



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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April 17, 2014

Via Electronically Only

Mr. Brian Taylor
Water Resource Control Engineer
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Dr., Suite #200
Rancho Cordova, CA 95670
Brian.Taylor@waterboards.ca.gov

RE: Comments on the Tentative Waste Discharge Requirements Order R5-2014-XXXX,
El Dorado Irrigation District Deer Creek Wastewater Treatment Plant, El Dorado County

Dear Mr. Taylor:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit comments on the tentative Waste Discharge Requirements for the Deer Creek Wastewater Treatment Plant (Tentative Order). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this spirit, we provide the following comments regarding the inclusion of annual pretreatment reporting requirements within the Permit, and the requirement for a new Salinity Evaluation and Minimization Plan.

I. Annual Pretreatment Reporting Requirements

The Tentative Order includes significant annual pretreatment reporting requirements in the body of the permit itself.¹ Similar reporting requirements are repeated again in the Monitoring and Reporting Program.² Inclusion of repetitive requirements in both the Permit and in the Monitoring and Reporting Program creates confusion, potential conflicts and may subject the El Dorado Irrigation District (District) to additional liability in the case of non-compliance with the reporting requirements. Further, such annual reporting requirements are appropriately included within the Monitoring and Reporting Program and should not be included within the body of the permit. Accordingly, CVCWA recommends that the annual reporting requirements contained directly in the Tentative Order be removed.

II. Salinity Evaluation and Minimization Plan

The District is being required to prepare a new Salinity Evaluation and Minimization Plan for the Deer Creek Wastewater Treatment Plant under the terms of the Tentative Order.³ The District's existing permit (Order No. R5-2008-0173-01) contains the same requirement.⁴ While CVCWA understands and appreciates the Central Valley Regional Water Quality Control Board's concerns with respect to salinity, CVCWA finds that requiring a "new" Salinity Evaluation and Minimization Plan is unnecessary. Rather than requiring development of a new plan, CVCWA recommends that the requirement be changed to update the existing plan should the District determine that additional efforts are reasonably feasible.

We appreciate your consideration of these comments. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or eofficer@cvcwa.org.

Sincerely,



Debbie Webster
Executive Officer

cc (*via email*): Pamela Creedon, Central Valley Regional Water Quality Control Board
Vickie Caulfield, El Dorado Irrigation District

¹ Tentative Order, pp. 16-17.

² Tentative Order, Monitoring and Reporting Program, pp. E-20 - E-23.

³ Tentative Order, p. 14.

⁴ Order No. R5-2008-0173-01, p. 22