

ATTACHMENT 3

Response to Comments

WDRs Order No. R3-2014-0025

COMMENTS BY FALL CREEK ENGINEERING ON BEHALF OF MISSION SPRINGS CHRISTIAN CAMP AND CONFERENCE CENTER, SCOTTS VALLEY, SANTA CRUZ COUNTY

COMMENT NO. 1: On Page 1 Finding 2 of the WDR, FCE requests that the second sentence be revised to say the following:

Mission Springs is responsible for providing wastewater collection, treatment, and disposal services to the conference center, camps, and a limited number of single family residences (up to 20 homes owned by the Mission Springs).

FCE requests this revision because the community includes over 140 individual residents that are not served by the Mission Springs Conference Center wastewater system.

RESPONSE NO. 1: Water Board staff updated Finding No. 2 as suggested.

COMMENT NO. 2: On the Page 2, Finding 13, FCE requests that the finding be revised as follows:

Once to twice a year, solids should be removed from the lift station and ABR tank, as required.

RESPONSE NO. 2: Water Board staff updated Finding No. 13 to read “*Once to twice a year, solids will be removed from the lift station and ABR tank, as required.*”

COMMENT NO. 3: On Page 2, Finding 14, FCE requests that the second sentence be revised as follows:

In case of power failure, all wastewater will flow by gravity to emergency overflow leachfields.

RESPONSE NO. 3: Water Board staff updated Finding No. 14 as suggested.

COMMENT NO. 4: On Page 6, Finding 40 indicates that monitoring reports will be submitted quarterly; however, in the attached Monitoring and Reporting Program (MRP) the frequency of submitting reports is semiannually. Please revise this finding to be consistent with the MRP. FCE recommends that the

WDR not specify the frequency of reporting to allow the Executive Officer the flexibility to modify the MRP without modifying the WDR.

RESPONSE NO. 4: Water Board staff removed text from the WDR indicating when monitoring reports are due. The reporting requirements are in the MRP.

COMMENT NO. 5: On Page 10, Specification 17 indicates the treatment system ("the Facility") shall enroll in "the State of California Office of Operator Certification program and shall be maintained and operated by a California State certified Grade II Wastewater Treatment Plant Operator". FCE requests the specification be revised to state the Facility be maintained and operated by a County-Approved operator, if possible.

RESPONSE NO. 5: According to Water Board regulations, within 60 days of the effective date of the order, the owner of a privately owned WWTP must submit to the Office of Operator Certification (OOC) a completed plant classification form with additional required documents. No later than two years from the effective date, the owner of a privately owned WWTP must staff the WWTP with operators of appropriate grade levels (See Title 23 sections 3676 and 3680.1). Water Board staff recommends leaving Specification 17 as drafted.

COMMENT NO. 6: On Page 10, Specification 20 indicates that each leachfield zone shall be alternated on a yearly basis to the other 100% disposal zone to maximize life of the disposal capacity. Please note that primary leachfield system is designed as a pressure dosed leachfield and the application of wastewater is alternated continuously to maximize the disposal areas, rest leachfields, and to maximize the life of the system. FCE requests that this specification be revised to reflect that.

RESPONSE NO. 6: Water Board staff revised Specification No. 20 and added Specification 21 to read as follows:

20. *The primary leachfield system is designed as a pressure-dosed leachfield, and the application of wastewater is alternated continuously to maximize the disposal areas, rest leachfields, and to maximize the life of the system.*

21. *An additional 100% disposal zone is available to maximize disposal rates, rest leachfields, perform maintenance when needed, and to maximize life of disposal capacity.*

COMMENT NO. 7: On page 12, Specification 6 states that the Discharger shall submit an engineering technical report on a biennially basis. FCE requests the last sentence of the specification be revised as follows:

The first biennial engineering technical report is due January 30, 2017.

RESPONSE NO. 7: Water Board staff added the suggested sentence to C.7 but substituted the words “salt and nutrient management” for “engineering technical.”

COMMENT NO. 8: On Page 13, Specification 10, the date of the monitoring well installation should be revised to April 30, 2015.

RESPONSE NO. 8: Water Board staff corrected the date to April 30, 2015, as suggested.

COMMENT NO. 9: FCE requests the frequency of Water Supply Monitoring for the onsite water supply wells be reduced to annual testing of total dissolved solids, sodium, chloride, sulfate, boron and nitrate (as nitrogen). These parameters are all conservative constituents are not expected to vary substantially on a seasonal basis.

RESPONSE NO. 9: Water Board staff requires a complete understanding of source water characteristics in order to evaluate how well the wastewater treatment system operates. We agree that water supply parameters do not vary much seasonally, but since the Discharger’s water supply originates from the underlying groundwater basin, every groundwater basin is unique, and we do not have a good history of the underlying groundwater basin at the Facility. These data are much needed for our records and evaluation. Water Board staff recommends keeping the water supply analysis requirement at semiannual until a sufficient data record is obtained. At that time, the Discharger may request a reduction in frequency as stated in Note C:

c) Sampling for specific analytes may be reduced or discontinued upon Discharger request and Executive Officer approval for parameters/constituents for which additional data provides no benefit.

COMMENT NO. 10: FCE requests the frequency of Influent and Effluent Monitoring be modified. FCE requests that the primary constituents as listed in the following table be tested on a monthly basis for the first six months after the adoption of the order and the frequency of testing be reduced to quarterly testing if the treatment system is performing within compliance with the effluent limitations set forth in the WDR. FCE requests the following influent and effluent monitoring programs:

Parameter	Units	Sample Type	Minimum Sampling and Analyzing Frequency
Flow Volume	GPD	Metered	Daily
Maximum Daily Flow	GPD	Metered	Monthly
Average Daily Flow	GPD	Calculated	30-day running average
Primary Parameters			
pH	Std. Units	Grab	Monthly *
BOD5	mg/L	Grab	Monthly *
Total Suspended Solids	mg/L	Grab	Monthly *
Ammonia (as nitrogen)	mg/L	Grab	Monthly *
Total Kjeldahl Nitrogen	mg/L	Grab	Monthly *
Nitrite (as nitrogen)	mg/L	Grab	Monthly *
Nitrate (as nitrogen)	mg/L	Grab	Monthly *
Oil and Grease	mg/L	Grab	Monthly *
Secondary Parameters Total			
Dissolved Solids	mg/L	Grab	Semiannually
Sodium	mg/L	Grab	Semiannually
Chloride	mg/L	Grab	Semiannually
Sulfate	mg/L	Grab	Semiannually
Boron	mg/L	Grab	Semiannually

** Primary constituents as listed in the table above shall be tested on a monthly basis for the first six months after the adoption of the order, and the frequency of testing may be reduced to quarterly testing if the treatment system is performing within compliance with the effluent limitations set forth in the WDR.*

RESPONSE NO. 10: Water Board staff requires a complete understanding of how well the wastewater treatment system performs for at least a year. Water Board staff recommends keeping the influent and effluent sampling frequency as presented in the draft monitoring and reporting program. After an adequate data record has been documented, the Discharger may request a reduction in frequency as stated in Notes a) and b):

- a) and b) Sampling for specific analytes may be reduced or discontinued upon Discharger request and Executive Officer approval for parameters/constituents for which additional data provides no benefit.*