

ATTACHMENT 2 - WDR R3-2012-0015 COMMENTS

WILLIAM B. MARCUM, STERLING ENVIRONMENTAL ENGINEERING (SEE) COMMENTS

WASTE DISCHARGE REQUIREMENTS (WDR) FINDING NO. 21 COMMENT:

On Page 3 of the WDR, Item 21, I am hoping that the wording can be changed to reflect that these issues did occur, but when I came aboard, I immediately rectified the issues and got them back into compliance. Actually, I was hired because of the state of the facility

RESPONSE SEE NO. 1: Water Board staff has modified wording in Finding No. 21 of the proposed WDR to indicate actual time frames of noted violations and the corrective actions taken by the Tres Pinos County Water District. Water Board staff has also created a separate heading for Finding No. 21, which is more appropriately titled as 'Compliance History'.

MONITORING AND REPORTING PROGRAM (MRP) FACILITY MONITORING:

On Page 5 of the MRP, Facility Monitoring, Item 1 needs to be changed from Daily inspections to Weekly inspections.

RESPONSE SEE NO. 2: Water Board staff prefers a daily inspection of the Facility, but it is understood that this would cause an economic burden on the Tres Pinos CWD. Water Board staff agrees to propose to reduce Facility inspections to weekly so that the Tres Pinos CWD may allocate funds to other increased operating requirements being proposed in WDR R3-2012-0015.

TRES PINOS COUNTY WATER DISTRICT (TPCWD) COMMENTS

COMMENT TPCWD NO. 1: There are serious financial impacts associated with satisfying the requirements of WDR Order R3-2012-0015. Therefore, it is important to point out the financial limitations we face and request consideration of extensions to enable first the development of the LTWMP, which will include the investigation of funding sources, and then phasing in the requisite improvements as such sources become available.

Based on this extensive report by an independent civil engineering firm as submitted, Tres Pinos County Water District respectfully requests an extension of the December 9, 2011 deadline contained in Order No. R3-2012-0015.

RESPONSE TPCWD NO. 1: Water Board staff does consider economic impacts associated with increased facility monitoring and reporting. Water Board staff requires the additional monitoring and reporting proposed in WDR R3-2012-0015 in order to assess potential water quality impacts but will consider alternative report due dates and monitoring frequencies that will alleviate economic constraints on the TPCWD. Water Board staff has discussed with the TPCWD

ways to accommodate the need to protect water resources and alternative monitoring and reporting requirements to fit within the operating budget of TPCWD. Both parties have agreed to a quarterly monitoring frequency instead of monthly and on report due dates increased by six to twelve months than what was originally proposed. These changes are reflected in proposed Order No. R3-2012-0015.

WY'EAST ENGINEERING (WY'EAST) ON BEHALF OF TRES PINOS COUNTY
WATER DISTRICT COMMENTS:

COMMENT WY'EAST NO. 1: We would recommend that TPCWD appeal WDO-2011 as currently proposed and request, as a minimum, an extension in time to enable the preparation of a comprehensive LTWMP that can better guide both TPCWD and the RWQCB in satisfying the goals of protecting the local and regional groundwater environment and protect the health, safety and well-being of the local community.

RESPONSE WY'EAST No. 1: Water Board staff has corresponded with the TPCWD in the past five years with regard to long-term wastewater management plans and salt management plans. Staff was very forthcoming with the additional reporting and monitoring requirements and proposed effluent limits that would become evident in the near future through a revised WDR. Water Board staff anticipates working with TPCWD to make the new requirements work for its operating budget and for the betterment of the community.

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