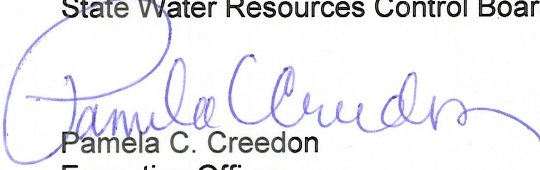


## Central Valley Regional Water Quality Control Board

**TO:** Victoria A. Whitney  
Deputy Director, Division of Water Quality  
State Water Resources Control Board

**FROM:**   
Pamela C. Creedon  
Executive Officer  
**CENTRAL VALLEY WATER BOARD**

**DATE:** 13 February 2015

**SUBJECT:** MINOR, NON-SUBSTANTIVE CHANGES TO THE BASIN PLAN  
AMENDMENTS ADOPTED UNDER CENTRAL VALLEY WATER BOARD  
RESOLUTION R5-2014-0074

The Central Valley Water Board adopted amendments to both of the Region's Basin Plans on 6 June 2014 under Resolution R5-2014-0074 to add policies for *Variances from Surface Water Quality Standards for Point Source Dischargers*, a *Variance Program for Salinity* and an *Exception from Implementation of Water Quality Objectives for Salinity*. The amendments are tentatively scheduled for consideration at the 17 March 2015 meeting of the State Water Board.

Central Valley Water Board Resolution R5-2014-0074 grants the Executive Officer the authority to make minor, non-substantive changes to the language of the adopted Basin Plan amendment. Based on review during the State Water Board approval process, staff determined that minor, non-substantive corrections to the record are needed for clarity or consistency.

Early on in the process, staff had considered land disposal as an additional option for publicly owned treatment works (POTWs) facing non-compliance with water quality based effluent limitations for salinity. POTWs contemplating land disposal would need to apply to the State Water Board to reduce or eliminate the discharge to surface waters and consider the affect to fish and wildlife resources. If the reduction in discharge to surface waters is approved by the State Water Board, it will still take a long time to complete the switch. In addition, while the POTW would no longer be subject to an NPDES permit, the effluent limitations for land disposal could be just as stringent as surface water discharge. Therefore, I am hereby adding the following paragraph to the end of Section 4.5.2.B of the Staff Report:

### Land Disposal

Changing the effluent disposal method to land disposal may be a possibility for dischargers with available land area for disposal or for dischargers that may be able to recycle the wastewater. Changing effluent disposal methods is usually a permanent change that takes a long time. (CVRWQCB. 2014a.) For dischargers contemplating such

a change, there are barriers to decreasing or removing wastewater discharge to surface waters. Water Code section 1211 requires that the owner of a wastewater treatment plant obtain approval from the State Water Board prior to making any change in the point of discharge. The Central Valley Water Board commonly includes this provision in NPDES permits. (CVRWQCB. 2014b. p. 11 (Provision VI.A.2.n) and CVRWQCB. 2014c. p. 19 (Provision VI.A.2.n).) Additionally, the discharge may provide benefit to fish and wildlife resources in the water body. (CVRWQCB. 2007a. p. F-6 to F-7). Therefore, while appropriate in certain situations, decreasing or removing a discharge into a surface water body requires careful consideration and cannot be automatically required.

I am also adding the following references to the Staff Report and to the Administrative Record as Relied-Upon References.

CVRWQCB. 2007a. Waste Discharge Requirements. City of Jackson, Wastewater Treatment Plant, Amador County. Order No. R5-2007-0133-01. October.

CVRWQCB. 2014a. Rescinding Waste Discharge Requirements and Time Schedule Order. Tuolumne Utilities District Sonora Regional Wastewater Treatment Plan and Jamestown Wastewater Treatment Plant, Tuolumne County. Order R5-2014-008. February.

CVRWQCB. 2014b. Waste Discharge Requirements. United States Department of the Interior, National Park Service, Yosemite National Park, El Portal Wastewater Treatment Facility, Mariposa County, Order R5-2014-0068. June.

CVRWQCB. 2014c. Waste Discharge Requirements. City of Visalia, Water Conservation Plant, Tulare County, Order R5-2014-0076. June.

If you have any questions regarding this matter, please contact Betty Yee of my staff at 916-464-4643 or [betty.yee@waterboards.ca.gov](mailto:betty.yee@waterboards.ca.gov).

cc: Central Valley Water Board Members  
David Coupe, OCC  
Rik Rasmussen, DWQ