

**DEPARTMENT OF TRANSPORTATION**

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Mata

November 27, 2007

Mr. Michael P. McCann, P.E.  
San Diego Regional Water Quality Control Board  
9174 Sky Park Court, Suite 100  
San Diego, CA 92123

2007 NOV 28 A 7:15

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WATER QUALITY  
CONTROL BOARD

**WASTE DISCHARGE REQUIREMENTS, SCR: 01-1541.02  
TENTATIVE ORDER NO. R0-2007-0148,  
TECATE TRUCK INSPECTION STATION, CALIFORNIA DEPARTMENT OF  
TRANSPORTATION**

Dear McCann:

The Department received Tentative Order No. R9-2007-0148, Waste Discharge Requirements, including monitoring, dated October 29, 2007, in response to the Tecate Truck Inspection Station (TIF), Application/Report of Waste Discharge Permit submitted on August 16, 2006. The following comments the Department would request the Board to take into consideration and revise the tentative order.

Findings No. 9. In accordance with Section 2200, Title 23, CCR, the threat to water quality and complexity of the treated wastewater discharge from the treatment system is determined to be category 2C.

Comment: Due to the nature of the discharge expected at the inspection station and the small amount of discharge actually processed through a passive treatment system, the Department believes that this system should be classified as a 3C. The Tecate Truck Inspection Station is for purposes of conducting California Highway Patrol (CHP) truck safety inspections. If the CHP inspector requires any truck to have repairs they are towed from the facility to a repair shop. The discharge from the inspection bay to the sump will be from truck rainwater runoff and occasional water from washing down the inspection bay.

The expected rainfall at the peak rain season is approximately 2 inches. The average duration of the rain season occurs during one fourth of the year. During that three months the sump shall receive runoff from trucks and wash water for cleaning the inspection bay. The amount of water from the inspection bay during this period is estimated to be at most 50-gallons on rain days including washing the bays down. The rest of the year the sump will only receive wash water from the bay. There is a possibility for trucks to leak some oil, diesel or gasoline which should be captured by the clarifier and the granulated activated carbon (GAC) filter. The inspection bays may be washed down on a weekly basis and is estimated to be at most 50 gallons.

The discharge shall be treated in a 1000 gallon, 3-cell clarifier which will remove oils and sediments and has a 20 week retention volume. The effluent will be pumped through a GAC filter which will remove chemicals and particularly organic chemicals. Representative sampling of untreated inspection bay water was submitted to the Board which shows the effluent does not exceed drinking water standards. To ensure the discharge does not have an adverse impact on the groundwater quality and eliminates the threat to water quality a 3 cell clarifier and GAC filter is being installed. Should a spill occur it can be contained by turning off the pump to the clarifier and the spill can be cleaned up without any contaminants being discharged into land. The rest of the discharge shall be domestic waste from 7 employees/8 hours/day/5 days a week and visitors. The amount of domestic sewage would be less than or equal to two family dwellings which is estimated to be at most 500 gallons per day.

The Department submitted a fee of \$872.00 with the application for a 3C. The fee for a 2C system is \$4290-\$6750. The passive design and sampling results present a minimum threat to warrant being classified as a 2C system. The fees for this system to the tax payers of California is an undue burden compared to the service the truck scale provides. The truck scale provides insurance that the trucks traveling on the California public highways are safe. The inspection station assures the trucks will not cause a hazard, accidents or toxic spills due to mechanical failure and meet regulations when carrying hazardous and toxic substances. The Department requests the Board to reclassify this system as a "3C"

B. Discharge Specifications, No. 2:

Groundwater down gradient of the leach field shall not contain constituents in excess of the following performance criteria: Total Dissolved Solids (TDS) -12 month average of 450 mg/L, Daily Maximum of 750 mg/L.

Comment: The adjacent well water sampling results of TDS is 460 mg/L. The level of TDS in the water is in excess of the 12 month average and the system would

be in violation the moment discharge has commenced. According to "Onsite Wastewater Treatment Systems Manual", EPA, June 2005 the typical residential wastewater characteristics state the TDS concentration range to be from 345 mg/L to 550 mg/L. If the levels of TDS using the water results and the lowest concentration of TDS in sewage, the TDS concentration at the facility will equal 805 mg/L without the inspection bay water.

The basin plan states on page 3-27, Secondary Drinking Water Standards, Water Quality Objective for Domestic of Municipal Supply Water: Water designated for use as domestic or municipal supply (MUN) shall not contain concentrations in excess of the maximum contaminant levels specified in Table 64449-A of section 64449 of Title 22 of the California Code of Regulations (Secondary Maximum Contaminant Levels, Consumer Acceptance Limits) which is incorporated by reference into this plan." Page 3-29 of the basin plan under Total Dissolved Solids states, " The recommended secondary drinking water standard for total dissolved solids is 500 mg/L with a upper limit of 1000 mg/L due to taste considerations." The Department requests the 12-month average be changed from 450 mg/L to 850 mg/L and the Daily Maximum be changed from 750 mg/L to 1000 mg/L.

NOTE:

The water system for Tecate is classified as a transient non-community system under the California Health and Safety Code, Div. 104, Part 12, Article 1, Section 116275. The Secondary Drinking Water Standards under, Title 22 of the California Code of Regulations, Article 16, Section 64449 (i), Regarding Nontransient-noncommunity and transient-noncommunity water systems (1) All systems shall monitor all sources at least once. This system is not required to meet secondary drinking water standards and treatment is not being installed. The water quality of the representative sampling taken from the well next to this facility indicates the system does meet all primary drinking water standards.

B. Discharge Monitoring, No. 1:

The flow from the septic tank to the leach field.

Comment:

The septic tank effluent flows by gravity to the leach field and a flow meter cannot be installed on a gravity flow line. The water usage is in direct correlation to the sewage flow. The Department requests the water meter usage be submitted for the septic tank flow monitoring requirements in lieu of the septic tank flow.

B. Discharge Monitoring, Note. 2: Reduced monitoring

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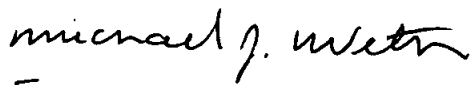
Comment: The Tecate facility shall have 7 people/8 hours/day for 5 days a week and visitors. The amount of sewage for this facility is estimated to be 500 gal/day. The sewage effluent constituents will vary slightly over time and the cost of performing the sampling semiannually for five years in combination with the other required monitoring is excessive due to the limited flow and long retention/treatment time. The Department requests to perform the wastewater sampling semiannual for two years. If the results of the effluent for the two years has consistent results and no impacts to groundwater then the monitoring can be reduced to annual frequency.

B. Discharge Monitoring, No. 2: Sump Monitoring

Comment: The facility provides for CHP safety inspection of the trucks and trailers. The contents of the trucks are not typically removed from the vehicles. The repairs of the trucks are completed offsite. The only activity in the inspection bays is the inspection of the trucks. This is not an agricultural inspection station and do not anticipate pesticides being deposited in the sump. There are no solvents being used in the inspection bay or to inspect the trucks. There are no PCBs or dioxin sources for contamination to occur at this site. There could be some oil, gas or diesel fuel drip from the truck. The Department requests the monitoring for solvents, pesticides and PCB's be eliminated.

Please let us know if there is any additional information the Department can provide for your approval of our request. If your staff would like to visit this facility please contact me at (916) 227-8526 or Laurie Vasquez, project engineer at (916) 227-8333.

Sincerely,

  
For,

Jerry Marcotte, PE  
Senior Sanitary Engineer

Attachments

c: Brian Kelley	P. E., Senior WRC Engineer
Victor Vasquez	P.E., WRC Engineer
Michael Webster	District Project Manager
Don Alsey	Architectural Branch 4 Chief