



CVCWA

Central Valley Clean Water Association

Representing Over Sixty Wastewater Agencies

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ED CROUSE – VICE CHAIR, RANCHO MURIETA CSD
HUMBERTO MOLINA – TREASURER, MERCED

October 24, 2008

Sent via U.S. Postal Mail and Electronic Mail

Ms. Diana Messina
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114

RE: NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT NO. CA0078999 for THE CITY OF COLUSA WASTEWATER TREATMENT PLANT, COLUSA COUNTY

Dear Ms. Messina,

The Central Valley Clean Water Association (CVCWA) has reviewed the Tentative Order for the City of Colusa and understands that a narrative limitation for chronic toxicity has been added in response to State Water Board Order No. 2008-0008, which requires the inclusion of a narrative limitation for chronic toxicity where there is reasonable potential. (WQO Order 2008-0008 at pp. 6-7.) In more recent tentative orders, where the Regional Water Board has included a narrative chronic toxicity limitation, the Regional Water Board has also included compliance determination language that states,

“Compliance with the accelerated monitoring and TRE/TIE provisions of Provision VI.C.2.a shall constitute compliance with the effluent limitation IV.A.1.k for chronic whole effluent toxicity.”

No such language currently exists in the City of Colusa’s Tentative Order. In order to ensure that compliance with the chronic toxicity limitation is consistent for all Central Valley wastewater entities, CVCWA recommends that the City of Colusa Tentative Order be revised to include the relevant compliance determination language.

Thank you for your consideration of this matter.

Sincerely,

Debbie Webster, Executive Officer
Central Valley Clean Water Association

c: Patty Hinkel – City of Colusa
Yula Borroum – ECO:Logic Engineers (electronic version only)