



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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April 27, 2012

Via Electronic Mail

Denise Soria
Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706
dsoria@waterboards.ca.gov

Re: Comments on the Tentative Waste Discharge Requirements for the Lamont Public Utilities District Wastewater Treatment Facility

Dear Ms. Soria:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the tentative waste discharge requirements (Tentative Order) for the Lamont Public Utilities District Wastewater Treatment Facility (Lamont WWTF). CVCWA is a non-profit organization that represents more than 50 publicly owned treatment works throughout the Central Valley Region in regulatory matters affecting surface water discharge, land application, and water reuse. We approach these matters with a perspective to balance environmental and economic interests consistent with state and federal law.

We agree with the Tentative Order that all public agencies that own or operate sanitary sewer systems greater than one mile in length must comply with the State Water Resources Control Board's Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (Order 2006-0003 or "General WDRs"). (Tentative Order at pp. 5-6.) Therefore, we believe that Provision 18 of the Tentative Order requiring the Lamont WWTF to continue to maintain coverage under and comply with the General WDRs is appropriate. (See *id.* at p. 27.) However, we are concerned that Provision 12 of the Tentative Order may frustrate regulatory compliance

with the General WDRs and/or Tentative Order if adopted. (See *id.* at p. 26.) In particular, the requirements of Provision 12 related to remedial action are redundant or in addition to requirements in the General WDRs and thus unnecessary and potentially confusing.

Accordingly, we request that you delete Provision 12 of the Tentative Order and modify Provision 18 of the Tentative Order as follows:

The Discharger shall continue to maintain coverage under, and comply with Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2006-0003-DWQ, the Revised General WDRs Monitoring and Reporting Program (Water Quality Order 2008-0002-EXEC), and any revisions thereto ~~as adopted by the State Water Board~~. Water Quality Order 2006-0003 and Order 2008-0002-EXEC require the Discharger to notify the Central Valley Water Board and take remedial action upon the reduction, loss, or failure of the sanitary sewer system resulting in a sanitary sewer overflow. (See Tentative Order at p. 27.)

CVCWA requested a similar change to the recently proposed waste discharge requirements for the City of Hughson Wastewater Treatment Facility (Hughson WDRs). As a result, Central Valley Water Board staff recommended, and the board adopted, a provision striking the redundant or additional language in that tentative permit and adopting a provision similar to that proposed above. (See R5-2012-0003 at p. 20.) Therefore, the change we propose is consistent with the recently adopted Hughson WDRs.

We appreciate your consideration of these comments and our requested revision. Please contact me at (530) 268-1338 or eofficer@cvcwa.org if I can be of further assistance.

Sincerely,



Debbie Webster,
Executive Officer

cc: (via email only)
Pamela Creedon – Central Valley RWQCB
Dale Harvey – Central Valley RWQCB