

Alameda County Water District  
Alameda County Flood Control and Water Conservation District, Zone 7  
Contra Costa Water District  
Kern County Water Agency  
Metropolitan Water District of Southern California  
State Water Contractors  
San Luis & Delta-Mendota Water Authority  
Santa Clara Valley Water District  
Westlands Water District

August 14, 2013

**VIA ELECTRONIC MAIL ONLY**

Pamela C. Creedon  
Executive Officer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670  
[kharder@waterboards.ca.gov](mailto:kharder@waterboards.ca.gov)

Re: Proposed Order Amending Waste Discharge Requirements Order R5-2010-0114-01 (NPDES Permit No. CA0077682) And Time Schedule Order R5-2010-0115-01 For Sacramento Regional County Sanitation District, Sacramento Wastewater Treatment Plant, Sacramento County

Dear Ms. Creedon:

This letter is submitted on behalf of the Public Water Agencies.<sup>1</sup>

The Public Water Agencies have reviewed the proposed Order No. R5-2010-0114-02 (“Proposed Order”), which proposes amendments to existing Order R5-2010-0114-01 setting discharge limits for the Sacramento Regional County Sanitation District’s Sacramento Regional Wastewater Treatment Plant. Below please find our comments on, and suggested revisions to, the Proposed Order.<sup>2</sup>

**1. Due Dates for Progress Reports Re Title 22 Disinfection Requirements (p. 34) and Ammonia Limitations (p. 35)**

As proposed, the due date for each progress report after 9 July 2014 seems unclear, because the due date is described as “annually” after 9 July 2014. We propose the following revision to the Due Date description on p. 34 and p. 35, to clarify that each subsequent report will be due on July 9 (additions are indicated in underline and deletions are indicated in strike-out):

---

<sup>1</sup> The Water Agencies include the following agencies: Alameda County Water District, Alameda County Flood Control and Water Conservation District, Zone 7, Contra Costa Water District, Kern County Water Agency, Metropolitan Water District of Southern California, San Luis & Delta-Mendota Water Authority, Santa Clara Valley Water District, State Water Contractors, and Westlands Water District.

<sup>2</sup> All page references are to the Proposed Order (Order No. R5-2010-0114-02).

“9 July 2014, and July 9 annually thereafter, ~~after approval of work plan~~ until final compliance”

**2. Effective Date for Final Effluent Limitations for Total Residual Chlorine (p. 15, fn. 1; p. 17, fn. 1)**

There is an inconsistency between the proposed amendments appearing in footnote 1 on page 15 and in footnote 1 on page 17 of the Proposed Order, with respect to the effective date for the final effluent limitations for total residual chlorine. Footnote 1 on page 15 states that the effective date is “30 November 2020” and footnote 1 on page 17 states that the effective date is “9 May 2023.” The Public Water Agencies submit that the original effective date identified in footnote 1 on page 17, of “1 December 2020” is the correct effective date. That is because: (1) the interim effluent limitation for total residual chlorine ends on “30 November 2020,” as indicated on page 17, which would make the effective date for the final limitation the following day (1 December 2020); and (2) the final effluent limitations for total residual chlorine were not subject to the court stays or settlement, and therefore the effective date for this effluent should not be extended to “9 May 2023.”

Therefore, we suggest the following revisions:

- retain original effective date of “1 December 2020” in footnote 1 on page 17, and eliminate proposed amendment that would change the effective date to “9 May 2023” (p. 17, fn. 1); and
- eliminate proposed amendment in footnote 1 on page 15, stating effective date of “30 November 2020” and replace with amendment that states the effective date is “1 December 2020” (p. 15, fn. 1).

Thank you for considering the Public Water Agencies suggested revisions to the Proposed Order. If you have any questions regarding the suggested revisions, please do not hesitate to contact me.

Sincerely,

KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
A Law Corporation



Eric N. Robinson

ENR/tw

cc: Terry Erlewine (SWC)  
Adam Kear (MWDSC)  
Jon Rubin (SLDMWA)  
Sam Boxerman (WWD)  
Anthony Fulcher (SCVWD)  
Doug Coty (CCWD)  
Michael McNaughton (ACWD)