



CVCWA

CENTRAL VALLEY CLEAN WATER ASSOCIATION

Formerly the Central Valley Wastewater Manager's Association

Representing Over Forty Wastewater Agencies

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April 3, 2007

Mr. Kenneth D. Landau
 Assistant Executive Officer
 Regional Water Quality Control Board
 Central Valley Region
 11020 Sun Center Drive, #200
 Rancho Cordova, CA 95670-6114

RECEIVED
 SACRAMENTO
 CVR WQCB
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SUBJECT: Waste Discharge Requirements for City of Angels Wastewater Treatment Plant, Calaveres County (NPDES No. CA000XXXX)

Dear Mr. Landau:

The Central Valley Clean Water Association (“CVCWA”) has reviewed the proposed *Waste Discharge Requirements for City of Angels Wastewater Treatment Plant* (“tentative order”). In particular, CVCWA is concerned with the Regional Water Quality Control Board’s (“Regional Board”) continued application of the agricultural water quality goals from the *Water Quality for Agriculture, Food and Agriculture Organization of the United Nations – Irrigation and Drainage Paper No. 29, Rev. 1* (R.S. Ayers and D.W. Westcot, Rome, 1985) (“UN Report”) with out the consideration of site-specific conditions as directed by the State Water Resources Control Board (“State Water Board”) in its *City of Woodland* decision. (Order WQO 2004 –0010.)

Although the Regional Board does not ultimately adopt final effluent limitations based on the agricultural water quality goals as contained in the UN Report (due to the low levels of salinity contained in the City’s effluent) in this tentative order, the fact sheet indicates that the Regional Board staff continues to use the most conservative agricultural water quality goals from the UN Report with out the consideration of site-specific factors. (Fact Sheet at pp. F-21-F-23.) For chloride, the fact sheet states that the recommended agricultural water quality goal is 106 mg/L as a long-term average based on the UN Report. (Fact Sheet at p. F-21.) Similarly, the fact sheet identifies 700 umhos/cm as the agricultural water quality goal for electrical conductivity based on the UN Report. (Fact Sheet at p. F-22.) In neither case does the fact sheet include a discussion regarding site-specific conditions that could affect the appropriate value to apply for protection of the agricultural beneficial use.

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The State Water Board's decision in *City of Woodland* precludes the practice of using the most conservative agricultural water quality goal from the UN Report:

The UN Report makes it clear that site-specific considerations are important in assessing irrigation water suitability. The preface to the report states that the guidelines can indicate potential problems and use restrictions with a water supply.

With this caveat in mind, it is obvious that the 700 umhos/cm EC value cannot be interpreted as an absolute value. Rather, the Regional Board must determine whether site-specific conditions applicable to Woodland's discharge allow some relaxation in this value. Chief among them is leaching.

(Order WQO 2004-0010 at p. 7.)

In its application of the UN Report's agricultural water quality goals, the Regional Board staff did not consider site-specific conditions, and in particular, rainfall and leaching. For example, information from the California Data Exchange Center indicates that average rainfall in near-by communities ranges between 26.8 inches/year for the City of San Andreas, which is located at an elevation of 1,000 ft.; and, 31.75 inches/year for the City of Sonora, which is located at an elevation of about 1,800 ft. (Department of Water Resources, California Data Exchange Center, cdec.water.ca.gov.) Using a linear regression of annual precipitation versus elevation, an elevation of 1,400 ft. for City of Angels yields an annual average precipitation of 29.1 inches/year. With an estimated 30 inches of rain per year, one could expect a reasonable amount of leaching to occur, which would impact the appropriate water quality goal to be used for the protection of the local agricultural beneficial use. CVCWA provides this information for illustrative purposes only to show how the tentative order fails to consider site-specific factors, as is required when using the agricultural water quality goals contained in the UN Report.

To address this fundamental issue, CVCWA recommends that the Regional Board staff revise the tentative order and the fact sheet to consider site-specific factors, in accordance with the State Water Board's decision in *City of Woodland*. If you have any questions, please do not hesitate to call me at (530) 886-4911.

Sincerely,



Warren Tellefson
Executive Officer

WT/jp

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cc: Anand Mamidi, Central Valley Regional Water Quality Control Board
Greg Ghio, City Engineer, City of Angels