



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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Ms. Diana Messina
Senior Engineer
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

May 22, 2007

SUBJECT: Waste Discharge Requirements for City of Davis Wastewater
Treatment Facility, Yolo County (NPDES No. CA0079049)

Dear Ms. Messina:

The Central Valley Clean Water Association (“CVCWA”) has reviewed the proposed *Waste Discharge Requirements for the City of Davis Wastewater Treatment Facility* (“TO”). Based on CVCWA’s review of the TO, there are several issues of concern that impact CVCWA and its member agencies. CVCWA provides the following comments on those issues that impact many CVCWA members within the Central Valley.

Final Effluent Limitations for Boron and Manganese

In particular, CVCWA is concerned with the Regional Water Quality Control Board’s (“Regional Board”) continued application of the agricultural water quality goals from the *Water Quality for Agriculture, Food and Agriculture Organization of the United Nations – Irrigation and Drainage Paper No. 29, Rev. 1* (R.S. Ayers and D.W. Westcot, Rome, 1985) (“UN Report”) with out the consideration of site-specific conditions as directed by the State Water Resources Control Board (“State Water Board”) in its *City of Woodland* decision. (Order WQO 2004 –0010.)

The TO contains final effluent limits for boron and manganese that are based on the agricultural water quality goals as contained in the UN Report with out the consideration of site-specific factors. (Fact Sheet at pp. F-22-F-23 and F-28-F-29.) The fact sheet does not include a discussion regarding site-specific conditions that could affect the appropriate value to apply for protection of the agricultural beneficial use.

The State Water Board's decision in *City of Woodland* precludes the practice of using the most conservative agricultural water quality goal from the UN Report:

The UN Report makes it clear that site-specific considerations are important in assessing irrigation water suitability. The preface to the report states that the guidelines can indicate potential problems and use restrictions with a water supply. . . .

With this caveat in mind, it is obvious that the 700 umhos/cm EC value cannot be interpreted as an absolute value. Rather, the Regional Board must determine whether site-specific conditions applicable to Woodland's discharge allow some relaxation in this value. Chief among them is leaching.

(Order WQO 2004-0010 at p. 7.)

CVCWA recommends that the Regional Board re-consider the application of the water quality goals from the UN Report for boron and manganese until the Regional Board has properly considered site specific conditions and factors, as directed by the State Water Board. After the consideration of such information, then the Regional Board may determine if the City has reasonable potential to exceed applicable water quality criteria.

Definition of Average Dry Weather Flow

CVCWA is concerned with the Regional Board's current practice of defining average dry weather flow ("ADWF") as times when groundwater is at or near normal and runoff is not occurring. CVCWA contends that this standard is difficult to determine compliance and is not appropriate. In lieu of using such a definition, CVCWA requests that the Regional Board consider determining ADWF during low-flow or dry weather months. CVCWA appreciates the fact that this is an issue that impacts all dischargers in the Central Valley. As such, CVCWA requests that the Regional Board agree to enter into a dialogue with CVCWA and other interested stakeholders to discuss what would be a proper definition. In the meantime, the language as contained in the City of Davis TO should be amended to be consistent with the language suggested by the City of Davis in its individual comments.

Final Limit for Aluminum

CVCWA has previously commented regarding the Regional Board's use of the U.S. EPA recommended ambient water quality criteria for aluminum in Central Valley permits. The recommended ambient water quality criteria were not developed for streams and waterways that are reflective of those in the Central Valley. The recommended ambient water quality criterion for chronic aluminum was developed in water that was very low in pH and very low in hardness. That is not typically found in the Central Valley.

However, because of the Regional Board's use of the ambient criteria, many POTWs find themselves conducting expensive water effects ratios ("WERS") to show that aluminum is not toxic in

this area. In fact, CVCWA is aware of three members who have conducted some sampling for the development of WERs. Based on the sampling information, CVCWA is of the understanding that the WERs are large, indicating the lack of toxicity. Thus, CVCWA encourages the Regional Board to not apply the EPA ambient water quality criteria for aluminum to Central Valley waterways, unless the Regional Board determines that there is substantial evidence to suggest that the criteria is applicable to the receiving water in question.

Pollution Prevention Requirements for Select Constituents

CVCWA has recently seen an increase use of pollution prevention plan requirements for constituents that are not readily subject to pollution prevention activities. In the case of the City of Davis, the TO requires pollution prevention plans for cyanide and dioxins. The issue of cyanide may well be an analytical issue for which many dischargers are currently conducting special studies. Cyanide is typically not present in the influent but measured in the effluent. Because it appears to either be an analytical issue, or a caused from the treatment plant process, it is not amenable to pollution prevention activities. For dioxins, the source is usually considered to be air emissions and therefore not present in POTW effluent due to an activity for which the POTW can control. Considering the inability to address the constituent with pollution prevention activities, it is unnecessary to require such studies. The pollution prevention studies take time and resources and should only be developed for constituents for which it applies.

Continuous Monitoring Requirement for Electrical Conductivity

Finally, CVCWA is concerned with the monitoring requirement in the City of Davis tentative order that requires continuous monitoring for electrical conductivity ("EC"). The monitoring requirement is not consistent with the permit limitation, which is an interim limit expressed as an annual average. Because the permit limit is an annual average, there is no need for a continuous EC monitoring requirement. Furthermore, EC is a conservative pollutant and therefore does not vary widely. Thus, CVCWA recommends that the continuous monitoring requirement for EC be removed.

If you have any questions, please do not hesitate to call me at (530) 886-4911.

Sincerely,



Warren Tellefson
Executive Officer

WT/jp

cc: Amy Simpson, Central Valley Regional Water Quality Control Board
Keith Smith, City Engineer, City of Davis

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