



CVCWA

Central Valley Clean Water Association

Representing Over Sixty Wastewater Agencies

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September 24, 2008

James D. Marshall, P.E.
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114

RE: TENTATIVE WASTE DISCHARGE REQUIREMENTS (NPDES NO. CA0084727) FOR TUOLUMNE UTILITIES DISTRICT, SONORA REGIONAL WASTEWATER TREATMENT PLANT, AND JAMESTOWN SANITARY DISTRICT, JAMESTOWN WASTEWATER TREATMENT PLANT, TUOLUMNE COUNTY

Dear Mr. Marshall,

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the Tentative Waste Discharge Requirements for the Tuolumne Utilities District, Sonora Regional Wastewater Treatment Plant (WWTP) and Jamestown Sanitary District, Jamestown WWTP (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.

The Fact Sheet (p. F-14 and F-15) states that the tentative order contains a reopener to reconsider dilution credits for acute and chronic aquatic life criteria should the Tuolumne Utilities District provide adequate justification. However, the reopener provision within the Tentative Order is not clear in this regard. CVCWA recommends that a specific reopener provision be included within the Tentative Order to allow changes to acute and chronic aquatic life criteria, including the chronic whole effluent toxicity numeric-monitoring trigger, as a result of providing adequate justification for dilution credit.

Thank you for your consideration of our comments. Please feel free to contact me if you have any questions.

Sincerely,

Debbie Webster, Executive Officer
Central Valley Clean Water Association

c: Tom Scesa – Tuolumne Utilities District