

Wy'east Engineering

Consulting Civil Engineers

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VIA HAND DELIVERY
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Subject: Tres Pinos County Water District
Comparison of Waste Discharge Orders 99-101 and R3-2011-0220

William:

As discussed, I have reviewed the *Waste Discharge Order R3-2011-0220 (WDO-2011)* proposed by the *Regional Water Quality Control Board (WB)* for the regulation of wastewater discharges by the *Tres Pinos County Water District (TPCWD)*. This order is to be implemented 8 December 2011 and will supersede *WDO 99-101 (WDO-1999)* and initial comments are due to the *WB* by 13 October 2011.

A significant element of the *WDO-2011* is the *Monitoring and Reporting Program No. R3-2011-0220 (MRP)*. *WDO-2011* is also divided into several subsections addressing specific issues of concern to the *WB*. I have broken my comments down into the same sections as shown in that proposed order. They are:

- A. Discharge Prohibitions
- B. Specifications
- C. Salt and Nutrient Management Program
- D. Long-Term Wastewater Management Plan
- E. General Provisions

The attached report will include my observations and assessment of each of these areas of concern as well as, wherever practical, some estimate of the impact on *TPCWD* in terms of manpower and/or specific expense. These estimates should be considered minimums and will, no doubt, increase as additional information becomes available.

Perhaps the most significant area of concern is that *WDO-2011* requires significantly greater efforts on the part of *TPCWD* in the operation of their wastewater collection, treatment and disposal systems. Given the scope of these requirements, the size and resources of *TPCWD*, it is our recommendation to the Board of the *Tres Pinos County Water District* to request an extension on the implementation of *WDO-2011* to enable *TPCWD* time to seek funding for and have prepared a comprehensive *Long-Term Wastewater Management Plan*. While required for *WDO-2011*, this is a critical document that will serve to guide *TPCWD* in their implementation of *WDO-2011* and the management of their systems in the years to come.

Not only will this document provide direction on specific operational and management activities, it will also identify the requisite funding challenges and possible avenues to pursue to develop those funds.

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Tres Pinos County Water District

Comparison of Waste Discharge Orders

page 2 of 2

Failure to first prepare the *LTWMP* will almost certainly lead to a failure of *TPCWD* to satisfy even the most basic of requirements beyond what they are currently meeting under *WDO-1999* which serves no one's best interests.

Thank you for the opportunity to work with you on this report and, if you have any questions or I may be of further assistance, please feel free to call me.

Sincerely
Wy'east Engineering

Douglas R. Allen, PE

Attach.



**Tres Pinos County Water District
Comparison of Waste Discharge Orders
99-101 and R3-2011-0220**

~
October 2011

~ Table of Contents ~

Executive Summary

Monitoring and Reporting Program No. R3-2011-0220 (MRP)

Section 1 - Monitoring and Reporting Program No. R3-2011-0220 (MRP)

1.2 Influent Monitoring	Page 1 of 12
1.2.1 Discussion	Page 1 of 12
1.2.2 24-hour Composite Samples	Page 2 of 12
1.2.3 Sulfates and Boron	Page 2 of 12
1.2.4 Plant Influent Flows	Page 2 of 12
1.3 Pond Monitoring	Page 2 of 12
1.3.1 Pond Freeboard	Page 2 of 12
1.3.2 Sludge Depth	Page 2 of 12
1.3.3 pH and Dissolved Oxygen	Page 3 of 12
1.3.4 Evaporation and Percolation/Infiltration	Page 3 of 12
1.3.4.1 Discussion	Page 3 of 12
1.3.4.2 Alternatives to Determine Evaporation Rates	Page 3 of 12
1.4 Effluent Monitoring	Page 4 of 12
1.4.1 Discussion	Page 4 of 12
1.4.2 Grab Samples	Page 4 of 12
1.4.3 Sulfates, Boron and pH	Page 4 of 12
1.5 Groundwater Monitoring	Page 4 of 12
1.5.1 Discussion	Page 4 of 12
1.5.2 Community Supply Well(s)	Page 4 of 12
1.5.3 Monitoring Wells	Page 4 of 12
1.6 Solids Monitoring	Page 5 of 12
1.6.1 Discussion	Page 5 of 12
1.6.2 Solids Constituents List	Page 5 of 12
1.7 Facility Monitoring	Page 5 of 12
1.8 Reporting	Page 6 of 12
1.8.1 Quarterly Reports	Page 6 of 12
1.8.2 Annual Reports	Page 6 of 12

Waste Discharge Order R3-2011-0220

Section 2 Discharge Prohibitions

2.1 <i>Section A - Discharge Prohibitions</i>	Page 6 of 12
---	--------------

Section 3 Specifications

3.1 <i>Section B- Specifications</i>	Page 7 of 12
3.2 Subsection <i>Groundwater Limitations</i>	Page 7 of 12

3.3 Subsection <i>System Operation</i>	Page 7 of 12
3.4 Subsection <i>Wastewater Disposal</i>	Page 7 of 12
Section 4 Salt and Nutrient Management Program	
4.1 Section C - Salt and Nutrient Management Program	Page 8 of 12
4.2 Commentary on the SNMP	Page 8 of 12
4.2.1 Discussion	Page 8 of 12
4.2.2 Sources of Extra Strength TDS	Page 8 of 12
4.2.3 Alternatives to Reduce TDS	Page 9 of 12
4.2.3.1 Community Supply Well	Page 9 of 12
4.2.3.2 Control of TDS within the <i>TPCWD</i> System	Page 9 of 12
4.2.4 Conclusions and Recommendations	Page 10 of 12
Section 5 Long-Term Wastewater Management Plan	
5.1 Discussion	Page 10 of 12
Section 6 General Provisions	
6.1 Discussion	Page 11 of 12
Section 7 Financial Considerations	
7.1 Discussion	Page 11 of 12
7.2 Funding Sources for Investigation	Page 11 of 12

Tables

Comparison of Waste Discharge Orders 99-101 and R3-2011-0220



**Tres Pinos County Water District
Comparison of Waste Discharge Orders
99-101 and R3-2011-0220**

~
October 2011

~ Executive Summary ~

Tres Pinos County Water District (TPCWD) is located in *San Benito County* approximately 7-miles southeasterly from the *City of Hollister* city center. *TPCWD* serves approximately 140 customers along *Airline Highway* west of *Bolado Park* overlooking *Tres Pinos Creek* and, farther west, the *San Benito River* valley and has served customers in the area for the past approximately 50-years.

The *District* provides both water and wastewater utilities to its customers with one well on *Bolado Road* southeasterly from the community center. Wastewater is collected by gravity and routed to a point at the intersection of *Bolado Road* and *Southside Road* where it is pumped to a lagoon treatment facility approximately 1,200-feet westerly. The wastewater treatment facility operates under a *Waste Discharge Order (WDO)* issued by the *State of California Regional Water Quality Control Board, (Region 3)(RWQCB)*. The current *WDO* was issued in 1999 and is scheduled to be superseded by a new *WDO* as of the *RWQCB* meeting scheduled for 8 December 2011. The attached report has been prepared to compare the two *WDOs* and their requirements as well as their probable impact on *TPCWD*.

The two *WDO* are dramatically different and the new *WDO* will have a significant impact on *TPCWD*. *WDO 99-101(WDO-1999)* placed certain, minimal requirements on monitoring and reporting of constituents and the operation of the treatment facility. *WDO R3-2011-0220 (WDO-2011)* places significantly greater requirements on the monitoring of constituents, both in the constituents to be monitored and the frequency of that monitoring. Furthermore, *WDO-2011* requires that *TPCWD* prepare a *Long-Term Wastewater Management Plan (LTWMP)* and a *Salt and Nutrient Management Plan (SNMP)* both of which will require the commitment of substantial resources to prepare and implement.

Put simply, while *WDO-1999* was relatively minimal in its requirements, though probably adequate for the time, *WDO-2011* appears to be directed more to the scale of much larger systems having full time management and operations staff, more sophisticated treatment processes, greater automation of both the operation and the monitoring and reporting and an economy of scale easing the financial burden of compliance.

While the *RWQCB* is well within their purview and mandate to issue these requirements, these requirements pose a significant burden to a small system such as *TPCWD*. It is our recommendation that *TPCWD* appeal certain elements of *WDO-2011*, especially the time of implementation, while they undertake an assessment and planning process to determine both what they can reasonably accomplish and how they can fund both the requisite improvements and the day-to-day cost of operation. The preparation of a comprehensive master plan such as the *LTWMP* should be the first step for *TPCWD* not only in answering and meeting the requirements of *WDO-2011* but also to enhance their management and operation of the system and treatment facility. Such a plan will enable identifying specific avenues to pursue to improve the reliability of the operation and funding sources to support the additional expense to both improve the operation and to actually operate it.

The plan would also endeavor to determine the reasonableness of the requirements found in *WDO-2011*. Some of the requirements in *WDO-2011* such as weekly pH and dissolved oxygen sampling and monthly 24-hour composite sampling, will impose a significant burden on the operation of the facility and, at this time, it is unclear if such an intense monitoring program will, in fact, make much difference in performance and compliance. There are other

monitoring requirements that should also be reviewed and, if appropriate, appealed once the *LTWMP* has been able to quantify the situation more accurately.

Similarly, *WDO-2011* includes the preparation of an *SNMP* which, in and of itself, is a major undertaking for such a small system. It would be our recommendation that the detailed preparation, and implementation, of the *SNMP* be deferred until completion of the *LTWMP* which will address, as a planning function, the role *TPCWD* plays in the regional groundwater planning, alternatives to meet the goal of reducing contaminants in the groundwater basin and alternatives to implement whatever appears to be the most reasonable solution to an *SNMP*.

In conclusion, the requirements in *WDO-2011* are significantly greater than anything in the earlier *WDO-1999* and will require careful planning, first to determine if they are reasonable or even feasible for *TPCWD* to accomplish and to enable responsible implementation.

We would recommend that *TPCWD* appeal *WDO-2011* as currently proposed and request, as a minimum, an extension in time to enable the preparation of a comprehensive *LTWMP* that can better guide both *TPCWD* and the *RWQCB* in satisfying the goals of protecting the local and regional groundwater environment and protect the health, safety and well-being of the local community.



**Tres Pinos County Water District
Comparison of Waste Discharge Orders
99-101 and R3-2011-0220**

~
October 2011

Monitoring and Reporting Program No. R3-2011-0220 (MRP)

Section 1 - Monitoring and Reporting Program No. R3-2011-0220 (MRP)

Section 1.1 Discussion - In order to determine compliance with *Waste Discharge Order R3-2011-0220* (hereinafter *WDO-2011*), the *Regional Water Quality Control Board (WB)* has promulgated *Monitoring and Reporting Program No. R3-2011-0220* hereinafter referred to as the *MRP*. The purpose of the *MRP* is to guide the *TPCWD* in the acquisition of data representative of the results of their efforts to comply with the overall provisions of *WDO-2011* and enable the *WB* to assess the performance of *TPCWD* in those efforts to reduce impacts on the local environment as a whole and the local groundwater basin specifically.

We have prepared a tabular comparison of the *MRP* for both *Waste Discharge Order 99-101 (WDO-1999)* and *WDO-2011* to enable an easier understanding of these requirements and the significant increase in analysis and reporting being required as part of *WDO-2011* and the resulting impacts to *TPCWD*. This comparison is attached for reference.

In preparing the following comments on the *MRP*, we have made some estimate of the additional manpower requirements that can be anticipated at this time. It should be noted that these estimates are solely for task specific time including taking samples, delivering samples to laboratories, recording data, making calculations therefrom and so on. They do not include any estimate for travel time or administrative time in support of the specific activity. The manpower estimates are made on a monthly basis with semiannual and weekly tasks prorated or projected to equivalent monthly values except where noted.

Similarly, the estimates for material acquisition are based on a quick search of available catalog data and an estimate of construction expense to install that equipment.

As will be discussed further in *Section C - Salt and Nutrient Management Plan*, an underlying goal of *WDO-2011* is to reduce and, if possible eliminate, the adverse impacts of salts, nitrogen species and other constituents on the regional groundwater. To that end, the *MRP* for *WDO-2011* has included not only measurement and recording of influent volumes on a daily basis, but also specific requirements for the frequency and method of determining the amounts of salts and nitrogen species as well as the biochemical oxygen demand (BOD), sulfates, boron and the pH of the influent and effluent.

Furthermore, the allowable limits for most of the constituents including total dissolved solids (TDS), sodium, chlorides, nitrates, nitrites, ammonia, total nitrogen, BOD and total suspended solids (TSS) are to be implemented in two stages. The first stage requires achieving one limit by 30 January 2013 and followed a second, lower limit by 20 January 2015.

Section 1.2 Influent Monitoring

Section 1.2.1 Discussion - - Except for recording daily flows, *WDO-1999* did not have any requirements for influent monitoring therefore, all requirements in *WDO-2011* for monitoring influent constituents and *Peak Daily* and *Average Daily Flows* must be considered new. Furthermore, the requirements of the *MRP* will include the development of 24-

hour composite samples on a monthly basis for each of the constituents except for pH.

Section 1.2.2 24-hour Composite Samples - 24-hour composite samples are now required to be taken monthly for the following constituents in the influent:

TDS	Ammonia (as N)
Sodium	Total Nitrogen
Chloride	BOD ₅
Nitrate (as N)	TSS
Nitrite (as N)	

A 24-hour composite sample requires that individual, discrete, representative samples be taken at regular, pre-determined intervals over a 24-hour period. These individual samples are then combined to create a single sample representative of the 24-hour period. Obviously, even though only required monthly, taking the requisite samples manually is impractical. This will require *TPCWD* to invest in equipment that will enable the acquisition of the individual samples necessary to prepare a 24-hour composite sample. This equipment will then have to be programmed, by the operator, to take the samples in the manner required which includes varying the day of the week each month. Finally, the operator will be required to take these samples to a laboratory for analysis at the end of each sampling period.

Estimated manpower requirements per month: 3-hours
Estimated equipment acquisition and installation: \$7,500

Section 1.2.3 Sulfates and Boron - Samples for the analysis of sulfates and boron are also to be taken as 24-hour composite samples although these are only required semiannually. pH values are to be taken weekly and can be performed by taking a grab sample.

Estimated manpower requirements per month: 2.5-hours

Section 1.2.4 Plant Influent Flows - The *MRP* requires not only the daily flow as *WDO-1999* required, it now requires identifying the *Peak Daily Flow* for each month and the *Average Daily Flow* at the end of each month. The required calculations and records of flows can be obtained by a review of chart recorder data sheets currently being created in conjunction with the existing flow meter. The addition of *Peak Daily* and *Average Daily Flows* will require additional data analysis and calculations.

Estimated manpower requirements per month: 1.0-hours

Section 1.3 Pond Monitoring

Section 1.3.1 Pond Freeboard - While the *MRP* associated with *WDO-1999* did have requirements for monitoring the conditions in the ponds, these requirements have been significantly increased in *WDO-2011*. Interestingly enough, whereas *WDO-1999* required monthly measurement of freeboard, *WDO-2011* does not. It does however call for maintaining a minimum of 2-feet of freeboard in each pond at all times and therefore it is to be expected that some provision must be made to continue measuring and reporting the freeboard on a regular basis.

Estimated manpower requirements per month: No Change

Section 1.3.2 Sludge Depth - A second parameter required to be monitored and reported is the sludge depth in the



ponds. *WDO-1999* required that this be measured semiannually whereas *WDO-2011* only requires this annually. This is the only parameter in *WDO-2011* that is actually less than its predecessor in *WDO-1999*.

Section 1.3.3 pH and Dissolved Oxygen - Proceeding from there, *WDO-1999* required that pH and dissolved oxygen (DO) be measured by grab samples taken semiannually and monthly respectively. Both of these are now required weekly and furthermore, that they reflect the average of three representative grab samples in each pond. This is a very significant increase in reporting requirements for these parameters.

Estimated manpower requirements per month: 12-hours

Section 1.3.4 Evaporation and Percolation/Infiltration

Section 1.3.4.1 Discussion - A new requirement in *WDO-2011* is the calculation of evaporation and percolation/infiltration. Specifically, these calculations are to be performed monthly by "... conducting a hydraulic balance between facility flow data and the facility area specific evaporation rates as determined by the pan evaporation method and using appropriate pan coefficients".

This is a significant additional task over and above anything currently being performed by *TPCWD*. In order to provide this hydraulic balance calculation, *TPCWD* will have to acquire and install specific equipment, a Class A evaporation pan with attendant appurtenances, and then develop a program of actually determining the evaporation rates at any given time. This latter is especially serious to *TPCWD*, at least in terms of monitoring and reporting efforts.

The basic method by which evaporation rates are determined using a National Weather Service Class A pan, once installed, is to fill the pan with clean water to a specific level in the pan. Every 24-hours at a pre-determined time, the evaporated water is replaced using a graduated cylinder. The amount of make up water is recorded and then forms part of the basis of calculation.

Other equipment required to support this calculation include recording thermometers, rain gauges, recording hygrometers and anemometers which provide data that enables correlating the environmental conditions to the observed evaporation which, in turn, enables extrapolating the observed results into a statistically viable rate of evaporation.

Given the labor intensive nature of the typical pan evaporation calculations, it is obvious that *TPCWD* cannot routinely perform these calculations manually. It would be our recommendation should this requirement remain in *WDO-2011* unaltered, that *TPCWD* investigate some means of automating as much of this function as possible. Control and SCADA systems are available that can control, perform the work, calculate and record the results and prepare reports for inclusion in the routine reporting protocol prescribed in *WDO-2011*.

Estimated manpower requirements per month: 4-hours

Note that this estimate of manpower requirements assumes some level of automation in the evaporation pan installation. Lack of automation will require daily effort by the *TPCWD*, a very significant requirement.

Estimated equipment acquisition and installation: \$5,500

(Note that this estimate does not include SCADA integration)

Section 1.3.4.2 Alternatives to Determine Evaporation Rates - In light of the amount of effort this will require, it would be advisable to request that the data from the California Irrigation Management Information System (CIMIS) Station 126 located at the fire station on Fairview Road be substituted for this requirement.



Section 1.4 Effluent Monitoring

Section 1.4.1 Discussion - Similar to the requirements for influent monitoring, the requirements for effluent monitoring have undergone a significant escalation.

Section 1.4.2 Grab Samples - Grab samples are now required to be taken monthly for the following constituents in the effluent:

TDS	Ammonia (as N)
Sodium	Total Nitrogen
Chloride	BOD ₅
Nitrate (as N)	TSS
Nitrite (as N)	

This will require *TPCWD* to schedule the operator to take these samples and deliver them to a laboratory for analysis at the beginning of each sampling period.

Estimated manpower requirements per month: 1.5-hours

Section 1.4.3 Sulfates, Boron and pH - Sulfates and boron are also to be taken as grab samples although these are only required semiannually. pH values are to be taken weekly and can be performed by taking a grab sample.

Estimated manpower requirements per month: 2.5-hours

Section 1.5 Groundwater Monitoring

Section 1.5.1 Discussion - The requirements for groundwater monitoring have also escalated significantly. Whereas *WDO-1999* did require grab samples from the potable water supply well and the three monitoring wells, they were limited to testing for TDS, sodium and chlorides. Furthermore, in *WDO-2011* there is an increase in the frequency of sampling, specifically for the monitoring wells.

Section 1.5.2 Community Supply Well(s) - *WDO-1999* required that grab samples be taken from the community supply well(s) semiannually and analyzed for TDS, sodium and chlorides. *WDO-2011* still requires grab samples from the community supply well(s) be taken semiannually however, the constituents list has been changed to add analysis for sulfates, boron and nitrate as well.

Estimated manpower requirements per month: 0.5-hours

Section 1.5.3 Monitoring Wells - *WDO-1999* required that grab samples be taken from the three monitoring wells sited around the treatment ponds semiannually and analyzed for TDS, sodium, chlorides and nitrates. *WDO-2011* now requires grab samples from the monitoring wells be taken quarterly and the constituents list has been changed to add analysis for nitrate, nitrite, total Kjeldahl nitrogen and total nitrogen quarterly as well. pH is now required to be tested weekly instead of semiannually along with boron and sulfates.

Estimated manpower requirements per month: 1.5-hours



Section 1.6 Solids Monitoring

Section 1.6.1 Discussion - Finally, unlike *WDO-1999*, *WDO-2011* now requires that any solids to be disposed of be analyzed for the following list of constituents prior to transport. This will require taking grab samples several days in advance of transport for disposal. A record of volume disposed of and the moisture content at the time of disposal will be required as well as the constituents.

Section 1.6.2 Solids Constituents List - The following list of constituents must be analyzed for in the solids scheduled for disposal:

Volume	Lead
Moisture content	Mercury
Nitrate (as N)	Molybdenum
Total phosphorous	Nickel
pH	Selenium
Arsenic	Silver
Antimony	Thallium
Barium	Tin
Beryllium	Vanadium
Boron	Zinc
Cadmium	Pesticides
Cobalt	Organic Lead
Copper	PCBs
Chromium, VI and total	

Since this analysis will be required only when solids are disposed of, the monthly impact on manpower and expenses cannot be predicted accurately. The anticipated manpower requirements per disposal operation are:

Estimated manpower requirements per disposal operation: 4.5-hours

Section 1.7 Facility Monitoring - This section of *WDO-2011* specifically calls for daily inspections of the wastewater treatment and disposal pond areas. A log of these daily inspections shall be maintained and submitted with the quarterly reports.

This is a significant change from *WDO-1999* which didn't make any specific statement regarding facility monitoring. Obviously, while taking the samples required by *WDO-1999* and related work, the operator is, in fact, going to conduct an inspection of the facility. Otherwise, no mention was made of specific inspection requirements.

By specifically addressing this in *WDO-2011*, the *WB* is imposing a significant operational burden on *TPCWD*, one which they will find difficult if not impossible, to meet. Not only does *TPCWD* not have a full time, 7-day operator, the financial burden of the increased labor expense would impair their ability to satisfy other, more pressing requirements in the *MRP*. In assessing the impact of this requirement, the amount of time required assumes solely that time to actually inspect the facility, on average 1-hour per day. Travel time for whoever may be assigned this task is an entirely different matter and one that must be considered in the assessment of the task.

Estimated manpower requirements per month for facility inspections: 30.5-hours



Section 1.8 Reporting

Section 1.8.1 Quarterly Reports - *WDO-1999* required that reports be submitted to *WB* quarterly that included all monitoring data acquired during that quarter. The data was to be presented in a tabular form to facilitate interpretation of the data and a summary of the data presented was to be included.

WDO-2011 also requires that reports be submitted quarterly that include all monitoring data acquired during that period and in a logical and coherent format accompanied by laboratory analysis reports.

By virtue of the dramatic increase in monitoring requirements discussed previously in this analysis, the preparation of the quarterly report under this new requirement will entail a significant increase in administrative support.

Estimated manpower requirements per month for preparing quarterly reports: 3-hours

Section 1.8.2 Annual Reports - *WDO-1999* made no specific reference to an annual, summarizing report. *WDO-2011* however requires a very detailed annual report. Not only must the report present the results of all monitoring activities during the previous year, it must also include details on operational staff, the Operations and Maintenance Manual, which should be updated annually, any operational changes in the facility and discussion of compliance issues both those satisfied and those requiring some corrective action.

Furthermore, annually the facility must submit a technical engineering report further discussed in *Section E* of *WDO-2011* that evaluates the performance and capacity of the wastewater treatment and disposal system.

Finally, the facility must submit an annual report summarizing their performance with regard to the *Salt and Nutrient Management Plan (SNMP)* discussed in detail in *Section C* of *WDO-2011*.

These three new requirements will dramatically impact *TPCWD*. Not only will there be additional administrative support required to compile the data in the required format, there will be a significant increase in the operator's efforts to summarize the annual performance of the system.

And, these new provisions will require that *TPCWD* engage a professional engineer to prepare the technical engineering report and the *SNMP* report.

In sum, this will have a very significant impact on the operations and financial planning of *TPCWD*.

Estimated manpower requirements per year for preparing annual reports: 16-hours

Estimated professional engineering requirements per year for preparing annual reports: \$3-5,000

Note that the estimate for providing professional engineering service in this task assume that the *Long-Term Wastewater Management Plan* and the *SNMP* provided for elsewhere in *WDO-2011* are in place.

Waste Discharge Order R3-2011-0220

Section 2 Discharge Prohibitions

Section 2.1 Section A - Discharge Prohibitions - *Section A - Discharge Prohibitions* of *WDO-2011* are quite straight forward and require little comment. The requirements themselves are really a matter of common sense and do not significantly impact the current operation of the facility by *TPCWD*.

No further comment is offered at this time.

Section 3 Specifications

Section 3.1 Section B- Specifications - *Section B - Specifications* of *WDO-2011* spell out the effluent and groundwater limitations for various constituents associated with the treatment and disposal of wastewater. These limitations have been tabulated, along with the schedule for sampling required in the *MRP*, in the attached documents for reference.

Section 3.2 Subsection Groundwater Limitations - Specific to groundwater limitations, *Section B, Subsubsections 6 and 9* include further direction not only on the measurable limits of total nitrogen and fecal coliform but also include the statement "... statistically significant increase ..." with respect to total nitrogen and "... the mineral or organic constituents in underlying groundwater as determined by statistical analysis collected from wells in the vicinity ...".

We would recommend that *TPCWD* request clarification on the definition of "statistically significant increase" for the purposes of determining the mechanism for compliance. Absent such clarification, any such determination will have to be considered arbitrary and therefore unenforceable.

An additional consideration in satisfying the requirements lies in that *Subsubsection 9* requires the "... statistical analysis of samples collected from wells in the vicinity ...". The nearest wells to the facility, within the alluvial plain, are as follows:

Down Gradient:

Private Domestic Wells

1,000-feet± northeasterly
1,500-feet± southeasterly

Community Wells (*TPCWD*)

5,000-feet± southeasterly

Up Gradient:

Private Domestic Wells

5,000-feet± northwesterly

Commercial or Industrial Wells

5,000-feet± northwesterly
(Granite Rock Quarry)

Wells located northeasterly across Airline Highway are out of the alluvial plain and therefore are not representative of the groundwater impacted by the facility.

TPCWD does not have rights of access to any of these wells except for the Community Supply Well located 5,000-feet± southeasterly from the facility. It is recommended that *TPCWD* solicit direction from District counsel regarding access to these other wells for the purposes of satisfying the requirements of this *Subsubsection 9*.

It should be noted that it is unlikely that wells up gradient from the facility will demonstrate much, if any, influence from the facility. Also, wells down gradient are far enough from the facility that without baseline data predating the construction of the facility, they will probably be of little value in determining any impacts from the facility.

Subsubsections 10 and 11 require little comment.

Section 3.3 Subsection System Operation - Again, little comment on this subsection is warranted at this time.

Section 3.4 Subsection Wastewater Disposal - No additional comment at this time.



Section 4 Salt and Nutrient Management Program

Section 4.1 Section C - Salt and Nutrient Management Program - This section is a continuation of efforts by the *WB* to enforce provisions of orders dating back to 2007 for a plan to quantify, and ultimately reduce, the discharge of TDS, sodium and chlorides to the local and regional groundwater basin. *Subsection 1 and 2* of this *Section C* summarize the history of these efforts to date.

Subsection 3 requires that *TPCWD* submit a *Salts and Nutrient Management Program (SNMP)* to the *WB* by 30 June 2012.

Subsections 4 through 8 present specific requirements for the composition of the *SNMP* required in *Subsection 3*.

Subsection 8 offers as an alternative to the *SNMP*, participation in a regional *SNMP* implemented under *State Water Board Resolution No. 2009-0011 (Recycled Water Policy)*.

Section 4.2 Commentary on the SNMP

Section 4.2.1 Discussion - The issue of contamination of groundwater by the application or disposal of treated wastewater is not a new one. In its various forms, such concerns have been an integral part of wastewater management since the inception of the centralized treatment process, if not before.

In recent years, perhaps the past 30-years or more, it has become increasingly apparent that relatively high levels of salt products, collectively referred to as Total Dissolved Solids or TDS, have been increasing in the effluent of wastewater treatment operations. This has been the result of higher loadings due to population growth, a decline in the availability of higher quality potable water and, in a related development, the increased use of Point of Entry (POE) water softeners to enhance the aesthetic quality of potable water that is otherwise safe for consumption.

In response to this situation, regulatory agencies, specifically the *Water Quality Control Board*, has undertaken measures to reduce or eliminate the infiltration of TDS laden water into the groundwater basins in California.

In reviewing the stated requirements in *WDO-2011* regarding the development of a *SNMP*, there is little to question given the explicit character of the requirements as presented. Furthermore, the *WB* initiated action on this matter some years ago with *TPCWD* receiving a partial response from *TPCWD* in 2007 and 2008.

A more comprehensive analysis of the *SNMP* requirements is beyond the scope of this report except to offer some insights into sources and alternatives for future consideration.

Section 4.2.2 Sources of Extra Strength TDS - The problem facing *TPCWD* in the issue of high TDS levels in the wastewater stream stem, almost exclusively, from the character of the Community Supply Well. This well, drilled in or around 1961, is extremely high in TDS, sodium, chlorides and total hardness. This is compounded by the fact that water of this poor quality, while perfectly safe to drink, is aesthetically quite undesirable therefore the customers address this individually by the use of POE water softeners, usually of a self-regenerating type. This adds additional salt compounds to the wastewater stream each time the water softener regenerates.

Finally, the evaporative process inherent in open lagoon wastewater treatment tends to concentrate these salt compounds further.



Section 4.2.3 Alternatives to Reduce TDS

Section 4.2.3.1 Community Supply Well - Given the character of the existing Community Supply Well, that would usually be the first place to attempt to improve the water quality. Typically, this would entail constructing a new well in the hopes of getting an improvement in water quality at which point the existing well would either be retired or put into a secondary status.

Unfortunately, the groundwater quality in the alluvial strata throughout this area is almost uniformly similar to what *TPCWD* is experiencing at this time in the existing well. Therefore, constructing a new well in that strata would probably not make a significant improvement in the overall TDS problem, certainly not enough to encourage customers to retire their individual POE water softeners.

Drilling deeper to get below the alluvium might also be a possibility however, there is little guarantee that an improvement would result. Typically in this area, deeper wells tend to end up in fractured rock aquifers which have both lower transmissivity, or production, and their own, often quite serious, water quality issues.

Therefore, at this point in time, it is unlikely that constructing a new well simply to improve water quality would warrant the expense involved although further investigation is certainly reasonable.

Another alternative related to the existing Community Supply Well would be to investigate treatment alternatives that would permit reducing the hardness at the wellhead to levels low enough to generate a consensus within the customer base to eliminate private, self-regenerating water softeners.

Section 4.2.3.2 Control of TDS within the *TPCWD* System - Were *TPCWD* to prepare an independent *SNMP* to the satisfaction of the *WB*, there are several considerations that would come into play.

First, some effort would be required to reduce TDS and related compounds wherever possible within the system. The most obvious of these is to eliminate and prohibit self-regenerating water softeners within the water distribution system. While there is some statutory foundation to this in the *Water Code* (§13148) (District counsel should be approached for an opinion), there is no doubt that there would be a great deal of opposition within the customer base to enforcing such a requirement. *San Benito County Water District (SBCWD)* has initiated a region-wide rebate/incentive program to replace existing self-regenerating water softeners with either newer, more efficient models or convert to non-regenerating models. Included in this program is an incentive to actually eliminate the applicant's water softener altogether.

Unfortunately, even eliminating ALL private water softeners entirely would not enable reliable compliance with the long-term TDS limits (1,200-mg/l by 30 January 2015) since the water currently delivered to the distribution system was last measured at 1,242-mg/l in November 2010.

One alternative to be investigated in the preparation of a *SNMP* for *TPCWD* would be to look into a different disposal method for the treatment plant effluent. As currently configured, the effluent is allowed to percolate into the alluvial deposits immediately below the facility. Relatively speaking, this concentrates the constituents of the effluent into a small area from which it disperses through groundwater migration into the aquifer.

It may be possible to carry treatment of the effluent to a slightly higher level and enter into an agreement with Granite Rock to utilize this water in their quarry operations. There would be the expense of additional treatment as well as a means of conveying the treated effluent to the point of use within the Granite Rock operation. The investigation would also have to consider the efficacy of such an application to reduce the amount of TDS actually reaching the underlying



groundwater basin.

Another possible alternative to disposing of the effluent would be to route it into the *Ridgemark* wastewater treatment ponds operated by *Sunnyslope County Water District (SCWD)*. Obviously, there would be the expense of a conveying pipeline and a booster station similar in scale to the existing station. And, perhaps most importantly, entering into an agreement satisfactory to both *TPCWD* and *SCWD*.

Finally and related to this last alternative, would be to send all raw wastewater to the *Ridgemark* wastewater treatment ponds and eliminate the need for *TPCWD* to operate and maintain an independent treatment facility themselves.

Section 4.2.4 Conclusions and Recommendations - As previously noted, detailed comprehensive analysis of the *SNMP* issue is both beyond the scope of this report and not practically feasible within the time available. The presentation of the alternatives noted above is provided to give some insight into the problem of TDS facing *TPCWD* and possible avenues for investigation during the preparation of a *SNMP*. No one of these alternatives is being presented as a recommendation. The reduction or elimination of TDS contributions to the groundwater basin will require careful consideration and open discussion of all alternatives during the preparation of the *SNMP* or, alternatively, the participation in a regional *SNMP* such as that in which *SBCWD*, *SCWD* and *City of Hollister* are currently participating.

Section 5 Long-Term Wastewater Management Plan

Section 5.1 Discussion - Perhaps the single most important component of *WDO-2011* is this requirement in *Section D Long-Term Wastewater Management Plan (LTWMP)*. While each of the other sections in *WDO-2011* are important and will have significant impacts on *TPCWD*, the development of a comprehensive *LTWMP* will bring all of the elements into one document where they can be investigated and considered individually as well as collectively.

The operation of a community water and wastewater system is a complex effort with many interrelated parts. The regulatory environment alone, as can be seen in *WDO-2011*, is a dynamic and ever increasing issue that requires careful, long-term planning. Satisfying these requirements is not a simple matter and requires careful coordinated action to achieve compliance in a reasonable time frame. And it must be remembered that compliance is not simply a matter of satisfying some obscure, frankly irrelevant, nuance of the regulatory community.

Rather the purpose of these regulations is to ensure safe potable water and the protection of the environment that will impact both that source of potable water and the health, safety and well-being of the community.

Unfortunately, for a number of reasons, small systems in particular, though not solely, find themselves well out of compliance or facing new regulatory demands for which they have no means to immediately satisfy the requirements. The reasons are many and varied but the result is the same - small, older, even inadequate systems with limited financial resources are faced with significant technical and managerial challenges to not only satisfy the regulatory demands but also to ensure as safe, reliable and efficient a system as possible.

It is significant to note that the compliance date for preparation of the *LTWMP* is 30 March 2012 while the compliance date for the *SNMP* is 30 June 2012. This alone points out the interrelationship of all of the elements involved in planning and operating the wastewater system.

The preparation of the *LTWMP* will enable a comprehensive assessment of the overall problems facing *TPCWD* and offer a plan for solving them. Included in this will obviously be consideration of financial resources both within and without *TPCWD* which will be discussed momentarily.



A more comprehensive analysis of the *LTWMP* requirements is beyond the scope of this report except to offer these insights into the premise behind a *LTWMP* for future consideration.

Section 6 General Provisions

Section 6.1 Discussion - For the most part, this *Section E, General Provisions* simply enacts *WDO-2011* and makes the obvious statements regarding proper operation, changes in the operation and so forth. One significant point to be noted in this section occurs in *Subsection 7* which requires that an annual engineering technical report on the performance and capacity of the wastewater treatment plant and disposal system be prepared and submitted by 30 January each year. This is a new requirement that is not found in *WDO-1999*. *WDO-1999* simply required the quarterly reporting of the data generated by the *MRP (1999)*. *WDO-2011* takes this to a much higher level.

This report is to include a great amount of detail although most it will come from the *MRP* during the course of the year. This will be summarized in the annual report and must be submitted by 30 January each year starting in 2012. In other words, for all practical purposes, *TPCWD* will be required to have implemented the *MRP* by that time and be in a position to submit such a report a month and a half after *WDO-2011* is adopted by the *WB*. This is not practical and some accommodation by the *WB* must be requested in order to avoid being in non-compliance virtually from the beginning of this new order.

Section 7 Financial Considerations

Section 7.1 Discussion - As has been discussed previously, there are serious financial impacts on *TPCWD* associated with satisfying the requirements of *WDO-2011*. These impacts range from simple increases in operational requirements such as for sampling, analyzing and reporting to specific physical improvements including equipment and instrumentation.

Also included are the very real expenses associated with preparing the management plans required not only by *WDO-2011* but also by sound management practice. Given the size of *TPCWD* customer base, it is unreasonable to assume that adequate funding for even the initial steps in satisfying these requirements will be available within the *TPCWD* accounts. For that reason, consideration must be given to what funding sources might be available and how to proceed in seeking them.

And, given the probable financial picture, it is doubtful if *TPCWD* will immediately have the resources to address even a fraction of the expenses they will face in complying with *WDO-2011* and sound management practices. Therefore it will be important for *TPCWD*, in answering the solicitation for comment on *WDO-2011*, to point out the financial limitations they face and request consideration of extensions to enable first the development of the *LTWMP* which will include the investigation of funding sources and then phasing in the requisite improvements as such sources become available.

It will be important for *TPCWD* to convey to the *WB* their intent and commitment to work toward satisfying the requirements of the *WB* as well as they can within the realistic constraints they face.

Section 7.2 Funding Sources for Investigation - The first order of business in seeking funding sources is to determine as accurately as possible, the funds required and at what time those funds will need to be available. That is one major role of the *LTWMP*. Initially, *TPCWD* may be forced to seek funds to prepare the *LTWMP*. The technically simplest is to solicit an assessment from customers in the form of the first phase of a long-term rate structure revision.

With the *LTWMP* in hand, other sources will be identified for consideration. These will include:



- Phased increases in the rate structure;
- Capital Improvement Bonds;
- State and Federal Grant sources;
- State and Federal Loan sources;
- Private loan sources (commercial banks).

In all probability, no one of these will be sufficient to fully meet the demands that *TPCWD* will face however, in aggregate they could enable funding the work required to bring the *TPCWD* system into compliance in a reasonable period of time as well as to enable improvements to the system that will improve the long-term efficiency and reliability of the system as a whole.



**Tres Pinos County Water District
Comparison of Waste Discharge Orders
99-101 and R3-2011-0220**

~
October 2011

Constituent	Limit			Units	Type		Frequency	
	Date of Implementation	1999	2011		1999	2011	1999	2011
INFLUENT MONITORING								
Capacity								
Daily Flow				-GPD	Metered	Metered	Daily	Daily
Max. Day Flow				-GPD		Metered		Monthly
Average Daily Flow				-GPD		Calculated		30-day Running Average
Salt Constituents								
TDS	1/30/2013		1500	-mg/l		24-hr Composite		Monthly
(30-day Average)	1/30/2015		1200	-mg/l		24-hr Composite		Monthly
Sodium	1/30/2013		300	-mg/l		24-hr Composite		Monthly
(30-day Average)	1/30/2015		200	-mg/l		24-hr Composite		Monthly
Chloride	1/30/2013		300	-mg/l		24-hr Composite		Monthly
(30-day Average)	1/30/2015		200	-mg/l		24-hr Composite		Monthly
Nutrients								
Nitrate (as N)	1/30/2013		10	-mg/l		24-hr Composite		Monthly
(30-day Average)	1/30/2015		5	-mg/l		24-hr Composite		Monthly
Nitrite (as N)	1/30/2013		10	-mg/l		24-hr Composite		Monthly
(30-day Average)	1/30/2015		5	-mg/l		24-hr Composite		Monthly
Ammonia (Total as N)	1/30/2013		10	-mg/l		24-hr Composite		Monthly
(30-day Average)	1/30/2015		5	-mg/l		24-hr Composite		Monthly
Total Nitrogen	1/30/2013		10	-mg/l		24-hr Composite		Monthly
(30-day Average)	1/20/2015		5	-mg/l		24-hr Composite		Monthly
Phased BOD and TSS								
BOD5	1/30/2013		60	-mg/l		24-hr Composite		Monthly
(30-day Average)	1/30/2015		30	-mg/l		24-hr Composite		Monthly
TSS	1/30/2013		60	-mg/l		24-hr Composite		Monthly
(30-day Average)	1/30/2015		30	-mg/l		24-hr Composite		Monthly
Sulfate				-mg/l		24-hr Composite		Semiannual
Boron				-mg/l		24-hr Composite		Semiannual
pH			6.5 to 8.4			Grab		Weekly
POND MONITORING								
pH			6.5 to 8.4		Grab	3 Grab	Semiannual (Apr/Oct)	Weekly
DO		>1.0	>1.0	-mg/l	Grab	3 Grab	Monthly	Weekly
(Top 1-ft in Ponds 3 and 4)								
Freeboard				-ft	Measured	Measured	Monthly	
Evaporation				GPD		Calculated		Monthly
Percolation/Infiltration				GPD		Calculated		Monthly
Sludge Depth				-ft	Measured	Measured	Semiannual (Apr/Oct)	Annually (Sept)
EFFLUENT MONITORING								
Salt Constituents								
TDS	1/30/2013		1500	-mg/l	Grab	Grab	Semiannual (Apr/Oct)	Monthly
(30-day Average)	1/30/2015		1200	-mg/l		Grab		Monthly
Sodium	1/30/2013		300	-mg/l	Grab	Grab	Semiannual (Apr/Oct)	Monthly
(30-day Average)	1/30/2015		200	-mg/l		Grab		Monthly
Chloride	1/30/2013		300	-mg/l	Grab	Grab	Semiannual (Apr/Oct)	Monthly
(30-day Average)	1/30/2015		200	-mg/l		Grab		Monthly
Nutrients								
Nitrate (as N)	1/30/2013		10	-mg/l	Grab	Grab	Semiannual (Apr/Oct)	Monthly
(30-day Average)	1/30/2015		5	-mg/l		Grab		Monthly
Nitrite (as N)	1/30/2013		10	-mg/l		Grab		Monthly
(30-day Average)	1/30/2015		5	-mg/l		Grab		Monthly
Ammonia (as N)	1/30/2013		10	-mg/l		Grab		Monthly
(30-day Average)	1/30/2015		5	-mg/l		Grab		Monthly
Total Nitrogen	1/30/2013		10	-mg/l		Grab		Monthly
(30-day Average)	1/30/2015		5	-mg/l		Grab		Monthly
Sulfate						Grab		Semiannual (Mar/Sept)
Boron						Grab		Semiannual (Mar/Sept)
pH			6.5 to 8.4		3 Grab	Grab	Semiannual (Apr/Oct)	Weekly
TSS	1/30/2013		1500	-mg/l		Grab	Semiannual (Apr/Oct)	Monthly
(30-day Average)	1/30/2015		1200	-mg/l		Grab		Monthly
BOD5				-mg/l		Grab		Monthly

**Tres Pinos County Water District
Comparison of Waste Discharge Orders
99-101 and R3-2011-0220**

~
October 2011

Constituent	Date of Implementation	Limit		Units	Type		Frequency	
		1999	2011		1999	2011	1999	2011
Groundwater Monitoring								
Community Supply Well(s)								
TDS (Title 22, Ch. 15)	3/30/2013	1000	1000	mg/l	Grab	Grab	Semiannual (Apr/Oct)	Semiannual (Mar/Sept)
Sodium (Title 22, Ch. 15)	3/30/2013	N/A	N/A	mg/l	Grab	Grab	Semiannual (Apr/Oct)	Semiannual (Mar/Sept)
Chloride (Title 22, Ch. 15)	3/30/2013	500	500	mg/l	Grab	Grab	Semiannual (Apr/Oct)	Semiannual (Mar/Sept)
Sulfate (Title 22, Ch. 15)	3/30/2013	500	500	mg/l		Grab		Semiannual (Mar/Sept)
Boron (Title 22, Ch. 15)	3/30/2013	N/A	N/A	mg/l		Grab		Semiannual (Mar/Sept)
Nitrate (as N) (Title 22, Ch. 15)	3/30/2013	45	45	mg/l		Grab		Semiannual (Mar/Sept)
Monitoring Wells								
Depth to Groundwater				-ft MSL	Measured	Measured	Semiannual (Apr/Oct)	Quarterly (Mar/June/Sept/Dec)
Salt Constituents								
TDS	1/30/2013	1500		-mg/l	Grab	Grab	Semiannual (Apr/Oct)	Quarterly (Mar/June/Sept/Dec)
(30-day Average)	1/30/2015	1200		-mg/l		Grab		Quarterly (Mar/June/Sept/Dec)
Sodium	1/30/2013	300		-mg/l	Grab	Grab	Semiannual (Apr/Oct)	Quarterly (Mar/June/Sept/Dec)
(30-day Average)	1/30/2015	200		-mg/l		Grab		Quarterly (Mar/June/Sept/Dec)
Chloride	1/30/2013	300		-mg/l	Grab	Grab	Semiannual (Apr/Oct)	Quarterly (Mar/June/Sept/Dec)
(30-day Average)	1/30/2015	200		-mg/l		Grab		Quarterly (Mar/June/Sept/Dec)
Nutrients								
Nitrate (as N)	1/30/2013	10		-mg/l	Grab	Grab	Semiannual (Apr/Oct)	Quarterly (Mar/June/Sept/Dec)
(30-day Average)	1/30/2015	5		-mg/l		Grab		Quarterly (Mar/June/Sept/Dec)
Nitrite (as N)	1/30/2013	10		-mg/l		Grab		Quarterly (Mar/June/Sept/Dec)
(30-day Average)	1/20/2015	5		-mg/l		Grab		Quarterly (Mar/June/Sept/Dec)
Total Kjeldahl Nitrogen (as N)	1/30/2013	10		-mg/l		Grab		Quarterly (Mar/June/Sept/Dec)
(30-day Average)	1/30/2015	5		-mg/l		Grab		Quarterly (Mar/June/Sept/Dec)
Total Nitrogen (Total as N)	1/30/2013	10		-mg/l		Grab		Quarterly (Mar/June/Sept/Dec)
(30-day Average)	1/30/2015	5		-mg/l		Grab		Quarterly (Mar/June/Sept/Dec)
Sulfate				-mg/l		Grab		Semiannual (Mar/Sept)
Boron				-mg/l		Grab		Semiannual (Mar/Sept)
pH					Grab		Semiannual (Apr/Oct)	Weekly
Solids Monitoring								
Volume				Tons or CY				As Required - Prior to Transport
Moisture Content				%				As Required - Prior to Transport
Nitrate (as N)				mg/kg				As Required - Prior to Transport
Total Phosphorus				mg/kg				As Required - Prior to Transport
pH								As Required - Prior to Transport
Arsenic				mg/kg				As Required - Prior to Transport
Antimony				mg/kg				As Required - Prior to Transport
Barium				mg/kg				As Required - Prior to Transport
Beryllium				mg/kg				As Required - Prior to Transport
Boron				mg/kg				As Required - Prior to Transport
Cadmium				mg/kg				As Required - Prior to Transport
Cobalt				mg/kg				As Required - Prior to Transport
Copper				mg/kg				As Required - Prior to Transport
Chromium, VI and Total				mg/kg				As Required - Prior to Transport
Lead				mg/kg				As Required - Prior to Transport
Mercury				mg/kg				As Required - Prior to Transport
Molybdenum				mg/kg				As Required - Prior to Transport
Nickel				mg/kg				As Required - Prior to Transport
Selenium				mg/kg				As Required - Prior to Transport
Silver				mg/kg				As Required - Prior to Transport
Thallium				mg/kg				As Required - Prior to Transport
Tin				mg/kg				As Required - Prior to Transport
Vanadium				mg/kg				As Required - Prior to Transport
Zinc				mg/kg				As Required - Prior to Transport
Pesticides				mg/kg				As Required - Prior to Transport
Organic Lead				mg/kg				As Required - Prior to Transport
PCBs				mg/kg				As Required - Prior to Transport



Cecile DeMartini
Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401-5427

October 8, 2011

Subject: Proposed Waste Discharge Requirements Order No. R3-2011-0220
for the Tres Pinos County Water District Wastewater Treatment Plant.

Dear Ms. DeMartini:

After reviewing the Waste Discharge Order R3-2011-0220 proposed by the Regional Water Quality Control Board for the regulation of wastewater discharges by the Tres Pinos County Water District, I proposed that the Tres Pinos County Water District Board allow me to consult with a Certified Civil Engineer to help myself, as well as the Board, in spelling out the significant elements of this vastly different and comprehensive Order compared with the current Order.

The Board complied with my proposal and I brought in Doug Allen, PE of Wy'east Engineering and gave him the task of comparing the new order to the previous order. Additionally, I asked Mr. Allen to provide an Executive Summary of his detailed comments to each and every aspect of the new order, as well as his conclusion of how the District will be affected by each new provision.

In summary, Mr. Allen and I understand the significance to each provision and feel that the District can benefit significantly once the order is implemented. Although, at this time, we would both like to let the Board know that certain elements of the new order will present difficult hardships to the District. It is understandable that provisions of the new order are indeed elements that are considered to be acceptable, but please keep in mind that the district is very small, it does not have significant income such as a larger municipality would, and contracts with a wastewater operator on a part-time basis.


In conclusion, I would like to let the Board know that the District is willing, by all means, to comply with the entire new order, but hopes that the Board may be willing to provide the District additional time to seek funding and have prepared a comprehensive Long-Term Wastewater Management Plan.

Please see the attached report prepared by Mr. Allen for complete detail. Do not hesitate to contact me at 831-626-7535 if you have any questions or comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'W.B. Marcum', with a long horizontal flourish extending to the right.

William B. Marcum
Operator No. III-5828

Tres Pinos 
County Water District

Cecile DeMartini
Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 993401-5427

Oct 11, 2011

Subject: Rescinding Waste Discharge Requirements Order No 99-101 and adopting Proposed Waste Discharge Requirements Order No R3-2011-0220 for the Tres Pinos County Water District Wastewater Treatment Plant.

Dear Ms. DeMartini,

The Board of Tres Pinos Water District (TPWD) is in receipt of the Notice of Public Hearing pursuant to the RWQCB Orders noted above.

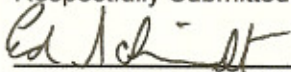
The TPWD Board of Directors understands the critical importance of the proposed order. After lengthy discussions with our systems operator, TPWD BOD, through our system operator, subsequently initiated a contract with a local civil engineering firm uniquely qualified to formulate observations and assessments of each area of the newly proposed order.

TPWD respectfully submits the attached civil engineering letters and reports along with our systems operator's letter in expectation that RWQCB will receive the respective reports into consideration when establishing new permits. As this detailed report will illustrate, there are serious financial impacts associated with satisfying the requirements of WDR Order R3- 2011-0220. Therefore, it is important to point out the financial limitations we face and request consideration of extensions to enable first the development of the LTWMP, which will include the investigation of funding sources, and then phasing in the requisite improvements as such sources become available.

Based on this extensive report by an independent civil engineering firm as submitted, Tres Pinos County Water District respectfully requests an extension of the December 8, 2011 deadline contained in Order No R3-2011-0220. The preparation of a comprehensive **LTWMP** will better guide both TPCWD and RWQCB in satisfying the goals of protecting both the local and regional groundwater environment while at the same time protecting the health, safety and well-being of the local community.

It is most important for the RWQCB to recognize our intent and commitment to work toward satisfying the requirements of the new WDR as well as can be expected within the realistic constraints faced by the District. We urge your consideration for an extension based on our comprehensive impact analysis and alternative approaches as depicted in the engineering report.

Respectfully Submitted



Ed Schmidt President TPWD BOD

Cecile DeMartini - TPWD Proposed WDR Order # R3-2011-0220

From: Tres Pinos Water District <trespinoscwd@razzolink.com>
To: 'Cecile DeMartini' <CDeMartini@waterboards.ca.gov>
Date: Friday, January 13, 2012 2:37 PM
Subject: TPWD Proposed WDR Order # R3-2011-0220
CC: 'William Marcum' <wmarcum@sterlingh2o.com>, 'Ray Creech' <rcreech@garlic...>

Cecile,

Thanks for your prompt reply and generous comments regarding the proposed dates from TPWD. Your cooperative approach in reaching mutually agreed concessions over the past few weeks has been most beneficial to the continued operations of *TPWD*.

Pursuant our telecom discussion following submittal for extensions, I would like to confirm our understanding of those concessions.

REQUESTED EXTENSIONS

PHASED EFFLUENT LIMITATIONS FOR SALT CONSTITUENTS
13.2012

GRANTED Jan

- 1. Current date: TDS - January 30, 2013 – 1,500 mg/L. New proposed date: 09/30/2013
01/30/2014
- 2. Current Date: TDS – January 30, 2015 – 1,350 mg/L. New proposed date: 09/30/2015
Delete limit N/A

- a. TDS – January 30, 2015 1,200 mg/L - New Proposed Date: 09/30/2016 09/30/2016

SALT AND NUTRIENT MANAGEMENT PROGRAM

- 1. Current Date by June 30, 2012. New Proposed Date: 12/31/2012 01/30/2013

ANNUAL SALT AND NUTRIENT MANAGEMENT REPORTS DUE:

- 1. Current Date: January 30th of each year. New Proposed date: 12/31/2012
01/30/2014 (Bi-annual)

LONG-TERM WASTEWATER MANAGEMENT PLAN. Submit a work plan and time schedule for the development of an LTWMP.

- 1. Current Date: March 3, 2012. New Proposed date=09/30/2012
09/30/2012

Final
 LTWMP
 for
 Approval -
 Executive
 Officer

03/30/2013

To paraphrase prior proclamations, the *TPWD Board of Directors* maintains a strong commitment to meet the demands that *TPWD* will face. Your resourcefulness, recognition of *TPWD's* delicate financial position and enduring effort to fortify the relationship between our agencies is testimony to a productive engagement to improve Water & Wastewater operations at *TPWD*. We are enthusiastic and appreciative for the cooperative exchange.

Respectfully,

Ray Creech

General Manager

Tres Pinos Water District.

WK: (831) 628-3319

MOB: (408) 505-0345

Cecile DeMartini - Tres Pinos County Water District

From: William Marcum <wmarcum@sterlingh2o.com>
To: CDeMartini@waterboards.ca.gov
Date: Monday, October 10, 2011 5:05 PM
Subject: Tres Pinos County Water District
CC: William Marcum <wmarcum@sterlingh2o.com>

Hi Cecile:

I just left a phone message with you. I just want to let you know that Tres Pinos is submitting a comment letter to you. You should receive on the final filing date.

As you have asked, I am informally informing you of a couple items that we spoke of on the proposed permit.

On Page 3 of the WDR, Item 21, I am hoping that the wording can be changed to reflect that these issues did occur, but when I came aboard, I immediately rectified the issues and got them back into compliance. Actually, I was hired because of the state of the facility.

On Page 5 of the MRP, Facility Monitoring, Item 1 needs to be changed from Daily inspections to Weekly inspections.

Those are the 2 easy items. When you receive our Comments Letter, please feel free to contact me if you have questions. I hired an Engineer to compare the 2 permits and make comments, etc. The biggest thing he and I agree on is that the District needs more time to produce a Long Term Wastewater Management Plan that will realistically enable the District to comply.

Thanks,

*William B. Marcum
P.O. Box 7105
Carmel, Ca. 93921
Phone: 831.626.7535
Fax: 831.626.7534
Cell: 831.915.5408
Email: wmarcum@sterlingH2O.com
Web: www.sterlingH2O.com*

