

**PUBLIC COMMENTS & RESPONSES**

**ORDER NO. R3-2019-0008 MASTER RECLAMATION REQUIREMENTS  
DAVENPORT COUNTY SANITATION DISTRICT SANTA CRUZ COUNTY**

<b>Santa Cruz County Department of Public Works/ Davenport County Sanitation District (SCC-DPW)</b>		
<b>Comment Topic</b>	<b>Public Comment</b>	<b>Central Coast Water Board Response</b>
SCC-DPW No.1 - Proposed Monitoring and Reporting Program Requirements, Page 2, Table 1	Currently we have "annually", not "monthly", as the minimum sampling frequency for the treatment plant. This is based off a consistent history of sampling and sampling data. Can we continue to have the minimum sampling frequency be annually? We have been sampling the water supply to the treatment plant for at least 10 years.	Central Coast Water Board staff reviewed the past five years of submitted water supply data by the Davenport County Sanitation District for the Davenport wastewater treatment plant. The data shows the water supply to be consistent with concentrations of pH, total dissolved solids, sodium, nitrate as nitrogen (N), chloride, and minerals. Based on this information and the stable water supply conditions, Central Coast Water Board staff modified the proposed MRP Order No. R3-2019-0008 Table 1 Water Supply Monitoring Requirements frequency to all be performed annually in September.
SCC-DPW No.2 - Proposed Monitoring and Reporting Program Requirements, Page 2, Table 2	For BOD5, TSS, and pH, we currently have a "monthly", "not weekly" sampling frequency for the treatment plant. This is based off a consistent history of sampling and sampling data. Can we continue to have the minimum sampling frequency be monthly? We have been sampling the water supply to the treatment plant for at least 10 years.	Central Coast Water Board staff reviewed the past five years of submitted tertiary treated effluent data by the Davenport County Sanitation District for the Davenport wastewater treatment plant. The data shows the tertiary treated effluent concentrations of 5-day biological oxygen demand (BOD5), total suspended solids (TSS), and pH to be consistently below their effluent limits. Based on this information, Central Coast Water Board staff modified the proposed MRP Order No. R3-2019-0008 Table 2 Recycled Water Effluent Monitoring-Compliance Point A with a frequency of monthly instead of weekly. Please note that the effluent limits for TSS and BOD5 are still Daily Maximums and Monthly (30-day) Averages so a single sample taken monthly will represent compliance with both effluent limits.
SCC-DPW No. 3- Proposed Monitoring and Reporting Program Requirements, Page 2, Table 2	For BOD5, and TSS we currently sample using a "grab" sample, not "24-hour composite" sampling for the treatment plant. This is based off a consistent history of sampling and sampling data. Can we continue to use grab samples for these measurements? We have been sampling the water supply to the treatment plant for at	Central Coast Water Board staff reviewed the past five years of submitted tertiary treated effluent data by the Davenport County Sanitation District for the Davenport wastewater treatment plant. The data shows that grab samples of the tertiary treated effluent for concentrations of BOD5, TSS, and pH to be consistent in value. Based on this information, Central Coast Water Board staff modified the proposed MRP Order No. R3-2019-0008 Table 2 Recycled Water Effluent Monitoring-Compliance Point A with grab

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	least 10 years.	sample types instead of 24-hour composite sampling.
SCC-DPW No. 4 - Proposed Master Reclamation Requirements, List No. 1	Do you need to include APN 058-021-07 where we have a buried stub for future reclaimed water use for the south side of the highway? Or does this area only become addressed if the stub is ever connected to an irrigation system?	Central Coast Water Board staff added APN 058-021-07 to ensure the proposed expanded irrigation areas are covered by the Master Reclamation Requirements Order No. R3-2019-0008 (MRR Order). Staff updated the Vicinity and Site Map to reflect potential future agricultural use areas.
SCC-DPW No. 5 - Proposed Master Reclamation Requirements, List No. 13	In planned uses, should we add "street sweeping"? It is currently listed on our user agreement document.	Central Coast Water Board staff reviewed the conditionally approved title 22 engineering report and Section 5 - Approved Uses lists street sweeping as an approved use. Street sweeping has been added to Section 12 (formerly Section 13) to the MRR Order.
SCC-DPW No. 6 - Proposed Master Reclamation Requirements, List No. 19	The reclaimed water that is used for irrigation by the farmer goes to the storage pond prior to use, however, the reclaimed water that is pumped to the fill station, CRLF habitat, or spray field does not go to the storage pond prior to use.	Central Coast Water Board staff updated Finding No. 19 as follows, "The recycled water is pumped to the recycled water storage pond prior to use for agricultural irrigation. Recycled water is pumped directly to the CRLF habitat, fill station, and spray field."
SCC-DPW No. 7 - Proposed Master Reclamation Requirements List No. 26	We currently do not have groundwater monitoring wells at the discharge sites; will they be required. If so, where?	At the time of drafting the MRR Order, groundwater monitoring around use sites was a requirement per the Recycled Water Policy. A 2018 amendment to the Recycled Water Policy became effective on April 8, 2019. Language in the amended Recycled Water Policy was revised to delete the requirement of groundwater monitoring around recycled water use areas. Therefore, Central Coast Water Board staff modified Finding No. 25 (formerly No. 26) and sections II.A.7, II.A.8, III.A.2.a, III.B.7 and Table 4 of the Monitoring and Reporting Program to eliminate the requirement for groundwater monitoring.
SCC-DPW No. 8 - Proposed Master Reclamation Requirements List	Does the truck fill station need to be listed here as an area where discharge of treated wastewater is allowed?	Central Coast Water Board staff added the words, "truck fill station" to this paragraph.

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No. A.2		
SCC-DPW No. 9 - Proposed Master Reclamation Requirements List No. D.17	We don't have high nutrient loading in our treated wastewater. Do we still need a Nutrient Management Plan?	<p>The Recycled Water Policy recognizes that local water and wastewater entities, together with stakeholders, would fund locally driven efforts to develop Salt and Nutrient Management Plans (SNMPs), with the intent that every basin/sub-basin in California have an SNMP. The State Water Board later clarified that regional Central Coast Water Boards should focus salt and nutrient management planning efforts on those basins identified as “priority basins” by the United States Geological Survey (USGS) <a href="https://pubs.usgs.gov/wri/wri034166/">https://pubs.usgs.gov/wri/wri034166/</a>. The recently adopted 2019 Recycled Water Policy continues to support this prioritization of SNMPs.</p> <p>The Davenport Recycling Facility and the immediately surrounding agriculture sites do not overly a Bulletin 118 groundwater basin or priority groundwater basins as defined by USGS. The nearest priority basin is the West Santa Cruz Terrace basin that is five miles southwest of the main agriculture use areas defined for using recycled water. Therefore, Central Coast Water Board staff will remove sections D.16 through D.23 and the associated monitoring requirements in the Monitoring and Reporting Program.</p>
SCC-DPW No. 10 - Proposed Master Reclamation Requirements List No. D.22	Do you have a sample Salinity Management Plan we could view to give us an idea of what this entails?	Same response as SCC-DPW No. 9.
SCC-DPW No. 11 - Proposed Master Reclamation Requirements List No. E.1	The Davenport County Sanitation District (as part of Santa Cruz County) will in the next couple of months adopt the County's "Climate Action Strategy". This document has been sent via email to the Central Coast Water Board. Can this document be used in place of the required submission of	Central Coast Water Board staff added Finding Nos. 39 and 40 in the proposed MRR Order that presents the Santa Cruz Climate Action Strategy and FEMA Flood Hazard Area information. Central Coast Water Board staff removed Provision E.1, which required submitting a Hazardous Flooding Action Plan using CREAT Risk Assessment Application for Water Utilities. The Discharger's proposed Climate Action Strategy document will address the intent

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	<p>the Hazardous Flooding Action Plan using CREAT Risk Assessment Application for Water Utilities? Section 5 on pages 37-63 provide a Vulnerability Assessment for concerns such as sea level rise, flooding, and extreme storm events. It does include the FEMA Flood Hazard Area map on page 42, and the hazard area for Davenport appears to be limited to the southern side of Highway 1 (away from the plant) and in the immediate vicinity of the creeks (away from the facilities). Page G-9 &amp; G-10 addresses the emissions from the Davenport WWTP.</p>	<p>of Provision E.1.</p>
<p>SCC-DPW No. 12 - Proposed Master Reclamation Requirements List No. E.5</p>	<p>How does the Off-Site Contingency Plan differ from the "Contingency" section of the Engineer's Report?</p>	<p>Section E.5 of the MRR Order requires the submittal of an Off-Specification Contingency Plan, which Central Coast Water Board staff believes is the intent of this question. The Off-Specification Contingency Plan should match the one presented in the Engineer's Report. The Davenport County Sanitation District is required to submit the plan to the Central Coast Central Coast Water Board for approval by the date specified in MRP No. R3-2019-0008.</p>
<p>SCC-DPW No. 13 - Vicinity and Site Map No. 1</p>	<p>Does the location of the buried stub for possible future connection on the south side of Highway 1 need to be shown on the map? The recycled water distribution piping crosses Highway 1 for this stub.</p>	<p>Central Coast Water Board staff added a shaded area on the Vicinity and Site Map indicating the potential for future recycled water use on the south side of Highway 1. If the District uses the recycled water in a manner other than what is allowed by the MRR Order then they will need to request this through DDW first. If approved by DDW then we would need to modify the MRR Order to include the new use.</p>

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