

DEPARTMENT OF CORRECTIONS
Deuel Vocational Institution
23500 Kasson Road
Tracy, Ca. 95376

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January 11, 2008
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California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Attention: Mr. Timothy R. O'Brien, Engineering Geologist

Subject: Comments Regarding Tentative Resolution Waiving Discharge Requirements for California Department of Corrections and Rehabilitation's Deuel Vocational Institution New Wastewater Treatment Plant Project - Dewatering Discharge to Land, San Joaquin County

Dear Mr. O'Brien:

The California Department of Corrections and Rehabilitation (CDCR) appreciates the opportunity to offer the following comments with regard to the Tentative Resolution Waiving Discharge Requirements for CDCR's Deuel Vocational Institution New Wastewater Treatment Plant Project - Dewatering Discharge to Land, San Joaquin County (Tentative Waiver):

1. Throughout Documents: The title of the California Department of Corrections and Rehabilitation was changed in 2005 to reflect the importance of rehabilitation as part of the organization's mission. Please modify all references to California Department of Corrections to include "...and Rehabilitation".
2. Throughout Documents: The project name utilized by the State of California for budgeting and management purposes is the Deuel Vocational Institution New Wastewater Treatment Plant Project. Please revise all references to the Wastewater Treatment System Improvement Project, and WTSIP, to the New Wastewater Treatment Plant Project, and WWTPP (or preferably Project) respectively.
3. Page 2, Findings, 14th Article: The statement "Dairy Wastewater will not be applied to the designated disposal area for the extracted groundwater..." Dairy wastewater has historically been applied to the designated disposal area (Fields 11, 12 and 13) and will be applied in the future to these fields, at rates commensurate with crop needs. It is not clear based on the language in this

article when CDCR would be able to recommence discharge of dairy wastewater to the designated disposal area.

One of the important conclusions resulting from the water balance model is the significant water volume deficit that will occur during the dry weather months of the year. Since it is anticipated that the dewatering operation is not likely to extend beyond the first dry weather season, it is requested, once all risk of a possible release has passed and the fields have dried sufficiently to recommence farming operations, that any residual dewatering effluent be utilized productively in conjunction with dairy wastewater and irrigation water to produce a crop. CDCR does not intend to apply dairy wastewater to any field where a potential for the occurrence of ponding exists. To assure the RWQCB staff that the operation will not jeopardize surface water quality, CDCR is willing to notify RWQCB staff at least 30 days prior to recommencing farming operations, so that RWQCB staff may inspect the site to confirm that conditions are appropriate to recommence farming operations.

Should the dewatering operations continue into the wet weather season of 2008-2009, the application of dairy wastewater would be eliminated well in advance of the potential to accumulate or pond water on the designated disposal area. If the RWQCB desires, a date for ceasing the application of dairy waste can be set as part of this waiver, or at a later date if mutually agreed upon by RWQCB and CDCR staff.

Therefore, it is suggested that the language within the last sentence of the 14th article to read: "Dairy Wastewater will not be applied to the designated disposal area for the extracted groundwater *at any point when ponding of water may occur*; and".

4. Page 3, Findings, 20th Article: The Notice of Determination for the Mitigated Negative Declaration was issued on April 7, 2006, as indicated in previous comments, not April 7, 2007.
5. Page 5, Discharge Prohibitions, 4th Article: As stated under Comment 3, CDCR does not intend to conduct any application of dairy waste during periods when ponding of water is possible, or when the application of water to any field would exceed crop requirements. A review of the water balance illustrates that a significant water deficit exists in the dry weather months of the year. If the dewatering operation is continuing into the dry weather season, and it appears feasible that the land could be productively farmed and irrigated with the extracted groundwater, CDCR would like to begin seasonal cropping, irrigating with a blend of extracted groundwater, dairy wastewater, and the facility's surface water diversion rights. As previously stated, if it appears that the groundwater extraction operation may continue into the fall of 2008, the application of dairy wastewater would be eliminated well in advance of the rainy season.
6. Page 2, Monitoring and Reporting Program (MRP): The MRP requires that granular activated carbon be monitored monthly in pounds. As the extent of the contamination to be encountered is unknown, ranging from non-existent up to some maximum value, the Contractor must plan for given volume of activated carbon to commence operations. Water quality sampling will determine at what

rate the GAC will be utilized. It isn't clear if the RWQCB is asking CDCR to report the total number of pounds of GAC in use on a monthly basis, or if an estimated consumption rate is to be provided.

We trust that these comments are sufficient for the RWQCB's needs. Thank you for the opportunity to provide these supplemental comments. Please contact us if there are any questions regarding the information provided herein.

Sincerely,



Jeffrey M. Ralumbo
Correctional Plant Manager II

JP:sep

c: Mr. John Spain, CDCR, Headquarters
Mr. Scott Parker, Carollo Engineers