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March 27, 2012

Kenneth Landau
Assistant Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

RE: Comments on the Tentative Draft Permit for the Center for Aquatic Biology and Aquaculture (CABA) facility at the University of California, Davis in Yolo County.

Dear Mr. Landau:

The university has provided the following comments for your consideration on the Tentative Draft Permit for the Center for Aquatic Biology and Aquaculture at the University of California, Davis. They include the following:

1. The university would like to request that the Ecosystem/Wetlands located at the Putah Creek Research Facility and north and northwest of Curve pond be reinstated back into the Tentative Draft Permit. This would allow the facility to retain continued flexibility to determine whether any discharge needs to go to Putah Creek, or if the capacity of the additional wetland ponds is adequate.

The ecosystem/wetlands are referenced in the current CABA permit (R5-2006-0126) and includes the following permit language, which describes the wetland ponds and discharge specifications/pond disposal limitations.

On Page 1, Background, item 3 of the current permit reads:

"Effluent from the Putah Creek Research Facility may also be diverted to a series of wetland ponds used for research studies. There is no discharge of water from these wetlands to surface waters. The wetlands are considered part of the research process, not a water of the State. The wetlands remain dry when corresponding research is not taking place. The wetlands are managed to prevent vector problems, nuisance, and toxicity to wildlife, and to minimize the occurrence of avian botulism, other infectious diseases, and bioaccumulation in the food chain.

To protect the wildlife that is attracted to the wetlands, limitations and requirements have been included in this Order for the discharge to the ponds and wetlands. The Order requires that toxic pollutants shall not be present in the water column, sediments, or biota in concentrations that produce detrimental responses in human, plant, animal, or aquatic life, and that toxic pollutants shall not bioaccumulate in concentrations that are harmful to human health or aquatic resources."

Page 20, C 1-3 outlines the discharge specifications and pond disposal limitations for Jamison Pond located at the Aquatic Center facility and for the ponds and wetlands located at the Putah Creek Research Facility.

Page 25, H.1-2: Wetlands limitations – Toxic pollutants shall not be present in the water column, sediments, or biota...

Factsheet

Page 1, paragraph 3 reads:

“Effluent from the Putah Creek Research Facility may be diverted to a series of ponds used for wetlands and ecosystems studies...”

Monitoring and Reporting Program

Page 1, Effluent Monitoring Aquatic Center (D-001) and Putah Creek Research Facility (D-002) discusses the monitoring requirements of D-002 relative to the Experimental Ecosystem.

Page 9, paragraph 3: Receiving Water Monitoring – requirements for visual monitoring of ecosystem wetland ponds.

Page 10, Ponds and Wetlands Monitoring Table – Wetlands influent/effluent monitoring requirements for experimental ecosystem wetland ponds.

The wetlands are also identified on Attachment A-2, Process Schematics as Ecosystem/Wetlands CABA Putah Creek Facility.

2. The university requests the ability to reroute wastewater from the Aquatics Center to the ground surface, with return water flow to Jamison Pond, in a limited area adjacent to Jamison Pond, depicted in red ink on the attached Figure, and as presented in the attached Flow Schematic. This may entail constructing channels and basins that will infiltrate a portion of the discharge stream. This flexibility will serve two purposes over the permit period:

- a. Allow the completion of a research project to study the effect of light levels on the establishment and growth of submersed aquatic plant propagules of one native species (*Elodea canadensis*) and one invasive species (*Myriophyllum spicatum*), with the hypothesis that survival and growth of propagules of both species will increase with greater light levels.

This project will take place on land adjacent to the UC Davis aquaculture facility and just west of Jamison Pond, and will begin in June 2012. Seven connected channels, each 25m long, 0.75m wide, and 0.6m deep, will be dug in this area, and water will be diverted to flow through these channels from the aquaculture center's water output.

The channels may be utilized to support similar research projects in subsequent years.

- b. Allow for Study activities to occur in the area to evaluate the feasibility of reducing the amount of wastewater discharged to Putah Creek from the facility. Potentially, ponds and channels will be constructed and infiltration capacity evaluated under various flow and climate conditions.

3. Page 26, VII.A Compliance Determination – Total Suspended Solids (TSS) Effluent Limitations (Sections IV.1.a and IV.A.2.a). Delete “24-hour composite samples” and insert “grab samples”

for consistency with the with the TSS sampling type requirements located on page E-5, Monitoring and Reporting Program, Table E.2.

4. Page I-1, II.D Sample Type: Delete "24-hour flow proportioned composite samples" and insert "grab samples" for consistency with the sampling type requirements located on page E-5, Monitoring and Reporting Program, Table E-2.
5. Page I-8.F10- Define Criterion Quantitation Limit (CQL).
6. Page F-9, D.1 Compliance Summary: Please clarify the Discharge Point No. 002 electrical conductivity (EC) value of 823 umhos/cm on June 23, 2007. According to the Monitoring and Reporting Program, EC sampling is required quarterly at effluent location D-002, which was done July 2007.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

If you require additional information or have any questions regarding the information provided, please contact Brent Cutler at (530) 752-0177 or bacutler@ucdavis.edu.

The university appreciates your consideration of the comments submitted on the CABA Tentative Draft Permit.

Sincerely,



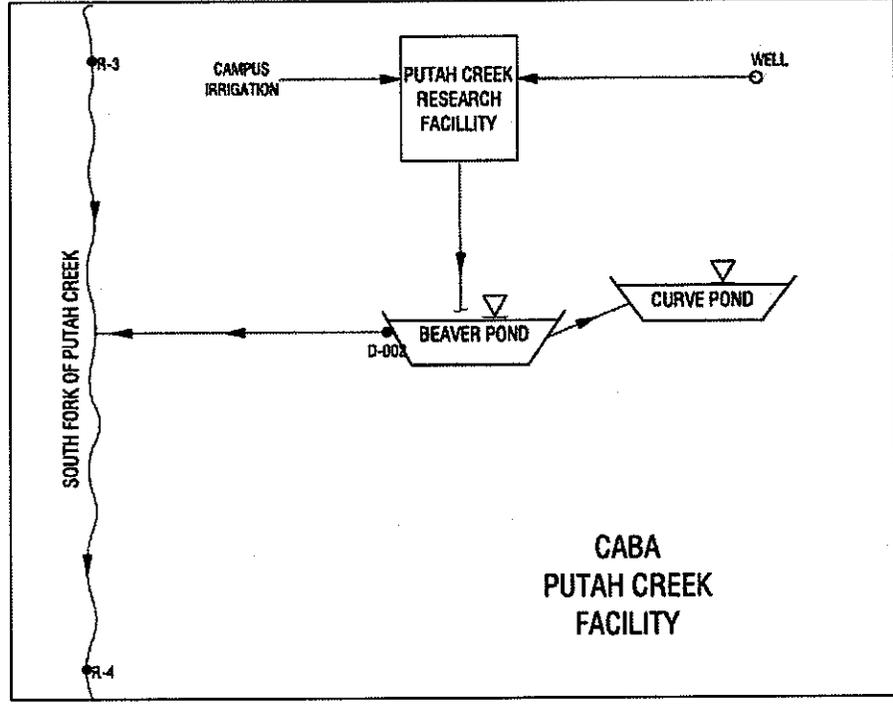
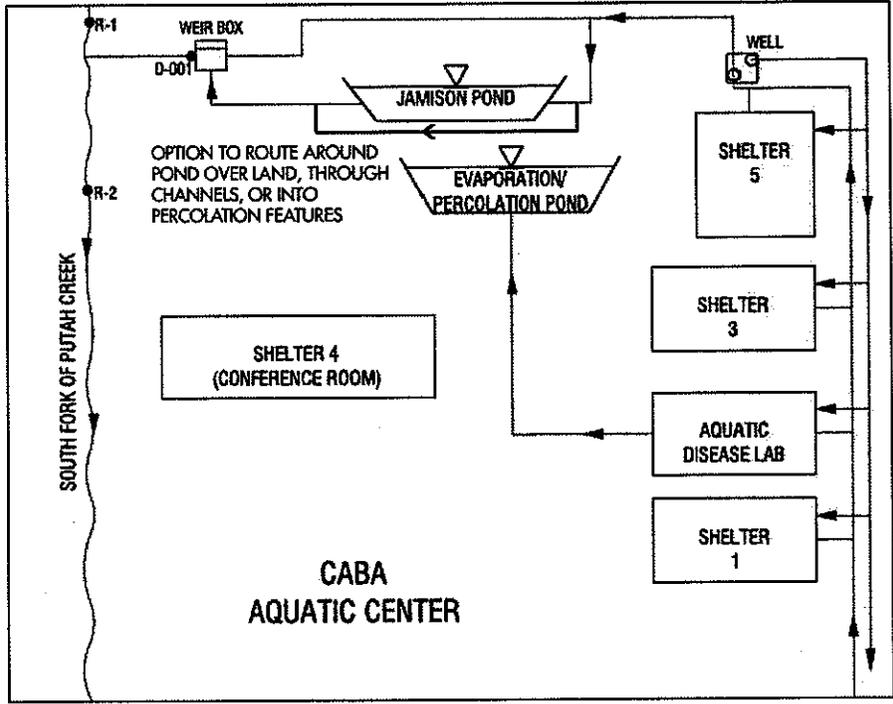
Jill Parker
Associate Vice Chancellor, Safety Services

/vrln

Attachments: Figure
Flow Schematic

c: Paul Lutes, CABA
Josh Palmer, RWQCB
Gayleen Perreira, RWQCB
File

ATTACHMENT C – FLOW SCHEMATIC



DATE 5/24/2011	SCALE NONE	PROJECT MANAGER B. CUTLER
DRAWN B. WOOLF	ZONE N/A	CAAN N/A
PATH: G:\PROJECTS\EH&S\CEBACenterOutfallsPermit	LAYOUT A-PORTRAIT	

**PROCESS SCHEMATICS
CENTER FOR AQUATIC BIOLOGY
AND AQUACULTURE (CABA)**

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