



CVCWA Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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January 2, 2007

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

*SUBJECT: Consideration of Adoption of Waste Discharge Requirements Order for
El Dorado Irrigation District, Deer Creek Wastewater Treatment Plant*

Dear Ms. Messina:

On behalf of the Central Valley Clean Water Association (CVCWA), the following comments are submitted in response to the Public Hearing notice for the Central Valley Regional Water Quality Control Board's (Regional Water Board) *Consideration of an Amendment to the Waste Discharge Requirements Order for El Dorado Irrigation District*. CVCWA has reviewed the proposed Amendments and submits the following comments.

Prohibition on the Use of Chlorine – CVCWA respects the decision by El Dorado Irrigation District to use ultraviolet disinfection for its effluent and the District's decision to not use chlorine or chlorine-containing substances in the District's treatment process. However, CVCWA must express concern regarding the inclusion of a Discharge Prohibition for chlorine. While this approach may be appropriate for the specific circumstances of EID, there are many permittees in the Central Valley for which a similar prohibition would have significant negative impacts.

An alternative approach that may be viable for other permits where chlorine is used in the treatment process rather than for disinfection would be to include a chlorine residual effluent limit and monitoring for chlorine residual. In these instances, chlorine residual monitoring should be required as a grab sample when chlorine is being used. Continuous chlorine residual monitoring requirements are not appropriate for wastewater treatment plants that have UV disinfection facilities.

Thus, CVCWA encourages the Regional Board to clearly indicate that this prohibition is limited to the circumstances of this permittee and that such an approach is not universally applicable to all permittees that

may use UV disinfection. This will make clear that the prohibition on the use of chlorine is not a precedent to be applied to other permittees in the Central Valley.

Copper Water Effects Ratio – CVCWA supports EID's decision to develop a copper water effects ratio (WER) and supports the Regional Board's adoption of the WER. WERs are among the water quality tools that can be used in regulating metals appropriately in certain circumstances. However, CVCWA is concerned that the Regional Board may view the development of WERs as a surrogate for using the appropriate hardness value for calculating CTR metals criteria. Water effect ratio studies are expensive and time consuming. Before public agencies expend the resources to develop a proper WER, the Regional Board should be certain that such a study is necessary.

Upstream Hardness – CVCWA continues to be concerned with the Regional Board's use of upstream hardness to calculate CTR criteria for hardness dependent metals. The use of upstream hardness does not account for the hardness of the effluent and its impact on the toxicity of effluent to organisms in the receiving water. Thus, CVCWA encourages the Regional Board to re-evaluate its current practice and policy of almost always using upstream hardness. CVCWA looks forward to continuing its dialogue with the Regional Board on this very important issue.

Thank you for your consideration. Please feel to call me at (530) 886-4911 if you have any questions.

Sincerely,

Warren Tellefson
Executive Officer

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