



September 22, 2008

Ms. Gayleen Perreira
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Subject: Tentative Waste Discharge Requirements and Time Schedule Order for City of Stockton Wastewater Treatment Plant

Dear Ms. Perreira:

California Urban Water Agencies (CUWA) has reviewed the subject tentative order for the City of Stockton and would like to commend Central Valley Regional Water Quality Control Board (Regional Water Board) staff on their commitment to protecting the drinking water beneficial use in the Delta. Many of CUWA's members rely on the Delta as a source of drinking water.

CUWA is working with the Regional Water Board on the technical studies needed to address numerous water quality concerns and to support a Basin Plan amendment to provide greater protection of drinking water supplies. The key constituents of concern to drinking water providers are organic carbon, nutrients, salinity, bromide and pathogens. The Drinking Water Policy technical studies include an evaluation of the loads of these constituents from sources in the watershed and an evaluation of the measures that can be taken to control the key sources. As part of these studies, the Regional Water Board will request that certain wastewater dischargers conduct monitoring to gather data on effluent concentrations of the key constituents of concern. The City of Stockton Wastewater Treatment Plant has been identified as one of the plants that will be asked to participate in this monitoring program.

Based on the current schedule for the Drinking Water Policy efforts, CUWA expects that the Basin Plan will be amended in 2009 or 2010 to incorporate additional protection of drinking water supplies. Since the tentative waste discharge requirements for Stockton will extend to 2013, CUWA requests that the Regional Water Board add the following reopener provision to the waste discharge requirements:

“Central Valley Drinking Water Policy. If water quality objectives for organic carbon, nutrients, salinity, bromide, and/or pathogens are adopted to protect drinking water supplies in the Central Valley, this permit may be reopened and modified to require that these objectives be met.”

CUWA also requests that the Regional Water Board include a requirement to immediately notify downstream drinking water agencies if there are spills of untreated or partially treated wastewater from the Stockton Wastewater Treatment Plant or collection system that reach Delta waters. Attachment 1 is contact information for the agencies that should be notified.

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CUWA appreciates the efforts of Regional Water Board staff to protect drinking water quality, both by requiring tertiary treatment of the Stockton wastewater and by working with us on the Drinking Water Policy. If you have any questions on our comments, please call me at 916-552-2929.

Sincerely,

A handwritten signature in cursive script that reads "Elaine M. Archibald".

Elaine M. Archibald

Enclosure

Wastewater Spill Notification Emergency Contact Information

California Urban Water Agencies

916-552-2929

Contra Costa Water District

24/7 Emergency Phone: 925-688-8374

Santa Clara Valley Water District

Emergency Spills: 408-395-9309

Alameda County Flood Control and Water Conservation District, Zone 7 Water Agency

Del Valle Water Treatment Plant 24/7 Emergency Phone: 925-447-6704

Alameda County Water District

24/7 Emergency Phone #1: 510-668-6636

24/7 Emergency Phone #2: 510-668-6645

Metropolitan Water District of Southern California

24/7 Emergency Phone: 800-354-4420