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Central Coast Regional Water Quality Control Board
c/o Jon Rokke, jon.rokke@waterboards.ca.gov

Dear Members of the Board:

Re: CAMBRIA COMMUNITY SERVICES DISTRICT, SAN LUIS OBISPO COUNTY – HEARING NOTICE AND AVAILABILITY OF PROPOSED UPDATE OF WASTE DISCHARGE AND WATER RECYCLING REQUIREMENTS ORDER NO. R3-2014-0050

1. Time and Hours of Operation. The CCSD Board of Directors changed their Water Shortage declaration from Stage 3 to Stage 2 (partial and without surcharges) at their meeting on May 25, 2017. They would need to reinstate the Stage 3 in order to turn on the Emergency Water Supply (EWS) plant again, if they do not yet have a Coastal Development Permit.

In the documents before you for this item, several phrases referring to the operating time period of the EWS plant need clarification.

a. On p. 4 of MONITORING AND REPORTING PROGRAM NO. R3-2014-0050 (MRP), these phrases are used:

- “Prior to startup of the Cambria Advanced Water Treatment Plant (AWTP)....”
- “During the first year of operation of the Cambria AWTP”

On MRP-9 appears this sentence, “CCSD shall take these samples monthly for the first year of Operation.”

This footnote is another example of clarification needed on this point. “¹⁰ If no problem is detected, analysis of nitrogen can be reduced to weekly after 12 months of data collection” (MRP-16).

What exactly does first year of operation mean? Here are two possibilities:

the first year of operating all 365 days

or

during the first year in which the plant operates at all, beginning with the next startup date?

b. Does the “startup date” refer to the next time the plant is turned on after June 2018? If not, it could be construed as referring to the plant’s initial start-up date in 2015.

c. This statement is simply not true:

21. Time and Hours of Operation - The EWS typically operates 8-hours per day, 5-days per week for 6-months of the year when drought conditions are most severe. The facility may operate longer hours in the future, at the discretion of the Discharger" (WASTE DISCHARGE REQUIREMENTS AND WATER RECYCLING REQUIREMENTS, p. 8, hereafter WDRWRR).

The plant has operated so rarely that the word "typically" is inaccurate. The duration of operation in any extended time period poses issues of reliability, sustainability, and safety. Intend is different from accomplish. Since additional operation is "at the discretion of the Discharger" [CCSD], this is an even greater concern.

2. Staff

One element of that greater concern has to do with fiscal responsibility of CCSD and adequate staff for this project. Since the Requirements under consideration include adequate funding and staffing, ⁱ how is "adequate" defined here and by whom?

The MONITORING AND REPORTING PROGRAM NO. R3-2014-0050 states, "ii. The OMMP includes staffing levels with applicable certification levels for facility operations personnel" (MRP-4).

Reference is made to the DDW recommendation.

The DDW recommends the treatment facility be classified as a T3, which would require a Grade T3 chief operator and Grade T2 shift operator. The chief operator is the person who has overall responsibility for the day-to-day operation of the treatment facility. The shift operator is the person in direct charge of the operation of the treatment facility for a specific period of a day (WDRWRR-23).

The CCSD has had difficulty filling the position of "SWF-CPO" and has not entertained the hiring of an additional shift operator. Since covering a shift in the fire department entails hiring three people, I doubt the standard can be met by CCSD for the EWS plant.

The defining of staff and funding adequacy is crucial.

3. OMMP updating and reporting

This is stated under Reporting Requirements: "4. The existing OMMP shall be updated to accurately reflect the operations of the Cambria AWTP, and the date the plan was last reviewed" (MRP-12).

The discussion of the procedure to update the OMMP does not clarify when updating is needed. "Based on this experience and anytime operational changes are made, the OMMP shall be updated" (MRP-4).

Both “operational” and “changes” are vague.

It is also not clear whether changes made that are “subject to an adaptive management plan” also therefore fall under the OMMP.

For example, “... water discharged to San Simeon Creek to prevent dewatering of the freshwater lagoon. The rate of discharge to the Lagoon is subject to an adaptive management plan, and may vary” (WDRWRR-9). “The rate of discharge into the Lagoon” is a major component of the EWS plant, but this is the only statement about the ADP in these documents.

4. New Development. In the Staff Report for these items, the following statement is made about the EWS plant and new development.

CCSD’s Board certified a Supplemental Environmental Impact Report (SEIR) for this project on July 27, 2017. The SEIR contains project modifications including changing the purpose of the project from a facility intended for use during emergency drought conditions to supply water to existing residents of Cambria, to an everyday facility which would supply enough water to accommodate new development. The SEIR refers to the project as the “Sustainable Water Facility” instead of the “Emergency Water Supply” project. The updated Order continues to use the EWS nomenclature consistent with the Emergency Coastal Development Permit (SR-5).

Thank you for continuing to use EWS as the name of this plant.

Is it the judgment of the RWQCB that the changing of the purpose of the plant by the CCSD and the production of more treated water will keep to the Requirements specified in the actions before the Board in June 2018? Now 3524 residential units are customers served.ⁱⁱ Does the addition of more than 1000 new residential connectionsⁱⁱⁱ and the consequent increase in water production stay within the Requirements approved in June 2018?

5. Some Excellent aspects (not a comprehensive list)

a. The consistent use of the strong word “shall” with regard to what is required is excellent. The CCSD administration’s tendency is to interpret requirements as suggestions.

b. Requiring of CCSD written protocols for monitoring reports is excellent. “ 3. Though not required to be submitted in the monitoring reports unless specifically requested by the Central Coast Water Board or the DDW, the CCSD shall have in place written sampling protocols” (MRP-6).

c. The same pertains to the required retention of documentation.

The CCSD shall retain the QA/QC documentation in its files for three years and make available for inspection and/or submit them when requested by the Central Coast Water Board or the DDW. Proper chain of custody procedures shall be

followed, and a copy of this documentation shall be submitted with the quarterly report (MRP-6f.).

d. Excellent too is the comprehensive listing of multiple sources of effluent and influent, the including of membrane integrity daily testing, UV intensity, etc. and the required testing and reporting (MRP-8f.).

The specifications in IV. Monitoring Programs, beginning on MRP-13, are explicit, clear, and required. Excellent!

e. In the requirement for Annual Summary Reports, the inclusion of water policy components and personnel information is excellent (in addition to technical quality monitoring, etc.).

h. The estimated quantity and quality of the recycled water to be utilized for the next calendar year;

i. A list of the analytical methods used for each test and associated laboratory quality assurance/quality control procedures shall be included. The report shall identify the laboratories used by the CCSD to monitor compliance with this Order, their status of certification, and provide a summary of proficiency test;

j. A list of current operating personnel, their responsibilities, and their corresponding grade of certification... (MRP 11f.).

f. Five-year evaluation

The 5-Year Engineering Report requires: "b. Evaluation of the ability of CCSD to comply with all regulations and provisions over the following five years" (MRP-13).

5 year planning has certainly not been a component of the CCSD over the past two decades, other than the creation, revision, and frequent ignoring of the Water Master Plan. Self-evaluation of performance has not been strong either. Thus, this requirement will, we hope, impel improvement in this regard.

I send my gratitude to the RWQCB staff for persisting in this work over several years. Oversight of community service districts certainly protects the public, especially people who live in, work in, or visit Cambria. My gratitude flows to you, the members of the Board, as well. Public service these days needs all the quality it can get, and you keep the standard high.

Sincerely yours,

Elizabeth Bettenhausen

cc: Jon Rokke
Jennifer Epp



ENDNOTES

ⁱ “6. The CCSD shall at all times properly operate and maintain all treatment facilities and control systems (and related appurtenances) that are installed or used by the CCSD to achieve compliance with the conditions of this Order. 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)” WDRWRR-20.

ⁱⁱ <http://www.cambriacsd.org/assets/november-december-2017-grand-totals-page.pdf>

ⁱⁱⁱ The 12.4 Errata to the Subsequent EIR states that the plant would produce water for 4,650 residential dwelling units.

Desalination Standard CW-4D Sustainable Water Facility and Mitigation Measures and (Project Modifications)

Consistent: The Project treats brackish groundwater at an inland location and does not involve a seawater desalination facility, which was under consideration when the CW-4D was developed. Regardless, mitigation measures have been developed as part of this SEIR to minimize adverse environmental impacts to coastal resources. The Project is designed to be consistent with all LCP policies, Coastal Act policies, and NCAP standards. The SWF is designed to minimize discharge of hazardous constituents into the San Simeon Creek Lagoon, thereby limiting potential impacts to the ocean; see Section 5.5, *Hydrology and Water Quality*. The Project is designed to provide a reliable water supply system that can accommodate the water demands for visitor serving demands and a maximum buildout within the existing CCSD service boundary at 4,650 existing and future (CCSD wait list) residential dwelling units, pursuant to the NCAP and mitigation set forth in the CCSD’s certified WMP PEIR; see Section 6.35, *Growth-Inducing Impacts*. (p. 66)

http://www.cambriacsd.org/assets/sec-12-04_errata.pdf