

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION

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RESPONSES TO COMMENTS

Tentative Order:

Waste Discharge Requirements Order R7-2024-XXXX

Scheduled Adoption Date:

May 14, 2024

Dischargers:

Salton Community Services District

Agenda Item:

9

Facility/Project:

Salton City Lansing Avenue Wastewater
Treatment Facility

Public Notice:

7-24-14

County:

Imperial County

Comment Period:

March 27, 2024 to April 26, 2024

Staff Contact:

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Table 1. Comments Received.

Commentor	Submittal Date
Emmanuel Ramos, Interim General Manager Salton Community Services District (Discharger)	April 26, 2024

COMMENTS FROM SALTON COMMUNITY SERVICES DISTRICT (DISCHARGER)

DISCHARGER-1

Subject

WDRs Order, § G.1. (p. 22-23)

1. Groundwater Monitoring Network

- a. Groundwater Depth Monitoring Network Work Plan.** Within six months of adoption of this Order, the Discharger shall submit, for Executive Officer approval, a technical work plan and proposed time schedule [Fn.16] for installing a groundwater monitoring network with the ability to monitor groundwater levels around the evaporation/percolation ponds.

The work plan shall include a description of the groundwater monitoring network (e.g., monitoring locations, sampling protocol, or quality assurance/quality control) and a time schedule for the implementation of the network. Within 30 days of Executive Officer written approval, [Fn.17] the Discharger shall begin implementation of the work plan in accordance with the time schedule.

- b. Groundwater Quality Monitoring Network Work Plan.** Within 12 months of adoption of this Order, the Discharger shall submit, for Executive Officer approval, a technical work plan and proposed time schedule [Fn. 18] for installing a groundwater monitoring network with the ability to monitor upgradient and downgradient water quality conditions.

The work plan shall include a description of the groundwater monitoring network (e.g., monitoring locations, sampling protocol, or quality assurance/quality control) and a time schedule for the implementation of the network. Within 30 days of Executive Officer written approval, [Fn.19] the Discharger shall begin implementation of the work plan in accordance with the time schedule.

Fn. 16: The time schedule for proposed activities shall not exceed six months from Executive Officer approval of the time schedule.

Fn. 17: The Executive Officer may approve the work plan and time schedule with any revisions that are determined to be warranted under the circumstances.

Fn. 18: The time schedule for proposed activities shall not exceed six months from Executive Officer approval of the time schedule.

Fn. 19: The Executive Officer may approve the work plan and time schedule with any revisions that are determined to be warranted under the circumstances.

Discharger Comments and Requested Revisions

The Tentative WDR Provision G.1. includes requirements for both a Groundwater Depth Monitoring Network Work Plan and a Groundwater Quality Monitoring Network Work Plan. The District has reviewed the requirements for each work plan and believes the work plans can be combined to achieve the desired results and maintain a phased approach to implementation, as requested by the District. Both work plans seek to install a groundwater monitoring network to obtain additional data regarding the depth to groundwater, groundwater quality, and groundwater flow. These need to be evaluated holistically to provide a concerted approach to monitoring plant operations and potential impacts, protecting public health, and understanding more about the surrounding hydrogeology. Again, the District anticipates a phased approach to work plan implementation.

In addition, the District requests the timeline to prepare a work plan addressing both Special Provisions G.1.a. Groundwater Depth Monitoring Network Work Plan and Special Provision G.1.b. Groundwater Quality Monitoring Network Work Plan requirements be 12-months. The District will require a 12-month period to establish a project budget through their Board (2 to 3-months), complete a consultant solicitation process (3-months), and prepare the work plan (6-months).

Further, the District requests that the timeline to implement said work plan be increased to 6-months of Executive Officer written approval. Similar to preparing the work plan, the District will need to establish a capital project budget through their Board (2 to 3-months), complete a competitive construction bidding process (2-months), obtain Board approval and execute a construction agreement (1-month).

Staff Response and Changes to Tentative Order

Regional Water Board staff concur with the boarder scope of this comment. The subject provision for a groundwater depth monitoring network work plan and a groundwater quality monitoring network work plan have been combined into one work plan.

The timeline to prepare the combined groundwater depth and water quality monitoring network work plan has been increased to 12 months. Concurrently, the timeline to implement the work plan has been increased to six months. Additionally, a special provision for extension requests has also been added to the Tentative Order.

The subject provision now be revised to read as follows:

Groundwater Quality and Depth Monitoring Networks Work Plan.
Within *12 months* of adoption of this Order, the Discharger shall submit, for Executive Officer approval, a technical work plan and proposed time

schedule [Fn.16] for installing a groundwater monitoring network with the ability to monitor groundwater levels around the evaporation/percolation ponds as well as a network with the ability monitor upgradient and downgradient water quality conditions.

The work plan shall include a description of the groundwater monitoring networks (e.g., monitoring locations, sampling protocol, or quality assurance/quality control) and a time schedule for the implementation of the networks. Within *six months* of Executive Officer written approval, [Fn.17] the Discharger shall begin implementation of the work plan in accordance with the time schedule.

Fn. 16: The time schedule for proposed activities shall not exceed six months from Executive Officer approval of the time schedule.

Fn. 17: The Executive Officer may approve the work plan and time schedule with any revisions that are determined to be warranted under the circumstances.

DISCHARGER-2

Subject

WDRs Order, § G.2. (p. 23)

Total Nitrogen Effluent Limit Feasibility Study. Within three years of adoption of this Order, the Discharger shall submit a technical report evaluating the feasibility of implementing nitrogen removal for compliance with a 10 mg/L effluent limit for total nitrogen, which may be incorporated in future WDRs.

Comments and Requested Revisions

Lastly, the Tentative WDR Special Provision G.2. includes a requirement to prepare a Total Nitrogen Effluent Limit Feasibility Study within three years of adoption of the Order. This appears to be based on the Regional Water Board's assumption that the discharge of treated wastewater from the Lansing WWTF may present a significant risk to beneficial uses of groundwater within the project location. However, the Tentative WDR states that between 2018 and 2023, the Lansing WWTF's effluent had an average Total Nitrogen of 18 mg/L and that "*the assimilative capacity in local groundwater for nitrogen is unclear*" (Order R7-2024-XXXX, p.9). Additionally, there are no municipal wells within 500 feet of the discharge area and there exists overwhelmingly prevalent

high salinity conditions (“*well above 3,000 mg/L at every point since 1968*”) in the groundwater “*attributable to natural hydrologic conditions*”. As such, it’s not clear Special Provision G.2. is applicable at this time since the Tentative WDRs state that the surrounding groundwater is not suitable for municipal or agricultural applications (Order R7-2024-XXXX, p.8). Based on the above, it seems prudent to implement the prescriptive Special Provisions G.1. monitoring program to complete an evaluation of groundwater quality and conditions prior to evaluating the necessity or feasibility for nitrogen removal at the Lansing WWTF.

Staff Response

No changes to Tentative Order.

The Antidegradation Policy prohibits the Regional Water Board from authorizing discharges that would result in groundwater not meeting applicable WQOs. The policy further requires implementation of best treatment and control measures that are practicable under the circumstances.

As stated in the Water Quality Control Plan for the Colorado River Basin Region (Basin Plan), the chemical constituent WQO for groundwater designated for municipal and domestic beneficial uses (MUN) is the Title 22 Maximum Contaminant Level (MCL), which is 10 mg/L for combined nitrate and nitrite. Consequently, the Antidegradation Policy prohibits the Discharger from discharging wastewater that would result in groundwater exceeding 10 mg/L for combined nitrate and nitrite.

Even if groundwater is impacted by additional sources outside of the Facility, the discharge from the Facility is still a contributing source to Total Nitrogen concentrations observed in downgradient groundwater.

Special Provision G.2. provides three years for the total nitrogen effluent limit feasibility study to be completed. Three years provides sufficient time for an evaluation of groundwater quality and conditions prior to preparing the total nitrogen effluent limit feasibility study.