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May 31, 2006

Michael P. McCann, Supervising Engineer
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court,
San Diego, CA 92123
Submitted by email to Victor Vasquez vvasquez@waterboards.ca.gov

Subject: Tentative Order for Descanso Maintenance Station (No. R9-2006-0063);
Refer to: SCR:01-01431.02:VASQV

Dear Mr. McCann:

Thank you for the opportunity to comment on the draft tentative order (TO) to establish waste discharge requirements for the Descanso Maintenance Station (hereinafter facility). This facility is located at 24171 Japatul Valley Road near the town of Descanso in south San Diego County. Specific comments are provided with the attachment to this letter.

This proposed TO appears directed at a much larger facility than the Descanso Maintenance Station and will consequently result in the unnecessary expenditure of state funds. This is a small facility used intermittently by eight employees during working hours. They produce an estimated 160 gallons per day (GPD) of domestic wastewater. In addition, vehicles are washed at the facility producing an estimated 250 gallons per week of washrack water. The washrack is for vehicle exterior cleaning, with only occasional use of detergents, and includes neither steam cleaning nor undercarriage cleaning. In other words, the volume and characteristics will be similar to that produced by a single family using a septic tank and leachfield.

The proposed requirements, however, appear more appropriate for a publicly-owned treatment works or large industrial facility. The *Biosolids Specifications* appear to be standard permit requirements for POTWs, and are not appropriate for a small septic tank and leach field. Also, the monitoring requirements include an extensive list of priority pollutants such as pesticides (Dinoseb, Molinate, Simazine) and industrial chemicals (Butylbenzyl phthalate, 1,2-dibromo-3-Chloropropane, etc.) that are very unlikely to be present. In addition, the draft TO requires construction of three groundwater monitoring wells. All of these onerous requirements for such a small facility would require very expensive initial and ongoing expenses that cannot be justified for what is essentially a very limited discharge.

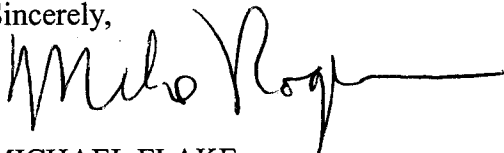
Finally, the Department is concerned that the proposed TO may deviate from regulations being developed by the State Water Board for onsite wastewater treatment systems (OWTS) under Assembly Bill 885. We would like the opportunity to follow the OWTS regulations, as appropriate, once they are finalized.


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We suggest that these requirements be held in abeyance while we work with the State Board staff involved in developing the OWTS to identify appropriate interim specifications for remote Department maintenance facilities like the Descanso facility.

If you would like additional information regarding the facility, please call our District NPDES coordinator, Chi Vargas, at (619) 688-3626. If you have questions regarding these comments, please call Mike Rogers of my office at (916) 653-3738.

Sincerely,



 MICHAEL FLAKE
Chief
Office Storm Water Policy

Cc: Victor Vasquez, RWQCB

**ATTACHMENT
SPECIFIC COMMENTS ON PROPOSED TENTATIVE ORDER FOR DESCANSO MS**

B. Discharge Specifications

#3 – “Septic tank effluent prior to discharge to subsurface disposal areas at the facility shall not contain constituents in excess of the following limitations:”

CONSTITUENT	Units	12-MONTH AVERAGE	DAILY MAXIMUM
pH	pH Units	Between 6.0 and 9.0 at all times	
Total Dissolved Solids	mg/L	7.0	3.9
Boron	mg/L	1.0	1.5
Total Nitrogen (as N)	mg/L	12	20
Methylene Blue Active Substances (MBAS)	mg/L	0.45	0.75
Sulfate (SO4)	mg/L	250	375

Table footnote #3 - The effluent limitations for boron and total nitrogen are enforceable only when groundwater monitoring indicates that upgradient groundwater exceeds the performance requirements indicated in Discharge Specification Provision B.4.

Comment: The TDS limitations of 7 and 3.9 mg/L appear to be in error. The TDS objective for the hydrologic area in which the facility is located (Barret Lake HA) is 500 mg/L (concentration not to be exceeded more than 10% of the time during any one year period).

Comment: TDS, Boron, and sulfate will be present in concentrations characteristic of the groundwater from the facility’s well. These parameters may increase slightly due to concentration caused by evaporation but are not likely to be added by the facility. We see no reason for limiting them since they are very unlikely to increase significantly over background concentrations. In addition, their concentration is not controllable by actions taken at the facility.

Problems may arise if the groundwater used to supply the facility contains concentrations near the limits. In this situation, a minor amount of evaporation may cause the effluent to exceed the limits.

#4 - Each groundwater sample taken from each monitoring well downgradient of the leachfield shall not contain constituents in excess of the following performance requirements when groundwater sample(s) from upgradient monitoring well(s) do not exceed the performance requirements:

CONSTITUENT	Units	12-MONTH AVERAGE	DAILY MAXIMUM
Boron	mg/L	1.0	1.5
Total Nitrogen (as N)	mg/L	9	15

Comment: We do not understand table footnote #3 (for discharge specification #3) in conjunction with this table for specification #4. The footnote appears to be saying that if upgradient groundwater has high concentration of boron or nitrogen then effluent limitations for boron and total nitrogen are enforceable. However, in these situations the effluent will always be in violation of the boron and likely the nitrogen limitations. The intent in table footnote #3 may have been to say “downgradient” rather than “upgradient.”

Comment: We also do not understand the rationale for setting the downgradient total nitrogen limitation at 9 mg/L. The Basin Plan objective is 10 mg/L (not to be exceeded more than 10% of the time during any one year period). A limitation of 10 mg/L would seem more appropriate.

#5 – “Vehicle washrack wastewater samples collected after the oil/water separator and prior to the septic tank/ leachfield system shall not contain constituents in excess of the following limitations:”

CONSTITUENT	Units	DAILY MAXIMUM
Di (2-ethylhexyl) phthalate	mg/L	0.004
Tetrachloroethylene	mg/L	0.005

Comment: Di (2-ethylhexyl) phthalate is a common laboratory contaminant and sometimes appears in analyses as a lab artifact. We believe it was not actually present at the facility and we would like the opportunity to eliminate it as a regulated and monitored constituent if subsequent monitoring does not detect it.

Comment: Tetrachloroethylene is not a common lab contaminant but we are unsure of why it would be present. We also request that this constituent be eliminated as a monitored constituent if subsequent monitoring does not detect it.

C. Facility Design and Operation Specifications

#2 – Proper operation. This specification includes a number of requirements including:

“Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls including appropriate quality assurance

procedures.”

Comment: Many of the specifications in this section appear intended for a larger facility rather than a septic tank and disposal field. This maintenance facility does not have a laboratory and process controls, which are required in this specification for proper operation. The specifications should be appropriate for this type of facility.

Comment: This specification refers to the “Recycled Water Agency” rather than to the “Descanso Maintenance Station”.

#3 – Operation Manual, #4 Flood Protection, and #5 Runoff Protection.

Comment: We question whether these specification relevant for a septic tank and leach field.

D. Biosolids Specifications

Comment: These specifications including comprehensive monitoring, record keeping, and reporting are applicable to publicly owned treatment plants and possibly to drinking water treatment facilities. They are not or should not be applicable to solids pumped from septic tanks. Typically, septage is periodically removed by vacuum-pump tank trucks and disposed of at a POTW with a septage receiving station. This usual process would be prohibited by the specifications which require that the solids removed be “disposed of in a municipal solid waste landfill, reused by land application, or disposed of in a sludge-only landfill...”

Monitoring and Reporting Program for Order R9-2006-0063

Comment: As discussed earlier in this letter, the monitoring requirements are excessive for a minor discharge such as that from the Descanso facility.

- The requirement to install three monitoring wells is excessive – we question whether any monitoring is necessary for such a small discharge. If it is necessary, it should be acceptable to install one downgradient well. An upgradient well should only be required if monitoring indicates that upgradient constituent concentrations are significant (i.e., potentially contributing to exceedances).
- The list of monitored constituents is also excessive. Many of these constituents are very unlikely to be present in the effluent. The rationale for these constituents has not been documented.
- The monitoring frequency is excessive. For example, groundwater monitoring for many of the constituents (boron, nitrogen, TDS, nitrite, etc.) is as frequent or more frequent than the groundwater monitoring required of the Recycled Water Agency in proposed TO R9-2006-0064 (page 37, item #3)

"E. SEWAGE SOLIDS AND BIOSOLIDS

1. A record of the type, quantity, manner, and location of disposal of all solids removed in the course of sewage treatment shall be maintained by the discharger and be submitted to the Regional Board annually.
2. A biosolids certification, certifying that the disposal of biosolids complies with existing Federal and State laws and regulations, including permitting requirements and technical standards included in 40 CFR 503 shall be submitted."

Comment: These requirements appear more appropriate for a POTW than the Descanso facility.