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ADMINISTRATION

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September 11, 2009

James D. Marshall, P.E.
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

Subject: Comments on August 13, 2009 Tentative Waste Discharge Requirements for City of Turlock Water Quality Control Facility (NPDES Permit No. CA0078948)

Dear Mr. Marshall,

The City of Turlock ("City") appreciates the opportunity to provide comment on the August 13, 2009 Tentative Waste Discharge Requirements for the City's Water Quality Control Facility (NPDES Permit No. CA0078948) ("Tentative Order"). Please find the City's detailed comments enclosed.

In accordance with prior discussions between you and City representatives, the City expects that its requested revision to the compliance schedules for final effluent limitations for electrical conductivity ("EC") will be made prior to the October 2009 Regional Water Board hearing. The City requests that the same thoughtful consideration be given to the remainder of the City's comments. Of particular importance to the City is a slight increase to the dilution factor used for the calculation of human health-based final effluent limitations (trihalomethanes), recalculation of the performance-based final effluent limitation for nitrate to reflect new data, and the removal of newly imposed final effluent limitations for silver in favor of an effluent and receiving water quality characterization study performed prior to initiation of direct discharge to the San Joaquin River so that reasonable potential can be more accurately assessed. In accordance with Section 1.2 of the SIP, the City's permit could be re-opened to include final effluent limitations for silver if reasonable potential is determined after the study is complete. Given the economic hardships being faced by agencies throughout California, including the City, reasonable regulation is especially appreciated at this time.

The City truly appreciates Regional Water Board staff efforts in drafting and negotiating the terms of the Tentative Order, and looks forward to continued cooperation amongst our agencies.

Should you have any questions regarding this letter, please feel free to contact me at (209) 668-5590.

Sincerely,

Dan Madden
Municipal Services Director

cc: Michael Cooke, City of Turlock
Nicole Granquist, Downey Brand LLP
Brian Laurenson, Larry Walker Associates