



# CVCWA

## Central Valley Clean Water Association

*Representing Over Fifty Wastewater Agencies*

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**TERRIE MITCHELL – Chair, Sacramento Regional CSD**  
**TERESA TANAKA – Secretary, Calaveras County WD**

**CASEY WICHERT – Vice Chair, City of Brentwood**  
**ROBERT GRANBERG – Treasurer, City of Stockton**

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October 20, 2017

**Via Electronic Mail Only**

Ms. Danielle Siebal  
Regional Water Quality Control Board,  
Central Valley Region  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, California 95670  
danielle.siebal@waterboards.ca.gov  
RB5S-NPDES-Comments@waterboards.ca.gov

RE: Comments on the Tentative Waste Discharge Requirements for City of Tracy,  
Wastewater Treatment Plant, San Joaquin County

Dear Ms. Siebal:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative Waste Discharge Requirements for the City of Tracy Wastewater Treatment Plant (Tentative Order). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this letter, we provide the following comments regarding the recognition of low-level toxicity challenges in establishing the toxicity monitoring trigger.

CVCWA appreciates that the Tentative Order recognizes that determining what is causing toxicity at very low levels can be a challenge. Accordingly, we appreciate that Provision VI.C.2.a provides reasonable actions for publicly-owned treatment works (POTWs) to undertake to identify and address the causes of toxicity effects that meet a trigger of >1 TUc with options

other than immediately undertaking a site-specific Toxicity Reduction Evaluation (TRE). We are looking forward to continuing to work with Central Valley Regional Water Quality Control Board staff on the issue of low-level toxicity as CVCWA's study on this topic is ongoing.

We appreciate your consideration of these comments. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268 1338 or [eefficer@cvcwa.org](mailto:eefficer@cvcwa.org).

Sincerely,

A handwritten signature in cursive script that reads "Debbie Webster".

Debbie Webster,  
Executive Officer