



# United States Department of the Interior

BUREAU OF RECLAMATION  
Mid-Pacific Regional Office  
2800 Cottage Way  
Sacramento, California 95825-1898

IN REPLY  
REFER TO:  
MP-740  
ENV-7.00

OCT 08 2010

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

Subject: Comments on Waste Discharge Requirements for Sacramento Regional Wastewater Treatment Plant

Dear Ms. Hart:

The Bureau of Reclamation appreciates this opportunity to provide comments to the Central Valley Regional Water Quality Control Board's (Board) public process pertaining to the renewal of National Pollutant Discharge Elimination System Permit CA0077682 for the Sacramento Regional County Sanitation District (SRCSD) Wastewater Treatment Plant.

The goal of Reclamation's Mid-Pacific Region is to balance the many competing and often conflicting needs among numerous water uses, including urban and industrial, agriculture, fish and wildlife habitat, water quality, wetlands, endangered species issues, Native American Tribal Trust, power generation, and recreation. The region strives to develop and implement a balanced approach to water allocation, serving users while protecting the environment.

Our specific concerns related to the waste discharge requirements for SRCSD are noted on the enclosed comment table.

Thank you for the opportunity to provide these comments on your project. Please feel free to contact Mr. Gene Lee at 916-978-5092 or [glee@usbr.gov](mailto:glee@usbr.gov) if you have any additional questions regarding our comments.

Sincerely,

Michelle H. Denning  
Regional Planning Officer

Enclosure

cc: see next page

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

Commenter: Reclamation		
Comment No.	Topic (i.e., ammonia, Title 22 tertiary, dilution, etc.)	Summarized Comment
1	Dilution	<b>Use of outdated and non-standard modeling tools to determine the appropriate mixing zone and potential dilution credit allowance for various constituents</b> - CALSIM II, DSM2, and Reclamation's revised temperature model are the recognized standard modeling tools used today to characterize the project area. These models incorporate the latest regulatory requirements and were developed to represent the combined operations of the state and federal projects. The use of PROSIM and the outdated version of Reclamation's temperature model, results in an inadequate analysis that does not properly reflect the current conditions of the basin. Since PROSIM output drives the other four linked models, the overall analysis does not meet the test of "Best Available Science" and quality information.
2	Dilution	<b>Use of an incomplete period of record to determine the appropriate mixing zone and potential dilution credit allowance for various constituents</b> - The Board's analysis was based on a period of record from 1922 - 1991 that does not represent the current conditions in the project area. Since 1991, additional regulatory obligations have been placed on the Sacramento River and the Delta for flows, temperature, and water quality; for example, the Water Quality Control Program, Central Valley Project Improvement Act, and the listing of numerous species as endangered. In addition, from 1991-1992, California experienced its most severe drought to date. By excluding the period of record from 1992 - to the present, the analysis does not properly characterize the current receiving water flow pattern, which is an integral component of the dilution equation.
3	BMP/PPP for Salinity	<b>Best management practices and a pollution prevention plan for salinity</b> - Although this order requires the SRCSD to develop and implement pollution control measures, the effort should be consistent with the activities of CV-SALTS and should evaluate the impact discharges have on salinity at the state and federal export pumps and the Delta.

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4	Historic Effluent Limitations	<b>Clarifications to Table F-2, “Historic Effluent Limitations and Monitoring Data”, Attachment F – Fact Sheet, page F-6 &amp; 7 - Under the “Effluent Limitation” column, the sub column titled “Average Daily” appears to be mislabeled and should be listed as “Daily Maximum.”</b>
5	Revised	Request the opportunity to review the revised plan based on current information.