



# CVCWA

## Central Valley Clean Water Association

*Representing Over Fifty Wastewater Agencies*

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April 27, 2012

***Via Electronic Mail Only***

Ms. Lixin Fu  
Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670  
[LFu@waterboards.ca.gov](mailto:LFu@waterboards.ca.gov)

**Re: Comments on the Tentative Waste Discharge Requirements for El Dorado Irrigation District, Camino Heights Wastewater Treatment Facility**

Dear Ms. Fu:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the tentative waste discharge requirements (Tentative Order) for El Dorado Irrigation District's Camino Heights Wastewater Treatment Facility (WWTF). CVCWA is a non-profit organization representing 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. For the following reasons, CVCWA respectfully requests that you revise the Tentative Order to reflect that the applicable water quality objective for electrical conductivity (EC) is a range, rather than 900 micromhos per centimeter ( $\mu\text{mhos/cm}$ ).

The Tentative Order identifies the applicable water quality objectives, including the narrative water quality objective for chemical constituents in groundwater. As the Tentative Order explains, the narrative objective requires that waters designated as domestic or municipal supply meet the maximum contaminant levels (MCLs) specified in Title 22 of the California Code

of Regulations (Title 22). (*Id.* at p. 9; Basin Plan<sup>1</sup> at p. III-10.00.) The Tentative Order finds that the beneficial uses of the groundwater underlying the WWTF include municipal and domestic supply. (Tentative Order at p. 9.) The Tentative Order also finds that the water quality objective for EC in the groundwater is the 900  $\mu\text{mhos/cm}$  based on the secondary MCL in Title 22. (*Id.* at p. 7.) CVCWA submits that the actual groundwater objective is a range of EC values, rather than 900  $\mu\text{mhos/cm}$ .

The Basin Plan incorporates by reference Table 64449-B from Title 22 as numeric water quality objectives for groundwater designated for municipal use. (Basin Plan at p. III-10.00.) Table 64449-B contains secondary MCLs for EC. (Title 22, § 64449.) As the State Water Resources Control Board (State Water Board) recognized in Order WQ 2009-0005,<sup>2</sup> the secondary MCLs for EC “consist of a *range* of values—recommended, upper, and short-term values.” (Order WQ 2009-0005 at p. 15, emphasis added.) For EC, these values are 900  $\mu\text{mhos/cm}$ , 1,600  $\mu\text{mhos/cm}$ , and 2,200  $\mu\text{mhos/cm}$ , respectively. (*Ibid.*; Title 22, § 64449.) In Order WQ 2009-0005, the State Water Board compared the permittee’s monitoring data for EC to the *upper* MCL. (Order WQ 2009-0005 at pp. 14-15.) Therefore, the water quality objective for EC is not 900  $\mu\text{mhos/cm}$  as indicated in the Tentative Order, but rather a range, and the Tentative Order should be revised accordingly. Further, the Tentative Order should also be revised to clearly explain why the Central Valley Water Board has determined that it is appropriate to apply the lowest end of the range in this case versus some other appropriate value within the range.

However, the Tentative Order includes an average monthly effluent limitation of 600  $\mu\text{mhos/cm}$ . (Tentative Order at pp. 9, 19.) CVCWA is very concerned with the Central Valley Water Board’s use of the Tulare Lake Basin Plan’s effluent limitation of 500  $\mu\text{mhos/cm}$  over source water as the basis for an effluent limitation here. The Tentative Order contains no supporting findings that identify evidence as to why this is an appropriate effluent limitation. Further, and as CVCWA has commented in the past, the 500  $\mu\text{mhos/cm}$  over source water as being the “typical” domestic increase is not supported or studied. It is our understanding that this principle may have come from literature that was available in the early 1970’s, however, documentation of it is uncertain. Additionally, that further review or study of this issue has not occurred since then and it does not take into account current water conservation practices and required water conservation mandates for 2020. Thus, there are no current day studies that provide evidence to suggest that this is true and applicable to today’s communities. Accordingly, CVCWA recommends that the Central Valley Water Board re-evaluate the proposed effluent limitation, and specifically evaluate the WWTF’s operations to determine what may be an appropriate limit.

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<sup>1</sup> *Water Quality Control Plan for the Central Valley Region* (4th ed., rev. Oct. 2011) or “Basin Plan.”

<sup>2</sup> State Water Board Order WQ 2009-0005, as amended by Order WQ 2012-0001, *In the Matter of Own Motion Review of City of Lodi Waste Discharge Requirements and Master Reclamation Permit* (Order No. R5-2007-0113 [NPDES No. CA0079243]) (Feb. 7, 2012) or “Order WQ 2009-0005.”

We appreciate your consideration of these comments. Please contact me at (530) 268-1338 or [ecofficer@cvcwa.org](mailto:ecofficer@cvcwa.org) if I can be of further assistance.

Sincerely,



Debbie Webster  
Executive Officer

cc (*Via Email Only*):

Pamela Creedon, Central Valley Regional Water Board ([pcreedon@waterboards.ca.gov](mailto:pcreedon@waterboards.ca.gov))  
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