



CVCWA Central Valley Clean Water Association

Representing Over Sixty Wastewater Agencies

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October 8, 2010

Submitted Via U.S. Mail and Electronic Mail

Ms. Kathleen Harder
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, California 95670-6114
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**Re: Comments on the Tentative Order for the Sacramento Regional
County Sanitation District Sacramento Regional Wastewater
Treatment Plant (NPDES No. CA0077682)**

Dear Ms. Harder:

The Central Valley Clean Water Association (CVCWA) submits these comments on the tentative waste discharge requirements (Tentative Order) for the Sacramento Regional Wastewater Treatment Plant (SRWWTP) of the Sacramento Regional County Sanitation District (SRCSD). CVCWA is a non-profit organization whose members include publicly owned treatment works (POTWs) throughout the Central Valley Region. We represent our members in regulatory matters affecting surface water discharge and land application with a perspective to balance environmental and economic interests consistent with state and federal law. Accordingly, and because the Tentative Order proposes unprecedented and inappropriate provisions that would have far-reaching consequences for POTWs throughout the Region, we offer the following comments.

Our overarching concern is that requirements proposed in the Tentative Order are unsupported by sound science and technical reasoning and may be unachievable while costing ratepayers approximately \$2 billion. We appreciate that the Central Valley

Regional Water Quality Control Board (Regional Water Board) is generally focused on issues affecting the Delta. CVCWA and its member agencies have been working to improve conditions in the Delta too. For example, we actively participate in CV-SALTS and in efforts to reduce mercury discharges. However, imposing requirements at an exorbitant expense to ratepayers without demonstrated links between the data and findings and the findings and permit requirements is generally disturbing and contrary to law. (See 40 C.F.R. § 124.8(b)(4); *Topanga Association for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515 (*Topanga*) [agency must “bridge the analytic gap between the raw evidence and the ultimate decision or order,” focusing on “relationships between the evidence and findings and between findings and ultimate action”]; *In the Matter of the Petition of Las Virgenes Municipal Water District*, Order No. WQ 2001-03 (Feb. 15, 2001) at p. 5 [findings must explain “the reasoning of the agency [and] how the law and facts justify the decision or order”.] Permit requirements must be “reasonable, considering all demands being made and to be made on [the receiving] waters and the total values involved, beneficial and detrimental, economic and social, tangible and intangible.” (Wat. Code, § 13000.)

Our remaining comments focus on specific provisions in the Tentative Order that lack a scientific and technical foundation and are otherwise improper. In particular, our comments address proposed requirements and statements regarding antidegradation and best practicable treatment or control (BPTC), advanced treatment, ammonia, nitrate, dilution, developing *Hyaella azteca* test procedures, mercury, and monitoring for *Giardia* and *Cryptosporidium*. We respectfully request that you revise the Tentative Order as described below.

A. Provisions in the Tentative Order Related to Antidegradation and BPTC, Including That a New Antidegradation Analysis Is Appropriate, Are Contrary to Applicable Law and Policy

The Tentative Order improperly concludes that changed conditions in the Sacramento River and Delta downstream of the SRWWTP discharge warrant a new antidegradation analysis. (Tentative Order at p. F-90.) There is no basis in law or guidance for this unprecedented conclusion; the renewal of SRCSD’s permit does not trigger the state or federal antidegradation policies. Further, statements and conclusions in the Tentative Order regarding BPTC are fundamentally flawed.

1. The Renewal of the Permit for the SRWP Does Not Require an Antidegradation Analysis

The state’s antidegradation policy (Resolution No. 68-16) provides that existing high quality waters “will be maintained until it has been demonstrated to the State that any *change*” will meet certain criteria. (Emphasis added.) Resolution No. 68-16 incorporates the federal antidegradation policy (40 C.F.R. § 131.12) where it applies.

(State Water Board Administrative Procedures Update No. 90-004 (APU 90-004), Attachment 3 at p. 3.) Whether a water body has existing high quality is determined on a pollutant-specific basis, and only activities that will *reduce* water quality for the constituent of interest trigger the state and federal antidegradation policies. (APU 90-004 at p. 4; *In the Matter of Petitions for Reconsideration of Water Quality Certification for the Re-operation of Pyramid Dam*, Order WQ 2009-0007 (Pyramid Dam Order) at p. 12 [the state and federal antidegradation policies “apply to reductions in water quality”]; *In the Matter of the Petition of Rimmon C. Fay*, Order No. WQ 86-17 at p. 17 [reductions in water quality may not violate the state or federal antidegradation policies]; *In the Matter of the Petitions of the County of Santa Clara, et al.*, Order No. WQ 86-8 (Santa Clara Order) at p. 28; APU 90-004 at p. 2.) This includes consideration of any reductions in water quality that already occurred if such reductions occurred after the state and federal antidegradation policies took effect, but were not reviewed for consistency with the policies. (Pyramid Dam Order at p. 12.)

As the Tentative Order recognizes, SRCSD is not requesting an increase in discharge capacity nor does the Tentative Order allow for an increase in flow or mass of pollutants to the receiving water, except with regard to cyanide. (*Ibid.*) Respecting cyanide, SRCSD performed a dynamic modeling analysis representing a more accurate picture of the mixing zone concentrations and justifying a less stringent effluent limitation that provides reasonable protection of the aquatic life beneficial use. The subject effluent limitation will not result in an increase in the concentration of cyanide. (*Id.* at p. F-89.) Accordingly, no reduction in water quality requiring SRCSD to complete an antidegradation analysis will occur under the Tentative Order.

2. Statements and Conclusions in the Tentative Order Regarding BPTC Are Fundamentally Flawed

Because no new antidegradation analysis is required to renew SRCSD’s permit and SRCSD withdrew its request for increased capacity, the Tentative Order should not use the antidegradation analysis prepared for that request (ADA). (See Tentative Order at pp. F-90 to F-91.) Even though the Tentative Order would not allow for increased pollutant loading, the Tentative Order uses the ADA to determine if the *currently permitted discharge* would result in significantly increased pollutant loading. (*Id.* at p. F-91.) The Tentative Order concludes that the existing discharge degrades the receiving water and therefore requires BPTC, which is identified as nitrification, denitrification and the equivalent of filtration in accordance with Title 22 of the California Code of Regulations (Title 22) with ultraviolet light or chlorine disinfection treatment. This represents an antidegradation baseline of zero for SRCSD instead of a baseline equivalent to existing water quality. (*Ibid.*) This new approach sets forth a precedent that is of concern for CVCWA. Moreover, the approach violates state policy:

Baseline quality is defined as the best quality of the receiving water that has existed since 1968 when considering Resolution No. 68-16, or since 1975 under the federal policy, unless subsequent lowering was due to regulatory action consistent with State and federal antidegradation policies. If poorer water quality was permitted, the most recent water quality resulting from permitted action is the baseline water quality to be considered in any antidegradation analysis. (APU 90-004 at p. 4.)

Assuming the Tentative Order may lawfully establish requirements to reverse past degradation authorized by a permit based on a complete antidegradation analysis, the decision to do so in this case would run afoul of the reasonableness requirements of Resolution No. 68-16 and Water Code section 13000. Resolution 68-16 is not a zero-discharge standard, but rather a policy statement that the existing high quality of waters be maintained when it is reasonable to do so. (Santa Clara Order at p. 29.) As mentioned, Water Code section 13000 requires that permit requirements be "reasonable, considering all demands being made and to be made on [the receiving] waters and the total values involved, beneficial and detrimental, economic and social, tangible and intangible." Neither the evidence in the record nor the Tentative Order's findings support that BPTC as identified in the Tentative Order is reasonable. Indeed, the socio-economic data in the record prevents any finding of reasonableness. (See Tentative Permit at p. F-93.)

Further, the Tentative Order does not provide the requisite legal and technical analyses as to why nitrification, denitrification and the equivalent of Title 22 filtration with ultraviolet light or chlorine disinfection treatment constitutes BPTC for this discharge. What constitutes BPTC depends on a variety of factors and the circumstances of the discharge. For example, the Tentative Order is to analyze the alternatives and costs of alternatives for compliance; consider the water quality achieved by other similarly situated dischargers and the methods used to achieve that water quality;¹ and balance the proposed action against the public interest. (*In the Matter of the Petition of San Luis Obispo Golf and Country Club*, Order No. WQ 2000-07 at pp. 10-11; APU 90-004 at p. 4.) The Tentative Order is also to address the economic and social costs (tangible and intangible) of the proposed discharge compared to the benefits. (See APU 90-004 at p. 5.) In this case, the Tentative Order fails to analyze the proposed requirements accordingly, and as a result, the technology that would be required is

¹ The Tentative Order seemingly attempts to justify the new BPTC requirements based on the permits and actions of similarly situated dischargers. (Tentative Order at p. F-92.) However, the dischargers cited are not similarly situated to SRCSD. The Cities of Roseville, Davis, Lodi, Woodland, and Vacaville discharge to effluent-dominated water bodies that lack dilution. The Cities of Manteca and Tracy discharge to the San Joaquin River, not the Sacramento River and upgraded to advanced treatment to meet localized requirements, not to maintain existing water quality. Ironhouse Sanitary District is a new discharger to the San Joaquin River subject to more restrictive regulatory requirements, discharging seasonally and applying recycled water in the summer months to adjacent agricultural lands. Such use of recycled water requires Title 22 compliance.

wholly out of proportion to the cost that SRCSD's ratepayers would incur and thus is not best "practicable" treatment or control. (See *CPC International, Inc. et. al., v. Train* (1976) 540 F.2d 1329, 1341.)

Statements made in the Tentative Order alleging the need for BPTC as identified therein are not proper findings nor do they support the new treatment requirements. (Tentative Order at pp. F-91 to F-92.) For example, the first four statements are merely factual (albeit misleading with regard to the potential effects of the SRCSD discharge) and do not connect the SRWP's discharge to demonstrated effects on beneficial uses. (See *id.* at p. F-91.) The statement in the fifth bullet point regarding the use of assimilative capacity is irrelevant—SRCSD is not proposing (and the Tentative Order does not authorize) an increase in permitted capacity, and SRCSD proposes an effluent limitation that will comply with the applicable dissolved oxygen (DO) water quality objectives. (See *id.* at p. F-92.) In addition, such proposal makes full nitrification unnecessary and thus negates the first sentence in the fifth bullet point regarding the reduction of DO. (See *Id.* at pp. F-91 to F-92.) Similarly, none of the other statements substantiate the proposed requirements in the name of BPTC as necessary to protect beneficial uses or that the Sacramento River is high quality for the constituents identified.

B. The Requirement to Treat to Title 22 Standards or Their Equivalent Should Be Removed

The requirement for the SRWWTP to treat its effluent in accordance with the reclamation criteria of Title 22 for unrestricted reuse or equivalent should be removed from the Tentative Order. (See Tentative Order at p. 33.) As explained, the antidegradation policies do not justify the requirement of this treatment level as BPTC. Further, the Title 22 criteria apply to the treatment and use of recycled water for specified beneficial use—not to discharges to surface waters. (*In the Matter of the Review on Own Motion the City of Turlock, Municipal Services Department*, Order No. WQO 2002-0016 (Oct. 3, 2002) at pp. 22-23 ["reclamation criteria are not directly applicable to wastewater discharged into a water body subject to NPDES [National Pollutant Discharge Elimination System] regulation"].) Accordingly, any requirement to treat to Title 22's unrestricted reuse standards or the equivalent must be supported by evidence demonstrating the "discharges of wastewater . . . will be used for the purposes described in Title 22" and application of the criteria is necessary to protect human health. (See *id.* at pp. 22-23.) The data and findings do not satisfy this threshold.

For example, the Tentative Order states that "undiluted effluent will not be drawn into the agricultural intakes" and "the SRCSD discharge will not be carried far enough upriver during incoming tides to be captured by the Freeport intake." (Tentative Order at p. F-73.) Further, the discharge does not exceed the United States Environmental Protection Agency's (USEPA) water quality criteria for contact recreation. However, the

Tentative Order references a new risk threshold (1 in 10,000 risk and 1 log removal) from the Department of Public Health (DPH) that has no legal or regulatory basis as another reason for requiring compliance with Title 22 filtration requirements.² (*Id.* at pp. F-74, F-75.) This risk threshold is not met in the receiving waters upstream of the SRWWTP. In addition, DPH's risk threshold is significantly greater than those applicable to bathing beaches and USEPA's recommended risk thresholds for *E. coli* and fecal coliform—i.e., accepted illness rates of 8 illnesses per 1,000 swimmers (0.8%) in freshwater and 19 illnesses per 1,000 swimmers (1.9%) at marine beaches. Although USEPA is considering whether to revise its recreational criteria, the recommended risk thresholds are not part of that consideration. As a result, the USEPA's risk thresholds remain the most relevant in this case, and the Tentative Order fails to bridge the analytic gap between the raw evidence and permit requirement to treat to Title 22 standards or the equivalent.

C. The Effluent Limitations for Ammonia and Nitrate Should Be Revised

The SRWWTP should receive acute and chronic aquatic life dilution credit for ammonia, and the effluent limitations for ammonia and nitrate should be revised accordingly. The Tentative Order acknowledges: "The discharge, when the approved mixing zones are considered, is in compliance with current USEPA acute and chronic ammonia criteria." (Tentative Order at p. K-1.) However, the Tentative Order denies dilution credits based on hypotheses related to whether ammonia might contribute to pelagic organism decline (POD) in the Delta and criteria being considered (but not yet adopted) by USEPA. (*Id.* at pp. F-54 to F-55, K-1.)

There is no scientific consensus on a causal link between ammonia and the POD. In November 2011, a committee of independent experts formed at the request of Congress and the Departments of the Interior and Commerce is to release a report on how to incorporate science and adaptive management into holistic programs for management and restoration of the Delta.³ Among other factors, the report will address ammonia.⁴ Further, with regard to the criteria being considered, USEPA's website provides: "To date, EPA has not made any final decisions on what to do about the ammonia criteria, and will not do so until all issues, questions and new scientific information is explored."⁵ The Tentative Order includes overly stringent effluent limitations for ammonia given the uncertain state of the science and in the absence of a demonstrated causal link between the SRWWTP's discharge and the POD or other use impairments.

² The Tentative Order states that the SRWWTP's effluent "must be treated to a level equivalent to that recommended by DPH." (Tentative Order at p. F-72.) In direct conflict, the Tentative Order later states that "the DPH recommendations are not directly implemented by this permit." (*Id.* at p. F-75.)

³ <http://www8.nationalacademies.org/cp/projectview.aspx?key=49175> (last visited October 1, 2010.)

⁴ <http://www8.nationalacademies.org/cp/projectview.aspx?key=49175> (last visited October 1, 2010.)

⁵ <http://www.epa.gov/waterscience/criteria/ammonia/re-eval.html> (last visited October 1, 2010.)

As a result of the overly stringent ammonia limitations, the Tentative Order would require the SRWWTP to nitrify its effluent fully, substantially increasing the nitrate levels in the effluent. (Tentative Order at p. F-71.) These levels would not exist absent full nitrification. The Tentative Order then orders full denitrification of the fully nitrified effluent. The Tentative Order's mandate for denitrification is not based on sound science, but rather on "theories that changing the ratio of nitrogen to phosphorous can change the ecology of a waterbody, so removal of nitrogen from the effluent would keep the nitrogen to phosphorous ratio from changing." (*Ibid.*) Further, the effluent limitation for nitrate is not a water quality-based effluent limitation (WQBEL) as claimed. Rather, the limitation derives from a cost-benefit attainability study which was not prepared with the purpose of establishing effluent limits, making the limitation a technology-based requirement that exceeds federal law and violates the state prohibition against dictating the manner of compliance. (40 C.F.R. § 122.44(a); Wat. Code, § 13360(a).)

D. The Tentative Order Should Base WQBELs on the Dilution Credits that have been justified for use in the permitting process

The Tentative Order inappropriately denies dilution credits for Bis(2-ethylhexyl) phthalate, carbon tetrachloride, chlorodibromomethane, dichlorobromomethane, pentachlorophenol, tetrachloroethylene, cyanide, manganese, and methyl tertiary butyl ether. The Tentative Order states that dilution is allowed for these constituents, but denies granting the allowable dilution based on the use of assimilative capacity and antidegradation concerns. (Tentative Order at pp. F-57, F-58, F-59, F-60, F-63, F-65 to F-66, F-67.)

The SIP governs the granting of mixing zones and dilution credits for priority pollutants. (SIP at pp. 3, 15.) While the Regional Water Board may deny or limit mixing zones and dilution credits, it may do so only to protect beneficial uses, meet the conditions of the SIP, or comply with other regulatory requirements. (*Id.* at p. 17.) Moreover, the Tentative Order must explain any such denial or limitation based on the facts of the discharge. (*In the Matter of the Petition of Yuba City*, Order WQO 2004-0013 (Yuba City Order) at p. 10.) It is not enough simply to express concern about the use of assimilative capacity and antidegradation. The Regional Water Board must fully consider the information in the record, the high cost to meet the effluent limitations without allowing the dilution credit and lack of evidence of any harm associated with a mixing zone. (*Id.* at p. 12.) The findings in the Tentative Order must trace the analytic route from this data to the ultimate decisions on dilution. (*Topanga, supra*, 11 Cal.3d at 515; see Yuba City Order at p. 13 [Regional Water Board must explain its action to deny a mixing zone in the findings].)

E. SRCSO Should Not Have to Develop *Hyalella azteca* Test Procedures

CVCWA requests that you remove the Tentative Order's requirement for SRCSO to conduct a study to develop procedures for conducting whole effluent toxicity testing using *Hyalella azteca* as the test species. (See Tentative Order at p. 28.) While we do not agree that *Hyalella azteca* is a "common species for determining toxicity in the Delta," we are more concerned about the Regional Water Board placing an enforceable requirement on a single POTW to develop an analytical test method having substantial implications for other POTWs in the Region. (Tentative Order at p. F-108.) Toxicity test-method development is a major undertaking that requires significant resources and expertise and is best left to an iterative and accountable public rulemaking process of an agency such as USEPA.

USEPA has already developed test methods for toxicity at 40 C.F.R. part 136. The federal regulations require that monitoring under an NPDES permit be "conducted according to test procedures approved under 40 CFR part 136 unless another method is required under 40 CFR subchapters N or O." (40 C.F.R. § 122.41(j)(4); see 40 C.F.R. §§ 122.44(i)(1)(iv) [requires the use of USEPA-approved test procedures for the analysis of pollutants], 136.3 [discharge parameter values for which reports are required must be determined using USEPA's standard analytical test procedures]; *NPDES Permit Writers' Manual*, EPA-833-B-96-003 (Dec. 1996) at pp. 125-127 [analytical methods for municipal wastewater pollutants must be conducted in accordance with USEPA-approved methods].) Further, the federal regulations provide processes by which a state may apply for approval of an alternate test procedure. (40 C.F.R. § 136.4.) Even if the test procedure would not be an "alternate" in this case, the regulations are informative in that they establish a high threshold for the approval of a test procedure not listed in 40 C.F.R. part 136 or 40 C.F.R. subchapters N or O. Namely, the applicant must provide data justifying that different procedures are necessary together with published studies establishing the applicability of the new procedure to the subject effluents. (40 C.F.R. § 136.4.) This underscores that test-method development is a major responsibility that is inappropriate to place on a single POTW.

F. The Tentative Order Warrants Several Revisions Related to Mercury

The Tentative Order's approach for regulating for mercury concerns CVCWA. First, the total mercury mass load limitation should be an interim limitation, not a final effluent limitation. Second, the period of record used to calculate the interim limitation should account for proactive source control efforts. Third, reasonable potential should be determined based on a clearer methodology.

1. The Total Mercury Mass Load Limit Should Be an Interim Limitation

The Tentative Order proposes a final effluent limitation for mercury as follows: "For a calendar year, the annual mass load of total mercury shall not exceed 2.2 lbs/year." (Tentative Order at p. 14.) This effluent limitation should be an interim limitation, an approach which is consistent with the Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Methylmercury and Total Mercury in the Sacramento-San Joaquin River Delta Estuary.⁶ Final approval of the total maximum daily load (TMDL) for Delta Methylmercury will eventually replace—not add to—this total mercury load limitation with a methylmercury load limitation. Further, the term "mass load" is redundant, as load is expressed in units of mass per time. Accordingly, we ask that you remove the final effluent limitation for mercury and include an interim total mercury load limitation as follows:

Mercury, Total Recoverable. Effective immediately, the total calendar-year load of total mercury discharged to the Sacramento River shall not exceed XX pounds.

In addition, we ask that you revise the reopener provisions (Tentative Order at pp. 23-25) to include a reopener clause for total mercury limitations as follows:

Mercury. If the Delta Methylmercury TMDL is approved by USEPA, this Order may be reopened and the interim effluent total mercury load limitation replaced with a final methylmercury load limitation (if attainable). If the Regional Water Board determines that a mercury offset program is feasible for Dischargers subject to a NPDES permit, then this Order may be reopened to reevaluate the mercury load limitation and/or the need for a mercury offset program for the Discharger.

2. The Period of Record Used to Calculate the Interim Limitation for Mercury Should Account for Proactive Source Control Efforts

The Tentative Order states with regard to mercury: "The mass limitation was derived in accordance with the Delta Methylmercury TMDL (the 99.9th percentile of running annual total mercury loading based on effluent data from January 2005 through April 2010)." (Tentative Order at p. F-70.) The Regional Water Board should

⁶ The Amendments to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Methylmercury and Total Mercury in the Sacramento-San Joaquin River Delta Estuary provide for interim total mercury mass limitations. "During Phase 1, all facilities listed in Table B shall limit their discharges of inorganic (total) mercury to facility performance-based levels. The interim inorganic (total) mercury effluent mass limit is to be derived using current, representative data and shall not exceed the 99.9th percentile of 12-month running effluent inorganic (total) mercury loads (lbs/year)." (Resolution R5-2010-0043, Attachment 1, page 4).

re-calculate SRCSD's total mercury load limitation based on an earlier period of record that accounts for higher loads.

The amendments to the Basin Plan for the Sacramento and San Joaquin Rivers for Mercury provide: "The interim inorganic (total) mercury effluent mass limit is to be derived using current, representative data and shall not exceed the 99.9th percentile of 12-month running effluent inorganic (total) mercury loads (lbs/year)," (Resolution No. R5-2010-0043 at p. 4), and "Interim limits established during Phase 1 and allocations will not be reduced as a result of early actions that result in reduced inorganic (total) mercury and/or methylmercury in discharges." (Resolution at R5-2010-003 at p.9) (Emphasis added.) The April 2010 staff report (at p. 182) selected a period to calculate current methylmercury loads that "ensures that the dischargers are not unfairly penalized for making early improvements to their discharges."

While there is an inherent expectation that source control will reduce effluent loads, and source control appears to have been effective over the past several years at the SRWWTP, other factors beyond SRCSD's control could increase loads—i.e., regionalization, long-term climate cycles, service area growth, etc. By basing the limit on the most recent time period, SRCSD receives less credit for its early, proactive source reduction efforts accomplished since 2001. The repercussions of this choice will be to discourage any other POTW from taking early action for fear of similar penalties.

G. The Requirements to Monitor for *Giardia* and *Cryptosporidium* Should Be Removed

The monitoring and reporting program of the Tentative Order would require SRCSD to monitor the SRWWTP's effluent at least once a week for *Cryptosporidium* and *Giardia*. (Tentative Order at p. E-6.) Such a requirement is inappropriate given the absence of significant risk to either drinking water or recreational users. SRCSD has performed sufficient monitoring to understand the levels of these organisms in its effluent. Additional ongoing monitoring for *Cryptosporidium* and *Giardia* is not necessary to characterize the discharge or to ensure compliance with the effluent limitations for total coliform. (See Tentative Order at pp. E-6, F-72 to F-76, F-102, F-104.)

Cryptosporidium and *Giardia* are subject to environmental fate processes in the ambient environment, and thus are not necessarily present when downstream waters are used for drinking water purposes. Protozoa are inactivated by exposure to UV light from sunlight and are removed from rivers via sedimentation. *Giardia* and *Cryptosporidium* are not detected frequently in State Water Project intake facilities according to the State Water Project Sanitary Survey. The source of waters for all of the drinking water

treatment plants analyzed were classified as Bin 1 (no additional treatment required under LT2ESWTR).

We appreciate your consideration of CVCWA's comments and requests for revisions to the Tentative Order. If you have any questions or we can be of further assistance, please contact me at (530) 268-1338.

Sincerely,



Debbie Webster
Executive Officer

cc: Stanley Dean, SRCSD
Paul Simmons, Somach Simmons & Dunn
Pamela Creedon, Regional Water Board (electronically)