



April 21, 2014

Ms. Kari Holmes  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

Subject: Tentative Waste Discharge Requirements for the City of Stockton Regional Wastewater Control Facility

Dear Ms. Holmes:

California Urban Water Agencies (CUWA) has reviewed the subject Tentative Order for the City of Stockton Regional Wastewater Control Facility and the Evaluation of the Potential Effects of Nitrate Plus Nitrite Discharged from the Stockton Regional Wastewater Control Facility on the San Joaquin River in Support of Dilution Credit for NPDES Permitting (Nitrate Study). CUWA would like to commend Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff on their commitment to protecting the drinking water beneficial use in the Delta. Many of CUWA's members rely on the Delta as a source of drinking water. We offer the following comments for your consideration.

### Impacts on Drinking Water Treatment

CUWA supports the nitrate effluent limit of 10 mg/L in the Tentative Order. CUWA's members who take water from the State Water Project and Central Valley Project are already challenged by the algae and macrophyte growth that occurs in the aqueducts and reservoirs. The challenges include filter-clogging algae, taste and odor producing algae, and aquatic macrophytes that clog conveyance structures and cause numerous other problems. These challenges are well-documented in the State Water Project Watershed Sanitary Survey, 2011 Update (Archibald Consulting et al, 2012). The Nitrate Study concludes that the incremental increase in nitrate concentrations from the Stockton Wastewater Control Facility at the Banks and Jones pumping plants will not cause algal blooms or result in undesirable tastes and odors for downstream water users, when they otherwise would not occur. There is no evidence to support the conclusion that adding additional nitrate from the Stockton Wastewater Control Facility as average dry weather flow increases to 55 mgd would not exacerbate these problems.

### Monitoring Requirements

While conducting the technical studies for the Drinking Water Policy, the stakeholder work group found that there are limited data on several key drinking water constituents in wastewater effluent. As a result, a number of assumptions were made and literature values were used to estimate wastewater quality. The assumptions are documented in a report prepared by West Yost (Wastewater Control Measures Study), which is posted on the Central Valley Water Board's website. CUWA appreciates the monitoring that is required in the Stockton tentative permit for drinking water constituents; however we have several concerns with the Monitoring and Reporting Program:

---

201 N. Civic Dr., Suite 115, Walnut Creek, CA 94596 925.210.2525 FAX 925.937.9026

- Effluent Monitoring - Total Kjeldahl nitrogen (TKN) and total organic carbon (TOC) have been eliminated from the effluent monitoring program. We support eliminating TOC since there are now several years of TOC data on Stockton effluent and it is still required to be monitored during the Effluent and Receiving Water Characterization Study. TKN should continue to be included in the weekly effluent monitoring until the denitrification facilities are constructed and are operational.
- Receiving Water Monitoring – Many of the nitrogen constituents (nitrate, nitrite, TKN) have been removed from the receiving water monitoring program. These constituents should be retained until the denitrification facilities are constructed and are operational.

CUWA appreciates the efforts of Central Valley Water Board staff to protect drinking water quality. If you have any questions on our comments, please contact me at 925-210-2477.

Sincerely,



Cindy Paulson, Ph. D.  
Executive Director

cc: Kenneth Landau