



August 14, 2013

Ms. Kathleen Harder  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

Subject: Tentative Waste Discharge Requirements for Sacramento Regional Wastewater Treatment Plant

Dear Ms. Harder:

California Urban Water Agencies (CUWA) has reviewed the subject Tentative Order for the Sacramento Regional Wastewater Treatment Plant and would like to commend Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff on their commitment to protecting the drinking water beneficial use in the Delta. Many of CUWA's members rely on the Delta as a source of drinking water. CUWA has identified two issues below that we would like to bring to your attention so they can be addressed in the context of the Tentative Order.

While conducting the technical studies for the Drinking Water Policy, the stakeholder work group found that there are limited data on several key drinking water constituents in wastewater effluent. As a result, a number of assumptions were made and literature values were used to estimate wastewater quality. The assumptions are documented in a report prepared by West Yost (Wastewater Control Measures Study), which is posted on the Central Valley Water Board's website. We greatly appreciate the extensive monitoring that has been conducted by Sacramento Regional County Sanitation District in the past and their continued commitment to monitoring for drinking water constituents.

In that light, we would like to make two specific requests with regard to the Tentative Order:

- We request that dissolved organic carbon be added to either the routine monitoring program or to the Effluent and Receiving Water Characterization Study. Dissolved organic carbon is a key constituent that is modeled in Delta water quality.
- We also request that footnote 3 on Table E-3b and Table E-6b specify that total phosphorus is the form of phosphorus to be analyzed.

We believe that these two additional items will help to further ensure protection of drinking water beneficial uses in the Delta.

CUWA appreciates the efforts of Central Valley Water Board staff and Sacramento Regional County Sanitation District to protect drinking water quality. If you have any questions on our comments, please contact me at 925-210-2477.

Sincerely,

Cindy Paulson, Ph. D.  
Executive Director

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