



California Regional Water Quality Control Board Central Valley Region

Katherine Hart, Chair

2/7/12 Bd. Mtg. Item 8
A-1886 - City of Lodi
Deadline: 2/3/12 by 12:00 noon

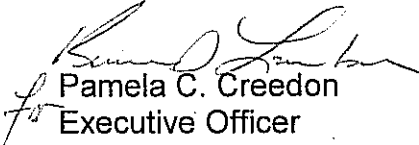


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Matthew Rodriguez
Secretary for
Environmental Protection



TO: Jeanine Townsend
Clerk to the Board
STATE WATER RESOURCES CONTROL BOARD

FROM: 
Pamela C. Creedon
Executive Officer
CENTRAL VALLEY REGION
REGIONAL WATER QUALITY CONTROL BOARD

DATE: 3 February 2012

SUBJECT: COMMENT LETTER: FILE A-1886, CITY OF LODI ORDER

This memorandum is in response to the State Water Resources Control Board's (State Water Board) letter of 4 January 2012 concerning the scheduled adoption of amendments to WQ Order 2009-0005 for the City of Lodi Water Quality Control Facility (Lodi Order). The State Water Board letter states that written submittals will be accepted only if they are limited to the proposed amendments to the original order and that written comments must be received by 12:00 noon on 3 February 2012.

As noted in Footnote 1 on page 1 of the proposed amendment, the Central Valley Water Board understands that the amendment does not result in any change to the conclusions of the Lodi Order. With that said, it is the Central Valley Water Board's understanding that the amendments to the Lodi Order interpret the sewage treatment plant exemption in Title 27. In particular, the proposed amendment interprets the sewage treatment plant exemption to allow for post-treatment facilities as subject to the exemption if the facilities (1) are used to store treated municipal wastewater prior to ultimate disposal or reuse, (2) do not receive any other wastes other than authorized on-site storm water flows, and (3) are under the control of the municipal treatment plant. (See proposed amendment at pp. 8 and 9.) Further clarification is necessary regarding what constitutes "authorized on-site storm water flows" for purposes of evaluating whether the exemption applies to post-treatment storage facilities. Presumably, this means on-site storm water flows that are subject to an applicable permit issued by the State or Regional Water Board(s). Additional clarification in this regard would be appreciated.

Thank you for your consideration of these comments to the proposed amendment. The proposed amendment does not fundamentally change our concerns about WQ 2009-005, which have been discussed in separate correspondence.

cc: David Coupe, State Water Resources Control Board, Sacramento
Phil Isorena, State Water Resources Control Board, Sacramento
Debbie Webster, Central Valley Clean Water Association, Grass Valley
Bill Jennings, California Sportfishing Protection Alliance, Stockton
Mike Jackson, Esq., Law Office of Mike Jackson, Quincy
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