

WATER & WASTEWATER
MUNICIPAL INFRASTRUCTURE
LAND DEVELOPMENT
AGRICULTURAL SERVICES
DAIRY SERVICES
LAND SURVEYING & GIS
PLANNING & ENVIRONMENTAL
DISTRICT MANAGEMENT

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July 24, 2007

California Regional Water Quality Control Board
Central Valley Region
Fresno Branch Office
1685 E. Street
Fresno, CA 93706



Attention: Mr. Lonnie Wass

Subject: Pixley Public Utility District
Tentative Waste Discharge Requirements and
Draft Cease and Desist Order

Dear Mr. Wass:

Thank you for the opportunity to comment on the proposed Orders. On behalf of the Pixley Public Utility District, please find the following comments:

Draft Cease and Desist Order:

Page 2, Item 7: It is understood that the existing flowrate received at the wastewater treatment plant is 0.29 mgd. The Cease and Desist Order (Order No. 5-00-097) and the existing WDRs (Order No. R5-2000-096) identify the present design capacity as 0.29 mgd. The reference to 0.252 mgd should be revised to 0.29 mgd.

Page 4, Item 2a: The Task requires a detailed quality assurance/quality control plan. As discussed with Kathleen Carpenter, the quality assurance/quality control plan was intended to address the construction of the sludge drying beds. No specific permeability criteria is intended or defined for the sludge drying beds. Construction activities will be reviewed and monitored by the Public Utility District to maintain conformance with the plans and specifications prepared for the project.

Page 5, Item 2c: There is reference to a certification report for the lined sludge drying beds. However, there is no requirement defined for said lining. Please provide the requirements, and reference thereto, for specific performance requirements. It is understood that the purpose of the comment is that there might be influence of the sludge drying beds to groundwater. Groundwater monitoring results are not consistent or conclusive. It is noted that the amount of water percolated to the groundwater from

the treatment and disposal ponds is significantly greater than any contribution from the existing sludge drying beds. Previous information supplied in the ROWD identifies concerns with the theory that the sludge beds impact local groundwater. Additional information regarding estimated contribution from the existing ponds and sludge drying beds can be forwarded for review if requested.

The sludge drying beds are to be lined with soil cement, the supernatant is returned to the headworks for additional treatment and to provide a path of least resistance for the supernatant rather than to penetrate soil cement and compacted native material. The present method of dewatering relies on evaporation. This is changed with the proposed design. Note that the proposed design includes a requirement of nitrogen reduction, which should further reduce any impact that the treatment facilities may have on the groundwater.

Draft Waste Discharge Requirements

Page 3, Item 16: The proposed expansion will not include a grinder or a Parshall flume. Note that the treatment process is not extended aeration. The lift station will discharge to a forced main that will include a magnetic flowmeter. The headworks will include a self cleaning screen instead of a grinder.

Page 3, Item 17: The treatment system will not be extended aeration. The WWTF will include two aerated basins that will include nitrification and denitrification. The process will include two clarifiers and an aerated sludge digester. The process will not include three aerated settling ponds.

Page 3, Item 18: The revised water balance indicates a need for approximately 3.8 acres of surface area. The new pond will include approximately 45.1 acre-feet of storage. The revised water balance incorporates a percolation rate of 1 in/d for the new pond, which is approximately 75 times slower than the percolation test results obtained from the geotechnical report.

Page 4, Item 19: The RWD does not address ammonia. It is recommended that ammonia not be included as a performance parameter. It is also requested that, pursuant to the letter from the RWQCB dated December 29, 2004, the total nitrogen limit of 10 mg/l is the only nitrogen performance parameter.

The ROWD does not state the process will achieve effluent quality as stated in the draft requirements for BOD5 and TSS. The process will achieve present limits of 40 mg/l for BOD5 and 40 mg/l for TSS.

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Page 5, Item 25: Note the revised size of the proposed effluent storage pond. Note that effluent nitrogen limits will decrease the amount of nitrogen available to the reclamation area.

Page 6, Items 32 and 34: These two items appear to contradict each other. It is recommended that the statement of Item 32 is deleted since item 34 is more specific to the site.

Page 6, Item 35: It is noted that the monitoring well near the sludge drying beds (MW-1) is neither upgradient or downgradient. The well is directly adjacent to the treatment ponds. It does not represent groundwater upgradient or downgradient of the facilities.

Page 7, Item 36: Note that the results of groundwater monitoring do not lead to a clear conclusion. Concentration of electroconductivity in MW-1 is greater than the effluent of the existing plant. It is unclear how the potential percolation from the existing plant could cause electroconductivity of groundwater to increase to a concentration greater than the effluent. If monitoring well MW-2 is actually upgradient and MW-3 is actually downgradient (some of the time), the electroconductivity results indicate there is no impact. Concentrations increase in a certain direction for a specific constituent yet another potential indicator constituent will decrease in concentration for the same direction. Please note that Item 34 states that groundwater is found between 130 and 160 feet below ground surface. Is this considered shallow groundwater?

Page 8, Item 43: The word "then" in the last line should be changed to "than".

Page 9, Item 46: Please note that the treatment process will reduce nitrogen, not remove it entirely.

Page 16, Item F.1.a.ii: Please note that the treatment facilities are not required to disinfect the effluent. It is requested that this Item is removed.

Attachment B: Please note that there is no distribution weir (replaced with a distribution box). Grit removal is an optional item (depending on available funds). The anoxic tank has been incorporated into the aeration tanks.

Information Sheet: Please refer to previous comments regarding permeability of the proposed liner of the sludge drying beds. What is required at other existing sludge drying beds?

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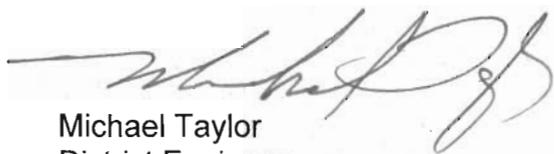
Draft Monitoring and Reporting Program

Page 5, Groundwater Monitoring: It is requested that sampling of iron and manganese be revised to annual. It is requested that coliform sampling is deleted. The treatment facilities are not required to disinfect.

Page 6, Groundwater Monitoring: It is requested that the sampling frequency of the water supply wells be as required by the Department of Public Health (three year intervals) for general minerals, iron and manganese. The source water is groundwater and not expected to vary from year to year.

Please contact me if you have any questions or if you need additional information.

Respectfully,

A handwritten signature in black ink, appearing to read 'Michael Taylor', is written over a light gray rectangular background.

Michael Taylor
District Engineer

cc: Pixley Public Utility District, Randy Masters