



CVCWA Central Valley Clean Water Association

Representing Over Sixty Wastewater Agencies

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August 27, 2010

Submitted Via U.S. Mail and Electronic Mail

Bryan Smith
Regional Water Quality Control Board,
Central Valley Region
415 Knollcrest Drive, Suite 100
Redding, CA 96002
bsmith@waterboards.ca.gov

**Re: Comments on the Tentative Order for the City of Redding Clear Creek
Wastewater Treatment Plant**

Dear Mr. Smith:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the tentative waste discharge requirements for the City of Redding (City) Clear Creek Wastewater Treatment Plant (Tentative Order). CVCWA is a non-profit organization that represents its members in regulatory matters that affect surface water discharge and land application with a perspective to balance environmental and economic interests in accordance with applicable law. Consistent with our comments at the May 27, 2010 Regional Water Quality Control Board (Regional Water Board) hearing, we request that the City's chronic whole effluent toxicity accelerated monitoring trigger be revised based on the dilution credit being granted.

The Tentative Order establishes an accelerated monitoring trigger of "> 1 TUc (where TUc = 100/NOEC)" for chronic whole effluent toxicity. (Tentative Order at p. 22.) The Tentative Order claims that there is insufficient information to justify a specific dilution credit for chronic toxicity, yet finds that a dilution credit of 2:1 for chronic aquatic life criteria is available for copper and zinc. (*Id.* at pp. F-24 to F-25, F-34, F-42, F-62.)

The monitoring trigger represents the toxicity threshold at which the treatment plant must begin accelerated monitoring for chronic toxicity and initiate a Toxicity Reduction Evaluation. (*Id.* at p. F-22.) Therefore, it is important that the monitoring trigger be consistent with any dilution credit determined available. Accordingly, we ask that the Regional Water Board adopt the Tentative Order with a monitoring trigger based on the available dilution.

Thank you for considering our comments and request for a revised accelerated monitoring trigger. If you have any questions or we can be of further assistance, please contact me at (530) 268-1338.

Sincerely,


Debbie Webster
Executive Officer

cc: Dennis McBride and Josh Keener, City of Redding
Pamela Creedon, Central Valley Regional Water Quality Control Board