

Sea Ranch Lodge LLC

Fall Creek Engineering (FCE), on behalf of Sea Ranch Inn, LLC (hereinafter Discharger), submitted comments on the draft permit (Waste Discharge Requirements Order No. R1-2010-0002) on December 21, 2009. In its comments, FCE requested two minor clarifications/additions to the draft Order. The following is the staff response to comments from the Discharger:

Comment 1: Compliance with Groundwater Limitations for Coliform Organisms.

Groundwater Limitation 4, which limits the shallow groundwater to 1.1 MPN per 100 mLs as measured in the onsite monitoring wells, would place the SLR in violation of coliform bacteria in any monitoring well. Given that we are measuring very shallow groundwater that could easily contain total coliform bacteria that is unrelated to the wastewater system, FCE would recommend revising this limitation so that it is based on comparing the coliform bacterial in up- and downgradient monitoring wells, so that the limit is based on a no net increase in coliform bacteria in the wells.

Staff Response: Groundwater Limitation D.4 was clarified to specify that compliance with this limitation would be based on monitoring results from groundwater wells upgradient and downgradient of the collection, treatment, storage and disposal facilities. Compliance with Order No. R1-2010-0002 will reduce wastewater pathogens and minimize the threat of noncompliance with the water quality objective for coliform organisms in groundwater designated for municipal and domestic supply (MUN).

Comment 2: No Groundwater Use at Sea Ranch Lodge. *FCE would also recommend noting in the WDRs that no groundwater on the site or in close proximity to the lodge is used of domestic or municipal supply. Shallow groundwater expressed as seeps on the site replenish wetlands and seep over the coastal bluffs supporting coastal vegetation and wildlife. The wastewater system improvements will be set back from all seeps and wetland areas.*

Staff Response: Comment noted. However, in accordance with the State's "Sources of Drinking Water" Policy, all surface and ground waters of the State are considered suitable, or potentially suitable, for municipal or domestic water supply and are so designated by the Basin Plan. Order No. R1-2010-0002 is protective of the beneficial use designated for municipal and domestic supply (MUN).