



January 6, 2010

Mr. Jim Marshall  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

Subject: Tentative Renewal of Waste Discharge Requirements for City of Sacramento  
Combined Wastewater Collection and Treatment System

Dear Mr. Marshall:

California Urban Water Agencies (CUWA) has reviewed the subject tentative order for the City of Sacramento's Combined Wastewater Collection and Treatment System.

### **Pathogen Monitoring**

The combined wastewater system discharges partially treated wastewater to the Sacramento River, the major source of drinking water for many of CUWA's members. Partially treated wastewater contains a number of human pathogens that could adversely impact the drinking water supply. CUWA requests that the monitoring program require the City to monitor the discharge and the receiving waters for *Giardia* and *Cryptosporidium* whenever there are discharges from the system. Fecal coliform monitoring is not adequate to assess the impact of the discharge on drinking water supplies.

### **Reopener Provision**

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. Based on the current schedule for the Drinking Water Policy efforts, CUWA expects that the Basin Plan will be amended in the next several years to incorporate additional protection of drinking water supplies. Since the waste discharge requirements for the City of Sacramento will extend to 2015, 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 are adopted for organic carbon, nutrients, salinity, bromide, or pathogens to protect drinking water supplies in the Central Valley Region, this Order may be reopened for addition and/or modification of effluent limitations and requirements, as appropriate, to require compliance with the applicable water quality objectives.”*

## **Notification of Drinking Water Agencies**

CUWA also requests that the Regional Water Board include a requirement that the City immediately notify downstream drinking water agencies whenever there are discharges from the combined system. This will allow the downstream water agencies to take preventive measures to protect the public health of their customers. The agencies requesting notification are listed on Attachment A.

CUWA appreciates the efforts of Regional Water Board staff to protect drinking water quality. 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  
Executive Director

**Attachment A**  
**Combined Wastewater System Discharge Notification 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

**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