



CARPINTERIA
Sanitary District

5300 Sixth Street
Carpinteria, CA 93013

Phone (805) 684-7214 • Fax (805) 684-7213

July 20, 2017

Mr. John Robertson
Central Coast Regional Water Quality Control Board
895 Aerovista Place
Suite 101
San Luis Obispo, CA 93401

**Re: DISCHARGER COMMENTS ON DRAFT ORDER
WASTE DISCHARGE REQUIREMENTS ORDER NO. R3-2017-0032
NPDES PERMIT NO. CA0047364**

Dear Mr. Robertson:

The Carpinteria Sanitary District (District) discharges treated wastewater in accordance with the provisions of NPDES Permit No. CA0047364. On June 22, 2017 the District received a copy of Draft Waste Discharge Requirements Order No. R3-2017-0032 and notice that this Order would be considered at the Central Coast Regional Water Quality Control Board (Regional Board) hearing on September 21-22, 2017 in Santa Barbara.

Attached herewith, in tabular form, are the District's comments on the Draft Order and its attachments. Many of the comments address formatting or typographical errors, but several comments are substantive and should be thoroughly considered and addressed prior to final permit action by the Regional Board. The most significant item for consideration is related to newly incorporated recycled water provisions. A narrative discussion of this topic is provided below.

Planned Recycled Water Project Development

The District has been working collaboratively with the Carpinteria Valley Water District (CVWD) over the past two years to develop a recycled water project to provide a new drought-proof water supply for the Carpinteria Valley. With support from the State Water Resources Control Board (SWRCB) and the City of Carpinteria, the District and CVWD prepared a comprehensive Recycled Water Facilities Plan (April 2016).

Based on the plan findings, the project being pursued is an indirect potable reuse (IPR) project that will include a multiple barrier advanced water treatment (AWT) plant, groundwater injection wells and related infrastructure. Consistent with the SWRCB's Recycled Water Policy, the project is intended to maximize the beneficial reuse of recycled water. It is anticipated that the

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project will divert 100% of the facility's dry weather effluent flow to the proposed AWT plant for recycling.

Draft Order No. R3-2017-0032 includes Recycling Specifications, a newly defined point of discharge, and various other provisions and references to a future recycled water project. However, the provisions and references are to a conventional Title 22 project geared towards surface irrigation. Much of the newly incorporated language in the order and attachments is inapplicable to the project actually being developed.

At this time, the IPR project is moving towards the final design stage, with permitting and environmental review scheduled concurrently. Although the final decision by CVWD to move the project forward is still pending, the implementation timeline has project startup occurring well within the five-year term of Draft Order No. R3-2017-0032. In order to facilitate this important project, it is suggested that the Order be modified to address the planned operational changes at the District's treatment plant.

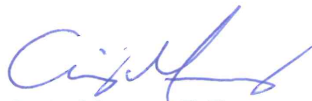
District representatives and Regional Board staff could work collaboratively to incorporate minor permit revisions prior to considering the Order for adoption. We believe that simple changes to the Draft Order could be made in the near term that would allow for IPR project implementation and would adequately protect water quality.

Alternatively, the Regional Board could include a Reopener provision in Section VI.C of the Order. This would allow for future revisions to the Order once the exact design details are known and environmental review for the IPR project has been completed. Certainly, this approach would provide more time to undertake any modeling or technical evaluation that might be necessary.

It is understood that a separate permit for groundwater injection will be required from the SWRCB Division of Drinking Water. This permit will be procured by CVWD.

Thank you for consideration of the District's comments. Please do not hesitate to contact me if you have any questions regarding this submittal or if you require additional information. I can be reached at (805) 684-7214, extension 12 or by email at craigm@carpsan.com.

Respectfully Submitted,
CARPINTERIA SANITARY DISTRICT



Craig Murray, P.E.
General Manager

cc: Mark Bennett, Operations Manager
Mark Rogers, Treatment Superintendent
Tony Trembley, Musick, Peeler & Garrett LLP

**CARPINTERIA SANITARY DISTRICT COMMENTS ON
DRAFT WASTE DISCHARGE REQUIREMENTS ORDER NO. R3-2017-0032
NPDES NO. CA0047364
JULY 21, 2017**

WASTE DISCHARGE REQUIREMENTS		
<i>Page #</i>	<i>Section</i>	<i>Comment/Edit</i>
3	II.A	Last sentence should reference locations (plural) described in Table 2
2	III.A	Should reference DP 002 for recycled water use.
5	Table 5	Errant values in first line under header row (lbs/day, 24, 140,380)
5	Table 5	Effluent limits for Phenolic Compounds and Chlorinated Phenolics were removed in 2011 based on RPA. Unclear why they were added back as monitoring did not show any measurable concentrations. These parameters should also be defined in the order or the MRP.
8	Table 6	For clarity, mass limit for 1,2-diphenylhydrazine should move up to page 7
9	IV.A	Subheading for Percent Removal and Initial Dilution should be "3." and "4." respectively, not under IV.A.2, Toxic Pollutants heading as "a." and "b."
9	IV.A	Item "c. Total Coliform Organisms:" pertains to a receiving water limitation not an effluent limitation and should fall under a separate heading or section.
10	IV.C	Standard Recycling Specifications for a Title 22 tertiary water recycling program have been inserted here. However, an indirect potable reuse project (AWT) is being developed. See full discussion in Transmittal Letter.
11	V.A	Last sentence indicates that compliance will be determined from effluent sampling. This does not make sense in the context of receiving water limitations as drafted.
12	V.A.7	This requirement is nebulous as "that which occurs naturally" is not defined and DO concentrations in the ocean can be variable. There may be other factors that cause fluctuations in DO, such as algal blooms and Carpinteria Creek discharge. A drop below 5.0 mg/L may be entirely unrelated to WWTP effluent discharge.
15	VI.C.3.a	Last sentence on page should refer to CCWB, not CSDWTP
16	VI.C.3.a.v	Annual status report should be sent to CCWB, not CSDWTP
16	VI.C.4	Reference should be to Standard Provision I.D (Permit Compliance Section) of Attachment D.
17	VI.C.5.d	Basis for this requirement is unclear. Does this include extension of service through out of agency service agreements authorized by LAFCO?
18	VII.B	First paragraph, third line should read ("DNQ") or (DNQ) - missing a parenthesis
A-6	TCDD Equivalents	spacing in second column is off for first isomer group

ATTACHMENT D - STANDARD PROVISIONS		
<i>Page #</i>	<i>Section</i>	<i>Comment/Edit</i>
D-7	V.E.3	Should refer to CCWB, not CSDWTP
D-7	V.F	typo in first line after "Board"
D-8	V.F	Second paragraph should be numbered (3.)
D-10	VIII.B.11	The specificity in this newly added provision is inappropriate and beyond the jurisdictional scope of the CCWB. This provision should be modified or deleted.
D-11	VIII.B.12	The specificity in this newly added provision is inappropriate and beyond the jurisdictional scope of the CCWB. This provision should be modified or deleted.
D-11	VIII.C.2	Last sentence should reference the State Department of Fish and Wildlife

**CARPINTERIA SANITARY DISTRICT COMMENTS ON
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ATTACHMENT E - MONITORING AND REPORTING PROGRAM		
Page #	Section	Comment/Edit
E-2		Typo in 4th line of first paragraph - delete "Region"
E-3	Table E-1	Coordinates added to monitoring location description for M-001A are incorrect - they reflect the outfall terminus and not the sample collection box within the treatment facility
E-4	III.A	Monitoring Location in Heading and in III.A.1 should be M-INF not INF-001 to match Table E-1.
E-4	III.A	A paragraph in the prior MRP, describing corrections for return flows and other sampling requirements, was omitted in this version. Was that the intent?
E-5	Table E-3	The effluent limitation for Acute Toxicity was removed. Reference to Acute Toxicity monitoring requirements should be removed accordingly.
E-5	Table E-3	Footnote 1 should reference current Order No. R3-2017-0032
E-5	Table E-3	For consistency with receiving water monitoring requirements in Section VIII.A (Pg. E-10), Footnote 5 should define "loss of disinfection" as 12 hours or more without disinfection
E-5	V.A	The effluent limitation for Acute Toxicity was removed. Reference to Acute Toxicity monitoring requirements should be removed accordingly. Suggest deleting this section.
E-9	VII.	Subsection numbering is incorrect (VII.B, VII.B.1.a.d)
E-10	VIII.A	Subsection numbering is incorrect (VIII.A.4, VIII.A.5)
E-10	VIII.A.4	First sentence reference "analyzed as specified in Table E-1" appears to be incorrect reference.
E-10	Table E-6	Title for table "Bottom Sediment Sampling" is incorrect
E-10	VIII.A.5	Third paragraph refers a "potential or actual discharge of inadequately disinfected effluent". This is ambiguous. Suggest defining terms or making consistent with first paragraph (i.e. 12 hour loss of disinfection).
E-13	IX.A	Last sentence contains typo and incorrect reference to Provision E-8; should be D-8.
E-13	IX.C.1	First sentence reference to Provision E-8 is incorrect; should be D-8.

ATTACHMENT F - FACT SHEET		
Page #	Section	Comment/Edit
F-2	Table of Contents	Page number should be F-13
F-3	Table F-1	Authorized Person to Sign and Submit Reports should be: Mark Bennett, Operations Manager, (805) 684-7214 x17
F-4	II.A.1	The location of the Facility is 5351 Sixth Street
F-4	II.A.4	Biosolids are transported and composted at an off-site location.
F-5	Table F-2	Highest average monthly discharge for Total Coliform is not applicable and misleading. Use median value for this parameter and/or provide footnote.
F-8	II.E	This section refers to a Title 22 tertiary water recycling program, however, an indirect potable reuse project (AWT) is proposed. See full discussion in Transmittal Letter.
F-9	Table F-6	This table is identical to Table F-7 in the California Ocean Plan section.
F-13	Table F-8	Turbidity Monthly Average Limit should be 75 NTU not 7.5 NTU
F-25	Table F-12	Unclear why WQBEL for chlorinated/non-chlorinated phenolics was re-established, as no detectable concentrations were reported during prior permit period