MAW

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Margaret Wong
Central Valley Regional Water Quality Control Board
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Rancho Cordova, CA 95670-6114
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Subject: **Draft Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program (MRP) for the Grassland Bypass Project**

Dear Ms. Wong:

Contra Costa Water District (CCWD) appreciates the opportunity to comment on the May 2014 Draft Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program (MRP) for the Grassland Bypass Project. CCWD supports the time schedule proposed by the San Luis & Delta-Mendota Water Authority (Authority) and United States Department of the Interior, Bureau of Reclamation (Reclamation) to gradually reduce the waste discharge, including the discharge of selenium, boron, and molybdenum.

However, the proposed monthly selenium effluent limits (Drain Terminus) on the discharge of selenium from the San Luis Drain contain limits that are higher (more relaxed) than the monthly selenium load limit in the 2010 Use Agreement (*Agreement for Continued Use of the San Luis Drain for the Period January 1, 2010 through December 31, 2019.* Agreement No. 10-WC-20-3975). Details of the discrepancies between the 2010 Use Agreement and Draft WDRs are shown in Attachment 1. These discrepancies should at minimum be explained. CCWD requests that the WDRs be modified to reflect the selenium load limits specified in the 2010 Use Agreement.

In addition, the draft WDR does not have the requirements for salt load values which were specified in Appendix E of the 2010 Use Agreement. The salt load limits specified in the 2010 Use Agreement are shown in Attachment 2. Although it was previously hoped that the reduction of selenium would also reduce the salt load from the Grassland Bypass Project, the selenium load limit itself is not sufficient to achieve the goal of salinity control. The relationship between selenium and salt concentrations has changed since the development of Grassland Bypass Project (please refer to Attachment 3 for details). CCWD requests that independent regulation of salt be included in the WDRs.

If you have any questions, please do not hesitate to call Lucinda Shih at (925) 688-8168 or email her at lshih@ccwater.com. CCWD would be happy to meet with you to discuss our comments further.

Sincerely,

Leah Orloff
Water Resources Manager

LHS/YL:wec

Attachments

Attachment 1

Discrepancies between the 2010 Use Agreement and Draft WDRs

Table 1. Use Agreement Selenium Load Limits for 2019 (summarized from 2010 Use Agreement, Appendix C; discrepant numbers in **bold**)

Month	Effluent limits (pounds of selenium)			
	Critical	Dry/Below Normal	Above Normal	Wet
January	**150**	**300**	398	211
February	93	185	**450**	488
March	92	184	**450**	488
April	101	193	**450**	506
May	105	197	**450**	512
June	69	130	212	354
July	70	131	214	356
August	75	137	225	366
September	57	235	264	332
October	55	233	260	328
November	55	233	260	328
December	**150**	**300**	398	211

Table 2. Draft WDRs Selenium Load Limits for 2019 (summarized from draft WDRs, Page 13; discrepant numbers in **bold**)

Month	Effluent limits (pounds of selenium)			
	Critical	Dry/Below Normal	Above Normal	Wet
January	**151**	**319**	398	211
February	93	185	**472**	488
March	92	184	**472**	488
April	101	193	**490**	506
May	105	197	**497**	512
June	69	130	212	354
July	70	131	214	356
August	75	137	225	366
September	57	235	264	332
October	55	233	260	328
November	55	233	260	328
December	**151**	**319**	398	211

Attachment 2

Salt Load Limits in 2010 Use Agreement

Table 3. Use Agreement Salt Load Limits for 2019 (summarized from 2010 Use Agreement, Appendix E)

Month	Effluent limits (tons of salt)			
	Critical	Dry/Below Normal	Above Normal	Wet
January	4283	7282	12141	12396
February	6779	11524	19215	19618
March	8031	13653	22764	23241
April	5910	10047	16753	17104
May	5792	9847	16418	16762
June	5991	10185	16983	17339
July	6055	10293	17162	17521
August	5373	9134	15230	15549
September	2838	4825	8045	8214
October	2180	3706	6178	6308
November	2265	3851	6421	6555
December	2502	4253	7092	7240
Annual	13,000	23,700	35,600	47,400

The salt load limits are not included in the draft WDRs.

Attachment 3

Relationship between selenium and salt concentrations

The monitoring data used for Figure 1 are from the portion of the San Luis Drain used by the Dischargers (Stations A and B) and in Mud Slough downstream of the Grassland Bypass Project (GBP) discharge (Station D). Figure 1 indicates that the relationship between selenium and specific electrical conductance (EC) has significantly changed since the start of GBP operations in 1996. Selenium concentrations have decreased much faster than EC (shown in Figure 2). This suggests that the significant reduction in selenium has not resulted in a corresponding reduction in salt and that independent regulation of salt is needed.

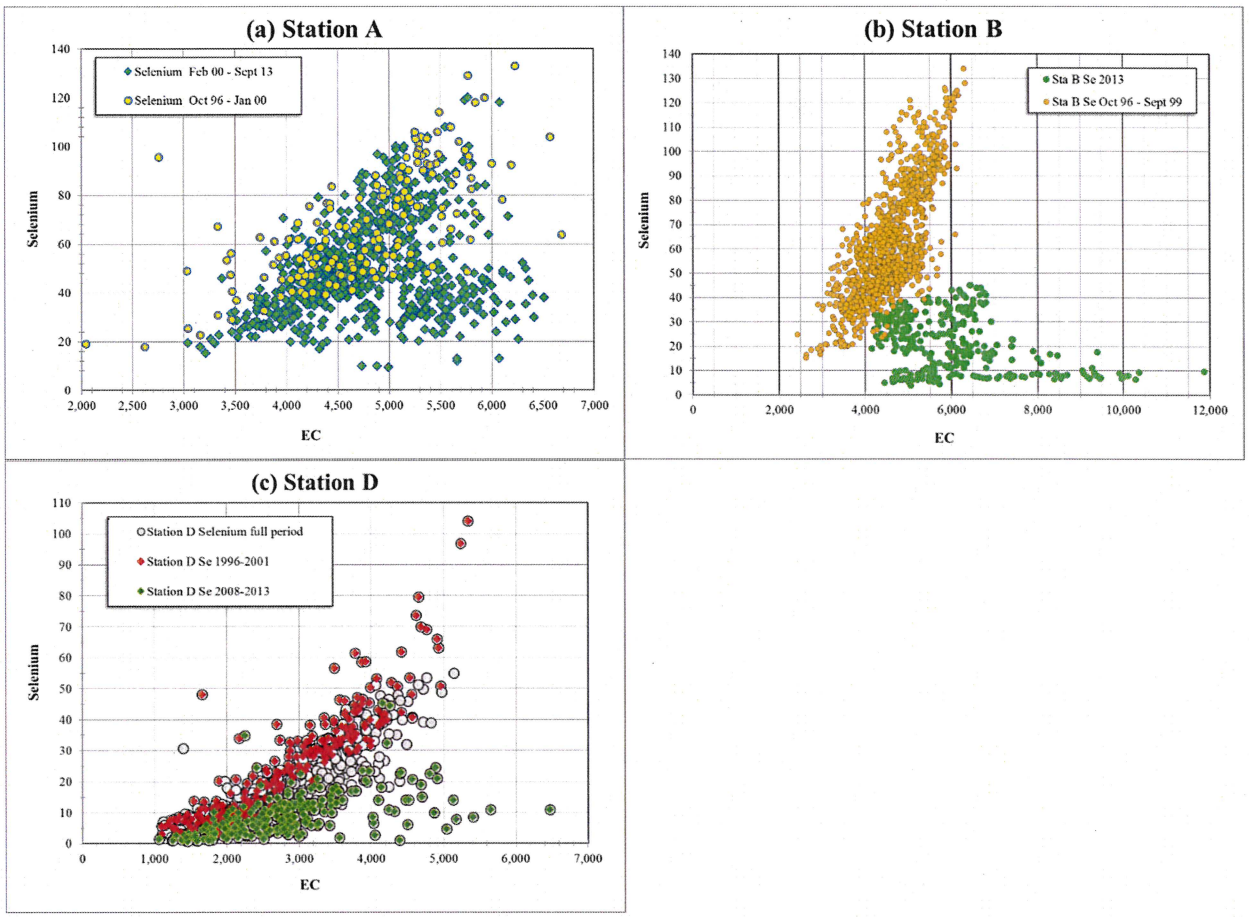

Figure 1. Relationship between selenium concentration and specific electrical conductance (EC). Data from the SFEI website: http://www.sfei.org/gbp/data_files. Station A and B: San Luis Drain used by the Dischargers; Station D: Mud Slough downstream of the Bypass discharge

Attachment 3

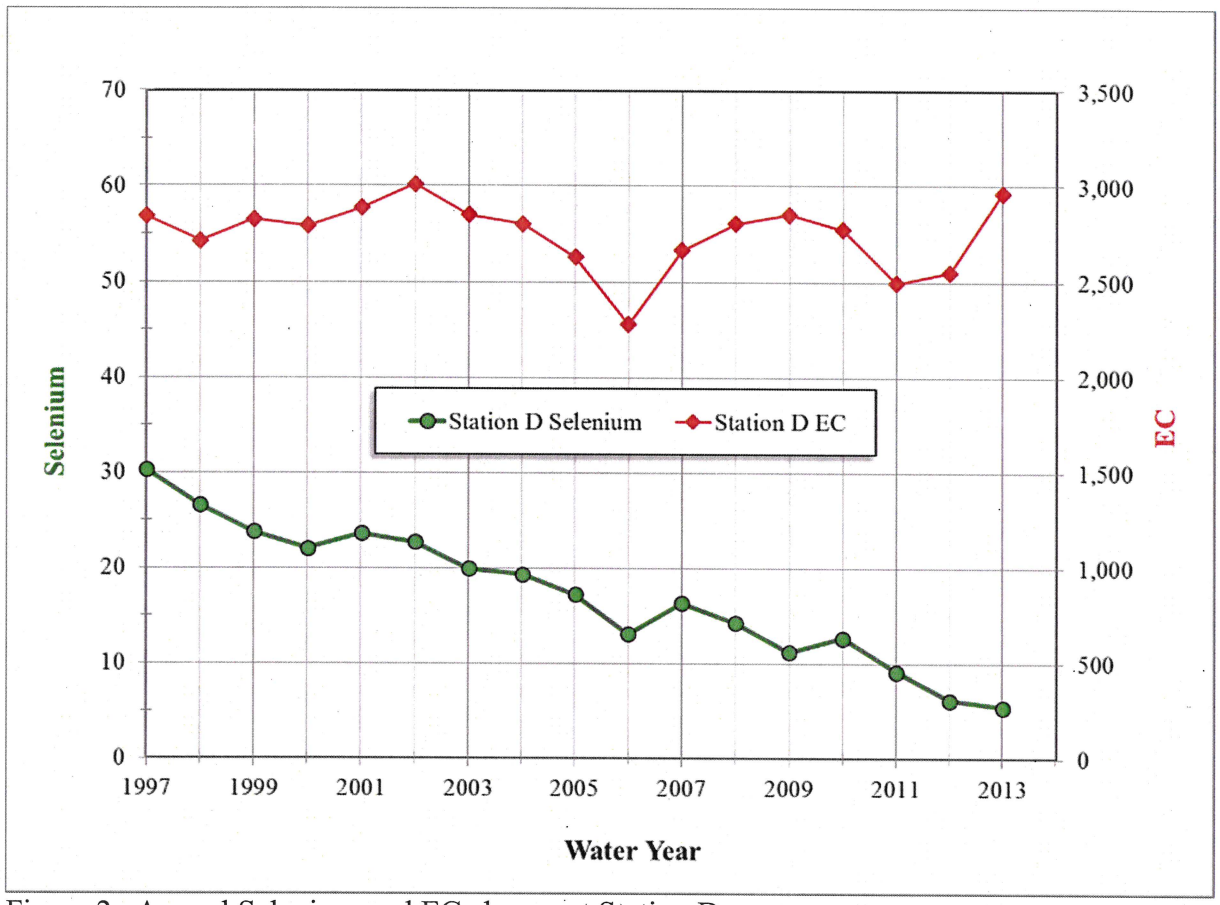

Figure 2. Annual Selenium and EC change at Station D