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April 23, 2015

Mr. David Kirn
California Regional Water Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

Subject: Donner Summit Public Utility District Tentative Order Comments

Dear Mr. Kirn:

The purpose of this letter is to provide comments on the Tentative Order (NPDES Permit No. CA0081621) for the Donner Summit Public Utility District Wastewater Treatment Plant. We appreciate you and your staff working closely with the District in drafting the subject Order. The District is in support of the Tentative Order, as written, and suggests the following minor revisions to improve factual accuracy and compliance with Title 22 regulations.

1. **Attachment F, Section II. Facility Description** – Change “Sierra Lakes Community Water District” to “Sierra Lakes County Water District.”
2. **Discharge Prohibition III.C. and Fact Sheet II. Facility Description** – The discharge prohibition of wastewater to land from 1 November to 30 June is contained in the District’s lease agreement with the application area land owner. The District believes this prohibition should be removed from the Order as it is not appropriate for this lease agreement restriction to be regulated by the Regional Water Board. On this topic, it should be noted that, to maximize land application flexibility, the District is currently in negotiations with the land owner to amend the lease agreement to remove this restrictive land application prohibition language.
3. **Compliance Determination VII.C.** – Now that the District is moving forward with snow making and full Title 22 tertiary effluent standards (per Title 22 § 60307(a)(8)), we suggest replacing the Regional Water Board’s template total coliform compliance determination language with the actual Title 22 tertiary language specified in Title 22 § 60301.230(b), modified as suggested below to be in context with this section of the Order.

“**C.Total Coliform Organism Effluent Limitations (Section IV.A.1.e).** The median concentration of total coliform bacteria measured in the disinfected effluent shall be determined utilizing the bacteriological results of the last seven days for which analyses have been completed. If the 7-day median of

total coliform organisms exceeds a most probable number (MPN) of 2.2 per 100 millimeters, the Discharger will be considered out of compliance.”

4. **Table E-6** – Per the requirements of Title 22 § 60321(a), we are required to monitor total coliform daily (not 5/week) when discharging to REC-001 (i.e., snowmaking).

Please feel free to contact me with any questions you might have regarding this submittal, or if you require any additional information prior to the scheduled adoption date of the Order.

Sincerely,



Thomas G. Skjelstad
General Manager

Cc: Eric Zeigler, Stantec Consulting Services