

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 4-5 December 2014**

**Response to Written Comments for
The Rancho Murieta Community Services District
Wastewater Treatment and Reclamation Plant
Tentative Waste Discharge Requirements and Master Recycling Permit**

At a public hearing scheduled for 4 and 5 December 2014, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) will consider adoption of Waste Discharge Requirements (“WDRs”) and a Master Recycling Permit for Rancho Murieta Community Services District’s Wastewater Treatment and Reclamation Plant (WWRP). This document contains responses to written comments received regarding the tentative WDRs and Master Recycling Permit. Written comments were required by public notice to be received by the Central Valley Water Board by close of business on 27 October 2014 to receive full consideration. Comments were received from the Rancho Murieta Community Services District and the Central Valley Clean Water Association.

Written comments are summarized below, followed by the responses of Central Valley Water Board staff. Based on the comments, Central Valley Water Board staff made some changes to the tentative WDRs. Central Valley Water Board staff also made some changes to correct typographical errors and to improve clarity.

RANCHO MURIETA COMMUNITY SERVICES DISTRICT COMMENTS

On 21 and 27 October 2014, the Rancho Murieta Community Services District (RMCS D) submitted written comments regarding the tentative WDRs. RMCS D’s comments identified some issues and requested certain editorial changes to the tentative WDRs. Several of the requested changes were made, as appropriate, and RMCS D concurs with the revised WDRs and Master Recycling Permit. The resolution of key issues is summarized below.

RMCS D Comment No. 1: RMCS D stated that given the water conservation efforts to address drought conditions and increased use of water conserving plumbing fixtures as the community grows, it is expected that the TDS effluent concentration will increase over time. RMCS D believes that an effluent limit is not needed because background groundwater quality near the WWRP exhibits high TDS concentrations and the WWRP produces relatively high effluent quality with respect to TDS, and requested that if the TDS limit cannot be deleted, that the limit be increased to 500 mg/L plus background groundwater quality.

RESPONSE: Background water quality is spatially variable and ranges from 488 mg/L to 1,360 mg/L between the three background wells. Effluent TDS concentrations have averaged about 300 mg/L over the last several years, and therefore, the discharge is not likely to cause degradation of groundwater quality. However, if effluent TDS concentrations increase significantly, the discharge will then have the potential to degrade groundwater. Therefore, it is appropriate to set a performance-based limit to ensure that the Discharger continues to implement best efforts, rather than allowing effluent salinity to increase indefinitely. In recognition of the fact the District has no commercial or industrial dischargers and that future water conservation efforts will likely result in higher effluent salinity, the TDS effluent limit was increased to 500 mg/L as a flow-weighted annual average. This is expected to allow flexibility for future salinity increases due to water conservation as the community grows, and to ensure compliance with the groundwater

limitations of the proposed WDRs. Also, the WDRs include a reopener if effluent TDS concentrations are forecasted to increase beyond the current limit. RMCS D concurs with the revision.

RMCS D Comment No. 2: RMCS D requested that the requirement for annual testing for Priority Pollutants be removed from the Monitoring and Reporting Program (MRP) or that annual monitoring be required only if Priority Pollutants are detected in the first annual sample. Wastewater treated at the WWRP is primarily domestic and there are no industries within RMCS D's service area. Therefore, RMCS D does not anticipate that any Priority Pollutants are present in the effluent.

RESPONSE: In order to be consistent with the State Board's Recycled Water Policy, effluent monitoring for Priority Pollutants is required; however, the monitoring frequency has been reduced to once every five years. Additionally, future revisions to the MRP can be approved by the Executive Officer. Therefore, RMCS D may request a revision to the MRP to reduce the number or frequency of constituents monitored after there are sufficient data to conclude that any constituent is either not present or poses no threat. RMCS D concurs with the revision.

CENTRAL VALLEY CLEAN WATER ASSOCIATION COMMENTS

On 27 October 2014, the Central Valley Clean Water Association (CVCWA) submitted written comments regarding the tentative WDRs. CVCWA's comments identified some issues and requested certain changes to the tentative WDRs and Master Recycling Permit. Some of the changes were made as requested and some were not.

CVCWA Comment No. 1: CVCWA states that the performance-based effluent limit for TDS is not consistent with the implementation provisions of the Basin Plan related to establishing limits when naturally occurring background water quality already exceeds the applicable water objectives. Imposing a performance-based limit for a community that is endeavoring to conserve water in extreme drought conditions and working to expand its recycled water uses will set up the District for a permit violation. CVCWA requests that the performance-based limit for TDS be removed or at least set the limit at 1,000 mg/L to be consistent with background groundwater quality conditions.

RESPONSE: Background groundwater is highly variable, and does not exceed water quality objectives for TDS in all areas. The Board is sensitive to potential increases in TDS due to conservation and have attempted to grant the City sufficient flexibility to expand recycled water uses, even in drought conditions. See also response to RMCS D Comment 1, above.

CVCWA Comment No. 2: CVCWA states that Discharge Specification D.1 requires compliance with the groundwater limitations, and is therefore duplicative and creates unnecessary liability. The specific language could impose liability on the District for acts of others which are beyond its control.

RESPONSE: Staff disagrees with CVCWA's comment that this specification is duplicative and unnecessary. Violations of the groundwater limitations may occur when waste disposal is improperly managed. Discharge Specification D.1 requires RMCS D to properly manage their waste disposal in a way that will not cause a violation of the groundwater limitations.

CVCWA Comment No. 3: CVCWA stated that the monitoring requirement for Priority Pollutants is extensive and onerous for a relatively small land discharger. CVCWA also stated that RMCS D is using recycled water for uses other than landscaping irrigation. Based on RMCS D's average dry weather flow rate and consistency with the terms of the General Order for Recycled Water Use, CVCWA requested that at a minimum the monitoring frequency for priority pollutants be reduced to once every five years.

RESPONSE: See response to RMCS D Comment 2 above. The monitoring frequency was reduced to once every five years as requested.

CVCWA Comment No. 4: CVCWA stated that as a Master Recycling Permit, the Tentative Order includes some recycled water specifications not based on the criteria in Title 22, are more stringent than those criteria, or do not provide the necessary caveat that RMCS D may proceed in a manner different than what is required in Title 22 with approval from the Division of Drinking Water (DDW). Specifically,

- a. Specifications that are not part of Title 22 should be deleted from the Order and any deviations from Title 22 should be explained.
- b. Water Recycling Specification F.15 imposes some setback requirements for recycled water use areas that are more stringent than Title 22. The requirement should be deleted or at least revised to delete the setback requirement of 25 feet between Use Areas and manmade or natural surface water drainage courses.
- c. Water Recycling Specification F.28 which requires specific horizontal and vertical separation between pipelines transporting recycled water and pipelines transporting domestic supply with no qualification that the Division of Drinking Water could grant a variance. Water Recycling Specification F.28 should be deleted or qualified by the addition of "except as approved by DDW".

RESPONSE:

- a. The recycled water specifications include applicable criteria from Title 22 and other requirements as necessary for the protection of water quality. It is both appropriate and the Board's longstanding practice to impose certain requirements that may be more stringent than the Title 22 regulations as needed to implement the Basin Plan. Other than the revisions described below, no other changes were made to the Water Recycling Specifications.
- b. Because the recycled water Use Areas include two golf courses that are traversed by manmade surface water drainage courses, Water Recycling Specification F.15 was amended to specify that the 25-foot setback from surface waters applies only to the agricultural irrigation Use Areas.

- c. Because the Division of Drinking Water approved RMCS D's Title 22 Engineering Report, which includes enforceable rules and regulations that cover the design and construction, operation and maintenance of the distribution systems and Use Area, Water Recycling Specification F.28 was deleted so as to not conflict with any procedures, restrictions, and other requirements that may have been included in the Title 22 Engineering Report and approved by DDW.

CVCWA Comment No. 5: CVCWA states that the Tentative Order limits the uses of recycled water to those set forth in section 60304(a) of Title 22. CVCWA is concerned that this limitation could foreclose other opportunities for recycled water application that are not strictly "irrigation uses" and has requested that the language be revised to include "for irrigation" and delete the specificity of the 60304 subsections of Title 22.

RESPONSE: RMCS D's Report of Waste Discharge specified recycled water use for irrigation use only. Recycled water uses include pasture land and landscape irrigation and ancillary recycled water uses such as irrigation of parks and playgrounds, residential landscaping, golf course, and freeway landscaping. Water Recycling Specification F.5 was amended to include 60304(c) of Title 22, which is consistent with the irrigation uses specified in RMCS D's Report of Waste Discharge and Title 22 Engineering Report. Any other uses would require submittal of a new Report of Waste Discharge and a new or amended Title 22 Engineering Report approved by DDW.