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October 8, 2010

Via email: kharder@waterboards.ca.gov

Ms. Katherine Hart, Chair
Central Valley Regional Water Quality Control Board
Sacramento Office
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Subject: Comments on Tentative Waste Discharge Requirements NPDES Permit
Renewal for Sacramento Regional County Sanitation District for the Sacramento
Regional Wastewater Treatment Plant

Dear Ms. Hart:

The Association of California Water Agencies (ACWA) appreciates the opportunity to provide comments on the Tentative Waste Discharge Requirements (WDR) Permit Renewal for Sacramento Regional County Sanitation District (SRCSD) for the Sacramento Regional Wastewater Treatment Plant (SRWTP). ACWA supports the Tentative Order to require SRCSD to implement advanced wastewater treatment, as proposed by staff. We also support the proposed time schedule order for compliance, with the added provision that interim ammonia limits should prohibit any increase in concentration or loading over current levels during the compliance period.

ACWA does not support the tentative NPDES permitting options that would depend on dilution to avoid full de-nitrification. We believe such alternatives would not be sufficiently protective of receiving water quality, and there is strong scientific evidence that ammonia discharges are adversely impacting the Bay-Delta ecosystem. The Bay-Delta is the hub of California's water system, serving more than 25 million Californians. The most recent scientific research continues to support the conclusion that a combination of environmental stressors is causing the ecological crisis in the Delta. This includes increased nutrient loading which is adversely impacting the Delta food chain. To date, federal and state regulatory agencies have focused primarily on one factor – slashing water exports from the Delta in an attempt to revive fish populations. Yet it is clear that a comprehensive response to the Delta crisis is needed, effectively addressing

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all of the contributing environmental stressors according to the magnitude of their impacts, based on the best science.

The recently released report, "Effect of Ammonium and Wastewater Effluent on Riverine Phytoplankton in the Sacramento River, CA." (May 29, 2010) by Alexander E. Parker, et al, of the Romberg Tiburon Center for Environmental Studies San Francisco State University provides clear scientific evidence of significant adverse impacts to plankton due to ammonia discharges from the SRWTP. Since plankton is at the base of the Delta food web it is clear that current ammonia discharge levels are having a detrimental effect on the Delta ecosystem.

ACWA urges the Regional Board to adopt the Tentative Order as proposed by staff. We recognize the significant costs and planning process that will be associated with upgrading the SRWTP. But avoiding or further postponing this needed upgrade, or wasting precious water resources to support dilution, merely shifts larger burdens to future generations. Instead, ACWA encourages the Regional Board and SRCSD to pursue collaborative opportunities to obtain public funding to mitigate the costs to local rate-payers.

And while we recognize that the SRCSD will require time to implement the needed upgrades, we encourage the Regional Water Board and the SRCSD to explore feasible opportunities to accelerate the 10-year compliance period set forth in the proposed permit renewal. Regardless of the time it takes to complete the upgrades, given the magnitude of on-going impacts to the ecosystem, the Tentative Order should prohibit any increase in concentration or loading of ammonia over current levels during the interim period. SRCSD is the largest discharger of wastewater into the Delta and one of the last dischargers in the region to upgrade to advanced treatment technologies. It is clear that the time has come for the Regional Board to use its permitting authority to require SRCSD to significantly reduce its ammonia discharges in the Sacramento River. We appreciate your attention on this matter. If you have any questions, please contact Mark Rentz, Director of Regulatory Affairs. Mr. Rentz can be reached by phone at (916) 441-4545, or by e-mail at markr@acwa.com

Sincerely,



Timothy H. Quinn
Executive Director