



Comment Letter – General Order WDRs for Small Domestic Wastewater ,Systems and/or Negative Declaration and Initial Study

Page 1, paragraph 3, Recommend the addition of treatment/constructed wetlands to the list of wastewater treatment systems. The US EPA has identified treatment wetlands as an acceptable treatment technology as noted in their “Onsite Wastewater Treatment Systems Manual, updated June 2005.

Page 16, paragraph 2.b second paragraph and sentence, Recommend the addition of informational signs at the location of the RV dump station. At some rest area RV dump stations, no personnel are present during daily operations. The RWQCBs have accepted the use of informational signs requiring the use of “green” enzyme deodorizers by RV users at California RV Sanitation dump stations in site specific WDRs.

Page 16, paragraph c, Recommend the addition of aerobic treatment systems to the list of treatment technology. Based on the results of full scale and pilot testing and identified this treatment technology effective at reducing or eliminating pollutant levels of RV deodorizers from the wastewater.

Page 23, Table 5: Effluent Limitations for Wastewater Treatment Systems, Recommend the addition of treatment wetlands to wastewater pond or trickling filter since they have the same performance limitations. (See "Treatment Wetlands", Robert Kadlec and Scott D. Wallace, pages 259 and 260, 2009). Passive post-anoxic denitrification wetland systems have been found to discharge residual BOD that is added as a carbon source to achieve full denitrification. Nitrate removal is critical for systems that discharge to subsurface disposal systems due to the potential for groundwater contamination. Whereas, residual BOD will be removed easily in the soil. Therefore, stringent regulations on effluent BOD should not apply to the residual carbon/BOD added in the course of operating a post-anoxic denitrification system. Recommend adding disposal of effluent by subsurface disposal to footnote 1 because TSS and BOD are treated and removed in the soil column and do not impact water quality. EPA’s "Onsite wastewater Treatment Design Manual" states in Table 3-18 that the within 2 feet of the soil surface that BOD levels are non-detect.