Leucadia County Water District

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June 15, 2001

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Mr. John Robertus
Executive Officer
California Regional Water Quality Control Board, San Diego Region
9771 Clairemont Mesa Blvd., Suite A
San Diego, CA 92124-1324

Re: Waste Discharge Requirements for Leucadia County Water District for the Forest R. Gafner Water Reclamation Plant

Dear Mr. Robertus:

The Leucadia County Water District (LCWD) operates the Gafner Water Reclamation Plant (GWRP) in accordance with Order 93-41, as amended. The disinfected tertiary recycled water is solely utilized by the Carlsbad Municipal Water District (CMWD) for irrigation purposes within the Encina Basin as authorized. LCWD does not rely on the GWRP for wastewater treatment or disposal purposes, but rather utilizes the GWRP solely for reclamation purposes. Finding 18 of Order 93-41 states that "All reclaimed water will be used in hydrologic basins having no ground water quality objectives or a ground water quality objective for TDS of 3,500 mg/l."

The purpose of this letter is to request modification of the GWRP effluent limits for Total Dissolved Solids (TDS) to reflect either:

1) Currently proposed TDS limits for the South Bay Plant in a basin with similar water quality objectives, which we understand will be for a 12-month average of 1,200 mg/l TDS and a daily maximum of 1,300 mg/l TDS, or

2) Existing TDS limits now in effect for the Shadowridge WRF as provided in Order 93-82, as amended, such that the "12-month average shall not exceed the imported water supply concentration plus an incremental increase equal to the typical incremental increase added to the water supply which has need used for domestic purposes" and a daily maximum that shall not exceed 1,200 mg/l. Adoption of this requirement for the GWRP and for the Vallecitos Water District's Meadowlark plant would provide uniformity in the monitoring of the three existing Encina Basin reclamation plants.

Adopting either of these proposals would allow LCWD to consistently meet the TDS limitations within the range of potable water TDS experienced at the GWRP over the last five years. LCWD's preference would be for the first of the above two requested

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conditions. Limits similar to South Bay plant would put the burden of compliance directly on the recycled water quality without consideration of potable water fluctuations

in TDS, that have been significant for the Gafner plant in recent years. In our opinion, adoption of either of these proposed modifications would continue to protect the Basin Plan Objective of 3,500 mg/l TDS for the recycled water use basins currently allowed in the Gafner WDR's.

Methods of TDS control to meet discharge requirements including reverse osmosis and potable water blending have been, and will be, considered in the event that there is a long-term upward trend in potable and recycled water TDS.

Thank you very much for your consideration regarding possible revisions to Order 93-41 for the Gafner plant. Please call Mr. Steve Deering, LCWD District Engineer at 760-942-0366 Extension 101, or myself at 760-753-0155 if you have further questions or if you need additional information.

Very truly yours,
Leucadia County Water District

Mr. Michael J. Bardin
LCWD General Manager

cc. Mr. Steve Deering, LCWD District Engineer
Ms. Nancy Anson, Encina Wastewater Authority