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# California Regional Water Quality Control Board Central Valley Region

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24 September 2009

## SPECIAL STUDIES AND TECHNICAL REPORTS, MALAGA COUNTY WATER DISTRICT, WASTEWATER TREATMENT FACILITY, FRESNO COUNTY

We have reviewed the following technical reports and studies submitted by Provost and Pritchard Engineering Group on behalf of Malaga County Water District, to fulfill requirements in Waste Discharge Requirements (WDRs) No. R5-2008-0033 and Cease and Desist Order (CDO) No. R5-2008-0032:

1. *Evaluation of Groundwater Monitoring*, submitted 10 July 2008 and supplemental information submitted 3 November 2008,
2. *Engineering Work Plan for Best Practicable Treatment or Control Study*, submitted on 24 July 2008 and amended on 9 September 2008, and supplemental information submitted on 11 May 2008, and
3. *Study Evaluating Treatment and Disposal Facilities*, submitted 28 July 2008.

The enclosed memorandums, as summarized below, describe why the submitted reports do not fulfill the requirements of the WDRs and CDO and are incomplete.

The *Evaluation of Groundwater Monitoring* needs to be revised to include a proper evaluation of the groundwater gradient and flow direction, a reevaluation of the upgradient monitoring well, an assessment of the Wastewater Treatment Facility's potential impacts to all groundwater designated beneficial uses, and a proposal for modifications to the groundwater network.

The *Work Plan for the Best Practicable Treatment and Control Study* needs to be revised to include assessment of the potential impacts to all beneficial uses and an evaluation of the pretreatment program. It needs to include a demonstration that soil cement lined sludgebeds are protective of underlying groundwater quality. Additionally, the evaluation of treatment components needs to be based on constituents identified in the finalized list.

The *Study Evaluating Treatment and Disposal Facilities* needs to be revised to include reassessment of flow projections and the additional items noted in the memorandum. In particular, the proposed long-term disposal alternatives need to be reevaluated. As described in more detail below, before the District considers additional disposal ponds, it needs to provide evidence demonstrating that consolidation and/or reclamation is economically infeasible.

The technical reports discussed above were included as requirements of the WDRs and CDO based on information in the report of waste discharge and the application for permit renewal submitted by the District in 2003. Since then, there have been significant developments that the District must consider carefully.

On 3 February 2009, the State Water Resource Control Board adopted Resolution No. 2009-0011, a Policy for Water Quality Control for Recycled Water. The purpose of this Policy is to effect an increase in the use of recycled water from municipal wastewater sources.

On 23 April 2009, the Central Valley Regional Water Quality Control Board adopted Resolution No. R5-2009-0028, a Policy in Support of Regionalization, Reclamation, Recycling, and Conservation for Wastewater Treatment Plants. The resolution states that dischargers that own or operate wastewater treatment plants shall provide, upon request, in their Reports of Waste Discharge, a report regarding efforts that have been taken to promote new or expanded wastewater recycling and reclamation opportunities and programs; water conservation measures; and regional wastewater management opportunities and solutions.

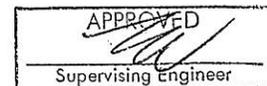
We are concerned the District's ongoing compliance issues demonstrate the District does not have the resources to adequately operate and maintain its WWTF and treat and dispose of its current permitted flow volume. Additionally, the WWTF location is now surrounded by development that is reportedly inhibiting reclamation opportunities. Finally, it is our understanding that the Fresno-Clovis Regional Wastewater Treatment Plant has the capacity to accept the District's flow volume and has a trunk line that terminates at the District boundary.

Given the above, the District needs to include detailed analyses of reclamation and consolidation opportunities in its revised reports. Any options proposed by the District that do not include consolidation with the Fresno-Clovis Regional Wastewater Treatment Plant must provide detailed evidence demonstrating why consolidation is infeasible. If consolidation is infeasible, then the District must provide detailed evidence demonstrating that reclamation of all or a part of its effluent is infeasible before it explores other options. The District must submit a revised report of waste discharge and request to revise its WDRs and CDO if it proposes a change in its disposal methods.

By **27 October 2009**, submit revised reports and documentation to satisfy the deficiencies as summarized above and in the enclosed memorandums. This date is for administrative tracking purposes only and does not supersede the dates in the applicable orders.

You may direct any questions regarding this matter to Debra Bates by phone at (559) 445-6281, or by email at [dbates@waterboards.ca.gov](mailto:dbates@waterboards.ca.gov).

  
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Enclosures: Groundwater Monitoring Evaluation  
Review of Engineering Work Plan for Best Practicable Treatment or Control  
Study Evaluating Treatment and Disposal Facilities

cc: Michael G. Taylor, Provost and Pritchard Engineering Group, Fresno