



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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April 26, 2013

Via Electronic Mail Only

Mr. Dale Harvey
Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, California 93706
dharvey@waterboards.ca.gov

Re: Central Valley Clean Water Association's Comments on the Tentative Waste Discharge Requirements for the Mariposa County Lake Don Pedro Wastewater Treatment Facility

Dear Mr. Harvey:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit comments on the Tentative Order for the Mariposa County Lake Don Pedro Wastewater Treatment Facility (Tentative Order). CVCWA is a non-profit organization representing more than 50 publicly owned treatment works (POTWs) throughout the Central Valley in regulatory matters affecting surface water discharge, land application, and water reuse. We carefully review permits for POTWs being proposed for adoption with a perspective to balance environmental and economic interests consistent with applicable law.

Based on our review of the Tentative Order, CVCWA has concerns with the proposed provision regarding submittal of a Salinity Management Plan (i.e., Provision H.3.). The Tentative Order would require the discharger to submit an individual, facility-specific Salinity Management Plan within 180 days from Order adoption. As noted in Finding 30, the groundwater in the area is of good quality with TDS ranging from 220 mg/L to 226 mg/L, which is well below the recommended secondary MCL of 500 mg/L. In addition, the source water is a

combination of very low salinity surface water (i.e., TDS of 52 mg/L) and low salinity groundwater. Accordingly, CVCWA does not believe that a Salinity Management Plan is warranted for this facility considering its specific circumstances.

In addition, the Tentative Order is overly prescriptive with respect to the substance of the Salinity Management Plan requirement in that it directs the discharger to evaluate specific residential practices like use of laundry detergents as well as evaluating changes from sodium based to potassium based cleaners. The discharger is also then required to provide a description of tasks, costs and time required to investigate and implement the different plan elements. All of these requirements collectively indicate that preparation of the Salinity Management Plan will require more than just nominal efforts on part of the discharger, and may require the discharger to pay for consultant services to prepare a plan that meets the Regional Board's requirements (See H.6).

Considering the fact that salinity in the effluent is very low, and that the Salinity Management Plan requirement is fairly laborious, this requirement is an unnecessary burden for a small community such as this with limited resources.

Finally, this requirement is inconsistent with the intent and purpose of the CV-SALTS process, which is working to develop region-wide salinity and nutrient management plans in accordance with the state's Recycled Water Policy. Requiring the development of a Salinity Management Plan now on an individual facility basis undermines CV-SALTS, and fails to account for the fact that the Regional Board has determined it more appropriate to manage these constituents on a larger scale versus on a facility-specific basis at this time. While it is important for individual facilities to currently manage these constituents to the maximum extent practicable, it is inappropriate to include the individual requirements specified here until CV-SALTS has completed its work.

For these reasons, CVCWA respectfully requests that Provision H.3. be deleted from the Tentative Order.

Thank you for considering these comments. Please contact me at (530) 268 1338 or eofficer@cvcwa.org if I can be of assistance.

Sincerely,



Debbie Webster,
Executive Officer

Cc: Via electronic mail:
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