



California Sportfishing Protection Alliance

"An Advocate for Fisheries, Habitat and Water Quality"

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24 December 2009

Mr. Ken Landau, Assistant Executive Officer
Ms. Diana Messina, Supervising WRCE
Mr. Jim Marshall, Sr. WRCE
Ms. Gayleen Perreira, WRCE
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6144

VIA: Electronic Submission
Hardcopy if Requested

RE: Tentative Cease and Desist Order for City of Colfax Wastewater Treatment Plant, Placer County.

Dear Messrs. Landau, Marshall and Mesdames Messina and Perreira,

The California Sportfishing Protection Alliance (CSPA) has reviewed the proposed Cease and Desist Order (CDO) for City of Colfax Wastewater Treatment Plant and respectfully submits the following comments.

CSPA requests status as a designated party for this proceeding. CSPA is a 501(c)(3) public benefit conservation and research organization established in 1983 for the purpose of conserving, restoring, and enhancing the state's water quality and fishery resources and their aquatic ecosystems and associated riparian habitats. CSPA has actively promoted the protection of water quality and fisheries throughout California before state and federal agencies, the State Legislature and Congress and regularly participates in administrative and judicial proceedings on behalf of its members to protect, enhance, and restore California's degraded water quality and fisheries. CSPA members reside, boat, fish and recreate in and along waterways throughout the Central Valley, including Placer County.

The CDO documents surface waters discharges of inadequately treated sewage due to hydraulic overloading of the City's new wastewater treatment plant. The CDO requires repairs of the collection system to eliminate excessive inflow and infiltration (I/I) based on a peaking factor of 5.0. Our specific comments are as follows:

- US EPA's Construction Grants – 1985 Municipal Wastewater Treatment assesses in Section 5.4 that 120 gallons per capita per day (gpcd) during high groundwater and 275 gpcd during a storm would not constitute excessive I/I. The corresponding peaking factors recommended by US EPA are likely significantly lower than the 5.0 recommended in the CDO.

However, the amount of I/I in this case should not be based on recommended acceptable peaking factors. The wastewater treatment plant at Colfax is new. The plant was designed utilizing organic and hydraulic loadings. The allowable peak wet weather flow rates should therefore be based on the actual hydraulic design capability of the wastewater treatment plant. A goal of allowing a 5.0 wet weather peaking factor, based on national averages rather than the actual design capability of the system, would likely result in continued excessive wastewater flows and discharges of inadequately treated wastes being discharged to surface waters. What is the peak wet weather design capability of the new wastewater treatment plant at Colfax? What is the corresponding peaking factor? The answer to these questions should be the basis of the required flow reductions to the wastewater treatment plant.

- Measurable collection system I/I reductions can be difficult to achieve. It is often the case that repairs in one part of the system only make room for flow from other parts of the system that are also failing. The CDO should at least require an assessment of additional solutions such as expansion of the treatment system to accommodate the high wet weather flows or construction of a new impermeable equalization basin until actual I/I reductions can be achieved. The City of Colfax has obviously constructed a new wastewater treatment plant that has not resulted in compliance and cannot afford to put all their compliance eggs in the I/I basket.
- The proposed CDO does not mention that the excessive leaks into the sewage collection system during periods of high groundwater and rainfall directly correspond to sewage leaking out of the system during dry periods. Since the Colfax area overlies fractured bedrock, raw sewage leaking from the system during dry periods has the potential to significantly degrade both groundwater and surface waters. It is critically important that the Board ensure that the compliance time schedule is as short as practicable to eliminate the discharge of raw sewage to ground and surface waters and eliminate the threat to public health and all beneficial uses of water. I/I corrective measures need to be completed to eliminate exfiltration, however these efforts can be quite time-consuming and provide no assurance of actual flow reductions at the treatment plant.

Thank you for considering these comments. If you have questions or require clarification, please don't hesitate to contact us.

Sincerely,



Bill Jennings, Executive Director
California Sportfishing Protection Alliance

Cc: Ms. Joan Phillipe, City Manager, Colfax