



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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October 10, 2012

Via Electronic Mail Only

Scott Hatton
Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706
shatton@waterboards.ca.gov

Re: Comments on the Tentative Waste Discharge Requirements for Hume Lake Christian Camps Wastewater Treatment Facility

Dear Mr. Hatton:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the tentative waste discharge requirements (Tentative Order) for the Hume Lake Christian Camps Wastewater Treatment Facility (WWTF). CVCWA is a non-profit organization that represents more than 50 publicly owned treatment works throughout the Central Valley Region in regulatory matters affecting surface water discharge, land application, and water reuse. We approach these matters with a perspective that balances environmental and economic interests consistent with state and federal law.

Upon review of the Tentative Order, and for the reasons described in more detail below, we respectfully request that you: (1) delete the effluent limitation for chlorine contact time (CT); and (2) revise the groundwater limitation for total coliform organisms to apply over a 7-day period, rather than as an instantaneous concentration.

A. The Effluent Limitation for Chlorine Contact Time Should Be Deleted

The Tentative Order contains the following effluent limitation: “The CT value (product of total chlorine residual and modal contact time measured at the same point) shall be at least 450 mg-min/mL at all times with a modal contact time of at least 90 minutes based on peak dry weather design flow.” (Tentative Order at p. 14.) As CT values relate to operational parameters established in title 22 of the California Code of Regulations (Title 22) for water recycling, this requirement is not an appropriate effluent limitation, and should be removed from the Tentative Order.

The Tentative Order would authorize the WWTF to produce recycled water to irrigate lawn areas having unrestricted public access. (Tentative Order at p. 1.) Under Title 22, recycled water for this type of use must be “disinfected tertiary recycled water.” (Title 22, § 60304(a).) Consistent with Title 22, the Tentative Order would require the recycled water produced by the WWTF to “be at least disinfected tertiary recycled water as defined in Title, section 60301 [now defined at Title 22, § 60301.230].” (Tentative Order at p. 15.) Section 60301.230 of Title 22 specifies the CT values applicable to the production of recycled water for irrigation uses involving unrestricted public access. (See also Title 22, § 60304(a).) Therefore, the effluent limitation for CT in the Tentative Order is not appropriate and should be deleted.

B. The Groundwater Limitation for Total Coliform Organisms Should Be Revised to Apply Over a 7-day period, Rather Than as an Instantaneous Concentration

The Tentative Order includes the following groundwater limitation for total coliform organisms:

Release of waste constituents associated with the discharge shall not cause or contribute to groundwater: a. Containing constituent concentrations in excess of the concentrations specified below or natural background quality, whichever is greater: . . . (ii) Total coliform organisms of 2.2 MPN/100 mL (*instantaneous concentration*). (Tentative Order at p. 19, emphasis added.)

Applying a groundwater limitation of 2.2 most probable number (MPN)/100 milliliters (mL) as an *instantaneous concentration* is inconsistent with the *Water Quality Control Plan for the Tulare Lake Basin* (Basin Plan). The applicable water quality objective for groundwater states: “In ground waters designated MUN, the concentration of total coliform organisms *over any 7-day period* shall be less than 2.2/100 mL.” (Basin Plan at p. III-7, emphasis added.) The Tentative Order finds that the groundwater in this case is designated for municipal and domestic supply or “MUN.” (Tentative Order at p. 6.) Therefore, expressing the groundwater limitation for total coliform organisms as an instantaneous concentration is inappropriate under the Basin Plan. We respectfully request that the groundwater limitation be revised as follows:

Release of waste constituents associated with the discharge shall not cause or contribute to groundwater: a. Containing constituent concentrations in excess of the concentrations specified below or natural background quality, whichever is greater: . . . (ii) Total coliform organisms of 2.2 MPN/100 mL over any 7-day period (~~instantaneous concentration~~). (See Tentative Order at p. 19.)

We appreciate your consideration of our comments and requested revisions. Please do not hesitate to contact me at (530) 268-1338 or ecofficer@cvcwa.org if I can be of further assistance.

Sincerely,



Debbie Webster,
Executive Officer

cc (*via electronic mail*): Pamela Creedon, Central Valley Regional Water Quality Control Board
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