

## **Response to Written Comments**

### **Draft Waste Discharge Requirements Order No. R1-2019-0002 for the Miranda Community Services District Wastewater Treatment Facility**

**Regional Water Quality Control Board, North Coast Region  
Thursday April 18, 2019**

#### **Comment Letter Received**

The deadline for submittal of public comments regarding draft Waste Discharge Requirements for Order No. R1-2019-0002, (Draft Order) for the Miranda Community Services District Wastewater Treatment Facility was February 4, 2019. The Miranda Community Service District (Discharger) provided timely comments. No other comments were received during the public comment period.

Regional Water Quality Control Board (Regional Water Board) staff discussed the comments with the Discharger on February 15 and February 19, 2019. On February 20, 2019, Regional Water Board staff provided the Discharger with a summary of the comments received and discussed. On February 20, 2019, the Discharger confirmed that this summary accurately captured their comments.

In this document, the Discharger's comments are summarized, followed by the Regional Water Board staff response. The terms "Draft Order" and "Tentative Order" refer to the draft that was sent out for public comment. The term "Proposed Order" refers to the version of the Order that has been modified in response to comments and is being presented to the Regional Water Board for consideration.

#### ***Comment:***

General Provision R of the Draft Order is unnecessary and costly. It requires the installation of monitoring wells to confirm compliance of the percolation pond discharge with Basin Plan groundwater limitations.

The Miranda CSD percolation pond is located adjacent to the east bank of the South Fork of the Eel River. There is no available space to install a monitoring well located between the percolation pond and the South Fork of the Eel River. The monitoring wells would have to be installed within the banks of the South Fork of the Eel River.

Water samples collected from monitoring wells installed within the banks of the South Fork of the Eel River would be representative of surface water quality.

We recommend the removal of General Provision R of the Draft Order or modification of General Provision R because the installation of monitoring wells within the banks of the South Fork Eel River will provide data on surface water quality rather than groundwater quality and the use of monitoring wells to assess surface water quality is not a beneficial use of public funds. Instead the provision, if not removed, should be modified to have the evaluation include upstream and downstream sampling of the South Fork Eel River rather than installation of groundwater monitoring wells.

**Response:**

Regional Water Board staff concurs with the Discharger's position that the installation of groundwater monitoring wells within the banks of the South Fork of the Eel River may not be effective for the purpose of assessing compliance with the Draft Order's groundwater limitations. Regional Water Board staff concedes that there may be other investigative work activities, including the proposed surface water sampling which could be done in conjunction with other data collection activities, to demonstrate compliance with the groundwater limitations.

General Provision R, as set forth in the Draft Order, provides the ability to the Discharger to propose the type of investigative work to be proposed and implemented to satisfy this requirement, subject to the concurrence of the Regional Water Board Executive Officer. Consequently, there is no need to remove or modify General Provision R of the Draft Order.