



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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June 20, 2012

VIA ELECTRONIC MAIL ONLY

Jim Marshall
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
jdmarsshall@waterboards.ca.gov

Re: Comments on the Tentative Order Amending Waste Discharge Requirements Order R5-2010-0002 for the City of Turlock Water Quality Control Facility

Dear Mr. Marshall:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the tentative order amending waste discharge requirements Order R5-2010-0002¹ (Tentative Order) for the City of Turlock Water Quality Control Facility (WQCF). 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.

CVCWA supports the Central Valley Regional Water Quality Control Board's (Central Valley Water Board) adoption of the Tentative Order. If adopted, the Tentative Order would reduce the effluent and receiving water monitoring frequency for certain priority pollutants if they are non-detect in the first three monthly samples. (Tentative Order at p. 3.) These priority pollutants include total cyanide, asbestos, dioxin, polychlorinated biphenyls, and chlorinated pesticides. (*Ibid.*)

We believe that the conditional reduction in monitoring is appropriate, as these constituents have not been detected in the WQCF's effluent or the receiving water. (Tentative

¹ NPDES Permit No. CA0078948.

Order at pp. 2, 4.) Further, the reduced monitoring will provide information sufficient to characterize the effluent and receiving water and conduct a reasonable potential analysis when the WQCF's permit is renewed, while significantly reducing Turlock's monitoring costs. (*Ibid.*) As the Tentative Order finds, these changes are consistent with Water Code section 13267(b)(1), which states: "The burden, including costs, of [monitoring] reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports." (*Ibid.*)

CVCWA appreciates your consideration of our comments and request that the Central Valley Water Board adopt the Tentative Order. Please do not hesitate to contact me at (530) 268-1338 or officer@cvcwa.org if I can be of further assistance.

Sincerely,



Debbie Webster,
Executive Officer

cc (via electronic mail): Pamela Creedon, Central Valley Regional Water Quality Control Board
pcreedon@waterboards.ca.gov