



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

CASEY WICHERT – Chair, City of Brentwood
CODY BILLINGS – Secretary, Jamestown Sanitary District

DEEDEE ANTYPAS – Vice-Chair, City of Stockton
HEATHER GROVE – Treasurer, City of Manteca

June 2, 2023

Via Electronic Mail Only

California Regional Water Quality Control Board
 Central Valley Region
 1120 Sun Center Drive, #200
 Rancho Cordova, CA 95670-6114
RB5S-NPDESComments@waterboards.ca.gov

Re: CVCWA Comments on the Tentative Waste Discharge Requirements
 for the Mountain House Community Services District Wastewater Treatment Plant

To the Central Valley Water Board:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the Tentative Waste Discharge Requirements for the Mountain House Community Services District (CSD) Wastewater Treatment Plant (R5-2023-XXXX). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters from the perspective of balancing environmental and economic interests consistent with state and federal law. In this letter, we provide comments supporting revisions of the tentative order as described herein.

A. Wastewater and Biosolids Treatment and Controls

The tentative order references construction of modifications to the Facility's treatment system intended to improve effluent quality – specifically, replacing the sequencing batch reactors (SBR) with membrane bio reactors (mbr). Based on the expected improvements, the tentative order includes effluent limitations that meet Title 22 recycled water applications. However, under the current language of the tentative order, those requirements would be effective immediately. (See Tentative Order at pp. F-34 – F-49.) The Facility improvements are not expected to be completed until

approximately Fall of 2023. The tentative order should include an in-permit compliance schedule, if possible, and otherwise address the need for a transition following the construction and implementation of the Facility treatment system upgrades, especially for ammonia.

B. Mercury

The tentative order includes a description of the Basin Plan’s Delta Mercury Control Program on page 15, with other references throughout the order and attachments. This program has progressed to Phase 2 and the description on page 15 should be updated accordingly.

The tentative order contains a final water quality-based effluent limitation (WQBEL) for methylmercury based on the waste load allocation (WLA). The Regional Board should confirm with Mountain House CSD whether an interim limit and compliance schedule are necessary or desired, or if the WLA for methylmercury is preferred. If the WLA is preferred, the tentative order should provide for the expanded capacity per the Basin Plan, and remove the interim limit for mercury, the pollution prevention plan (PPP) requirements, and the compliance schedule for methylmercury included on page 21.

C. Salinity Reduction Goal and CV-SALTS Participation

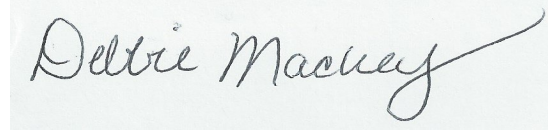
The tentative order includes a Salinity Reduction Goal. (Tentative Order at p. 17.) This section is hard to follow and potentially contains duplicative language as well as missing words or phrases. Importantly, the inclusion of the calendar annual average of 500 $\mu\text{mhos/cm}$ over source water as electrical conductivity goal is not supported and should be removed, particularly because the Discharger is also subject to a performance-based trigger of 1,200 $\mu\text{mhos/cm}$.

D. Include Reference to the Recently Adopted Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems

The tentative order includes reference to “Statewide General Waste Discharge Requirements for Sanitary Sewer Systems.” (See Tentative Order at pp. 21, F-16.) However, the reference does not reflect the recent adoption of General Order WQ 2022-0103-DWQ, which takes effect on June 5, 2023. CVCWA recommends revising the tentative order to reflect that the Permittees are subject to the requirements of, and must comply with, State Water Board Order WQ 2022-0103-DWQ.

We appreciate your consideration of these comments. If you have any questions or if CVCWA can be of any further assistance, please contact me at (530) 268-1338 or eofficer@cvcwa.org.

Sincerely,

A handwritten signature in black ink that reads "Debbie Mackey". The signature is written in a cursive style with a long, sweeping tail on the letter "y".

Debbie Mackey
Executive Officer

MEC/je