



# CVCWA

## Central Valley Clean Water Association

*Representing Over Fifty Wastewater Agencies*

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**ROBERT GRANBERG – Treasurer, City of Stockton**

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March 29, 2017

***Via Electronic Mail Only***

Mr. Brian Taylor  
California Water Quality Control Board  
Central Valley Region  
364 Knollcrest Drive, Suite 205  
Redding, CA 96002  
[Brian.Taylor@waterboards.ca.gov](mailto:Brian.Taylor@waterboards.ca.gov)  
[RB5S-NPDES-Comments@waterboards.ca.gov](mailto:RB5S-NPDES-Comments@waterboards.ca.gov)

**Subject: CVCWA Comments on Renewal of Waste Discharge Requirements and NPDES Permit for the River Highlands Community Services District Hammonton Gold Village Wastewater Treatment Plant, Yuba County**

Dear Mr. Taylor:

The Central Valley Clean Water Association (CVCWA) appreciates this opportunity to provide comments on the Tentative Waste Discharge Requirements and NPDES permit for the River Highlands Community Services District (River Highlands CSD) Hammonton Gold Village Wastewater Treatment Plant (Tentative Order). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this letter, we provide comments regarding the toxicity trigger of >1 toxic unit.

**I. Provision VI.C.2.a.ii.**

The Tentative Order includes a numeric toxicity monitoring trigger of >1TUc that requires the initiation of a Toxicity Reduction Evaluation (TRE) if exceeded. Determining what is actually causing toxicity, especially at low levels, can often be a challenge. Due to these challenges, CVCWA, in collaboration with staff from the Central Valley Regional Water Quality Control Board (Central Valley Water Board), has initiated a Special Study to Investigate Low Level Toxicity Indications (Special Study). Should CVCWA, River Highlands CSD, and staff from the Central Valley Water Board agree that it would be appropriate, River Highlands CSD should be given the opportunity to participate in this Special Study. The Tentative Order should be revised to include a reopener provision to adjust the toxicity monitoring trigger should new information be developed in the course of this Special Study that is applicable to River Highlands CSD's situation.

We appreciate your consideration of these comments. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or [eeofficer@cvcwa.org](mailto:eeofficer@cvcwa.org).

Sincerely,



Debbie Webster,  
Executive Officer

cc: Kevin Perkins, Principal Planner, River Highlands CSD  
(Via Electronic Mail Only: [kperkins@co.yuba.ca.us](mailto:kperkins@co.yuba.ca.us))  
Pamela Creedon, Central Valley Water Board  
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