



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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Via Electronic Mail

Kevin Kratzke
Regional Water Quality Control Board
Central Valley Region
415 Knollcrest Drive, Suite 100
Redding, CA 96002

kkratzke@waterboards.ca.gov

Re: Comments on the Tentative Waste Discharge Requirements for the Shasta-Tehama-Trinity Joint Community College District, Shasta College Wastewater Treatment Facility

Dear Mr. Kratzke:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the tentative waste discharge requirements (Tentative Order) for the Shasta College Wastewater Treatment Facility (WWTF) of the Shasta-Tehama-Trinity Joint Community College District (District). CVCWA is a non-profit organization representing 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 to balance environmental and economic interests consistent with state and federal law. Upon reviewing the Tentative Order, we respectfully request that you revise it to ensure that any groundwater limitations for chloride, electrical conductivity (EC), and total dissolved solids (TDS) prescribed for the WWTF are based on a thorough consideration of site-specific conditions.

The Tentative Order includes groundwater limitations of 106 milligrams per liter (mg/L) for chloride, 700 micromhos per centimeter ($\mu\text{mhos/cm}$) for EC, and 450 mg/L for TDS to protect the agricultural use. (Tentative Order at pp. 10, 12, 21-22.) The numeric values for these groundwater limitations were derived from “Water Quality for Agriculture” by Ayers and

Wescot, Food and Agriculture Organization of the United Nations (1985) (UN Report). (*Id.* at pp. 10, 12.) Noting that the District has not yet sampled the WWTF's effluent for chloride, EC, or TDS, the Tentative Order finds that these groundwater limitations are appropriate in the absence of information to support less protective limitations. (*Ibid.*) The findings do not address any site-specific factors that may warrant groundwater limitations different than those specified in the UN Report.

The State Water Resources Control Board (State Water Board) addressed application of the UN Report in Order WQO 2004-0010.¹ In that order, the State Water Board determined that the UN Report's salinity value of 700 $\mu\text{mhos/cm}$ for EC "cannot be interpreted as an absolute value" and adopted into the City of Woodland's permit as an effluent limitation. (Order WQO 2004-0010 at p. 7.) "Rather, the Regional Board must determine whether site-specific conditions applicable to Woodland's discharge allow some relaxation in this value." (*Ibid.*) The State Water Board explained that the preface to the UN Report makes clear that the true suitability of a water body depends on the specific conditions of the use and on the management capability of the user. (*Ibid.*) The State Water Board further explained that there are a variety of options available for managing salinity. (*Ibid.*) The State Water Board concluded that the Central Valley Regional Water Quality Control Board (Regional Water Board) needed to consider site-specific conditions to determine the appropriate effluent limitation, rather than adopting the agricultural water quality goal. (*Id.* at p. 8.)

CVCWA therefore believes that the Regional Water Board's adoption of the groundwater limitations of 106 mg/L for chloride, 700 $\mu\text{mhos/cm}$ for EC, and 450 mg/L for TDS are similarly inappropriate. We submit that any groundwater limitations for these constituents applicable to the WWTF should be based on a thorough consideration of site-specific conditions. We request that you revise the Tentative Order accordingly.

CVCWA appreciates your consideration of these comments and requested revisions. Please contact me at (530) 268-1338 or eofficer@cvcwa.org if I can be of further assistance.

Sincerely,



Debbie Webster, Executive Officer
Central Valley Clean Water Association

¹ State Water Board Order WQO 2004-0010, *In the Matter of the Own Motion Review of City of Woodland Waste Discharge Requirements Order No. R5-2003-0031 [NPDES No. CA0077950] and Cease and Desist Order No. R5-2003-0032* (Sept. 2, 2008).

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