



CVCWA Central Valley Clean Water Association

Representing Over Sixty Wastewater Agencies

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September 29, 2008

Mr. Ken Landau
Central Valley RWQCB
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114

RE: ADOPTION OF WASTE DISCHARGE REQUIREMENTS (RENEWAL OF NPDES NO. CA0084476) FOR CITY OF LINCOLN WASTEWATER TREATMENT AND RECLAMATION FACILITY, PLACER COUNTY

Dear Mr. Landau,

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the Tentative Waste Discharge Requirements for the City of Lincoln Wastewater Treatment Plant (WWTP) (Tentative Order). CVCWA represents the interests of more than 60 wastewater agencies in the Central Valley in regulatory matters related to water quality and the environment.

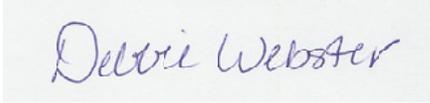
We are writing to express concern over the multiple proposed permit limitations for Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS) and Settable Solids (SS) in the City of Lincoln's tentative order, which would apply at two different locations. First, CVCWA recognizes that these requirements may be site specific for the City of Lincoln and that the City may not be contesting the inclusion of these limits in their permit. Therefore, CVCWA's comments here are not intended to contest the Tentative Order, but our intended to express CVCWA's concern should the Regional Water Board decide to make this a standard approach for permitting in the Central Valley.

The Fact Sheet (p. F-3 and pp. F-11 through F-13) states that the effluent limitations applicable at the clearwell are intended to satisfy the Department of Public Health's (DPH) requirements for tertiary standards. The second, duplicative (albeit less stringent) set of limitations for BOD, TSS and SS are apparently being imposed to satisfy Clean Water Act (CWA) requirements for secondary treatment for the discharged effluent which may consists of either stored tertiary-treated water or tertiary-treated water directly from the clearwell. Accordingly, the Fact Sheet implies that since the treated wastewater has been stored, it may no longer meet CWA

standards. CVCWA does not support the imposition of the second set of effluent limits for BOD, TSS and SS because they are not necessary for the City to meet the technology treatment limitations of the CWA. These technology requirements have been met at the end of the clearwell and are more stringent than required by the CWA.

Please feel free to contact me to discuss our comments.

Sincerely,

A handwritten signature in blue ink that reads "Debbie Webster". The signature is written in a cursive style and is centered within a light gray rectangular box.

Debbie Webster
Central Valley Clean Water Association

c: Ms. Elizabeth Thayer – CVRWQCB (via email)
John Pedri – City of Lincoln
Bob Emerick – ECO:Logic Engineering (via email)