



# CVCWA

## Central Valley Clean Water Association

*Representing Over Fifty Wastewater Agencies*

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**MICHAEL RIDDELL** – Chair, City of Riverbank  
**CASEY WICHERT** – Secretary, City of Brentwood

**TERRIE MITCHELL** – Vice Chair, Sacramento Regional CSD  
**MARGARET ORR** – Treasurer, City of Stockton

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October 27, 2014

**Via Electronic Mail Only**

Mr. David Kirn  
Water Resources Control Engineer  
Regional Water Quality Control Board,  
Central Valley Region  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670  
[david.kirn@waterboards.ca.gov](mailto:david.kirn@waterboards.ca.gov)

RE: Comments on the Tentative Waste Discharge Requirements for University of California, Davis, Main Wastewater Treatment Plant, Solano and Yolo Counties

Dear Mr. Kirn:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative Waste Discharge Requirements for the University of California, Davis Main 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 salinity plan requirement and the water quality-based effluent limitation for boron, and request revisions as indicated herein.

**I. Salinity Plan Requirement**

The Tentative Order requires the University to prepare a “salinity evaluation and minimization plan to identify and address sources of salinity from the Facility” within nine

months of the adoption of the order.<sup>1</sup> Since 2004, this discharger has prepared a salinity study to develop site-specific objectives for Putah Creek, a source control study to reduce salinity from the central heating and cooling plant, a technical memorandum for salinity reduction and source control, a technical memorandum on EC, and a report on reducing water cycling in the cooling towers.<sup>2</sup> The University has also pursued the following salinity projects: installation of reverse osmosis units at the central heating and cooling plant; replacement of existing water supply through either the Solano Water Project or the Davis-Woodland Surface-Water Project; and installation of reverse osmosis for the boiler at the Primate Center.<sup>3</sup> These studies and projects represent extensive efforts to learn about sources of salinity and implement source control where feasible. Yet, the Central Valley Regional Water Quality Control Board (Regional Board) is requiring yet another salinity evaluation and minimization plan in this permit.

Given the University's comprehensive past efforts to study and address salinity in its discharge, CVCWA respectfully requests that the salinity plan requirement be removed from the Tentative Order. At minimum, the provision should be revised to require an update to the University's existing plans.

## II. Effluent Limitation for Boron

The Tentative Order imposes a final water quality-based effluent limitation for boron of 1.5 mg/L as an annual average despite the fact that there is no reasonable potential.<sup>4</sup> The average and maximum effluent concentration for boron is 0.78 mg/L, well below the site-specific objective of 1.5 mg/L.<sup>5</sup> The Tentative Order cites this information, but still concludes that salinity in the discharge has a reasonable potential to cause an excursion above the site-specific objective. This conclusion is not accurate based on the monitoring data. Moreover, the prior order does not include a limitation for boron,<sup>6</sup> and thus, anti-backsliding is not a valid reason for imposing a water-quality based effluent limit when there is no reasonable potential.

CVCWA respectfully requests that this effluent limitation for boron be removed. There is no reasonable potential, and the Regional Board does not offer another legally sound basis for imposing a water quality-based effluent limitation.<sup>7</sup> The limitation for electrical conductivity will

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<sup>1</sup> Tentative Order, p. 14.

<sup>2</sup> See Order No. R5-2008-0183, p. 10 (UC Davis).

<sup>3</sup> *Ibid.*; see also Tentative Order, p. F-42.

<sup>4</sup> Tentative Order, p. 5.

<sup>5</sup> *Id.*, p. F-41.

<sup>6</sup> See Order No. R5-2008-0183, pp. 11-12.

<sup>7</sup> See 40 C.F.R. § 122.44(d).

ensure that the University continues to address and reduce salinity in the discharge where feasible and effective.

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 [ecofficer@cvcwa.org](mailto:ecofficer@cvcwa.org).

Sincerely,



Debbie Webster,  
Executive Officer

cc (via email): Pamela Creedon, Central Valley Regional Water Quality Control Board  
([pcreedon@waterboards.ca.gov](mailto:pcreedon@waterboards.ca.gov))