

TEJON-CASTAC WATER DISTRICT

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December 17, 2007

RECEIVED

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RWQCB-CVR
FRESNO, CALIF.

Douglas K. Patteson
Senior Engineer (Non-15 WDRs)
Central Valley Water Quality Control Board – Central Valley Region
1685 E Street, Fresno, CA 93706

Dear Doug:

RE: Draft Cease and Desist Order for Tejon-Castac Water District, Tejon Industrial Complex Wastewater treatment Facility, Kern County

Thank you for your letter dated November 17, 2007 regarding the Draft Cease and Desist and Tentative Order. We appreciate the opportunity to provide feedback on the proposed Draft Cease and Desist Order.

We agree with your Finding #1 that Tejon-Castac Water District is the responsible party. Finding #1 also identifies Tejon-Castac Water District and Tejon Ranch Corp. as the discharger. Tejon Ranch Corp granted permanent easement of the land to the Tejon-Castac Water District on which the WWTF reside (see Exhibit A attached). We request that Tejon Ranch Corp be removed as a Discharger.

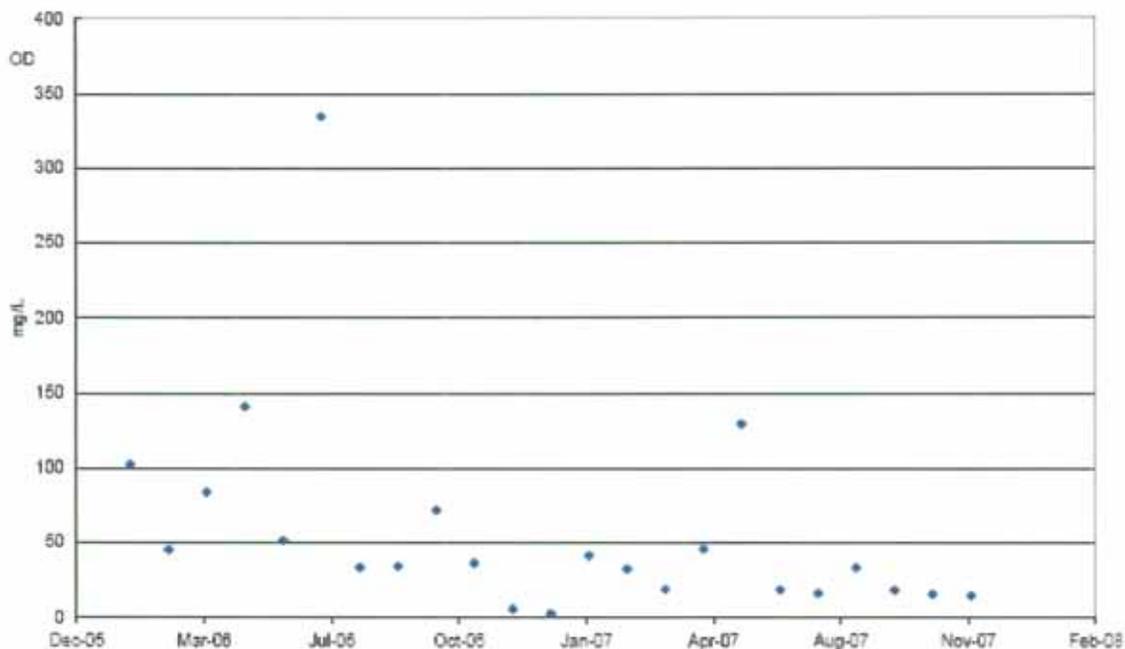
TCWD requests the Regional Board consider the attached revisions (*Exhibit B*) to tentative order R5-2008-XX. In Addition, Tejon-Castac Water District requests the Regional Board withdraw the Draft Cease and Desist (*Exhibit C*) because:

- Tejon-Castac Water District is committed to rectifying the issues raised in the proposed draft Cease and Desist order.
- Tejon-Castac Water District is progressing rapidly with replacing the existing treatment process with a more-efficient and robust treatment regime. Tejon-Castac Water District submitted a Report of Waste Discharge (RWD) on November 30, 2004 to expand the discharge flow.
- In August 2007, Tejon-Castac Water District installed Dissolved Air Flotation (DAF) (Finding #7) as an interim improvement. The draft cease and desist order should await long-term performance data of the interim measure.

- The Draft Cease and Desist order was based on self monitoring reports from January 2006 through May of 2007. More recent data, especially since the addition of the Dissolved Air Flotation (DAF) now show significant improvements and a downward trend. Better performance is expected as the District continues to fine-tune operations and acquire operational experience.

TCWD faces unique wastewater characteristics and existing improvements has typically reduced BOD from an influent average of 553 mg/L to an effluent average of 71 mg/L (low of 2.8 and high of 140 – see table below).

Tejon-Castac Water District - Treated Wastewater Effluent



Attached are results from SMRs for the period June 2007 through November 2007. Those reports, as well as field data for December 2007 (*Exhibit D*) show the plant is now consistently producing effluent in compliance with Discharge limit C1 and C2. The improved effluent quality is attributed to the commissioning of the Dissolved Air Flotation in early August of 2007. Phased recommissioning of the sand filter and UV will commence on December 13, 2007 which will have a significant, positive impact on effluent quality.

TCWD and the contract operator for the WWTF, California Water Service Co. are confident that effluent quality will continue to improve as the sand filter is phased into full operation.

TCWD is proposing a more aggressive Long Term Improvements similar to those outlined on Page 6, #3. Many of the implementation steps are either complete or significantly ahead of the schedule outlined in the Draft Cease and Desist Order.

The following briefly summarizes the status of items a-e as outlined under “Long Term Improvements” in the Draft Cease and Desist Order:

- A) Submit a technical report that describes measures, planned or taken, to ensure long term compliance with the WDRs. This includes implementation of water recycling on the Landscape Use Area, or other areas requiring a lesser degree of treatment or other methods of disposal consistent with the Basin Plan and State Board Resolution 68-16.

STATUS – Installation of the DAF unit and recommissioning of the sand filter and UV unit represents actions taken to assure long term compliance with the WDR’s and the capacity to accept flows from Tejon Industrial Complex West at full build out. Restricted reuse is planned on the landscape areas in TIC West. To accommodate this reuse all reuse conveyance piping has been installed and all facilities within the complex have installed irrigation systems for recycled water reuse.

Attached is the Draft 2002 “Tejon Industrial Complex Wastewater Treatment Master Plan” (*Exhibit E*) and the April 2006 “Tejon Industrial Complex East Side Water Reclamation Facility Conceptual Plan (*Exhibit F*)”. Both reports outline improvements planned to support expansion of TIC West and development of TIC East. TIC East development is slated to commence 1st quarter 2008 with the first discharger on-line 2nd quarter 2009.

The first discharger at TIC East will be Truck Stops of America (TA). TA current discharge is regulated under Order # 5-01-002 (*Exhibit G*). This discharger will continue into the existing facilities in accordance with the existing order until TCWD expansion is complete and treatment provided by the new plant has stabilized and is consistent. At that time TA flows will be diverted to the TCWD plant. The existing TA facilities will then be converted to storage to support the expanded TCWD facilities.

- B) Begin construction of any improvements and provide written of such. A report of water recycling and the CEQA documentation must also be completed as appropriate.

STATUS – Construction of the DAF unit to support TIC West discharge is complete. Notification of the DAF unit completion and commissioning was included with the August SMR (See attached *Exhibit H*). Included with this report is *Exhibit I* showing in-service removal results utilizing the DAF unit.

No additional CEQA documentation is required as all required CEQA documentation was completed in 2000 with TIC West approvals.

Design of a plant Eexpansion to support TIC East development has commenced with construction slated to commencebegin 2nd quarter 2008 with completion expected 2nd quarter 2009. The attached Exhibit J includes California Water Services Request for Proposal for the design of the new facilities to support TIC East, site layout for the ultimate 800,000 GPD plant at the current TIC waste facility and Stantecs successful proposal.

TCWD is committed to recycled water reuse as soon as practicable and responsible resource usage. The adopted 2005 TCWD Urban Water Management plan identifies recycled water as an important component of available water resources to the District. The recently adopted AB3030 Groundwater Management Plan of the Wheeler Ridge-Maricopa Water Storage District shows the contribution of imported surface water has helped reverse historical overdraft of the groundwater basin area.

In consideration of the most recent data showing compliance with discharge limit C1 and C2 trending towards compliance with discharge limits D1-D4 and the fact that TCWD and California Water Service Co. has initiated design for the expansion of the TIC Waste Water Facilities in advance of the dates outlined in the draft Cease and Desist, TCWD requests the RWQCB withdraw the draft Cease and Desist and remove it from both the proposed agenda of the January 24-25, 2008 meeting of the Regional Water Board and the webpage. In addition, we propose Tentative Order No. R5-2008-XX be amended as outlined on Exhibit A and submitted for formal approval at the January 24-25 meeting of the Regional Water Quality Control Board.

Special thanks to you and your diligent staff for the ongoing assistance and technical support in improving the operations of the TCWD facilities.

Please feel free to contact Babs Makinde, at (661) 663-2479 with any questions or concerns related to this issue.



Dennis Atkinson
President
Tejon-Castac Water District