



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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March 6, 2017

Via Electronic Mail Only

Ms. Denise Soria
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
denise.soria@waterboards.ca.gov

RE: Comments on the Tentative Waste Discharge Requirements for City of Delano,
Wastewater Treatment Facility, Kern County

Dear Ms. Soria:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative Waste Discharge Requirements for the City of Delano, Wastewater Treatment Facility (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 the following comments regarding the effluent limitation for total nitrogen.

Provision C.1.a of the Tentative Order proposes an effluent limitation of 10 mg/L for total nitrogen as a monthly average. Setting an effluent limitation for total nitrogen is inappropriate for several reasons. First, there is no water quality objective for total nitrogen. There is a primary maximum contaminant level (MCL) for nitrate, but not for

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total nitrogen. For this reason, the proposed limit is not consistent with any adopted water quality objective or known criteria.

Second, total nitrogen is also different and distinguishable from nitrate, and setting an effluent limit for total nitrogen will not necessarily translate to obtaining the target nitrate levels. Accordingly, a substantial justification is needed to impose an effluent limitation for nitrogen rather than nitrate. There are no findings in the Tentative Order that provide any reasoning or explanation as to why a total nitrogen effluent limit will result in maintaining groundwater quality at the Primary MCL of 10 mg/L for nitrate. At most, the Regional Board could determine that an effluent limitation for nitrate is appropriate to protect groundwater quality and similarly set the effluent limit at 10 mg/L for nitrate. Alternatively, the Regional Board could set an effluent limit for nitrate plus nitrite. CVCWA requests that the effluent limitation for total nitrogen be removed from the Tentative Order.

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.

Sincerely,



Debbie Webster,
Executive Officer

cc (via email): Pamela Creedon, Central Valley Regional Water Quality Control Board
(pamela.creedon@waterboards.ca.gov)