



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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April 19, 2013

Submitted Via Electronic Mail

Ms. Kathy Harder
Senior Engineer
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, California 95670
kharder@waterboards.ca.gov

**Re: Comments on the Tentative Waste Discharge Requirements Order R5-2013-XXXX,
Calaveras County Water District Saddle Creek Golf Course, L.P., Copper Cover
Wastewater Reclamation Facility, Calaveras County**

Dear Ms. Harder:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit comments on the tentative Waste Discharge Requirements for the Calaveras County Water District Copper Cove Water Reclamation Facility (Tentative Order). Although we recognize that our comments on this permit is being submitted late, we are providing these comments in writing to express our concern and provide an opportunity prior to the hearing for Central Valley Water Board staff to consider and address these comments.

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 and Total Suspended Solids effluent limitations.

The Tentative Order includes final effluent limitations for BOD and TSS that are being carried over from the District's current permit. In the current permit, it explains that tertiary treatment was determined to be necessary to protect certain beneficial uses (which were included the municipal and domestic supply, agricultural and recreational beneficial uses. See discussion in Order No. R5-2006-0081 at pp. F-17-18, F-33-34). 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. R5-2006-0081, p. F-23).

The Tentative Order proposes to depart dramatically from the previous reasons and explanations for including the final effluent limitations for BOD and TSS (see pp. F-39). Rather than relying on the previous reasons, which CVCWA believes have not changed, the Tentative Order includes statements that allege that secondary wastewater treatment does not adequately remove BOD and TSS to levels that are protective of fish and other aquatic life. However, the fact sheet provides no evidence to support such a statement. Accordingly, the Tentative Order needs to be revised to remove all such allegations including removal of Section IV.C.3.c (iii) of the Fact Sheet (p. F-39) and any references to this section. CVCWA recommends that the Tentative Order be revised to mirror Order No. R5-2006-0081 with respect to the limits for BOD and TSS.

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 eofficer@cvcwa.org.

Sincerely,



Debbie Webster,
Executive Officer

c: Pamela Creedon – Central Valley RWB (via email)
Jim Marshall – Central Valley RWB (via email)
Teresa Tanaka – Calaveras County Water District (via email)

