lake California Wastewater Treatment Plant Renewal of Waste Discharge Requirements (NPDES Permit No. CA0077852) and the Tentative Cease and Desist Order out for public comment on July 26, 2010.

Dear Mr. Smith,

The Rio Alto Water District respectfully encloses our formal comments and concerns in response to the Draft Renewal of Wastewater Discharge Requirements (NPDES Permit No. CA007852) and the Tentative Cease and Desist Order. Dean Sherrill, our Regulatory Supervisor, has addressed his comments and concerns in the enclosed letter to you. Please review the comments, concerns and requests, and respond accordingly.

Should you need further clarification, please do not hesitate to contact our Regulatory Supervisor, Dean Sherrill.

Sincerely,

Martha Slack

Martha Slack
General Manager

Rio Alto Water District

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Submitted via Certified Mail
& Electronic Mail

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Re: Comments on Rio Alto Water District's Lake California Wastewater Treatment Plant Renewal of Waste Discharge Requirements (NPDES Permit No. CA0077852) and the Tentative Cease and Desist Order out for public comment on 26 July 2010.

Mr. Smith:

The Rio Alto Water District (District) would like to have our comments and requested revisions on record with regard to the Draft Renewal of Waste Discharge Requirements (WDR) (NPDES Permit No. CA0077852) and the Tentative Cease and Desist Order (CDO).

In order to comply with the California Toxics Rule (CTR), our District will have to consider alternatives, such as 1) installing an expensive and questionably reliable diffuser in the Sacramento River; 2) building a large effluent storage reservoir with pasture irrigation; or 3) upgrading our existing facilities and processes requiring extensive capital outlay to meet end of pipe requirements. Each of these alternatives require expensive capital improvements ranging anywhere in the neighborhood of $3 to $10 million dollars.

The District commends the State Water Resources Control Board for its efforts to keep California's waters clean and environmentally safe. The District does not want to be a contributor of any contaminants that could affect the sustainability of our rivers. Our main concern is how to financially accomplish any of these projects with limited revenue sources.

LAKE CALIFORNIA HISTORY

Lake California is a small 6000 acre community located in northern Tehama County where the median household income (MHI) of $36,731 is 60% of the State's MHI (as measured by the United States Census Bureau in 2008). The development was formed in the late 1960's with great intentions for a major community that included schools,

restaurants, shopping centers, a club house, a golf course, equestrian center, a recreational lake, and boating access to the Sacramento River. The original plans provided for both high and low density housing. Unfortunately, the development went bankrupt prior to completion and the District was formed in 1969 to provide water and sewer services to the community.

CUSTOMER BASE AND FUNDING ISSUES

The original sewerage system was designed so that some of the approved tracts would be sewered by the Wastewater Treatment Plant (WWTP) and others would have septic systems. Currently the District has 800 sewer connections and 615 standby connections. Twenty-one of the sewer connections are currently in the process of foreclosure. Proposition 218 has significantly hindered our ability to increase standby charges. Eighty four percent of the ownership of the standby parcels are non-resident, non-local owners who most likely will not vote for an increase to standby charges.

WASTEWATER TREATMENT PLANT FLOWS

The Lake California WWTP was built with a facility design flow of 0.644 million gallons per day. Currently our average dry weather flow of 0.120 mgd is discharged into the Sacramento River. The District has never been under a CDO in the past up until now with the advent of the CTR.

COMMENTS AND CONCERNS

1. Zinc

Since 2001, a total of 9 samples of our effluent were tested for zinc levels. The results of those samples indicated the zinc levels in our effluent averaged 29 ug/L with a maximum concentration 37.6 ug/L. Based on those 9 samples, we have been issued new stringent average monthly limitations on zinc. Two additional samples have since been tested for zinc and the average concentration is now 31.5 ug/L, with a maximum concentration of 43.9 ug/L. Located just north of our plant is Cottonwood Wastewater Treatment Plant. This plant discharges into Cottonwood Creek which eventually enters the Sacramento River at the boundary of Lake California. Approximately 8 miles up the Sacramento River, the City of Redding has two Wastewater Treatment Plants (Clear Creek Wastewater Treatment Plant and Stillwater Wastewater Treatment Plant) both of which discharge into the Sacramento River. The City of Red Bluff is located approximately 15 miles south of our wastewater treatment plant and also discharges into the Sacramento River. The attached Exhibit A summarizes the new proposed limitations in comparison to the aforementioned treatment plant's limits. It appears that, based on average dry weather flows, our wastewater treatment plant is a very small contributor in comparison to the other facilities and our average zinc levels are considerably lower than that of the other facilities.

2. Disinfection Byproducts

Based on one sample, our proposed Chlorodibromomethane and Dichlorobromomethane limitations are particularly stringent. Two additional samples have since been tested. The average Chlorodibromomethane level is 2.6 ug/L and the average Dichlorobromomethane level is 19.2 ug/L. Again, as Exhibit A shows, we contribute much less than our neighboring facilities, and our new proposed limits are significantly more stringent than that of the other facilities.

3. Municipal Water Supply Monitoring

Section IX B of Attachment E of the Tentative WDR requires monitoring of the municipal water supply. The District believes that this testing is redundant because the California Department of Public Health already requires periodic analysis of the constituents listed in Table E-7 at each domestic water supply well. Duplicate testing places an unnecessary financial burden on the District. The District can provide the Board with the most recent results for the constituents listed in Table E-7. The District requests that this requirement be removed.

4. Influent BOD

Attachment E, Section III, Table E-3 requires a 24-hour flow proportioned composite sample for influent BOD. All influent received by the WWTP is pumped by one major lift station and is well homogenized. The purchase and installation of a refrigerated composite sampler, again, places an unnecessary financial burden on the District. The District would prefer to take a composite influent sample during hours of discharge when a composite sample is taken of the effluent discharge.

5. Turbidity Monitoring

Table E-3 requires daily turbidity monitoring of the effluent while Tables E-5 and E-6 require monthly monitoring of the receiving water. Section V.A.17 (page13) ties effluent turbidity requirements to turbidity levels in the receiving water. The District is concerned that, should the one receiving water turbidity result be less than one NTU, effluent turbidity would have to be less than two NTU the entire month, regardless of the natural turbidity levels in the receiving water. The District requests clarification of the turbidity monitoring requirements.

6. Biosolids Testing

Attachment E, Section IX.A.1.a requires yearly testing of biosolids pursuant to 40 CFR Part 122, Appendix-D, Table III. Should the District choose to dispose of its biosolids at a landfill, the landfill requires TTLC/CAM 17 metals testing on biosolids. The TTLC/CAM 17 test includes all required metals except cyanide. The District believes that, should it choose to dispose of it's biosolids at a landfill, the proposed biosolids

monitoring would unnecessarily duplicate testing. Therefore, the District requests that the biosolids monitoring requirement be removed should it choose to dispose of biosolids at a landfill.

7. Continuous Chlorine Residual Monitoring

Part VII.D (page 27) discusses continuous chlorine residual monitoring and Table E-3 requires continuous chlorine monitoring. Note 2 of Table E-3 indicates that, "If the discharge is not continuous, then hourly sampling during discharge, rather than continuous sampling is acceptable, at the discretion of the Executive Officer." The District requests that the Executive Officer grant this exception since the District's discharge is not continuous.

8. Total Chlorine Residual Limitations

Table F-13 establishes Total Chlorine Residual limitations of 0.011 mg/L as a 4-day average and 0.019mg/L as a 1-hour average. Page F-32 indicates that chlorine residual should not exceed 0.01 mg/L as a 4-day average and 0.02mg/L as a 1-hour average. Table E-3, Note 2 indicates that the Total Chlorine Residual must be monitored with a method sensitive to and accurate at the permitted level of 0.01 mg/L. The District requests clarification of this matter.

9. pH

The proposed permit seeks to change the allowable pH range from 6-9 to 6.5-8.5. The District's effluent routinely has a pH of less than 7. Much of the time, the pH is as low as 6.7. This proposed change would put the District at risk of violating the permit requirements. The WQO on page F-22 states "The Basin Plan includes a water quality objective for surface waters that the pH shall not be depressed below 6.5 nor raised above 8.5". The District has recently monitored the pH of the Sacramento River, both upstream and downstream of the discharge point, and has found that its effluent has very little effect on the pH of the receiving water (0 to 0.10 pH unit increase). Therefore, a pH range of 6-9 should adequately meet the Basin Plan objectives. Additionally, a discharger immediately downstream of the Lake California WWTP currently has a NPDES Permit that allows for a pH range of 6.0-9.0. The District requests that the allowable pH range be changed to 6.0-9.0 as it is in our current permit.

10. Total Coliform Organisms

The proposed permit seeks to change the method by which the Total Coliform Organism requirement is calculated. Currently, the District calculates compliance based on a monthly median. The permit, as proposed, seeks a 7-day median calculation requirement. The 7-day median will cause a financial burden on the District for additional testing if the first result comes back high. If the 7-day median calculation had been in the current permit, the District would have been in violation 9 times since 2005; however, because of the current monthly median requirement, the District has never been in violation.

Additionally, a discharger immediately downstream of the Lake California WWTP currently has a permit that allows for a 23 MPN/100mL monthly median. The District requests that the limit be changed to a 23 MPN/100mL monthly median.

We respectfully ask that you review and respond to our comments. The District, having very limited sources of funding, also requests that the Board, if possible, delay compliance with the California Toxics Rule deadline until such time as the District has a larger customer base and consequently a greater source of revenue.

Sincerely,

Dean Sherrill
Regulatory Supervisor
Rio Alto Water District

EXHIBIT A
COMPARISON OF LOCAL VICINITY EFFLUENT LIMITS

Facility	Average Dry Weather Flow	Units	Zinc		Chlorodibromomethane		Dichlorobromomthane	
			Average Monthly Limit	Maximum Daily Limit	Average Monthly Limit	Maximum Daily Limit	Average Daily Limit	Maximum Daily Limit
Lake California WWTP	0.12 mgd	ug/L	9.16	18.38	0.4	0.8	0.56	1.12
City of Redding Clear Creek WWTP	7.0-8.0 mgd	ug/L	57	86	3.5	10.3	12.2	29.3
City of Redding Stillwater WWTP	4.0 mgd	ug/L	57.8	115.9	12.1	24.2	18.1	36.2
Cottonwood WWTP	0.300 mgd	ug/L	77	131.3	1.53	3.8	8.62	29.6
City of Red Bluff	2.5 mgd	ug/L	116.25	233.25	8.24	16.53	13.32	26.72