



# CVCWA

## Central Valley Clean Water Association

*Representing Over Fifty Wastewater Agencies*

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**MICHAEL RIDDELL** – Chair, City of Riverbank  
**CASEY WICHERT** – Secretary, City of Brentwood

**TERRIE MITCHELL** – Vice Chair, Sacramento Regional CSD  
**TONY PIRONDINI** – Treasurer, City of Vacaville

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October 23, 2013

***Via Electronically Only***

Ms. Gayleen Perreira  
Senior Engineer  
Regional Water Quality Control Board,  
Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670  
[gperreira@waterboards.ca.gov](mailto:gperreira@waterboards.ca.gov)

**RE: Comments on Tentative Waste Discharge Requirements Order No. R5-2013-XXXX,  
City of Jackson, Wastewater Treatment Plant, Amador County**

Dear Ms. Perreira:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit comments on the Tentative Waste Discharge Requirements for the City of Jackson Wastewater Treatment Plant (Tentative Order). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this spirit, we provide the following comment on the justification for the Biological Oxygen Demand (BOD) and Total Suspended Solids (TSS) effluent limitations as contained in the Fact Sheet and are recommending the prohibition in section III.E be modified to provide flexibility for compliance in drought situations.

The Tentative Order includes final technology-based effluent limitations for BOD and TSS that are being carried over from the City's current permit. The Tentative Order, however, adds a new water quality-based rationale for the limitations, claiming that secondary wastewater

treatment does not adequately remove BOD and TSS to levels that are protective of fish and other aquatic life. (Tentative Order at p. F-44.) In other words, the Tentative Order alleges that water quality based effluent limitations for BOD and TSS are necessary to protect aquatic life related beneficial uses. However, the Fact Sheet provides no evidence to support such a statement, nor does the Tentative Order identify any water quality criteria for BOD and TSS, which are supposedly appropriate for the protection of aquatic life beneficial uses.

Accordingly, the Tentative Order needs to be revised to remove all such allegations. The Tentative Order provides sufficient justification for the BOD and TSS limitations in section IV.B.2 of the Fact Sheet under "Applicable Technology-Based Effluent Limitations." There is no basis or need for the water quality-based explanation for the BOD and TSS limitations in section IV.C.3.d.ii of the Fact Sheet, and this section should be deleted entirely.

CVCWA acknowledges and appreciates the changes made in the Tentative Order to modify the previous requirements that would have forced the City to remove its discharge from Jackson Creek for a portion of the year. CVCWA is still concerned that the prohibition language in Section III.E that has been added to the permit may create compliance problems for the City during drought years or in the event the proposed Jackson Valley Irrigation District drinking water replacement projects are not completed in 2016. The California Department of Health email cited on Page F-4 of the Fact Sheet states that: "Given that the City of Jackson's current wastewater treatment plant provides disinfected tertiary treatment and the City usually provides 20:1 dilution in Lake Amador, our Department believes that adequate public health protection is being provided until both domestic water supply intakes are removed from Lake Amador." CVCWA requests that language be added to the prohibition that would provide greater flexibility in the compliance determination during drought conditions.

We appreciate your consideration of these comments and request that you revise the Tentative Order as suggested above. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or [eofficer@cvcwa.org](mailto:eofficer@cvcwa.org).

Sincerely,



Debbie Webster,  
Executive Officer

cc: (Via Email)  
Pamela Creedon, Central Valley Regional Water Quality Control Board  
Eric Neuschmid, City of Jackson