

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 23/24 June 2016**

**Response to Written Comments for Tesoro Viejo Master Mutual Water Company,
Tesoro Viejo Wastewater Treatment Facility
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 23/24 June 2016, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of Waste Discharge Requirements (WDRs) for the Tesoro Viejo Master Mutual Water Company's Wastewater Treatment Facility in Madera County. This document contains responses to written comments received from interested parties regarding the Tentative WDRs (TWDRs) circulated on 6 April 2016. Written comments from interested parties were required by public notice to be received by the Central Valley Water Board by 6 May 2016 to receive full consideration. Comments were received from the Central Valley Clean Water Association (CVCWA) on 6 May 2016.

Written comments are summarized below, followed by responses from Central Valley Water Board staff. Based on the comments, Central Valley Water Board staff has made no changes to the TWDRs. Staff however, has made a few minor changes to improve clarity and fix typographical errors.

CENTRAL VALLEY CLEAN WATER ASSOCIATION (OR CVCWA) COMMENTS

CVCWA – COMMENT No. 1: Effluent Limitations C.1 includes an effluent limit of 10 mg/L as a monthly average for total nitrogen. CVCWA comments that an effluent limit for total nitrogen is inappropriate since there is no water quality objective for total nitrogen. In addition, CVCWA states that while there is a primary maximum contaminant level (MCL) for nitrate an effluent limit for total nitrogen will not necessarily translate to obtaining the target nitrate levels.

RESPONSE: The proposed wastewater treatment facility (WWTF) will be an activated sludge treatment plant that will provide tertiary treatment with nitrogen reduction and UV disinfection to produce a high quality effluent for unrestricted reuse. The effluent limit of 10 mg/L for total nitrogen will ensure proper operation of the treatment system for nitrogen reduction and was proposed by the Discharger and included in its antidegradation analysis. Title 22 sets a primary MCL for nitrate as nitrogen of 10 mg/L to protect human health. While not a water quality objective, total nitrogen is the sum of nitrate and nitrite as well as organic nitrogen compounds in the wastewater, which can convert to nitrate in the soil. Nitrate is relatively mobile and can percolate to groundwater and degrade groundwater quality. Setting an effluent limit for total nitrogen as proposed by the project proponent will ensure that the contribution of nitrogen from the discharge will not contribute to nitrate concentrations in groundwater in excess of the primary MCL. Therefore, no change was made.