

Response to Written Comments

Draft Waste Discharge Requirements Order No. R1-2019-0010 for Calpella County Water District Wastewater Treatment Facility

**Regional Water Quality Control Board, North Coast Region
April 17/18, 2019**

Comments Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements for Order No. R1-2019-0010, (Draft Order) for the Calpella County Water District Wastewater Treatment Plant was February 12, 2019. The Calpella County Water District (Calpella CWD) provided comments after the comment period ended. No other comments were received during the public comment period.

Regional Water Quality Control Board (Regional Water Board) staff discussed the comments with Jared Walker and Dave Redding of the Calpella CWD on March 4, 2019. Their comments are summarized by Regional Water Board staff below followed by a response from staff.

Comment:

The Calpella CWD recognizes the need to confirm compliance with the proposed groundwater limitations in Section VII.A. of the Draft Order and understands the intent of the proposed groundwater monitoring requirements in Attachment C of the Draft Order. The existing groundwater monitoring wells that were installed in June 2005 have not been used since that time and their current condition is unknown. In order to initiate groundwater sampling as required by the Draft Order, Calpella CWD would need to hire a consultant(s) to assess the need for any reconditioning of the monitoring wells, complete any necessary repairs, design a sampling program, collect the samples, and assess and report the results. In consideration of the cost of reconditioning the monitoring wells and initiating a groundwater monitoring program, the CWD asks for time to assess the best approach to demonstrating compliance. There may be other options in lieu of or in combination with groundwater monitoring. The CWD would like the ability to explore these options and to select the one that makes most sense technically and financially for their district.

Response:

Regional Water Board staff concurs with the Calpella CWD that groundwater sampling may not be necessary to demonstrate compliance with the groundwater limitations. Regional Water Board staff agrees that there may be other investigative work which could be done in conjunction with additional data collection to demonstrate compliance.

In response to the comments from the Capella CWD, Regional Water Board staff revised the Draft Order to include General Provision 'R' on page 15 of the Draft Order, which requires the Calpella CWD to conduct an evaluation to confirm that the discharge of treated municipal wastewater from the community percolation pond to groundwater complies with the groundwater limitations set forth in section VII.A. of this Order. It allows time for

Calpella CWD to perform the necessary investigative work to satisfy this requirement, subject to the concurrence of the Regional Water Board Executive Officer. Regional Water Board staff also revised the Draft Order to remove the groundwater monitoring requirements from Attachment C of the draft Order. Should the District propose groundwater monitoring as the means of demonstrating compliance with groundwater limitations, the Order's Monitoring and Reporting Program will be revised to establish appropriate monitoring and reporting requirements.

The Draft Order with the following modifications will be proposed for adoption by the Regional Water Board at the April xx 2019 meeting. The text to be added is identified by underline and text to be deleted is identified by ~~strike through~~.

The following text was added to Section VIII.R. of the Draft Order on pg. 15:

Special Study to Evaluate the Potential Impact to Groundwater. The Discharger shall conduct an evaluation to confirm that the discharge of treated municipal wastewater from the community percolation pond to groundwater complies with the groundwater limitations set forth in section VII.A. of this Order. At a minimum, the evaluation must include preparation and submission of a preliminary scope of work that describes the proposed investigative work to be undertaken, a final work plan that includes work tasks and milestones to complete the evaluation, and a final report that presents the results and conclusion of the evaluation. In the event that the final report concludes that the percolation pond discharge is not attaining groundwater limitations, the final report shall include a work plan with a proposed compliance schedule to bring the discharge into compliance with groundwater limitations as soon as practicable.

The preliminary scope of work shall be submitted to the Regional Water Board Executive Officer for approval **within 18 months after Order adoption.** The final work plan shall be submitted for approval by the Regional Water Board Executive Officer **within 6 months after approval of the preliminary scope of work.** The Discharger shall implement the approved final workplan per the schedule of implementation and if applicable per the compliance schedule set forth to bring the discharge into compliance with groundwater limitations.

The indicated text below has been removed from Table C-1 in section II of Attachment C of the Draft Order on pg. 2:

Table C-1 Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
---	INF-001	Influent monitoring location
001	EFF-001	Effluent monitoring location following treatment prior to discharge to leach field

Table C-1 Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
—	MW-1	Monitoring well, located on the west side of railroad tracks along the access road to monitor upgradient groundwater quality
—	MW-2	Monitoring well, located on the east side of the percolation ponds to monitor downgradient groundwater quality
—	MW-3	Monitoring well, located on the east side of the percolation ponds to monitor downgradient groundwater quality

The following text and table have been removed from Section III of Attachment C of the Draft Order on pg. 3:

~~**A. Groundwater Monitoring.** The Discharger shall monitor groundwater at Monitoring Locations MW-1, MW-2, and MW-3 as follows:~~

~~**Table C-4. Groundwater – Monitoring Location MW-1, MW-2, and MW-3**~~

Parameter	Units	Sample Type	Minimum Sampling Frequency
Depth to Groundwater	0.01 feet	Grab	May and October of each year
Nitrogen, Total (as N)	mg/L	Grab	May and October of each year
Nitrogen, Nitrate (as N)	mg/L	Grab	May and October of each year
Title 22 Pollutants ^{Error!} Bookmark not defined.	ug/L	Grab	1 x / 5 years; first sampling event to take place May 2020