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(1929 - 2002)

September 10, 2009

Ms. Pamela C. Creedon, Executive Officer  
Mr. Kenneth D. Landau, Assistant Executive Officer  
Regional Water Quality Control Board, Central Valley Region  
11020 Sun Center Dr., Suite #200  
Rancho Cordova, CA 95670

*Re: Tentative Waste Discharge Requirements (NPDES No. CA0081558) and  
Time Schedule Order for the City of Manteca Wastewater Quality Control  
Facility San Joaquin County  
Our File No.: 3535-010*

Dear Ms. Creedon and Mr. Landau:

The San Luis & Delta-Mendota Water Authority ("Authority") and Westlands Water District ("Westlands") provide written comments on the Tentative Waste Discharge Requirements (NPDES No. CA0081558) and Time Schedule Order for the City of Manteca Wastewater Quality Control Facility, San Joaquin County.

The materials issued by the Regional Water Quality Control Board ("Regional Board") on this matter suggest that the City of Manteca ("City") is striving to limit the pollutants in its discharges. The Authority and Westlands appreciate the City's efforts in that regard. However, the Authority and Westlands provide two comments concerning the Waste Discharge Requirements and Time Schedule Order.

First, the Tentative Waste Discharge Requirements and Time Schedule Order proposes an interim effluent limitation for salinity (electrical conductivity) of 1,000 µmhos/cm from April 1 to August 31. However, from September 2007 through August 2008, the City's "Highest Average Monthly Discharge" for salinity was 827 µmhos/cm. (Discharge Requirements at F-7.) The Authority and Westlands question why the proposed interim effluent limitation exceeds the "Highest Average Monthly Discharge".

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Second, there is growing concern with the effects of contaminants (including pharmaceuticals and endocrine disrupters) in the Delta on fish. The Authority and Westlands ask the Regional Board to take advantage of the opportunity presented by this permitting process to require the City to make more robust its data gathering and report to allow scientists to better understand the potential effects of contaminants that may be in the City's discharges.

Thank you very much for your consideration of these comments.

Very truly yours,

DIEPENBROCK HARRISON  
A Professional Corporation



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Authority and Westlands Water District

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