



October 17, 2012

Sent via Electronic Mail and Regular Mail

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

Subject: Tentative Waste Discharge Requirements for City of Tracy Wastewater Treatment Plant

Dear Mr. Landau:

California Urban Water Agencies (CUWA) has reviewed the subject Tentative Order for the City of Tracy Wastewater Treatment Plant and would like to commend Central Valley Regional Water Quality Control Board (Central Valley 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. We offer the following comments for your consideration.

Reopener Provisions

We support the inclusion of the reopener provision on South Delta Salinity Standards and request that the Central Valley Water Board include a reopener provision for the Drinking Water Policy. As you know, CUWA is working with Central Valley Water Board staff and a stakeholder work group to bring the proposed Drinking Water Policy to the Board by July 2013. Since the waste discharge requirements for Tracy will extend to 2017, CUWA requests that the Central Valley Water Board add the following reopener or, in lieu of the reopener, include the monitoring we request in the following section:

"Drinking Water Policy. The Central Valley Water Board will consider adoption of the Drinking Water Policy in 2013. This order may be reopened to incorporate monitoring of drinking water constituents that may be included in the implementation plan for the Drinking Water Policy."

Monitoring Requirements

While conducting the technical studies for the Drinking Water Policy, the stakeholder work group found that there are limited data on several key drinking water constituents in wastewater effluent. As a result, a number of assumptions were made and literature values were used to estimate wastewater quality. The assumptions are documented in a report prepared by West Yost (Wastewater Control Measures Study), which is posted on the Central Valley Water Board's website. CUWA appreciates the monitoring that is required in the Tracy tentative permit for drinking water constituents; however, the list of constituents does not include several key drinking water constituents. CUWA requests that monthly effluent monitoring be required for total Kjeldahl nitrogen, total phosphorus, total organic Kjeldahl nitrogen, ammonia, nitrate plus nitrite, total phosphorus, total organic carbon, dissolved organic carbon, total dissolved solids, and chloride) could be included

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in the effluent and receiving water study and the monitoring frequency could be changed from every two months to monthly.

Notification of Drinking Water Agencies

CUWA requests that the Regional Water Board include a requirement in the Order to immediately notify downstream drinking water agencies if there are spills of untreated or partially treated wastewater from the Tracy Wastewater Treatment Plant or collection system that reach Delta waters. We recommend that Standard Provision f be modified as follows:

"f. The Discharger shall take all reasonable steps to minimize any adverse effects to waters of the State or users of those waters resulting from any discharge or sludge use or disposal in violation of this Order. Reasonable steps shall include such accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge or sludge use or disposal, and public notification within 24 hours to downstream water agencies or others who might contact the non-complying discharge."

CUWA has already contacted the City of Tracy and requested notification in the event of a spill.

CUWA appreciates the efforts of Central Valley Water Board staff to protect drinking water quality. If you have any questions on our comments, please contact me at 925-210-2477.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cindy Paulson", followed by a long horizontal line extending to the right.

Cindy Paulson, Ph. D.
CUWA Executive Director