

Response to Comments
On
Tentative Amendment (dated May 19, 2015) to Order No. R4-2014-0033 (adopted on March 6, 2014)
Calleguas Municipal Water District, Regional Salinity Management Pipeline (RSMP)
NPDES Permit No. CA0064521, CI No. 9404

This Table (matrix) summarizes comments received from interested parties with regard to the above-referenced tentative amendment. Each comment presented has a corresponding Regional Water Board staff response and corresponding action taken, if any.
(Additions are underlined, and deletions are lined over.)

Agency	#	Comment	Response to Comment	Action Taken
Letter dated June 19, 2015 from Calleguas Municipal Water District (CMWD)				
Clarifications and Corrections				
CMWD	1	Page 4 - Section III.A Change "spills or other sources" to " <i>spills or sources other than those listed on page F-5 - Section II.A</i> ". Reason: Clarification to further define the proposed amended operation of RSMP	The sentence has been revised as follows: "The discharge of wastes from accidental spills or other sources <u>other than those listed on page F-5 – Section II.A</u> is prohibited."	Changes have been made.
CMWD	2	Pages 11, 12, A-7, A-9, and E-2 All references to California Department of Public Health or CDPH should be changed to <i>Division of Drinking Water or DDW</i> Reason: Change in conditions since permit renewal effective date of May 1, 2014	In the 2014 State reorganization, the Environmental Laboratory Accreditation Program (ELAP) was transferred to the State Water Board, Drinking Water Division. However, Bacteriological standards for coast water adjacent to public beaches are still regulated by CDPH. Therefore, CDPH on pages 11, 12, and A-7 remains unchanged. Other referenced to ELAP on pages A-9 and E-2 have been changed to "State Water Board, Drinking Water Division."	Changes have been made.
CMWD	3	Page 17 - Section 2.a Change to reflect previous requirement for TRE, " <i>The Discharger was required to submit to the Regional Water Board an Initial Investigation TRE work plan (1-2 pages) within 90 days of the May 1, 2014 permit renewal effective date.</i> " Reason: Clarification to acknowledge a past deadline	The sentence has been revised as follows: "The Discharger <u>was required to</u> shall submit to the Regional Water Board an Initial Investigation TRE workplan (1-2 pages) within 90 days of the <u>May 1, 2014 permit</u> effective date of this permit. "	Changes have been made.
	4	Page 17 - Section 2.b Change to reflect previous requirement for Mixing Zone Study work plan, " <i>The Discharger was required to develop and submit to the Los Angeles Regional Water Board for review a work plan detailing how the Discharger will conduct a Mixing Zone Study, within 90 days of the March 6, 2014 permit renewal adoption date</i> "	The sentence has been revised as follows: "The Discharger <u>was required to</u> shall develop and submit to the Los Angeles Regional Water Board for review a work plan detailing how the Discharger will conduct a Mixing Zone Study, within 90 days <u>of the March 6, 2014 permit</u>	Changes have been made.

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		Reason: Clarification to acknowledge a past deadline	adoption date after the adoption of this permit.”	
CMWD	5	Page 17 - Section 2.c Change to reflect previous requirement for Sediment Loading Study work plan, “ <i>The Discharger was required to develop and submit to the Los Angeles Regional Water Board for review a plan detailing how the Discharger will conduct a sediment loading study, within 90 days of the March 6, 2014 permit renewal adoption date</i> ” Reason: Clarification to acknowledge a past deadline	The sentence has been revised as follows: “The Discharger was required to shall develop and submit to the Los Angeles Regional Water Board for review a plan detailing how the Discharger will conduct a sediment loading study, within 90 days of the March 6, 2014 permit adoption date after the adoption of this permit.”	Changes have been made.
CMWD	6	Page 17 - Section 3, first paragraph Change to reflect previous requirement for SWPPP and BMPP, “ <i>The Discharger was required to develop and submit, within 90 days of the May 1, 2014 permit renewal effective date.</i> ” Reason: Clarification to acknowledge a past deadline	The sentence has been revised as follows: “The Discharger was required to shall develop and submit, within 90 days of the <u>May 1, 2014 permit effective date</u> effective date of this Order. ”	Changes have been made.
CMWD	7	Page 17 - Section 3, last paragraph Change to reflect previous requirement for SWPPP and BMPP, “ <i>The Discharger was required to implement their SWPPP and BMPP within 10 days of the approval by the Executive Officer or no later than 90 days of the May 1, 2014 permit renewal effective date to the Los Angeles Regional Water Board whichever comes first.</i> ” Reason: Clarification to acknowledge a past deadline	Since the SWPPP and BMPP was required to be submitted to the Regional Water Board within 90 days of the May 1, 2014, the permit effective date of Order No. R4-2014-0033, the “no later than 90 days after submission” is referred to a date within 90 days of the effective date of Order No. R4-2014-0033. Therefore, the sentence has been revised as follows: “The Discharger was required to shall implement their SWPPP and BMPP within 10 days of the approval by the Executive Officer or no later than 90 days after submission to the Los Angeles Regional Water Board, whichever comes first.”	Changes have been made.
CMWD	8	Page E-8 - Footnote 14 Per the Calleguas letter to RWQCB staff dated April 30, 2015, change Footnote 14 to, “ <i>Analysis for uranium shall be conducted only if gross alpha results for the same sample exceed 15 pCi/L, or beta greater than 50 pCi/L. If the uranium result is greater than 20 pCi/L,</i>	The Footnote 14 has been revised as proposed. “ Analysis for combined radium-226 & 228 shall be conducted only if gross alpha results for the same sample exceed 15 pCi/L or beta greater than 50 pCi/L. If radium-226 & 228 exceeds 5 pCi/L, analyze for tritium, strontium-90 ”	Changes have been made.

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		<p><i>analysis for radium-226 & 228 shall be conducted. If the combined radium-226 & 228 exceeds 5 pCi/L, analyze for tritium and strontium-90.</i></p> <p>Reason: Clarification of existing permit requirements to be implemented at RWQCB staff discretion.</p>	<p>and uranium. Analysis for uranium shall be conducted only if gross alpha results for the same sample exceed 15 pCi/L, or beta greater than 50 pCi/L. If the uranium result is greater than 20 pCi/L, analysis for radium-226 & 228 shall be conducted. If the combined radium-226 & 228 exceeds 5 pCi/L, analyze for tritium and strontium-90.</p>	
CMWD	9	<p>Page E-11 - Section 7</p> <p>Change to reflect previous requirement for TRE, <i>“The Discharger was required to prepare or update and submit a generic Initial Investigation TRE Work Plan (1-2 pages) within 90 days of the May 1, 2014 permit renewal effective date, to be ready to respond to toxicity events.”</i></p> <p>Reason: Clarification to acknowledge a past deadline</p>	<p>The sentence has been revised as follows: “The Discharger was required to shall prepare or update and submit a generic Initial Investigation TRE Work Plan (1-2 pages) within 90 days of the May 1, 2014 permit effective date, to be ready to respond to toxicity events.”</p>	Changes have been made.
CMWD	10	<p>Pages E-17 through E-19</p> <p>Calleguas is required to submit Discharge Monitoring Reports (DMR) and Self-Monitoring Reports (SMR). After the Permit was adopted, Calleguas was directed to submit all SMRs and DMRs electronically. In addition, while monthly data is required to be filled out, CIWQS does not allow the DMRs to be submitted monthly. They are submitted quarterly.</p> <p>Reason: Clarification of existing permit requirements to be implemented at RWQCB staff discretion</p>	<p>The SMRs are to be submitted quarterly as indicated in the permit. No submittal frequency for DMRs is specified in the permit. Please follow the directions given by the State Water Board regarding the DMR submittal requirements.</p>	None required.
CMWD	11	<p>Page E-20 - Section X.D.2</p> <p>Change to reflect previous requirement for plan submittal, <i>“Within 90 days of the May 1, 2014 permit renewal effective date, the Discharger was required to submit the following required by Special Provisions of this Order to the Regional Water Board:”</i></p> <p>Reason: Clarification to acknowledge a past deadline</p>	<p>The sentence has been revised as follows: “Within 90 days of the May 1, 2014 permit effective date of this permit, the Discharger was is required to submit the following required by Special Provisions of this Order to the Regional Water Board:”</p>	Changes have been made.
CMWD	12	<p>Page E-20 - Section X.D.3</p> <p>Change to reflect previous requirement for work plan submittal,</p>	<p>The sentence has been revised as follows: “Within 90 days after the March 6, 2014 permit adoption</p>	Changes have been

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		<p><i>“Within 90 days of the March 6, 2014 permit renewal adopted date, the Discharger was required to submit the following required by Special Provisions of this Order to the Regional Water Board:”</i></p> <p>Reason: Clarification to acknowledge a past deadline.</p>	<p>date adoption of the permit, the Discharger iswas required to submit the following required by Special Provisions of this Order to the Regional Water Board:”</p>	made.
CMWD	13	<p>Page F-3 - Section I.A</p> <p>Change “that will collect” to “collects”</p> <p>Reason: Change in conditions since permit renewal effective date of May 1, 2014</p>	The sentence has been revised as proposed.	Changes have been made.
CMWD	14	<p>Page F-4 - Section I.E.2</p> <p>Replace “to agricultural users in PVCWD’s service area” with “through the PVCWD distribution system to agricultural users within the Oxnard Plain.”</p> <p>Reason: Clarification to further define the proposed amended operation of RSMP</p>	<p>The sentence has been revised as proposed:</p> <p><u>“Allow use of the RSMP to convey a blend of desalinated recycled water from the AWPf and brine discharge from Camrosa’s Round Mountain Water Treatment Plant to agricultural users in PVCWD’s service area through the PVCWD distribution system to agricultural users within the Oxnard Plain for irrigation of crops.”</u></p>	Changes have been made.
CMWD	15	<p>Page F-4, Section I.F</p> <p>Replace “to the PVCWD’s irrigation distribution system” with “to agricultural users within the Oxnard Plain through the PVCWD distribution system.”</p> <p>Reason: Clarification to further define the proposed amended operation of RSMP</p>	<p>The sentence has been revised as proposed:</p> <p><u>“Separate WDRs will authorize additional discharge points in order to connect the RSMP to agricultural users within the Oxnard Plain through the PVCWD’s irrigation distribution system.”</u></p>	Changes have been made.
CMWD	16	<p>Page F-5 - Section II, last paragraph before Section A</p> <p>Change to “The remaining portions of Phase 2 (i.e., 2B, 2D, and 2E) are expected to be online within the timeframe of the next permit cycle, by 2018. Phases 2B and 2D are currently under construction and Phase 2E is in design.”</p> <p>Reason: Change in conditions since permit renewal effective date of May 1, 2014</p>	<p>The sentence has been revised as proposed:</p> <p>“The remaining portions of Phase 2 (i.e., 2B, 2D, and 2E) are in design and expected to be online within the timeframe of the next permit cycle, by 2018. <u>Phases 2B and 2D are currently under construction and Phase 2E is in design.</u>”</p>	Changes have been made.

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CMWD	17	Page F-5 - Section II, last sentence before Section A Change to, “ <i>CMWD began discharging from the RSMP to the Hueneme Outfall in September 2014.</i> ” Reason: Change in conditions since permit renewal effective date of May 1, 2014	The sentence has been revised as proposed: “ CMWD anticipates discharge from the RSMP to the Hueneme Outfall will commence in 2014. <u>CMWD began discharging from the RSMP to the Hueneme Outfall in September 2014.</u> ”	Changes have been made.
CMWD	18	Page F-6 - Section 2.A, last sentence on page PHWA has begun discharging its concentrate streams into the RSMP through their BWRDF. Please change from “Once PHWA begins” to “ <i>PHWA has begun discharging</i> ”. Reason: Change in conditions since permit renewal effective date of May 1, 2014	The sentence has been revised as proposed: “ Once PHWA begins <u>PHWA has begun</u> discharging its concentrate streams into the RSMP, the Agency will <u>changed</u> its operations to ensure dechlorination occurs before discharge.”	Changes have been made.
CMWD	19	Page F-7 - Section 2.A, first sentence on page Change from “will change its operations” to “ <i>changed its operations to ensure dechlorination</i> ”. Reason: Change in conditions since permit renewal effective date of May 1, 2014	The sentence has been revised as proposed: Please refer to the change in Item 18 above.	Changes have been made.
CMWD	20	Page F-7 - Section 2.A, second to last paragraph The permit states “AWPF water discharge to the RSMP that is not used by Pleasant Valley irrigation will be discharged at the RSMP outfall and must comply with the effluent limits contained in this Order. Change to “ <i>AWPF water discharged to the RSMP that is not delivered to the PVCWD irrigation system will be discharged at the RSMP outfall and must comply with the effluent limits contained in this Order.</i> ” Reason: Clarification to further define the proposed amended operation of RSMP	The sentence has been revised as proposed: “ AWPF water discharged to the RSMP that is not used by delivered to the PVCWD-Pleasant Walley irrigation will be discharged at the RSMP outfall and must comply with the effluent limits contained in this Order. ”	Changes have been made.
CMWD	21	Page F-12 - Section II.E The permit states, “The remaining portions of Phase 2 (i.e., 2B, 2D, and 2E) are in design and expected to be online within the timeframe	The sentence has been revised as proposed: “The remaining portions of Phase 2 (i.e., 2B, 2D, and 2E) are in design and expected to be online within the timeframe	Changes have been made.

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		<p>of the next permit cycle, by 2018.” Change to “<i>The remaining portions of Phase 2 (i.e., 2B, 2D, and 2E) are expected to be online within the timeframe of the next permit cycle, by 2018. Phases 2B and 2D are currently under construction and Phase 2E is in design.</i>”</p> <p>Reason: Change in conditions since permit renewal effective date of May 1, 2014</p>	<p>of the next permit cycle, by 2018. <u>Phases 2B and 2D are currently under construction and Phase 2E is in design.</u>”</p>	
CMWD	22	<p>Page F-16 - Section IV, second paragraph</p> <p>Change the sentence “The RSMP has not commenced discharging” to read: “<i>The RSMP began discharging in September of 2014.</i>”</p> <p>Reason: Change in conditions since permit renewal effective date of May 1, 2014</p>	<p>The sentence has been revised as proposed:</p> <p>“The RSMP <u>began discharging in September of 2014.</u>has not commenced discharging at the time of the drafting of this Fact Sheet.”</p>	Changes have been made.
CMWD	23	<p>Page F-37- Section VI.B.2.b</p> <p>Change to, “The Discharger was required to develop and submit to the Los Angeles Regional Water Board for review a work plan detailing how the Discharger will conduct a Mixing Zone Study.”</p> <p>Reason: Clarification to acknowledge a past deadline</p>	<p>The sentence has been revised as proposed:</p> <p>“The Discharger <u>was</u> required to develop and submit to the Los Angeles Regional Water Board for review a work plan detailing how the Discharger will conduct a Mixing Zone Study.”</p>	Changes have been made.
CMWD	24	<p>Page F-37- Section VI.B.2.c</p> <p>Change to, “The Discharger was required to develop and submit to the Los Angeles Regional Water Board for review a work plan detailing how the Discharger will conduct a Sediment Loading Study.”</p> <p>Reason: Clarification to acknowledge a past deadline</p>	<p>The sentence has been revised as proposed:</p> <p>“The Discharger <u>was</u> required to develop and submit to the Los Angeles Regional Water Board for review a work plan detailing how the Discharger will conduct a Sediment Loading Study.”</p>	Changes have been made.
CMWD	25	<p>Page G-1 - Section I</p> <p>Change to, “A storm water pollution prevention plan (SWPPP) was required to be developed and submitted to the Regional Water Board within 90 days of the March 6, 2014 permit renewal adoption date.”</p> <p>Reason: Clarification to acknowledge a past deadline</p>	<p>The sentence has been revised as follows:</p> <p>“A storm water pollution prevention plan (SWPPP) <u>was required to be</u>shall be developed and submitted to the Regional Water Board within 90 days <u>of the March 6, 2014 permit adoption date.</u>following the adoption of this Order.”</p>	Changes have been made.