

August 20, 2007

Mr. Jeffery S. Pyle
Engineering Geologist
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION
1685 E Street
Fresno, CA 93706

Via FedEx, Fax, and Email

**Re: Comments to Tentative Waste Discharge Requirements
PacificUS Real Estate Group
SilverTip Resort Village**

Dear Mr. Pyle:

PacificUS Real Estate Group and its technical consultants, Mr. Dana Ripley (Ripley Pacific Company) and Mr. Kenneth Schmidt (Kenneth D. Schmidt and Associates) have reviewed the Tentative Waste Discharge Requirements ("TWDR") transmitted by the California Regional Water Quality Control Board on July 20, 2007 and herein provide the following comments and recommendations concerning the TWDR:

Item	Location	Comment
1.	Info Sheet page 1, first paragraph	Replace last sentence with <i>"The WWTF will be designed to have an annual average daily flow of 33,500 gallons per day (gpd) and a peak daily flow of 74,000 gpd."</i>
2.	Info Sheet page 3, 1 st par. under Groundwater Cond.	Insert <i>"near the leachfield"</i> after <i>"...flow is to the north/northeast"</i> .
3.	Info Sheet page 3, 2 nd par. under Groundwater Conditions	First sentence replace "high" water quality with <i>"good"</i> water quality.
4.	Info Sheet page 5, 2 nd par. under Monitoring Requirements	Delete "surface water monitoring." See item #17 below.
5.	TWDR pages 1-2, item #5 concerning the list of project features	The project features description is not accurate. We suggest that it be replaced as follows: <ul style="list-style-type: none"> a. A 137 room hotel; b. A large conference center; c. 30 cabins for hotel guest use; d. Up to 4 small conference centers; e. A tennis court; f. An exterior swimming pool and deck; g. 3 decorative ponds; h. Parking for 359 vehicles; i. A two story commercial building; j. Housing for hotel employees;

		<p>k. Associated accessory uses;</p> <p>l. An effluent storage tank;</p> <p>m. Potable water storage tank(s);</p> <p>n. Parking, roadways, pathways, utility line extensions, etc.;</p> <p>o. An onsite wastewater disposal system</p>
6.	TWDR page 2, item #11	Replace "0.1 Nephelometric turbidity units" with "0.2 Nephelometric turbidity units." This is consistent with Title 22 Sec. 60301.320 – see TWDR p. 21, Item 5.a.
7.	TWDR page 7, item #31	Replace entire paragraph as follows: <i>"The resulting groundwater elevations indicate an eastward direction of flow in these wells, but these levels are piezometric surface readings that are above the water production zone due to induced pressure from the overlying bedrock. The actual depth to the water producing zones is much greater than the piezometric groundwater level as shown in the previous table. Groundwater flow and movement in the igneous bedrock environments is controlled primarily by flow through the fractures and the direction is determined primarily by locations of groundwater recharge and discharge."</i>
8.	TWDR page 7, item #32	Delete sentence "Other construction details (screened intervals, filter material, location of seals, etc.) are unknown." Next sentence, insert "monitor" after "Three."
9.	TWDR page 8, item #33	Insert new sentence (immediately after first sentence) <i>"Historical data indicate rises during precipitation and snowmelt periods, and declines during the summer."</i>
10.	TWDR page 9, item #35	Revise sixth sentence as follows <i>"Four to five monitoring wells will likely be required to adequately monitor shallow groundwater near the proposed leachfield and in the application areas."</i>
11.	TWDR page 13, item #50, lower right box	Insert word "supply" after "Construct" in second paragraph.
12.	TWDR page 20, item B.1	Replace 1.a. as follows: <i>"an annual average discharge flow of 33,500 gpd; and"</i> . On 1.b. replace "mgd" with "gpd."
13.	TWDR page 21, item C.1	Request relaxation of seasonal nitrate nitrogen limit to < 25 mg/l for spray irrigation, and < 10 mg/l for subsurface dispersal. This is an energy saving measure during irrigation season to reduce use of internal recirculation pumps. 25 mg/l is an agronomic rate of nitrogen application (see RWD p.38, Sec. 7.6.) for spray irrigation.
14.	TWDR page 25, item G.1.a.	Request delete provision (ii) "Total coliform organisms of 2.2 MPN/100 ml." The WWTF effluent is monitored weekly for coliform, and testing for coliform from monitoring wells is problematic. See item #16 below.
15.	TWDR Attachment B	Spray field area is shown as two discrete locations, however RWD Table 11 indicates numerous locations for effluent irrigation areas beyond the two discrete areas indicated. Request notation on Attachment B that lists all application areas beyond what is shown graphically.

16.	Monitoring and Reporting Program (MRP) page 2, Effluent Monitoring	Insert turbidity specification per Title 22 Sec. 60301.320, see TWDR p.21, Item 5.a.
17.	MRP page 5, Groundwater Monitoring	Request delete "total coliform organism" monitoring from table. This requirement is problematic in that normal groundwater sampling well design and extraction procedure does not prevent potential bacterial contamination from the sample procedure itself. This would require wellhead sanitary seals and submersible pumps that are not proposed for the shallow groundwater monitoring. In addition, Title 22 regulations already require coliform effluent monitoring as indicated on MRP page 2. For "General Minerals" reporting, request replace "Quarterly" with "Annually." For table footnote #3, request replace specific months with "four times per year." There may be instances where snow depth could potentially prevent monitoring well access during January and potentially April. Best efforts will be made to sample on a regular interval, however access could preclude this during heavy snow seasons.
18.	MRP page 5, Surface Water Monitoring	Request delete entire section. Both EC and turbidity surface water monitoring are redundant with EC and turbidity effluent monitoring. Other contributors to EC (such as highway road salt) and turbidity (upstream erosion) are beyond the control of this Discharger. Effluent monitoring of these parameters is sufficiently protective of surface water quality based on controllable factors of SilverTip wastewater operations.

Please feel free to contact me if you have any questions or comments. Thank you, Jeff, for your assistance in this matter.

Sincerely,

PACIFICUS REAL ESTATE GROUP



David J. Giuntini
Project Manager

/djg

cc: Paul J. Giuntini
Dana Ripley
Kenneth Schmidt
Chris Hall, Esq.
Jeff Reid, Esq.