

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

SUPPLEMENTAL SHEET FOR REGULAR MEETING OF NOVEMBER 13-14, 2014
Prepared on November 5, 2014

ITEM NUMBER: 11

SUBJECT: Order No. R3-2014-0046, Revision of Waste Discharge Requirements for California Army National Guard - Camp Roberts Training Facility, San Luis Obispo and Monterey Counties

KEY INFORMATION

The proposed Waste Discharge Requirements' (WDRs) effluent limits are stricter than the existing WDRs' effluent limits. After the official written comment period closed and the agenda package was mailed, the Discharger requested interim transitional effluent limits to accommodate an in-process wastewater treatment plant upgrade. The Discharger also requested refinement of the leachate sampling requirements. Staff agrees that interim transitional effluent limits are appropriate and that leachate sampling requirements can be refined. Accordingly, this supplemental sheet responds to the Discharger's comments and revises the proposed draft WDRs.

COMMENTS

**Chris Rose, P.E., Project Manager, Avocet Environmental
On behalf of California Army National Guard - Camp Roberts**

1. Comment: The proposed WDRs' stricter effluent limits are appropriate for the upgraded wastewater treatment plant (WWTP); however the WWTP upgrades will not be completed until July 1, 2015. Until the upgrades are completed, the California Army National Guard (CA ARNG) proposes that the existing WDR Order No. R3-2004-0106's effluent limits be set forth as interim transitional effluent limits in the new WDR Order No. R3-2014-0046.

Staff Response: Staff agrees that interim transitional effluent limits are appropriate. The existing WWTP is currently incapable of meeting the proposed effluent limits. Interim transitional effluent limitations will give the discharger time to upgrade the WWTP. Once the new WWTP has been upgraded, the new, stricter effluent limits will take effect. The proposed WDRs have been revised, starting on page 7, as shown in underline-strikeout format on the following page:

Effluent Limits

3. Under normal circumstances, when Camp Roberts is not used to temporarily (up to 90 days) shelter the public during disasters, effluent discharged to the Main Garrison disposal ponds shall not exceed the following limitations: ^{ROWD}

Parameter	Value
BOD ₅	30 mg/L
Total Suspended Solids	30 mg/L
TDS	1250 mg/L
Sodium	340 mg/L
Chloride	240 mg/L
Sulfate	250 mg/L
Boron	3.5 mg/L
Nitrate (as N)	7.7 mg/L ¹
Total Nitrogen (as N)	10 mg/L ²

¹This Nitrate effluent limit serves as an interim limit and expires on June 30, 2015

²This Total Nitrogen effluent limit shall take effect starting on July 1, 2015

2. Comment: The proposed WDRs allow the WWTP to accept landfill leachate, should the need arise. The need would arise during an extremely unusual weather occurrence, when successive storms do not allow conventional leachate disposal at the landfill. In the event that CA ARNG would need to discharge landfill leachate at the WWTP, the proposed Monitoring and Reporting Program (MRP) includes a batch testing requirement for leachate prior to disposal at the WWTP. In a high volume precipitation scenario where multiple storms occur in a short period of time, it would not be possible to complete batch testing analyses fast enough to ensure compliance with leachate storage and handling regulations. The CA ARNG respectfully requests that the Central Coast Water Board consider periodic, predictive testing rather than batch confirmation testing. Periodic, predictive testing is a common leachate testing requirement found in landfill WDRs. In fact, the Camp Roberts landfill WDRs specify annual (in December) leachate sampling and analysis. Furthermore, the CA ARNG respectfully requests that the Camp Roberts landfill WDRs' annual (in December) leachate analysis results suffice for the purposes of leachate monitoring for WWTP disposal.

Staff Response: Staff agrees that periodic predictive testing is a common and appropriate practice. Staff agrees that the Camp Roberts landfill WDRs' annual (in December) leachate analysis results would suffice for the purposes of leachate monitoring for WWTP disposal. The proposed MRP's Leachate Monitoring section has been revised in underline-strikeout format as follows:

LEACHATE MONITORING

Prior to discharge of leachate to the Main Garrison WWTP, the CANG must demonstrate ~~through batch sampling~~ that the leachate from the Solid Waste Cell does not contain any chemicals of concern that could degrade state waters. ~~Batch s-~~Sampling should analyze for the following constituents/parameters...

RECOMMENDATION

Adopt Order No. R3-2014-0046 as proposed, including the above-mentioned revisions.

TJK

CIWQS Place 212962

126-01

P:\WDR\WDR Facilities\Monterey Co\California National Guard - Camp Roberts\2014 WDR Revision\Supplemental Sheet.docx