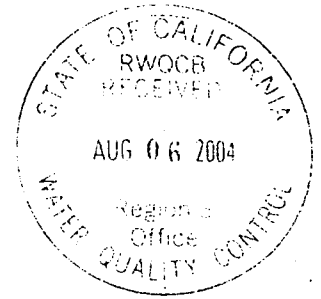




**SOUTH COUNTY REGIONAL
WASTEWATER AUTHORITY**



August 4, 2004

7351 ROSANNA ST.

GILROY, CA 95020

(408) 846-0400

California Regional Water Quality Control Board, Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401-7906
Attention: Mr. Matthew Keeling

**Subject: Comments on Tentative Draft WDR Order No. R3-2004-0099,
NPDES Permit No. CA0049964, South County Regional Wastewater
Authority.**

Dear Mr. Keeling,

The South County Regional Wastewater Authority (SCRWA) has reviewed the subject draft Order along with the associated Staff Report and Monitoring and Reporting Program attached to your letter dated July 14, 2004. The tentative draft Order as it stands is acceptable to SCRWA. We do request consideration of several editorial items and adjustments to the monitoring program. Our comments are as follows:

1. It is suggested that the reference on Table MRP-4 (pages 2 and 3 in the draft MRP), to "Food Process Ponds (used for municipal wastewater disposal in winter)" be changed to "Former Food Processor Ponds" because the regulatory distinction between the Food Processor and Municipal disposal areas has been eliminated, as recognized in existing Order No. 99-29. We recognize that abruptly changing pond names may hinder interpretation of past records, and thus reference to "former food processor ponds" is appropriate.
2. In Table MRP-6 (page 3 in the draft MRP), the description of station SW3A should be "Farm drainage east of the East Ponds" rather than "east of the Shriner Ponds".
3. In Table MRP-7 (page 4 in the draft MRP), we suggest that the heading for column 5 should say "SW1 to SW10" rather than "SW1-SW11" because appropriate monitoring for SW11 (consistent with footnote d) is called out in column 6.

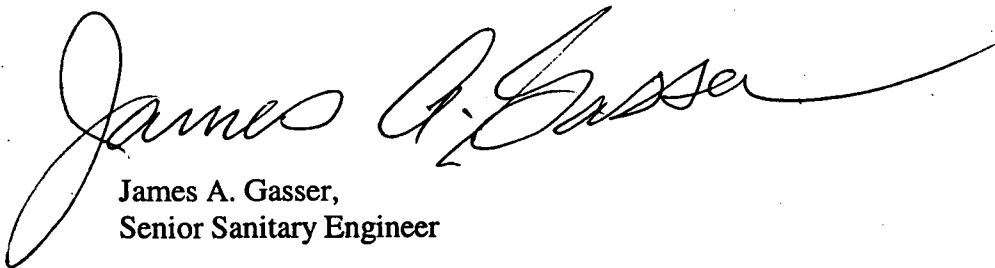
Item No. 20 Attachment No. 5
September 10, 2004 Meeting
SCRWWA WWTP

4. Table MRP-3 changes the list of constituents analyzed quarterly in the existing SCRWA land disposal system monitoring wells, deleting some wastewater-related parameters (e.g. BOD, COD, TKN, and ammonia) and adding others that tend to be more applicable to characterizing general water quality and irrigation suitability (e.g. alkalinity, bicarbonate, boron, carbonate, calcium, magnesium, manganese, fluoride, potassium iron, and zinc). While quarterly multiple-well sampling for parameters directly related to wastewater treatment activities may be appropriate, less intensive sampling should be sufficient to characterize the shallow aquifer mineral quality. We request that the additional parameters be reconsidered, or tested annually in a limited number of wells (e.g. MW3, MW5, MW10, MW13, and MW24.)

5. The current SCRWA monitoring program calls for total coliform analysis for tertiary treated (reclaimed) wastewater to verify disinfection efficiency for all bacteria originating in the wastewater, in accordance with CCR Title 22. However, the more selective fecal coliform test is used to detect 'bacteria of wastewater origin' in surface water samples to avoid interference from naturally occurring microorganisms. This distinction is correctly reflected in most of the tables in the draft Order. However, Table MRP-7 combines surface water and effluent monitoring requirements and lists only total coliform. It is suggested that a second line should be added so the fecal coliform test can be applied to the surface water samples while the more inclusive total coliform test is applied to the tertiary effluent.

We appreciate the efforts and attention to detail provided by the RWQCB staff during preparation of the tentative draft Order. We look forward to participating in the September 10 hearing and to the granting of a discharge permit consistent with the tentative draft Order.

Very Truly Yours,
South County Regional Wastewater Authority

A large, stylized handwritten signature in black ink, reading "James A. Gasser". The signature is written in a cursive style with a long, sweeping underline.

James A. Gasser,
Senior Sanitary Engineer

cc: R. Smelser (City of Gilroy)
J. Ashcraft (City of Morgan Hill)
A. Faber (Berliner Cohen)
C. Cain (MWH)