



August 5, 2010

Gayleen Perreira
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

RE: Tentative Waste Discharge Requirements for the City of Galt Wastewater Treatment Plant and Reclamation Facility

Dear Ms. Perreira:

California Urban Water Agencies (CUWA) has reviewed the subject tentative order for the City of Galt and would like to commend Central Valley Regional Water Quality Control Board (Regional Water Board) staff on their commitment to protecting the drinking water beneficial use in the Delta. Many of CUWA's members rely on the Delta as a source of drinking water.

CUWA is working with the Regional Water Board on the technical studies needed to address numerous water quality concerns and to support a Basin Plan amendment to provide greater protection of drinking water supplies. The key constituents of concern to drinking water providers are organic carbon, nutrients, salinity, bromide and pathogens. The Drinking Water Policy technical studies include an evaluation of the loads of these constituents from sources in the watershed and an evaluation of the measures that can be taken to control the key sources. Based on the current schedule for the Drinking Water Policy efforts, CUWA expects that the Basin Plan will be amended in 2013 to incorporate additional protection of drinking water supplies.

There are other ongoing efforts that should be considered in the waste discharge requirements for Galt, including studies of nutrients and their effects on the pelagic organism decline in the Delta, the development of the Regional Monitoring Program, the development of nutrient objectives through the State Water Resources Control Board's (State Water Board's) Nutrient Numeric Endpoint Process, and the development of salinity objectives through CV-SALTS.

Reopener Provisions

Since the tentative waste discharge requirements for Galt will extend to 2015, CUWA requests that the Regional Water Board add several reopener provisions to the waste discharge requirements. Similar language was included for several of these reopener provisions in the City of Stockton waste discharge requirements that were adopted by the Regional Water Board in 2008.

Central Valley Drinking Water Policy. If water quality objectives are adopted for organic carbon and/or pathogens to protect drinking water supplies in the Central Valley Region, this Order may be reopened for addition and/or modification of effluent limitations and requirements, as appropriate, to require compliance with the applicable water quality objectives.

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Nutrient Numeric Endpoint Process. If water quality objectives are adopted for nutrients to protect drinking water supplies and other beneficial uses in the Central Valley Region, this Order may be reopened for addition and/or modification of effluent limitations and requirements, as appropriate, to require compliance with the applicable water quality objectives.

CV-SALTS. If water quality objectives are adopted for salinity to protect drinking water supplies and other beneficial uses in the Central Valley Region, this Order may be reopened for addition and/or modification of effluent limitations and requirements, as appropriate, to require compliance with the applicable water quality objectives.

Ammonia Studies. The ammonia effluent limitations in this Order are based on USEPA's recommended National Ambient Water Quality Criteria for protection of freshwater aquatic life. However, studies are ongoing to evaluate the effect of ammonia and nutrient ratios on phytoplankton productivity and species composition, as well as, studies to evaluate the sensitivity of delta smelt and other aquatic species to ammonia toxicity. In addition, USEPA has drafted new ammonia criteria in response to findings that several freshwater mussel species are significantly more sensitive to ammonia than the organisms evaluated for the existing criteria. The Nature Conservancy and U.S. Forest Service have conducted a survey and found freshwater mussels in several areas of California, including the Sacramento River. Based on the result of these or other studies, and based on whether the draft USEPA ammonia criteria are adopted, this Order may be reopened to modify the ammonia effluent limitations, as appropriate.

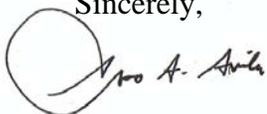
Regional Monitoring Program. The State and Regional Water Boards are committed to creation of a coordinated Regional Monitoring Program to address receiving water monitoring in the Delta for all Water Board regulatory and research programs. When a Regional Monitoring Program becomes functional, this permit may be reopened to make appropriate adjustments in permit-specific monitoring to coordinate with the Regional Monitoring Program.

Notification of Drinking Water Agencies

CUWA also requests that the Regional Water Board include a requirement in the Order to immediately notify downstream drinking water agencies if there are spills of untreated or partially treated wastewater from the Galt Wastewater Treatment Plant and Reclamation Facility or from the collection system that reach Delta waters. Attachment 1 is contact information for the agencies that should be notified.

CUWA appreciates the efforts of Regional Water Board staff to protect drinking water quality, both by requiring tertiary treatment of the Galt wastewater and by working with us on the Drinking Water Policy. If you have any questions on our comments, please call me at (916) 552-2929.

Sincerely,



Ernesto A. Avila, P.E.
Executive Director

EMA/mmt

Attachment 1 – Wastewater Spill Notification Emergency Contact Information

Attachment 1
Wastewater Spill Notification Emergency Contact Information

California Urban Water Agencies

916-552-2929

Contra Costa Water District

24/7 Emergency Phone: 925-688-8374

Santa Clara Valley Water District

Emergency Spills: 408-395-9309

Alameda County Flood Control and Water Conservation District, Zone 7 Water Agency

Del Valle Water Treatment Plant 24/7 Emergency Phone: 925-447-6704

Alameda County Water District

24/7 Emergency Phone #1: 510-668-6636

24/7 Emergency Phone #2: 510-668-6645

Metropolitan Water District of Southern California

24/7 Emergency Phone: 800-354-4420