



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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CASEY WICHERT – Secretary, City of Brentwood

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TONY PIRONDINI - Treasurer – City of Vacaville

December 2, 2013

Via Electronically Only

Mr. James Marshall
Senior Engineer
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670
james.marshall@waterboards.ca.gov

RE: Comments on the Tentative Waste Discharge Requirements Order R5-2014-XXXX,
Calaveras County Water District and Sierra Golf Management Corporation, Forest
Meadows Wastewater Reclamation Plant, Calaveras County

Dear Mr. Marshall:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit comments on the tentative Waste Discharge Requirements for the Calaveras County Water District and Sierra Golf Management Corporation Forest Meadows Wastewater Reclamation 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 comments on the Central Valley Regional Water Quality Control Board's (Regional Board) continued practice of

including UV operating specifications and making reasonable potential determinations based on “best professional judgment.”

I. Operating Specifications for UV Disinfection

CVCWA has previously expressed its concern regarding the Regional Board’s precedent for dictating in waste discharge requirements specific operating specifications for UV disinfection. CVCWA maintains that these UV operating specifications impermissibly dictate the manner in which the dischargers must comply with the requirements for disinfection in violation of Water Code section 13360.

Further, in prior permits the Regional Board included the option of submitting an alternative plan for UV operating requirements for approval by the Regional Board’s Executive Officer or the Department of Public Health. At the very least, the option of submitting an alternative UV operating plan gives permittees some flexibility to identify optimal performance specifications while at the same time satisfying the Regional Board’s concern that an operation and maintenance program is in place to ensure adequate disinfection. However, the Tentative Order omits this option for an alternative UV operating plan. To ensure flexibility, CVCWA requests that the Tentative Order be revised to include the language “unless operated by an alternative plan approved by the Department of Public Health (DPH) or the Executive Officer” to paragraph IV.C.4.b of the Tentative Order.

II. Reasonable Potential Determinations for Ammonia, Pathogens, and pH

CVCWA is concerned in general that the Regional Board is continuing to depart from the normal reasonable potential analysis procedures to determine if water quality based effluent limitations (WQBELs) are necessary. Rather than evaluating the concentration (or mass) of a pollutant in the effluent and comparing it to an applicable water quality objective or criteria, the Regional Board continues to expand its use of “best professional judgment” to impose treatment requirements under the guise of WQBELs. In this Tentative Order, the Regional Board proposes to use this approach to impose effluent limitations on ammonia, total coliform, BOD, TSS, and pH even though the effluent does not exhibit reasonable potential for these constituents in the normal sense. As indicated, these rationales for WQBELs inappropriately depart from traditional analysis for reasonable potential to impose treatment standards. Such a process is of concern, and the Regional Board should re-evaluate some of its determinations based on best professional judgment.

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 eoofficer@cvcwa.org.

Sincerely,



Debbie Webster
Executive Officer

cc: Pamela Creedon, Central Valley Regional Water Quality Control Board