Regional Water Quality Control Board
Central Valley Region
Board Meeting –9/10 October 2014

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

At a public hearing scheduled for 9/10 October 2014, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board), will consider adoption of Waste Discharge Requirements (WDRs) for discharge from the Caruthers Community Services District (hereafter Discharger or District) Wastewater Treatment Facility (WWTF). This document contains responses to written comments received from interested parties regarding the tentative WDRs (TWDRs) circulated on 1 July 2014. Written comments from interested parties were required by public notice to be received by the Central Valley Water Board by 7 August 2014 to receive full consideration. The District and Central Valley Clean Water Association (CVCWA) submitted comments.

Written comments from interested parties are summarized below, followed by the responses of Central Valley Water Board staff. Central Valley Water Board staff also incorporated rescission of WDRs Order 91-191 to the TWDRs, added Finding 66 regarding Water Code section 106.3, updated references to the Drinking Water Program to reflect its recent migration to the State Water Resources Control Board, and made minor changes to the TWDRs to improve clarity and fix typographical errors.

In addition to the comments noted below, the District identified typographical and minor factual errors in the findings, Information Sheet, and Attachment C of the tentative WDRs. Minor changes have generally been made in accordance with District comments.

CVCWA COMMENTS

CVCWA – COMMENT No. 1: CVCWA comments that Discharge Specification C.2 of the tentative WDRs, which reads, "No waste constituent shall be released, discharged, or placed where it will be released or discharged, in a concentration or in a mass that causes violation of Groundwater Limitations of this Order," is unnecessary and requests that it be removed. CVCWA states it is duplicative of Groundwater Limitations in section E.1 of the tentative WDRs. CVCWA also states that it is inappropriate to reference the "mass" of waste constituents in this way because groundwater limitations implement concentration-based water quality objectives.

> **RESPONSE:** Discharge Specification C.2 has been modified for clarity, but it is neither duplicative nor unnecessary. Violations of the groundwater limitations may occur when waste disposal is improperly managed. Discharge Specification C.2 requires the District to manage its waste disposal in a way that will not cause a violation of the groundwater limitations.

CVCWA – COMMENT No. 2: CVCWA comments that the requirement in Provision F.19 of the tentative WDRs for a Salinity Management Plan is unnecessary and requests that it be removed. Noting the quality of the effluent and source water, low threat of salinity impacts to groundwater, and the relative small size of the discharge, CVCWA comments that the Salinity Management Plan is not justified.

> **RESPONSE:** The requested change has not been made. The Water Quality Control Plan for the Tulare Lake Basin (Basin Plan) identifies the increase in groundwater salinity as the greatest long-term problem facing the entire Basin. Preparation of a Salinity Management Plan is a reasonable requirement. Provision F.19 of the tentative WDRs allows the Discharger to define the scope and implementation schedule of the Salinity Management Plan.

DISTRICT COMMENTS

DISTRICT – COMMENT No. 1: The District comments that Finding 5 and the Information Sheet should clarify that the capacity of wastewater facilities prior to recent improvements was 0.24 mgd, not the 0.16 mgd described in WDRs Order 91-191.

RESPONSE: The requested changes have been made to Finding 5 and to the Information Sheet.

DISTRICT – COMMENT No. 2: The District comments that the finding that District water supply wells impact the groundwater gradient (Finding 35) is unsubstantiated.

RESPONSE: Finding 35 has been modified to improve clarity. Finding 35 no longer identifies District supply well pumping as an example of the groundwater pumping that appears to be affecting the local groundwater gradient.

DISTRICT – COMMENT No. 3: In reference to Finding 37, the District comments that the potential impact to any specific monitoring well is presently not known and an effluent characterization must be taken into account when assessing potential impacts to groundwater.

RESPONSE: No changes have been made to Finding 37. The primary basis for the analysis described in Findings 37 is a comparison of groundwater quality data with effluent data considering the well locations and past groundwater gradient (based on quarterly monitoring data for the 8-year period before the first well went dry in 2007).

DISTRICT – COMMENT No. 4: The District comments that if groundwater monitoring wells are required, the useful life of the wells should be at least 20 years due to the cost of installation. The District also comments that the funds to install new groundwater monitoring wells may not be readily available and it may not be possible for the District to install the new wells within 270 days, as Provision F.20 of the tentative WDRs requires.

RESPONSE: Provision F.20 has been changed to extend the deadline to submit a Groundwater Monitoring Well Installation Report (describing completed installation) to within 360 days of Order adoption or 180 days following Executive Officer approval of the Groundwater Monitoring Well Installation Work Plan, whichever is sooner. Regarding the useful life of the wells, the tentative WDRs do not prescribe a particular groundwater monitoring well design, but staff supports designs that consider site-specific issues, including the rate of decline in groundwater levels.

DISTRICT – COMMENT No. 5: Since the District has already made two attempts to identify potential recycled water projects, it requests clarification of what constitutes sufficient justification for not using WWTF effluent for a recycled water project.

RESPONSE: Provision F.17 of the tentative WDRs, which generally requires the Discharger to comply with recycled water policy in the Basin Plan, will be considered satisfied upon submittal by the Discharger of the documentation identified therein. Nonetheless, the Water Quality Control Plan for the Tulare Lake Basin (Basin Plan) states that dischargers must recycle WWTF effluent whenever feasible and places the burden on the District to demonstrate, at the discretion of the Central Valley Water Board, that plans to recycle WWTF effluent are “not possible.” Because new

possibilities for using recycled water may arise at any time, the District is expected to periodically explore available options as long as WWTF effluent is not being recycled. The letters the District circulated to potential recycled water users in 2005 and 2010 represent valid attempts to identify recycled water projects, but future efforts (including letters and other outreach) should at least include the items identified in Provision F.17.

DISTRICT – COMMENT No. 6: The District comments that because effluent from the WWTF is limited to a total nitrogen concentration of no more than 10 mg/L, a groundwater limit for nitrate is unnecessary. The District also questions the potential to prove a relationship between the discharge and total coliform found in groundwater at about 140 feet below ground surface. The comments imply that Groundwater Limitations E.1.a.i. and E.1.b. should be removed.

RESPONSE: No changes have been made to Groundwater Limitations E.1.a.i. and E.1.b. The groundwater limits for nitrate and total coliform organisms implement numeric water quality objectives specified in the Water Quality Control Plan for the Tulare Lake Basin (Basin Plan).

DISTRICT – COMMENT No. 7: The District requests an explanation of the basis for requiring a Salinity Management Plan.

RESPONSE: See the response to CVCWA comment number 2, above.

DISTRICT – COMMENT No. 8: The District comments that WWTF effluent flow is not significantly different from influent flow and requests the requirement for WWTF effluent flow monitoring be removed from the tentative Monitoring and Reporting Program.

RESPONSE: The requested change has been made.

DISTRICT – COMMENT No. 9: The District requests that the requirement to monitor effluent total dissolved solids (TDS) be changed to a grab sample or eliminated.

RESPONSE: The requested changes have not been made. The monthly TDS monitoring requirement adds value to the other monitoring requirements and it does not appear to add significant additional burden for the sample to be a flow-proportioned composite (the Discharger already operates a composite sampler and other effluent samples will be collected at the same monitoring frequency).

DISTRICT – COMMENT No. 10: The District requests an explanation for annual effluent monitoring for arsenic, particularly given that arsenic occurs naturally in the vicinity. The District also questions the significance of the discussion of arsenic and vanadium in the Information Sheet.

RESPONSE: The discharge is not expected to, and is not authorized to, cause groundwater to contain higher concentrations of arsenic. Because the discharge contains arsenic, the limited monitoring for arsenic proposed in the tentative WDRs is necessary to verify that the discharge will not cause groundwater degradation with arsenic. The discussion of arsenic and vanadium in the Information Sheet clarifies that source water quality issues with these constituents are not related to the discharge, and explains their presence in the wastewater.