



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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June 9, 2014

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RE: Comments on the Tentative Waste Discharge Requirements for City of Dixon Wastewater Treatment Facility, Solano County

Dear Ms. Olson:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative Waste Discharge Requirements for the City of Dixon (City) Wastewater Treatment Facility (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 letter, we provide the following comments regarding several of the Central Valley Regional Water Quality Control Board's proposed provisions, and request revisions as indicated here.

I. Discharge Prohibition A.5

Discharge prohibition A.5 states that the “[d]ischarge of toxic substances into the wastewater treatment system such that biological treatment mechanisms are disrupted is prohibited.”¹ CVCWA does not believe it appropriate to express this requirement as a discharge prohibition that applies directly to the City’s actions, but rather the City should be required to prohibit such discharges into the wastewater treatment system. For example, Provision G.15 provides that the “Discharger shall not allow pollutant-free wastewater to be discharged into the wastewater collection, treatment, and disposal systems”² Discharge prohibition A.5 should re-written as a provision in section G, and state that the “Discharger shall not allow toxic substances to be discharged into the wastewater treatment system such that biological treatment mechanisms are disrupted.” Expressed in this manner would be more accurate, and provides the City with a way to comply by adopting ordinances that prohibit such discharges.

II. Discharge Specification D.1

The inclusion of discharge specification D.1 is duplicative and unnecessary. This specification establishes a requirement to comply with the groundwater limitations contained in the Tentative Order at E.1. However, the groundwater limitations are an independent requirement thus it is unnecessary to include a separate discharger specification requiring compliance therewith.

Further, CVCWA is concerned with the inclusion of reference to “mass” as part of the discharge specifications for complying with groundwater limitations. The groundwater limitations are concentration-based requirements that are consistent with adopted water quality objectives. Such objectives, or criteria interpreting narrative objectives, are concentration-based objectives and therefore it is inappropriate to include reference to “mass” with respect to compliance with groundwater limitations.

III. Discharge Specification D.2

The Tentative Order includes a discharge specification that states “[t]he discharge shall not cause degradation of any water supply.”³ But the Tentative Order contains no findings or information to explain the intent and purpose of this requirement, or how compliance with such a requirement will be measured. Considering the lack of information as well as the lack of definition for the term “water supply,” CVCWA must express concerns with the provision as proposed. It is an overly broad statement that can be interpreted in many ways. Further, on its face, the specification appears to be duplicative in light of discharge specification D.3, and the groundwater limitations expressed in section E. Accordingly, CVCWA recommends that

¹ Tentative Order, p. 26.

² Tentative Order, p. 34.

³ Tentative Order, p. 27.

discharge specification D.2 be removed, or at the very least, the Tentative Order needs to be revised to provide for a specific explanation as to the intent of this provision and how compliance is determined.

IV. Groundwater Limitations E.1

The Tentative Order includes groundwater limitations for TDS, chloride, and sodium. All three are salt constituents and it is unnecessary to include groundwater limitations for all three. Further, the Tentative Order includes effluent limits for chloride - not TDS and sodium. Accordingly, CVCWA recommends that the groundwater limitations for TDS and sodium be removed.

Groundwater Limitations E.1 also includes a footnote to the table that defines the term temporal increase.⁴ CVCWA does not dispute the definition of temporal increase but is concerned that compliance with groundwater limits would be determined on a well-by-well basis. In other words, based on the language of the footnote, if the City showed a temporal increase in three of its groundwater monitoring wells, this would be considered to be three separate violations of the groundwater limitations, rather than just one. This is not appropriate as the monitoring well network is designed to collectively determine compliance with groundwater limitations. To address this issue, CVCWA recommends that the footnote be revised as follows: "Temporal increase is defined as an increase relative to the 2013 annual average concentration for any individual compliance well, but a temporal increase for the same constituent in more than one compliance well shall be considered as non-compliance with a single groundwater limit for all wells combined."

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: Joe DiGeorgio, Stantec

⁴ Tentative Order, p. 29.