



# CVCWA

## Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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March 20, 2013

*Submitted Via Electronic Mail*

Elizabeth Thayer  
Regional Water Quality Control Board,  
Central Valley Region  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, California 95670  
[ETHayer@waterboards.ca.gov](mailto:ETHayer@waterboards.ca.gov)

**Re: Comments on the Tentative Waste Discharge Requirements Order R5-2013-XXXX, City of Colfax Wastewater Treatment Plant, Placer County**

Dear Ms. Thayer:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the tentative Waste Discharge Requirements Order R5-2013-XXXX, City of Colfax 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 spirit, we provide the following comments regarding the Tentative Order's justification for Biological Oxygen Demand (BOD) and Total Suspended Solids (TSS) effluent limitations, and the Ultraviolet Light (UV) Disinfection System Requirements.

The Tentative Order includes final effluent limitations for BOD and TSS that are being carried over from the City's current permit. In the current permit, it explains that tertiary treatment was determined to be necessary to protect certain beneficial uses (which were then identified as the municipal and domestic supply, agricultural and recreational beneficial uses). (See discussion in Order No. R5-2007-0130 at pp. F-16, F-29 –F-32.) It then further explains that the

final effluent limitations for BOD and TSS are based on the technical capability of the tertiary process. (Order No. R5-2007-0130, p. F-16.) The State Water Resources Control Board (State Board) has found the imposition of such limitations to be reasonable where it is necessary to achieve compliance with water quality standards. (*In the Matter of the Petitions of City of Stockton, et al.*, Order WQ 2009-0012, p. 7.)

Rather than maintaining the previous rationalization for adopting such limitations for BOD and TSS, which are to ensure proper operation of a tertiary treatment process, the Tentative Order includes a new rationalization that claims secondary wastewater treatment does not adequately remove BOD and TSS to levels that are protective of fish and other aquatic life. In other words, the Tentative Order now alleges that water quality based effluent limitations for BOD and TSS are necessary to protect aquatic life related beneficial uses. However, the fact sheet provides no evidence to support such a statement, nor does the Tentative Order identify any water quality criteria for BOD and TSS, which are supposedly appropriate for the protection of aquatic life beneficial uses. Accordingly, the Tentative Order needs to be revised to remove all such allegations. CVCWA recommends that the Tentative Order be revised to mirror Order No. R5-2007-0130 with respect to the limits for BOD and TSS.

With respect to the UV Disinfection system requirements, CVCWA appreciates the fact that the Tentative Order allows a discharger to provide for an alternative plan for UV dosage requirements. However, CVCWA remains concerned that Tentative Order continues the Regional Board's precedent for dictating in NPDES permits specific operating specifications for UV disinfection. CVCWA continues to contend that it is more appropriate for the Tentative Order to allow a discharger an alternative to the specific requirements identified in the Tentative Order. Specifically, the Tentative Order should be revised to provide as an alternative to all of the UV disinfection requirements the ability for a discharger to prepare, with DPH approval, a UV Operations and Maintenance Program. We recommend revisions accordingly.

We appreciate your consideration of these comments and request that you revise the Tentative Order as suggested above. If you have any questions or CVCWA can be of further assistance, please contact me at (530) 268-1338 or [eoofficer@cvcwa.org](mailto:eoofficer@cvcwa.org).

Sincerely,



Debbie Webster,  
Executive Officer

c: Pamela Creedon – Central Valley RWB (Via email: [PCreedon@waterboards.ca.gov](mailto:PCreedon@waterboards.ca.gov))  
Gayleen Perreira – Central Valley RWB (Via email: [GPerreira@waterboards.ca.gov](mailto:GPerreira@waterboards.ca.gov))  
Bruce Kranz – City of Colfax (Via email: [Bruce.Kranz@colfax-ca.gov](mailto:Bruce.Kranz@colfax-ca.gov))