

Central Valley Regional Water Quality Control Board  
16/17 April 2015 Board Meeting

Response to Comments  
for the  
City of Sacramento  
Combined Wastewater Collection and Treatment System  
Tentative Waste Discharge Requirements

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The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements (NPDES Permit No. CA0079111) renewal for the City of Sacramento (Discharger) Combined Wastewater Collection and Treatment System (Facility).

The tentative NPDES Permit was issued for a 30-day public comment period on 6 February 2015 with comments due by 9 March 2015. The Central Valley Water Board received public comments regarding the tentative Permit by the due date from the Discharger, the Central Valley Clean Water Association (CVCWA), and the Natural Resources Defense Council (NRDC). Some changes were made to the proposed Permit based on public comments received.

The submitted comments were accepted into the record, and are summarized below, followed by Central Valley Water Board staff responses.

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**DISCHARGER COMMENTS**

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**The Discharger supports the Tentative Order, and provides minor clarification comments.**

**RESPONSE:** Comments noted. Changes have been made to the Tentative Order.

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**CVCWA COMMENTS**

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**CVCWA Comment I. CVCWA Methylmercury Special Project.**

CVCWA is not requesting any changes to the Tentative Order, but believe it is important the Central Valley Water Board recognize the Discharger's participation and contribution to the CVCWA Methylmercury Special Project. The Tentative Order describes in Section C.2.a, a study the Discharger is conducting in compliance with the Phase 1 Mercury Control Program. The Discharger also participates in the CVCWA Methylmercury Special Project, a collaborative effort which evaluates control strategies through municipal wastewater treatment plants and whether variations in influent mercury and methylmercury has statistically significant effects on effluent characteristics for secondary plants and higher. The City of Sacramento's participation in the CVCWA Methylmercury Special Project has included, but has not been necessarily limited to cost sharing, providing water quality data, and staff participation time.

**RESPONSE:** Comments noted. Acknowledgement of the Discharger's participation in CVCWA Methylmercury Special Project is added to the Fact Sheet.

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**NRDC COMMENTS**

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**NRDC Comment 1. Enhancement of the Discharger’s Existing Water Conservation Efforts**

NRDC requests the Board direct the Discharger to enhance efforts to reduce base sanitary wastewater flows into the system through water conservation, which specifically is to accelerate the existing program of installing meters and converting customers to volumetric billing as it is a proven means of reducing water usage and sanitary wastewater flows. The Discharger’s current and planned efforts to further reduce CSO discharges fall short of fully implementing the Permit’s requirement to “maximize the use of the collection system for storage” because the Discharger has not taken full advantage of opportunities to reduce base sanitary flow through policies and programs to promote water conservation.

**RESPONSE:** Central Valley Water Board staff agrees with the NRDC that water conservation is an important factor in minimizing combined sewer overflows, and the installation of water meters is essential to reduce water use. The Discharger originally planned to complete water meter installation by 2025 in accordance with the State-mandated requirement for the installation of water meters on all water service connections by 1 January 2025 (AB 2572). However, on 24 February 2015, due to the severe drought in California the Sacramento City Council adopted a resolution to accelerate the water meter installation program in an effort to improve water conservation. The new projected completion date for full water meter implementation is 2020, with 88% completion by 2017 (See figure below).

**5-Year Plan (Accelerated Program)**

Year	Number of Meter Installations	Percent of Program Completion	Type of Meter Installations	Cost per Year	
1	10,194	70%	Installed in Backyards	245	\$20.0M
			Installed w/ Backyard Main Relocations	0	
			Installed in Frontyards	9949	
2	24,835	88%	Installed in Backyards	9484	\$ 60.2M
			Installed w/ Backyard Main Relocations	0	
			Installed in Frontyards	15,351	
3	7,192	93%	Installed in Backyards	2702	\$62.1M
			Installed w/ Backyard Main Relocations	4490	
			Installed in Frontyards	0	
4	4,490	97%	Installed in Backyards	0	\$53.7M
			Installed w/ Backyard Main Relocations	4490	
			Installed in Frontyards	0	
5	4,490	100%	Installed in Backyards	0	\$53.7M
			Installed w/ Backyard Main Relocations	4490	
			Installed in Frontyards	0	