



California Sportfishing Protection Alliance

"An Advocate for Fisheries, Habitat and Water Quality"

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2 February 2012

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 "I" Street, 24th Floor
P.O. Box 100
Sacramento, CA 95814
commentletters@waterboards.ca.gov

VIA: Elect
Hardcopy if Requested



RE: Comments, Petition of California Sportfishing Protection Alliance (Waste Discharge Requirements Order No. R5-2007-0113 [NPDES No. CA0079243] for City Of Lodi, White Slough Water Pollution Control Facility, San Joaquin County), Central Valley Water Board: Board Meeting Notification (SWRCB/OCC File A-1886)

Dear Ms. Townsend and Members of the State Board:

Thank you for the opportunity to provide comments on the proposed changes to the subject Order. The conclusions of the Order remain unchanged. CSPA does not object to the changes in the Order as currently proposed, with what we hope is a minor error as cited below. As required our comments have been limited to the changes to the proposed Order.

Our comment is as follows:

Page 20 has been modified to include the following sentence: *"The City may also want to consider either routing its industrial wastewater and industrial and agricultural stormwater runoff through the headworks of the treatment plant, or discontinue storing those wastestreams in the storage ponds, so that the storage ponds can qualify for the sewage treatment plant exemption from Title 27."*

The sentence states that the industrial wastewater could be routed through the wastewater treatment plant (WWTP) headworks. Generally, a WWTP headworks contains a flow measuring device, sampling equipment and a bar screen and/or communiter and possible grit removal. The headworks generally provide little treatment other than grinding or removing large sized waste materials. Simply routing the industrial wastes through the WWTP headworks will not reduce the overall pollutant load from the industrial wastestream. The character of the industrial wastes or stormwater would not be significantly altered. We also believe that simply running the industrial wastewater through the headworks of the WWTP only would not meet the spirit or letter of CCR Title 27. Frequently, it is stated that wastes can be diverted to a WWTP headworks when the intent is clearly to treat the wastes through all the WWTP processes. It is

our hope that the modification to the Order is simply in error and that the sentence can be modified to state that the industrial wastestream could be routed through the entire WWTP.

The transmittal letter stated that: "*Evidence relating to this matter will not be heard and written submittals will be accepted only if they are limited to the proposed amendments to the original order.*" It would be appreciated if you could clarify whether oral testimony will be allowed at the Board hearing.

Thank you for considering these comments. If you have questions or require clarification, please don't hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Jennings". The signature is written in a cursive, flowing style with some loops and flourishes.

Bill Jennings, Executive Director
California Sportfishing Protection Alliance