

## Lahontan Regional Water Quality Control Board

April 9, 2018

ECM: (LAMP) Mono County  
CW-825769

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### **Water Board Comments – Final Draft 1, Mono County Local Agency Management Plan**

The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff reviewed the Final Draft 1 Local Agency Management Program (LAMP) for Mono County, received by your email on January 18, 2018. Please consider the following comments. Separately, we will send you a redline/strikeout version of the draft LAMP with suggested changes. We want to work with you to resolve these issues by early May 2017, in order to allow Water Board consideration of the Mono County LAMP in July 2018.

#### **Comments**

1. As we have discussed, Water Boards are not authorized to approve the design of any treatment system (Water Code sec 13360). Therefore, Mono County will need to use third party testing to assure that the selected treatment system is appropriate for the intended performance.

When a county refers a supplemental treatment system or a non-conventional dispersal system to the Lahontan Water Board, the proposed system may not qualify for the conditional waiver of waste discharge requirements (see OWTS sec 12). Therefore the owner of the proposed system must submit a report of waste discharge, obtain waste discharge requirements, and pay fees (see OWTS Policy, Sec. 12).

2. When supplemental treatment is used, we suggest specifying the National Sanitation Foundation (NSF) standard NSF 245 for nitrogen removal or another third party treatment unit tester. Please note that under NSF 245 certification, the maximum certified flow is 1,500 gal/day, although some manufacturers may market higher capacity systems designed to achieve similar performance.

PETER C. PUMPHREY, CHAIR | PATTY Z. KOYOUUMDJIAN, EXECUTIVE OFFICER

Other third party testers may certify higher maximum flows. In any case, the Water Board expects supplemental treatment systems approved by Mono County to achieve specified performance criteria. The Mono County LAMP should include provisions for compliance oversight and enforcement as necessary to require correction of compliance issues.

3. For supplemental treatment systems intended to remove nitrogen, we suggest that the LAMP require the owner to sample the influent and effluent for at least one event annually and provide calculations to verify a 50% reduction in total nitrogen. Typically a service provider will collect samples, have a laboratory analyze the samples, perform calculations, and report the data to both the owner and the Mono County Environmental Health Division.
4. Unless located near an impaired water body or other surface water, we do not recommend that the supplemental treatment unit provide disinfection by chlorination. Chlorination can produce disinfection byproducts in the receiving groundwater that are harmful carcinogens.
5. The Mono County LAMP cannot apply to land in another county, even with an existing MOU with Madera County to regulate onsite systems in the Red's Meadow Area. This MOU must be incorporated into both the Madera and Mono County LAMPs. Red's Meadow is tributary to the San Joaquin Watershed. Therefore, the Central Valley Regional Board is responsible for approving the Madera County LAMP. We have contacted Eric Rapport, Senior Geologist for the Central Valley Water Board, and made this recommendation.
6. Basin Plan OWTS prohibitions remain in full force under the OWTS Policy.
7. Under the section, General Policy Recommendation and Provisions, you provide two different dates for the applicability of the effective date for the maximum density of 2 equivalent dwelling units (EDU)/acre. Please select one of the dates.
8. On Page 5, you state that residential disposal fields for single family home are based on flow of 150 gallons per day per bedroom. As long as these are single family homes the maximum density is two homes per acre. For multiple dwelling units and commercial development, the density is based on a flow of 500 gal/day/acre, as you state in the 1<sup>st</sup> bullet under Introduction (Page 1).
9. As a point of clarification on Page 14, alternative systems include any non-conventional system other than supplemental treatment. Therefore, alternative systems are non-conventional dispersal systems, such as pressurized dispersal systems and mound systems.

Please send all future correspondence to [lahontan@waterboards.ca.gov](mailto:lahontan@waterboards.ca.gov), and copy me, so that information is placed into the proper electronic file. If you have any questions, please contact me at (760) 241-2434, [jehiel.cass@waterboards.ca.gov](mailto:jehiel.cass@waterboards.ca.gov).

  
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RB6V/Shared Units/Jays Unit/Jay/Septic/OWTS Policy (2012-04)/LAMP – Mono Co/Comments – Final Draft Mono County LAMP – December 2017