



MWD

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

April 5, 2007

Ms. Pamela C. Creedon
Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite #200
Rancho Cordova, CA 95670-6114

Dear Ms. Creedon:

NPDES NO. CA0079154

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to comment on the Tentative Waste Discharge Requirements and Time Schedule Order for the City of Tracy Wastewater Treatment Plant Order No. R5-2007 (Tentative WDR). Metropolitan, through its member agencies, provides approximately half of the water used by 18 million people in a six-county region. Water diverted from the Bay-Delta is one of Metropolitan's two major sources of supply, and source water protection is essential to our mission of providing water that is safe to drink. The discharges to the San Joaquin River from the Tracy Wastewater Treatment Plant (Tracy) in close proximity to the export pumps, means that there is direct link between the quality of the wastewater effluent and the quality of exported drinking water supplies, as well as the potential to exceed the State Board-adopted salinity objectives in the South Delta.

Metropolitan previously provided comments on Order No. R5-2006, and we are pleased that some of our concerns have been addressed in the revised Tentative Order. In particular, we appreciate the inclusion of effluent monitoring requirements for total organic carbon (TOC) and phosphorus as well the special provisions for reopening the permit upon the adoption of drinking water objectives for TOC, nutrients, salinity and/or pathogens. These additions are important steps toward improved protection of drinking water beneficial uses. We also support salinity control options 2 and 3, which will help ensure that salinity objectives for the South Delta are met.

We note, however, that the Tentative WDR includes interim maximum daily effluent limitations for ammonia that exceed the historical mean plus 3.3 standard deviations. The interim maximum daily effluent limit shown in Table 9 of the Tentative WDR is 42 mg/L. We understand from the discussion on page F-65 of the Fact Sheet, however, that the maximum interim limit is to be based on the mean plus 3.3 standard deviations of the available data.

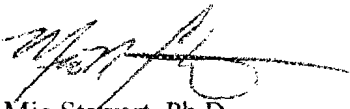
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Table F-12 of the Fact sheet shows that the mean concentration is 16.6 mg/L with a standard deviation of 4.1 mg/L.

The mean plus 3.3 standard deviations is 30.1 mg/L, not 42 mg/L. We ask that staff revise the interim effluent limit for ammonia to 30.1 mg/L. We also note that there is neither an average monthly nor average weekly interim effluent limit for ammonia, and we ask that such limits be included.

We appreciate your consideration of our comments. If you have any questions, please feel free to contact Marcia Torobin of my staff at (213) 217-7830.

Sincerely,

A handwritten signature in black ink, appearing to read "Mic Stewart", with a long horizontal flourish extending to the right.

Mic Stewart, Ph.D.
Water Quality Section Manager