



June 12, 2013

Mr. James Marshall
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Subject: Tentative Waste Discharge Requirements for City of Brentwood Wastewater Treatment Plant

Dear Mr. Marshall:

California Urban Water Agencies (CUWA) has reviewed the Tentative Order for the City of Brentwood Wastewater Treatment Plant and would like to commend Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff on their commitment to protecting the drinking water beneficial use in the Delta. Many of CUWA's members rely on the Delta as a source of drinking water. We offer the following comments for your consideration.

Monitoring Requirements

While conducting the technical studies for the Drinking Water Policy, the stakeholder work group found that there are limited data on several key drinking water constituents in wastewater effluent. As a result, a number of assumptions were made and literature values were used to estimate wastewater quality. The assumptions are documented in a report prepared by West Yost (Wastewater Control Measures Study), which is posted on the Central Valley Water Board's website. CUWA appreciates the monitoring that is required in the Brentwood tentative permit for drinking water constituents; however, the list of constituents does not include several key drinking water constituents. CUWA requests that total Kjeldahl nitrogen (TKN), total organic carbon (TOC), and dissolved organic carbon (DOC) be included in the effluent and receiving water characterization study and that the monitoring frequency be changed from quarterly to monthly for the full suite of drinking water constituents (TKN, ammonia, nitrate, nitrite, total phosphorus, TOC, DOC, total dissolved solids, and chloride). The Monitoring and Reporting Program proposes to decrease the frequency of routine effluent monitoring for nitrate and nitrite from monthly to quarterly because MUN is not a beneficial use of Marsh Creek. However, nitrate and nitrite are nutrients that stimulate algal growth so the concentrations in the wastewater effluent are important to understanding nutrient dynamics in the Delta.

Notification of Drinking Water Agencies

CUWA requests that the Central Valley Water Board include a requirement in the Order to immediately notify downstream drinking water agencies if there are spills of untreated or partially treated wastewater from the Brentwood Wastewater Treatment Plant or collection system that reach Delta waters. We have previously discussed this with Central Valley Water Board staff and understood that it would be consistently added to all permits. We recommend that Standard Provision f be modified as follows:

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“f. The Discharger shall take all reasonable steps to minimize any adverse effects to waters of the State or users of those waters resulting from any discharge or sludge use or disposal in violation of this Order. Reasonable steps shall include such accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge or sludge use or disposal, and adequate public notification to downstream water agencies or others whose contact with the non-complying discharge is reasonably foreseeable within the minimum travel time to the nearest drinking water intake or 24 hours, whichever is less.”

CUWA has already contacted the City of Brentwood and requested notification in the event of a spill.

CUWA appreciates the efforts of Central Valley Water Board staff to protect drinking water quality. If you have any questions on our comments, please contact me at 925-210-2477.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cindy Paulson", followed by a long horizontal flourish.

Cindy Paulson, Ph. D.
Executive Director