



CVCWA Central Valley Clean Water Association

Representing Over Sixty Wastewater Agencies

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May 12, 2009

Via U.S. Mail and Electronic Mail

Ronald S. Dykstra
Regional Water Quality Control Board,
Central Valley Region
415 Knollcrest Drive, Suite 100
Redding, CA 96002
rdykstra@waterboards.ca.gov

RE: **Comments on the Tentative Order for the City of Portola, Portola Wastewater Treatment Plant**

Dear Mr. Dykstra:

The Central Valley Clean Water Association (CVCWA) appreciates this opportunity to comment on the tentative waste discharge requirements for the City of Portola, Portola Wastewater Treatment Plant (Tentative Order). CVCWA is a non-profit organization of 60 agencies that own and operate wastewater treatment facilities throughout the Central Valley. 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. Accordingly, CVCWA has a keen interest in permit provisions adopted by the Central Valley Regional Water Quality Control Board (Regional Water Board).

CVCWA respectfully requests that you revise the Tentative Order's final effluent limit of 684 umhos/cm for electrical conductivity (EC) from a monthly to an annual average. (See Tentative Order at p. 8.) Salinity does not cause short-term toxic effects, and the water quality control plan for the Sacramento and San Joaquin River Basins (Basin Plan) does not require short-term averages for EC. (See Basin Plan at pp. III-3.00; Tentative Order at pp. F-28.) The Basin Plan incorporates the drinking water maximum contaminant level for EC from Title 22 of the California Code Regulations (Title 22). (Basin Plan at p. III-3.00.) The secondary MCLs for EC are consumer-acceptance based, allow for higher short-term levels and are generally expressed as annual averages for drinking water providers. The Basin Plan also includes a salinity objective of 150 umhos/cm at a 90th percentile for well-mixed waters of the Middle Fork of the Feather River at 25 degrees Celsius as a 10-year rolling average. (Basin Plan at Table III-3 p. III-7.00; Tentative Order at p. F-28.)

The revision requested would make the Tentative Order consistent with the Regional Water Board's current permitting practice of specifying EC limits as annual averages. (See e.g., Order Nos. R5-2009-0010, R5-2009-0007, R5-2008-0177.) The Regional Water Board's salinity guidance provides that discharge permits should treat salinity consistently. (*Management Guidance for Salinity in Waste Discharge Requirements*, from P. Creedon, et. al to Program Managers (April 26, 2007) at p. 1.) Moreover, the salinity guidance encourages the use of "a long-term average, such as an annual average" for numeric EC limits based on performance. (*Id.* at p. 5.) The EC limit in the Tentative Order is performance-based. (Tentative Order at p. F-29.) Therefore, the Tentative Order should express the EC limit as an annual average instead of a monthly average.

Thank you for considering CVCWA's request that the Tentative Order specify the EC limit for the Portola Wastewater Treatment Plant as an annual rather than monthly average. Please contact me at (530) 268-1338 if you have any questions.

Sincerely,



Debbie Webster
Executive Officer