



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

MICHAEL RIDDELL – Chair, City of Riverbank
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March 9, 2015

Via Electronic Mail Only

James Marshall, P.E.
Senior Engineer
California Water Quality Control Board
Central Valley Region
11020 Sun Center Drive
Rancho Cordova, CA 95670-6114
RB5S-NPDES-Comments@waterboards.ca.gov

SUBJECT: Tentative Waste Discharge Requirements for the City of Sacramento, Combined Wastewater Treatment and Collection System, Sacramento County

Dear Mr. Marshall:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative Waste Discharge Requirements Order No. R5-2015-XXXX for City of Sacramento, Combined Wastewater Treatment and Collection System (Tentative Order). 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 with the perspective of balancing environmental and economic interests consistent with state and federal law. In this letter, we provide the following information regarding the City of Sacramento's participation in the CVCWA Methylmercury Special Project. We are not requesting any changes to the tentative order, but believe it is important the Central Valley Regional Water Quality Control Board (Regional Water Board) recognize the City of Sacramento's participation and contribution to the CVCWA Methylmercury Special Project.

I. CVCWA Methylmercury Special Project

The Tentative Order describes in Section C.2.a starting on page 12, a study the City of Sacramento is conducting in compliance with the Phase 1 Mercury Control Program. The City of Sacramento also participates in the CVCWA Methylmercury Special Project, a collaborative effort which evaluates control strategies through municipal wastewater treatment plants and whether variations in influent mercury and methylmercury has statistically significant effects on effluent characteristics for secondary plants and higher. The City of Sacramento's participation in the CVCWA Methylmercury Special Project has included, but has not been necessarily limited to cost sharing, providing water quality data, and staff participation time.

When forming the CVCWA Methylmercury Special Project, we, along with the City of Sacramento, recognized that the combined system was unique in its operation and treatment: it was not purely a wastewater treatment plant or a stormwater collection system. Therefore, the City of Sacramento chose to conduct its own control study and participate in the CVCWA's collaborative control study. The City of Sacramento's control study, as described in the tentative order, is designed to specifically address control measures appropriate for the City's combined system. CVCWA's Methylmercury Special Project may inform the City of mercury control measures at its treatment facility, although to what extent is unknown at this point but should become clearer as CVCWA's control study is finalized in this Phase 1 timeframe. CVCWA, on behalf of the agencies participating in the CVCWA Methylmercury Special Project, will be submitting its findings in a report to the Regional Water Board in compliance with the TMDL deadlines.

CVCWA is not requesting that its study be added to the requirements of Section C.2.a, as the final outcome of our study may not be relevant to the City of Sacramento's combined system. If desired, some discussion of the City's participation in the CVCWA Methylmercury Special Project could be included in the Fact Sheet, although we are not specifically requesting a discussion be added. CVCWA appreciates the City of Sacramento's participation in our collaborative methylmercury control study and wants the Regional Water Board to be aware of their participation.

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

Sincerely,

A handwritten signature in cursive script that reads "Debbie Webster".

Debbie Webster
Executive Officer

cc (*via email*): Pamela Creedon, Central Valley Regional Water Quality Control Board
(pcreedon@waterboards.ca.gov)