



# CVCWA

## Central Valley Clean Water Association

*Representing Over Fifty Wastewater Agencies*

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April 21, 2017

***Via Electronic Mail Only***

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

**Subject: CVCWA Comments on Tentative Waste Discharge Requirements for the Shasta County Service Area No. 8 Palo Cedro Wastewater Treatment Plant, Shasta County**

Dear Ms. Gaido:

The Central Valley Clean Water Association (CVCWA) appreciates this opportunity to provide comments on the Tentative Waste Discharge Requirements for the Shasta County Service Area No. 8 (Shasta CSA No. 8) Palo Cedro 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 setback limits for land application areas.

The Tentative Order lists five different setback limits for the land application areas of treated wastewater. (Provision F.5.) These are as follows: (1) a minimum setback of 10 feet from edge of application area to property boundary; (2) a minimum setback of 100 feet from edge of application area to manmade or natural surface water drainage course; (3) a minimum setback of 100 feet from edge of application area to domestic water supply well; (4) a minimum setback of 25 feet from property boundary to nearest residence; and (5) a minimum setback of 300 feet from edge of application area using spray irrigation to property boundary, public road, or similar place of potential public exposure.

First, CVCWA is uncertain regarding the application of two different setback limits (10 feet versus 300 feet) that are imposed for the edge of the application area to a property boundary. No justification or explanation has been provided to distinguish between the two requirements.

Second, for the setback limits proposed, only one appropriately corresponds to the setback limits established in Title 22, which is that for minimum setback from a domestic supply well. (Cal. Code Regs., tit. 22, § 60310, subds. (c) and (f).) The Palo Cedro Wastewater Treatment Plant is a secondary treatment facility; therefore, the setback limits imposed in the tentative order should comply with Title 22, section 60310. For instance, the Tentative Order prohibits spray irrigation within 300 feet of a property boundary, public road, or similar place of potential public exposure, while Title 22 provides that spray irrigation of secondary-treated recycled waters can occur no closer than within 100 feet of “a residence or a place where public exposure could be similar to that of a park, playground, or schoolyard.” (Cal. Code Regs., tit. 22, § 60310, subd. (f).)

The Tentative Order states that the setback limits chosen were based on the 2016 Shasta County Local Agency Management Program for Onsite Wastewater Treatment Systems (LAMP) and Shasta CSA No. 8’s Report of Waste Discharge. The LAMP cited in the Tentative Permit is inapplicable to the Palo Cedro Wastewater Treatment Plant because the plant is a publicly-owned treatment work (POTW), and not a septic system. The LAMP only applies to septic systems. (See LAMP, p. 3.) For this reason, the LAMP setback limits should not be relied upon in this Tentative Order. Further, a report of waste discharge should not displace the minimum setback requirements established by California law in Title 22. Therefore, CVCWA requests that the setback limits in the Tentative Order be changed to be consistent with Title 22 requirements.

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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 [eoofficer@cvcwa.org](mailto:eoofficer@cvcwa.org).

Sincerely,



Debbie Webster,  
Executive Officer