



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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October 25, 2011

Submitted Via Electronic Mail Only

Ms. Katie Bowman
California Regional Water Quality Control Board,
Central Valley Region
415 Knollcrest Drive, Suite 100
Redding, CA 96002
kbowman@waterboards.ca.gov

**SUBJECT: Comments on Waste Discharge Requirements and Water Recycling
Requirements for Grizzly Ranch Community Services District, Wastewater
Reclamation Facility, Plumas County**

Dear Ms. Bowman:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the Waste Discharge Requirements and Water Recycling Requirements for the Grizzly Ranch Community Services District, Wastewater Reclamation Facility (Tentative Permit). CVCWA is a non-profit organization of over 50 publically owned treatment works (POTWs) in the Central Valley Region that represents its members in regulatory matters affecting surface water discharge and land application with a perspective to balance environmental and economic interests consistent with applicable law.

CVCWA must express its concerns with two parts of the Tentative Permit. First, as CVCWA understands the Tentative Permit, it includes requirements for the District's application of reclaimed water to the Grizzly Creek Golf Course. However, the Tentative Permit also acknowledges that reclaimed water applied to the Grizzly Creek Golf Course is subject to requirements under separate waste discharge requirements contained in Order No. R5-2007-0001. The inclusion of reclamation requirements here for the application of

reclaimed water to Grizzly Creek Golf Course is duplicative and may subject the discharger to multiple permit violations for one potential infraction. Where there are adopted waste discharge requirements for reclaimed water use in a separate order, the same requirements should not be repeated in a separate NPDES permit. Further, removal of these requirements is not subject to the federal anti-backsliding requirements because they are included in the Tentative Permit pursuant only to state law. (See Tentative Permit, p. 9.) Thus, federal anti-backsliding provisions are not applicable. CVCWA requests that the duplicative requirements as applied to the Grizzly Creek Golf Course be removed.

Second, CVCWA comments that the receiving water limitation for salinity must be revised to be consistent with the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan). The Basin Plan states that the water quality objective for the Middle Fork of the Feather River is 150 micromhos/cm ($\mu\text{mhos/cm}$) (90th percentile) in well-mixed waters of the Feather River. (Basin Plan, p. III-7.00.) In comparison, the Tentative Permit includes a receiving water limit for salinity of 150 $\mu\text{mhos/cm}$ without including the 90th percentile. In other words, the Tentative Permit expresses the receiving water limitation as an instantaneous limit instead of one that applies to the 90th percentile. Thus, the Tentative Permit needs to be revised to include the 90th percentile, consistent with the Basin Plan.

CVCWA appreciates this opportunity to comment. Please contact me at (530) 268-1338 or ecofficer@cvcwa.org if you have questions with respect to these comments.

Sincerely,



Debbie Webster,
Executive Officer

c: Pamela Creedon - CVRWQCB (via email)
Greg Cash – CVRWQCB (via mail)
Bob Perreault – Grizzly Ranch CSD