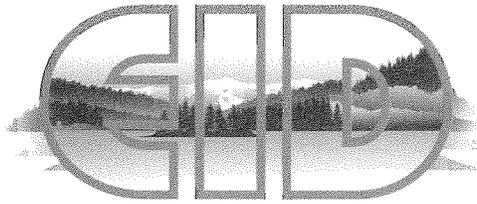


Harry J. Norris - *President*
Division 5
William (Bill) L. George
Vice President
Division 3



Ane D. Deister
General Manager
Thomas D. Cumpston
General Counsel

El Dorado Irrigation District

In Reply Refer To: FML1206-410

December 20, 2006

Mr. Kenneth Landau
Central Valley Regional Water Board
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

Subject: Deer Creek Wastewater Treatment Plant
Comments for Tentative Waste Discharge Requirements Amendment
(NPDES PERMIT NO. CA0078662)
Project No. DC2716

Dear Mr. Landau:

Attached are the El Dorado Irrigation District's (District) comments regarding the Tentative Waste Discharge Requirements Amendment for the Deer Creek Wastewater Treatment Plant. The District is pleased that the Regional Board staff is recommending the changes, which are a culmination of many years of hard work by the District and its representatives, Regional Board, State Board, EPA, Office of Administrative Law and many other organizations. Without the cooperation and commitment from these entities, the amendments would not be possible.

If you have any questions, please do not hesitate to contact me at (530)642-4177..

Sincerely,

Tim Sullivan
Senior Engineer, Wastewater Division

TS:nm

Enclosure: Comments

cc: Vicki Caulfield, Co-Manager Wastewater/Recycled Water - Operations
Elizabeth Wells, Co-Manager Wastewater/Recycled Water - Engineering
Diana Messina, Central Valley Regional Water Board

COMMENTS
ON
TENTATIVE AMENDMENTS TO WASTE DISCHARGE REQUIREMENTS
FOR
NPDES NO. CA0078662

FOR
EL DORADO IRRIGATION DISTRICT
DEER CREEK WASTEWATER TREATMENT PLANT

Prepared by:
Robertson-Bryan, Inc.

Prepared for:
EL DORADO IRRIGATION DISTRICT

December 20, 2006

1) p. 15, d. Copper. Suggest the following edits to the first sentence [underlined text represents suggested additions. ~~Strikethrough text~~ suggests deletions]. “*Based on analytical results...discharger, the discharge total recoverable copper concentration has been measured up to 30.7 ug/l....”*”

last sentence of same paragraph: “*At the worst-case hardness of 66 mg/l, the total recoverable criterion*”

2) p. 16, first paragraph, second sentence. “*When the total recoverable WER is applied to the criterion values for copper, the total recoverable criterion continuous concentration...*”

Third sentence: “*The maximum total recoverable copper effluent concentration (MEC) is 30.7 ug/l.*”

3) p. 22, b. “*Where discharge dilution ratio is 20:1 or greater, or where natural turbidity is greater than 5 NTUs, the following general turbidity objectives shall apply.*”

- *Where natural turbidity is between 5 and 50 NTUs, receiving water increases due to discharge shall not exceed 20 percent*
- *Where natural turbidity is between 50 and 100 NTUs, receiving water increases due to discharge shall not exceed 10 NTUs*
- *Where natural turbidity is greater than 100 NTUs, receiving water increases due to discharge shall not exceed 10 percent*”

4) p. 22, 8. “*The ambient (R2) temperature to be ~~below~~ elevated above the following temperatures:*”

5) Information Page 12, d. copper. *“Based on analytical results...measured up to a maximum total recoverable effluent concentration of 30.7 ug/l...”*

Next paragraph, First Sentence: “ The Discharger conducted a discharger-specific Water Effect Ratio (WER) study for copper consistent with state and federal guidance ~~to determine the site-specific toxicity of copper in the effluent and Deer Creek.~~

Third Sentence: *“The reason for performing this study is to determine if the WER ~~ratio~~ for the site-specific conditions in Deer Creek is greater than the default value, which would result in and if that value allows for a higher effluent limit for copper.”*

Last Sentence: *“Regional Board staff evaluated ... to account for a ~~site~~-specific WER for discharge from the DCWWTP.”*

6) Information Page 13, d. copper, third paragraph. *“The maximum total recoverable copper effluent concentration of 30.7 ug/l does not exceed the CMC or CCC of 25.8 ug/l (and equal to the CMC), ~~t~~ Therefore, the discharge does not ... for copper. Effluent limitations for copper and Table C, included in the original Order, have been deleted from this amended Order.”*

7) Information Page 16, Turbidity. *“... by the addition of the following to the end of the “Turbidity Section”:* The turbidity to increase as follows:

Deer Creek, source to Cosumnes River:

a. *“When the dilution ...*

8) MONITORING AND REPORTING PROGRAM p. 2, copper-monitoring frequency. As defined by the amended order, the DCWWTP’s discharges do not have reasonable potential to cause or contribute to an exceedance above the applicable copper water quality criteria. Consequently, requiring the District to monitor copper weekly is unnecessary, excessive, and inconsistent with monitoring requirements for all other priority pollutants that lack reasonable potential in this Order and all other NPDES permits issued by the Central Valley Board. For consistency with monitoring frequency required for priority pollutants lacking reasonable potential in other NPDES permits issued by the Central Valley Board, the District requests that the frequency required in this monitoring and reporting program for copper not exceed quarterly.