

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 11-12 April 2013**

**Response to Written Comments for Planada Community Services District
Wastewater Treatment Facility
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 11 and 12 April 2013, the Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) will consider adoption of Waste Discharge Requirements (WDRs) and for Planada Community Services District. This document contains responses to written comments received from interested parties regarding the Tentative WDRs (TWDRs) initially circulated on 6 February 2013. Written comments from interested parties were required by public notice to be received by the Central Valley Water Board by 8 March 2013 to receive full consideration. Comments were received by AM Consulting Engineers on behalf of Planada Community Services District, and Central Valley Clean Water Association.

Written comments from the above interested parties are summarized below, followed by the response of the Central Valley Water Board staff. Central Valley Water Board staff also made some minor changes to the TWDRs to improve the clarity of some findings and monitoring locations. The TWDRs have also been modified to require continued submittal of electronic self-monitoring reports.

PLANADA COMMUNITY SERVICES DISTRICT (DISTRICT) COMMENTS

On 7 March 2013, AM Consulting Engineers, submitted comments regarding the TWDRs on behalf of Planada Community Services District (District).

DISTRICT Letter – COMMENT No. 1: The District states that Provision G.21 of the TWDRs requiring the submittal of a Salinity Management Plan duplicate the efforts of Special Provision C.3.a of WDRs Order R5-2011-0042 and NPDES CA0078950 that require a Salinity Evaluation and Minimization Plan. The District requests that Provision G.21 of the TWDRs be replaced to require the District to provide evidence of the District's implementation of the Tasks proposed in the Salinity Evaluation and Minimization Plan it submitted on 16 February 2012.

RESPONSE: The change has been made. The Salinity Evaluation and Minimization Plan (Salinity Plan) submitted on 16 February 2012 does not describe specific public outreach methods that will be implemented by the District. Language in Provision G.21 of the TWDRs has been modified to read as follows:

“By (180 days following Order adoption), the Discharger shall submit a Salinity Management Plan addendum for Executive Officer approval. The addendum needs to describe the various public outreach methods the Discharger will implement as part of its salinity reduction measures and report these on annual basis”

DISCHARGER Letter – COMMENT No. 2: The District intends to relocate MW-2 and construct two new monitoring wells. The District asks for this to be reflected in the TWDRs.

RESPONSE: The TWDRs have been updated to include provisions that require the District to submit a Work Plan for the installation of the proposed wells and a Well Installation Report once the wells are constructed.

CENTRAL VALLEY CLEAN WATER ASSOCIATION (CVCWA) COMMENTS

On 8 March 2013, Central Valley Clean Water Association (CVCWA) submitted comments regarding the TWDRs via email.

CVCWA Letter – COMMENT No. 1: CVCWA states that the Provisions in the TWDRs requiring the District to submit Salinity and Nutrient Management Plans are inconsistent with CV-SALTS and that it is inappropriate for the TWDRs to include individual requirements until CV-SALTS has completed its work.

RESPONSE: The requested change has not been made. As described above under the Response to District Letter – Comment No. 1., Special Provision C.3.a, of Waste Discharge Requirements Order R5-2011-0042 and NPDES Permit CA0078950 required the District to submit a Salinity Evaluation and Minimization Plan. On 16 February 2012, the District submitted a Salinity Evaluation and Minimization Plan. Provision G.21 in the TWDRs has been revised to reflect that the District submitted a Salinity Plan and that the TWDRs require the District to submit a Salinity Plan addendum that describes in detail the public outreach activities and/or methods it will implement.