



# CVCWA Central Valley Clean Water Association

*Representing Over Sixty Wastewater Agencies*

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April 15, 2010

*Submitted Via Electronic Mail*

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Central Valley Region  
11020 Sun Center Drive, Suite 200  
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**Re: Central Valley Clean Water Association's Comments on the Tentative Order for the Placer County Department of Facility Services, Placer County Sewer Maintenance District 1 Wastewater Treatment Plant**

Dear Ms. Messina:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative waste discharge requirements (Tentative Order) and tentative cease and desist order (Tentative CDO) for the Placer County Department of Facility Services (County), Placer County Sewer Maintenance District 1 Wastewater Treatment Plant. CVCWA is a non-profit organization of agencies that own and operate wastewater treatment facilities throughout the Central Valley Region. CVCWA represents its members in regulatory matters that affect surface water discharge and land application with a perspective to balance environmental and economic interests consistent with applicable law. Consequently, CVCWA has a keen interest in effluent limitations adopted by the Central Valley Regional Water Quality Control Board (Regional Water Board) in waste discharge permits.

For the reasons explained below, CVCWA respectfully requests that you remove the effluent limitations for aluminum from the Tentative Order. In addition, CVCWA requests that you move the interim effluent limitations and time schedules for biochemical oxygen demand (BOD<sub>5</sub>) and total suspended solids (TSS) from the Tentative CDO to the Tentative Order.

**A. The Tentative Order's Effluent Limitations for Aluminum Should Be Removed and Tentative CDO Revised Accordingly**

The Tentative Order proposes final effluent limitations for aluminum, total recoverable, of 68 µg/L as an average monthly limitation and 151 µg/L as a maximum daily limitation. (Tentative Order at p. 12.) The basis for these limitations is the United States Environmental Protection Agency's (USEPA) National Ambient Water Quality Criteria (NAWQC) for the protection of freshwater aquatic life. (*Id.* at pp. F-37 to F-38.) In particular, the Tentative Order relies upon the recommended 4-day average chronic criterion for aluminum of 87 µg/L to implement the basin plan's narrative toxicity objective. (*Ibid.*) The Fact Sheet of the Tentative Order states:

Although the effluent hardness may currently increase the downstream hardness, future modifications of the treatment process to discontinue addition of magnesium hydroxide may significantly reduce the effluent hardness and, consequently, the downstream receiving water hardness to levels supportive of the applicability of the NAWQC chronic criteria for aluminum. Therefore, the low pH values and low hardness observed in the receiving water is supportive of the applicability of the NAWQC chronic criteria for aluminum, according to USEPA's development document. (Tentative Order at p. F-37.)

USEPA considers the chronic criterion of 87 µg/L necessary to protect waters that concurrently experience low hardness (10-12 mg/L as CaCO<sub>3</sub>) and pH (6.5-6.6). For waters that do not experience such conditions, USEPA indicates that the criterion for aluminum of 750 µg/L is protective of aquatic life. The 750 µg/L criterion should apply to the receiving water at and downstream of the County's discharge. The lowest measured upstream receiving water hardness is 20 mg/L as CaCO<sub>3</sub> and lowest measured effluent hardness is 141 mg/L as CaCO<sub>3</sub>. (Tentative Order at p. F-37.) Accordingly, the downstream receiving water hardness would always be above 20 mg/L as CaCO<sub>3</sub> and substantially greater than the 10-12 mg/L CaCO<sub>3</sub> hardness range if the 87 µg/L chronic criterion applies. Under conditions where the downstream receiving water flow is dominated by the discharge and thus aluminum levels predominantly affected by the discharge, downstream total hardness would be on the order of 80 mg/L as CaCO<sub>3</sub> or greater.

As indicated above, the Tentative Order's Fact Sheet acknowledges that the County's use of magnesium hydroxide for nitrification affects final effluent hardness. (Tentative Order at p. F-37.) The Fact Sheet also acknowledges that the County plans to discontinue the use of magnesium hydroxide after the treatment plant upgrades, which will reduce hardness of the effluent and receiving water from current levels. (*Ibid.*) The Fact Sheet does not identify what the new hardness levels would be or whether the new levels would be in the range at which the 87 µg/L or 750 µg/L criterion would apply. (See *id.* at pp. F-37 to F-38.) The determination of the appropriate criterion should be based on the hardness of the current final effluent produced by the treatment plant. The monitoring and reporting program for the Tentative Order requires the County to monitor hardness monthly. (*Id.* at pp. E-5, E-11.) Further, the Tentative Order includes a reopener provision to allow for a permit modification when new information not available at the time of permit issuance would have justified different permit conditions. (*Id.* at p. 21.) A major future reduction in effluent hardness tied to the County's elimination of the use of magnesium hydroxide would constitute new information that is unknown and therefore not available at this time.

The aluminum concentrations in the effluent do not exceed the currently applicable chronic criterion of 750 µg/L or drinking water maximum contaminant level of 200 µg/L. For this reason and those just described, CVCWA requests that you remove the effluent limitations for aluminum from the Tentative Order and revise the Tentative CDO accordingly. (See Tentative CDO at pp. 7-8.)

**B. The Tentative Order Should Include Compliance Schedules for BOD<sub>5</sub> and TSS**

The Tentative CDO includes interim effluent limitations and a time schedule for BOD<sub>5</sub> and TSS. (Tentative CDO at pp. 7-8.) Consistent with the State's *Policy for Compliance Schedules in National Pollutant Discharge Elimination System Permits* (Resolution 2008-0025), these interim limitations and the time schedule should be included in the Tentative Order rather than the Tentative CDO. The BOD<sub>5</sub> and TSS limitations are new, more stringent numeric limitations than those previously applied to the County's discharge and result from a newly interpreted water quality objective.

Thank you for considering these comments on the Tentative Order and CVCWA's above-requested revisions. Please contact me at (530) 268-1338 if you have any questions.

Sincerely,



Debbie Webster  
Executive Officer

c: Will Dickenson, Dave Atkinson – Placer County  
Pamela Creedon - CVRWQCB