



CVCWA Central Valley Clean Water Association

Representing Over Sixty Wastewater Agencies

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September 21, 2008

Mr. James D. Marshall, P.E.
Senior Engineer
NPDES Section
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Re: Comments on the Tentative Waste Discharge Requirements for the City of Stockton Regional Wastewater Control Facility

Dear Mr. Marshall:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the Tentative Waste Discharge Requirements for the City of Stockton Regional Wastewater Control Facility (Tentative Order). CVCWA represents the interests of more than 60 wastewater agencies in the Central Valley in regulatory matters related to water quality and the environment.

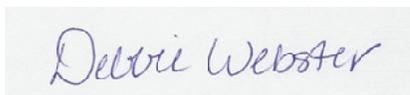
Based on its review of the Tentative Order, CVCWA has identified two issues for which it finds necessary to comment. The first issue is with regards to the monitoring requirements for sulfur dioxide (SO₂) and sodium bisulfite (Na HSO₃) contained in the Tentative Monitoring and Reporting Program (Tentative MRP). CVCWA is uncertain as to why the Central Valley Regional Water Quality Control Board (Regional Water Board) staff would find it necessary to require monitoring for these two constituents when such monitoring is not necessary to determine compliance with effluent limitations or evaluate surface water quality. In general, CVCWA is concerned with the imposition of excessive monitoring requirements when there is no regulatory, or water quality based justification. Further, when the State Water Resources Control Board (State Water Board) imposed a monitoring surcharge on NPDES permit holders to fund the Surface Water Ambient Monitoring Program, it was with the understanding that Regional Water Boards would not impose monitoring requirements that were not directly related to permit compliance. The proposed monitoring requirements for SO₂ and Na HSO₃ in the Tentative Order appear to be in direct conflict with this agreement.

More specifically, many wastewater agencies in the Central Valley use SO₂ and/or Na HSO₃ to de-chlorinate effluent before discharge to protect aquatic life. The chemicals themselves are not considered to be a threat to aquatic life in receiving waters. CVCWA is concerned that the proposed monitoring requirements would establish a precedent that will lead to additional monitoring for these constituents by all Central Valley wastewater agencies. As indicated earlier, CVCWA is fundamentally opposed to the imposition of excessive monitoring without proper justification. Thus, CVCWA respectfully requests that the monitoring requirements for SO₂ and Na HSO₃ be removed from the Tentative MRP.

CVCWA's second issue pertains to language in the Fact Sheet for hardness. Overall, CVCWA concurs with the proposed language in the Fact Sheet and the approach proposed by the Regional Water Board, as expressed on pages F-16 through F-18. However, there are some inconsistencies in the language in other parts of the Fact Sheet that should be corrected to ensure consistency throughout the Fact Sheet. In particular, CVCWA is concerned with the hardness discussion relative specifically to copper in the Fact Sheet. The Fact Sheet at page F-29 proposes to use "worst-case measured design hardness from the receiving water," to calculate CTR criteria for copper. Such an approach for copper would be inconsistent with the use of "reasonable worst-case ambient hardness, estimated here as the lowest effluent hardness," which is the approach expressed in the hardness section of the Fact Sheet. (See Tentative Order at F-18.) To address this inconsistency, CVCWA recommends that the language on page F-29 be revised and amended to reflect the approach expressed on pages F-16 through F-18 of the Fact Sheet.

In summary, CVCWA respectfully requests that the Tentative MRP be revised to remove the proposed effluent monitoring requirements for SO₂ and Na HSO₃, and that the Fact Sheet be revised to remove inconsistencies with regard to the selection of hardness for calculating CTR criteria for copper. Thank you for your consideration. Please call me if you have any questions regarding our comments.

Sincerely,



Debbie Webster, Executive Officer
Central Valley Clean Water Association

c: Jeff Willett – City of Stockton