



# CVCWA Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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January 25, 2008

Mr. Mathew Scroggins  
Regional Water Quality Control Board  
Central Valley Region  
1685 E Street  
Fresno, CA 93706

**SUBJECT: Tentative Waste Discharge Requirements for the City of Clovis, Clovis Sewage Treatment and Water Reuse Facility (NPDES No. CA0085235)**

Dear Mr. Scroggins:

The Central Valley Clean Water Association (“CVCWA”) appreciates the opportunity to provide comments on the *Tentative Waste Discharge Requirements for the City of Clovis Sewage Treatment and Water Reuse Facility* (“ST/WRF”) (“Tentative Order”), prepared by the Regional Water Quality Control Board (“Regional Board”) staff. In particular, CVCWA is concerned with two provisions of the proposed permit. Those provisions are (1) the requirement to meet Title 22 requirements prior to discharge to surface waters (Fancher Creek and/or the Diversion Channel from Big Dry Creek Reservoir to Little Dry Creek) and (2) the imposition of total nitrogen effluent limits that are more stringent than required under the Basin Plan.

Our specific comments on these issues are provided below.

## **Title 22 Requirements**

We understand the need to provide Title 22 treatment to satisfy the recycled water requirements of the Department of Public Health. However, for discharge to surface waters, it is neither necessary nor required to attain the Title 22 performance standards for UV disinfection or turbidity. We request that the following UV disinfection performance standards stated in Section C. Special Provisions (page 28) be modified to state that they apply only to recycled water discharges:

- C.b.ii. The discharger shall operate the UV disinfection system to provide a minimum UV dose of 80 millijoules per square centimeter at peak daily flow...; and,

C.b.iii. The UV transmittance (at 254 nanometers) in the wastewater shall not fall below 65% of maximum at any time...

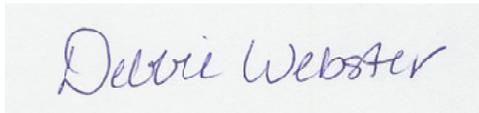
We also request that the effluent limitations for turbidity pertaining to discharges from points 001 and 002 as described in Section A.1.f. be eliminated. These proposed turbidity limitations are based on technology, not receiving water limitations; as such, the Regional Board should not be setting treatment technology in permit for discharge beyond what will meet the water quality objective for the specific beneficial use.

### **Total Nitrogen Limitations**

For discharge to surface waters, the Basin Plan requires compliance with the MCL for nitrate (10 mg/l as N). We therefore request that the Total Nitrogen as N limitations stated in Section A., Table 6 – Effluent Limitations – Discharge Points 001 and 002, be modified to be limits for Nitrate as N.

Thank you for consideration of these issues. We believe these changes will be protective of beneficial uses while preserving operational flexibility for the discharger. If you have any questions, please call me at 530-268-1338.

Sincerely,

A rectangular box containing a handwritten signature in blue ink that reads "Debbie Webster".

Debbie Webster  
Executive Officer, CVCWA

c. Lisa Koehn, City of Clovis