

March 9, 2015
(150144:RKE)

Mr. Jim Marshall
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

Electronic Submission: RB5S-NPDES-Comments@waterboards.ca.gov

SUBJECT: Comments on Tentative Order for the Renewal of Waste Discharge Requirements (NPDES No. CA0079111) for the City of Sacramento Combined Wastewater Collection and Treatment System

The City of Sacramento (City) appreciates the opportunity to provide comments on Renewal of Waste Discharge Requirements (NPDES No. CA0079111) for the City of Sacramento Combined Wastewater Collection and Treatment System (Permit), as issued by the Central Valley Regional Water Quality Control Board (Water Board) on February 6, 2015.

The City appreciates the Water Boards diligent efforts to understand the operational complexities of the combined sewer system. We support the permit as it has been issued, and only wish to provide minor clarification comments on the tentative order, as provided below.

Comment #1

Page 1, Table 2

Discharge Point No. 3 description is truncated, and should read “Combined Municipal and Industrial Wastewater and Stormwater.”

Comment #2

The CSS includes all of the collection system, pumping stations and the CWTP/Pioneer Reservoir treatment facilities. There are several references throughout the Permit that appear to differentiate between the CSS and the treatment facilities, and the page A-1 definition of the CSS only refers to collection system facilities. The City recommends modifying the definition of the CSS to include the CWTP, Pioneer Reservoir and Treatment facilities. The definition should also state that the CWTP and Pioneer Reservoir are not POTWs. Below are the recommended changes to the definition.

Page A-1, Attachment A - Definitions

“Combined Sewer System (CSS)

CSS is a wastewater collection system designed to carry sanitary sewage (consisting of domestic, commercial, and industrial wastewater) and storm water (surface drainage from rainfall or snowmelt) in a single pipe to a treatment facility. The City of Sacramento’s CSS includes the collection system, pump stations, storage facilities, the CWTP/Pioneer Reservoir treatment facilities, and other miscellaneous ancillary facilities. The CSS is not a Publicly Owned Treatment Works (POTW).”

The clarification to the definition is consistent with the intent of the permit. In the event that you choose to leave the CSS definition generic, the City would recommend the following changes to the permit.

Page 3, Section II.A. Legal Authorities

In this section, the CSS is distinguished from the treatment facilities. Suggest the following edit for clarification:

“The City’s combined sewer system (CSS), including Pioneer Reservoir and the Combined Wastewater Treatment Plant (CWTP), is not a POTW and is not subject to requirements that apply only to POTWs.”

Page 5, Footnote 2

This is another clarification that the CSS includes the CWTP and Pioneer Reservoir treatment facilities are part of the CSS.

“The Discharger must obtain prior written approval from the Executive Officer to discharge from the CWTP, Pioneer Reservoir, or the combined sewer system (CSS), including the CWTP and Pioneer Reservoir, for maintenance or equipment testing, when the discharges would not be required by wet weather conditions.”

Page D-7 and D-8, VII. Additional Provisions – Notification Levels

This section refers to provisions applicable to POTWs, without any exclusion of the CSS. Recommend adding the following to each reference to this section.

“Applicable to POTWs only. The CSS is not a POTW, thus this provision is not applicable to the CSS.”

Comment # 3

Page E-19, 4. Special Study Reports and Progress Reports

The City recommends removing Table E-8 since the reporting requirements are already specified in the special provisions on page 20. Other references to the Methylmercury TMDL reporting requirements specify some Executive Officer discretion. If the table is not removed, it is recommended that the following note be added:

“Reporting requirements and due dates may be modified with Executive Officer approval.”

Comment # 4

Page F-3, A.

The City recommends that the CSS reference in the last sentence be modified to clarify that the facilities also provide treatment.

“The City of Sacramento (hereinafter Discharger) is the owner and operator of the Combined Wastewater Collection and Treatment System (hereinafter Facility). The Facility includes a Combined Sewer System (CSS) that collects and treats domestic and industrial wastewater and storm runoff.”

Comment # 5

Page F-39, 1. Methylmercury Compliance Schedule

The City also participates in the Central Valley Clean Water Association (CVCWA) Delta Methylmercury TMDL Control Study Workgroup. Suggest insertion of the following sentence in third-to-last paragraph:

“The City also participates in the Central Valley Clean Water Association (CVCWA) Delta Methylmercury TMDL Control Study Workgroup, which is evaluating methylmercury control opportunities as well as supporting the Delta Mercury Exposure Reduction Program (MERP).”

Thank you for the opportunity to provide comments on the Permit. If you have any questions regarding this submittal, please contact me at 916-808-1455/shuun@cityofsacramento.org or Kyle Ericson at 916-607-3850/kericson@cityofsacramento.org.

Sincerely,



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Supervising Engineer
City of Sacramento
Department of Utilities

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