



9896 N Sedona Cir  
Fresno, CA 93720  
Phone 559.288.9172  
Fax 559.513.8449

March 7, 2013

Dale Harvey  
Water Resource Control Engineer  
Central Valley Water Board - Fresno  
1685 "E" Street  
Fresno, CA 93706

**Re: Tentative Waste Discharge Requirements**

Dear Dale:

On behalf of the Planada Community Services District (District) we are submitting this letter with comments to the Tentative Waste Discharge Requirements being proposed for the new wastewater treatment facility (WWTF). The District's comments are as follows:

1. Discharge Provision G. 21 requires the Discharger to submit a Salinity Management Plan, with salinity source reduction goals and a proposed implementation time schedule for Executive Officer approval. On February 14, 2012 the District submitted to the Regional Water Quality Control Board (RWQCB) a Salinity Evaluation and Minimization Plan (SEMP). The preparation of the SEMP was a requirement contained in Special Provision C.3.a. of Waste Discharge Requirements Order No.R5-2011-0042.

The SEMP provided an evaluation of the District's source water and quantification of salinity contributing sources. The SEMP found the District WWTF discharge to be in compliance with effluent limitations and protective of beneficial uses of the groundwater. The SEMP also proposed tasks for continuing monitoring and salinity minimization (through public outreach) and an implementation schedule for those tasks.

The District has not received any review comments from RWQCB staff to the February 14, 2012 SEMP. It appears that Provision G.21 duplicates the efforts of the previously submitted SEMP. It is requested herein that Provision G.21 be replaced with a requirement to provide evidence of the implementation of the tasks proposed on the SEMP.

2. As part of the WWTF improvement project, the District is proposing to relocate MW-2 and construct two additional MWs down gradient from the effluent disposal areas. The TWDRs do not contain any reference to the new MWs. It is recommended that any requirements for the relocation of MW-2 and the construction of the new MWs be included in the WDRs.

If you have any questions regarding the TRE Workplan or require any additional information, please call me at (559) 288-9172.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alfonso Manrique', with a long horizontal flourish extending to the right.

Alfonso Manrique, PE  
Principal