



# CVCWA

## CENTRAL VALLEY CLEAN WATER ASSOCIATION

Formerly the Central Valley Wastewater Manager's Association

***Representing Over Forty Wastewater Agencies***

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July 6, 2005

*Via Electronic and U.S. Mail*

Mr. Daniel Merkley  
Agricultural Coordinator  
Division of Water Quality  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, California 95812

**SUBJECT: PUBLIC WORKSHOP RE: PRACTICES FOR THE  
MANAGEMENT AND DISPOSAL OF FOOD PROCESSING  
AND WINERY WASTE THROUGH LAND APPLICATION  
AND OTHER MEANS**

Dear Mr. Merkley:

On behalf of the Central Valley Clean Water Association (CVCWA), we are pleased to submit the following comments in response to the recently released Notice of Public Workshop concerning the “Practices for the Management and Disposal of Food Processing and Winery Waste through Land Application and other Means.” CVCWA is an association of local public agencies providing wastewater collection, treatment and water recycling services to millions of Central Valley residents and businesses.

CVCWA is an interested party on this issue for several reasons. First, many of CVCWA’s members dispose of wastewater through land application and therefore face permit requirements and water quality issues similar to those of concern to food processors that land apply wastewater. Groundwater objectives apply to the discharges of CVCWA’s members as well as to food processors and wineries, and thus CVCWA shares similar concerns as to the application of such groundwater objectives in individual waste discharge requirements.

Second, CVCWA members may be affected if additional regulation of the land application of food processing waste results in increased diversions of such wastes to local sewerage agencies. There are already many POTWs throughout the Central Valley that receive food processing waste for treatment and discharge. POTWs address and evaluate the impacts of such wastes on their treatment systems through pretreatment programs and the issuance of local limits, if necessary. However, as POTW permits become more stringent with the imposition of water quality based effluent limitations for metals and salts, it becomes increasingly difficult for local sewerage agencies to accept industrial waste. Alternatively, local agencies are forced to develop local limits and pretreatment requirements that are not economically feasible for the food processing entities.

At the center of most of the permit and regulatory issues for the food processors and the POTWs, is the issue of salts and their impact on surface and groundwater quality throughout the Central Valley. In short, many wastewater dischargers (industrial and POTWs) are currently receiving permit effluent limits for salts that can not be met with current, economically feasible treatment methods. For the POTWs, the primary technology available for treating salts is reverse osmosis (RO). However, RO is expensive, creates brine for which there is no current feasible disposable method, consumes significant energy, and may create more environmental detriments than benefits.

As an alternative, POTWs are encouraged to use surface water supplies which are lower in salts instead of groundwater for municipal uses. Many POTWs do not control the municipal drinking water supply in their service area. Moreover, many Central Valley communities are unable to obtain additional surface water rights for current and future municipal uses. There is a limited supply of surface water available for municipal uses and it is not legally, economically or technically feasible for all Central Valley communities to forego their use of groundwater in favor of surface waters.

Consequently, there is no easy fix to the issue of salts in wastewater discharged to land or surface waters. Because of the complexities associated with salts and their impact on California's sustainability, we recommend that the State Water Resources Control Board (State Water Board) undertake an effort to address salts on a statewide basis and look for statewide solutions. As part of this effort, the State Water Board should engage the various constituencies and stakeholders that are affected by this issue, including food processors, the Central Valley Regional Board and POTWs. Should the State Water Board determine that this is the appropriate path, CVCWA would agree to be an active participant.

Furthermore, CVCWA encourages the State Water Board to act quickly in establishing a plan for addressing salts throughout the Central Valley and the state. Many of CVCWA's member agencies have already received salt related effluent limitations with which they cannot readily comply. Some agencies have been granted time schedules to comply with these limits; however, the time schedules are generally limited to five years. Such short time schedules do not allow the agencies enough time to evaluate the various

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options and develop plans for meeting these limits on a consistent basis. Thus, CVCWA encourages the State Water Board to consider addressing these pending final effluent limits in the interim while the salt plan is being developed.

In summary, CVCWA encourages the State Water Board to review salts issues broadly and comprehensively using the best available scientific information. Thank you for giving us the opportunity to comment. We look forward to working with you and members of the food processing and winery industry in addressing this vital statewide issue.

Sincerely,

QuickTime™ and a  
TIFF (LZW) decompressor  
are needed to see this picture.

Warren Tellefson  
Executive Officer

WT/jlp

cc: Tom Howard, Deputy Director, SWRCB  
Stan Dean, Chair, CVCWA