



CVCWA Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

MICHAEL RIDDELL – CHAIR, CITY OF CERES
JEFF WILLETT – SECRETARY, CITY OF STOCKTON

STEVE HOGG – VICE CHAIR, CITY OF FRESNO
ED CROUSE – TREASURER, RANCHO MURIETA CSD

September 2, 2011

Submitted Via Electronic Mail

Mr. Greg Cash
California Regional Water Quality Control Board,
Central Valley Region
415 Knollcrest Drive, Suite 100
Redding, CA 96002
gcash@waterboards.ca.gov

SUBJECT: Comments on Late and Late-Late Revisions on Tentative Waste Discharge Requirements (NPDES No. CA0078034) and Time Schedule Order for City of Willows, Willows Wastewater Treatment Plant, Glenn County

Dear Mr. Cash:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the Late and Late-Late Revisions on the Waste Discharge Requirements (Tentative Permit) and the Revised Time Schedule Order (TSO) for the City of Willows' Wastewater Treatment Plant.

In general, CVCWA appreciates and supports the proposed revisions to the TSO. At the June 10, 2011 hearing of the Central Valley Regional Water Quality Control Board (Central Valley Water Board), CVCWA expressed concern with the specific tasks identified in the Compliance Schedule Table of the TSO. As originally proposed, the City of Willows would have had no option but to pursue and build new treatment to meet effluent limitations based on the municipal (MUN) beneficial use designation notwithstanding the fact that MUN is not a proper beneficial use for the receiving waters in question. The proposed revisions to the TSO appear to

provide the City of Willows sufficient flexibility to seek a Basin Plan Amendment to remove the MUN beneficial use. To that end, we support the proposed revisions.

However, CVCWA must express its concerns with the Central Valley Water Board staff's position that pursuit of a Basin Plan Amendment under these circumstances must be funded wholly, or at least largely in part, by the City of Willows. As chairperson Hart clearly stated at the June 10, 2011 Central Valley Water Board meeting, the Central Valley Water Board should accept responsibility for not excepting out agricultural drains when it adopted Resolution 88-63 into the Basin Plan. ("[]in adopting Resolution 88-63 without excepting out these ag drains, we should accept responsibility for that.") Accepting responsibility includes funding the studies and staff time necessary to pursue a Basin Plan Amendment for Central Valley Water Board consideration.

Accordingly, CVCWA recommends that the Central Valley Water Board direct staff to expeditiously pursue a Basin Plan Amendment if the Tentative Permit and TSO are adopted. Please contact me at (530) 268-1338 or eofficer@cvcwa.org if you have questions with respect to these comments.

Sincerely,

Original Signed by Debbie Webster

Debbie Webster
Executive Officer