CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION

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RESPONSES TO COMMENTS

Tentative Order:
Waste Discharge Requirements Order R7-2024-XXXX

Scheduled Adoption Date:
June 11, 2024

Agenda Item:
6

Public Notice:
7-24-11

Comment Period:
April 19, 2024 to May 20, 2024

Dischargers:
Salton Community Services District

Facility/Project:
Thomas R. Cannell Wastewater Treatment Facility

County:
Imperial County

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Table 1. Comments Received.

Commentor	Submittal Date
Emmanuel Ramos, Interim General Manager Salton Community Services District (Discharger)	May 24, 2024

COMMENTS FROM SALTON COMMUNITY SERVICES DISTRICT (DISCHARGER)

DISCHARGER-1

Subject

WDRs Order, § G.1. (p. 23-24)

1. **Groundwater Monitoring Network**

a. **Existing Groundwater Monitoring Network Study.** Within six months of the adoption of this Order, the Discharger shall submit, for Executive Officer approval, a technical work plan to determine the adequacy of the existing groundwater monitoring network.

   The technical work plan shall describe the current condition of the groundwater monitoring network (e.g., monitoring locations, sampling protocol, or quality assurance/quality control), establish total depth and screened intervals for each of the monitoring wells, and, establish groundwater elevation in the mound in the area of the evaporation/percolation ponds.

   If the technical work plan indicates that repair or addition of monitoring wells is necessary, the Discharger shall submit a time schedule for Executive Officer approval that includes a description of proposed changes to the groundwater monitoring network and a time schedule for the implementation of these changes. Within 30 days of Executive Officer written approval [Fn.18] the Discharger shall begin implementation of the work plan in accordance with the time schedule.

b. **Groundwater Quality Monitoring Network Work Plan.** Within 12 months of adoption of this Order, the Discharger shall submit, for Executive Officer approval, a technical work plan and proposed time schedule [Fn. 19] for installing a groundwater monitoring network with the ability to show the direction of flow and identification of up-gradient and down-gradient monitoring wells and monitor upgradient and downgradient water quality conditions.

   The work plan shall include a description of the groundwater monitoring network (e.g., monitoring locations, sampling protocol, or quality assurance/quality control) and a time schedule for the implementation of the network. Within 30 days of Executive Officer written approval, the Discharger shall begin implementation of the work plan in accordance with the time schedule.

Fn. 18: The Executive Officer may approve the work plan and time schedule with any revisions that are determined to be warranted under the circumstances.

Fn. 19: The time schedule for proposed activities shall not exceed six months from Executive Officer approval of the time schedule.

Discharger Comments and Requested Revisions

The Tentative WDR Special Provision G.1. includes requirements for both an Existing Groundwater Monitoring Network Study (G.1.a) and a Groundwater Quality Monitoring Network Work Plan (G.1.b). The District has reviewed the study requirements and requests that the timeline to prepare the study be extended. Specifically, the Special Provisions G.1.a. Existing Groundwater Monitoring Network Study be completed within 12-months of the adoption of the Order. This will allow the District time to establish a project budget through their Board (2 to 3-months), complete a consultant solicitation process (3-months), and prepare the study (6-months). In addition, the District requests that the timeline to implement said study be increased from 30-days to 6-months of Executive Officer written approval. Similar to preparing the study, the District will need to establish a capital project budget through their Board (2 to 3-months), complete a competitive construction bidding process (2-months), obtain District Board approval and execute a construction agreement (1-month).

Regarding Tentative WDR Special Provision G.1.b. Groundwater Quality Monitoring Network Work Plan, the District requests that the preparation of said work plan be initiated after the Special Provision G.1.a. Existing Groundwater Monitoring Network Study is completed and approved by the Regional Board. The District will need to complete the Study (SP G.1.a.) first to develop a better understanding of the existing monitoring network and its ability to monitor both groundwater elevations and water quality prior to developing a work plan to install new monitoring wells, that may not be required if the existing monitoring well network if determined to be sufficient. The District agrees with the 12-month schedule to prepare the work plan as it will allow time to establish a project budget, complete a consultant solicitation process, and prepare the work plan. However, the District also requests that the timeline to implement said work plan be increased to 6-months of Executive Officer written approval for the same reasons identified above.

Staff Response and Changes to Tentative Order

Regional Water Board staff concur. The timeline to prepare the existing groundwater monitoring network study has been increased to 12-months. Concurrently, the timeline to implement the work plan has been increased to 6-months.

The subject provision will be revised to read as follows:

> **Existing Groundwater Monitoring Network Study.** Within ***12 months*** of the adoption of this Order, the Discharger shall submit, for Executive Officer approval, a technical work plan to determine the adequacy of the

existing groundwater monitoring network.

The technical work plan shall describe the current condition of the groundwater monitoring network (e.g., monitoring locations, sampling protocol, or quality assurance/quality control), establish total depth and screened intervals for each of the monitoring wells, ***and establish groundwater elevation in the mound in the area of the evaporation/percolation ponds.***

If the technical work plan indicates that repair or addition of monitoring wells is necessary, the Discharger shall submit a time schedule for Executive Officer approval that includes a description of proposed changes to the groundwater monitoring network and a time schedule for the implementation of these changes. Within ***six months*** of Executive Officer written approval [Fn.18] the Discharger shall begin implementation of the work plan in accordance with the time schedule.

Additionally, the timeline to prepare the groundwater quality monitoring network work plan has been deferred until the evaluation of the adequacy of the existing groundwater monitoring network study is completed and approved. Concurrently, the timeline to implement the work plan has been increased to 6-months.

The subject provision will be revised to read as follows:

Groundwater Quality Monitoring Network Work Plan. Within 12 months of ***determining the adequacy of the existing groundwater monitoring network (completion and approval of Special Provision G.1.a)*** , the Discharger shall submit, for Executive Officer approval, a technical work plan and proposed time schedule [Fn. 19] for installing a groundwater monitoring network with the ability to ***show the direction of groundwater flow and identification of up-gradient and down-gradient monitoring wells and,*** monitor upgradient and downgradient water quality conditions.

Fn. 18: The Executive Officer may approve the work plan and time schedule with any revisions that are determined to be warranted under the circumstances.

Fn. 19: The time schedule for proposed activities shall not exceed six months from Executive Officer approval of the time schedule.

> The work plan shall include a description of the groundwater monitoring network (e.g., monitoring locations, sampling protocol, or quality assurance/quality control) and a time schedule for the implementation of the network. Within ***six months*** of Executive Officer written approval, the Discharger shall begin implementation of the work plan in accordance with the time schedule.

The changes to the time schedules as mentioned above have also been updated in Section H. Other Provisions, Table 6 Time Schedule.

DISCHARGER-2

Subject

WDRs Order, § G.3. (p. 24)

> **Total Nitrogen Effluent Limit Feasibility Study.** Within three years of adoption of this Order, the Discharger shall submit a technical report evaluating the feasibility of implementing nitrogen removal for compliance with a 10 mg/L effluent limit for total nitrogen, which may be incorporated in future WDRs.

Comments and Requested Revisions

Lastly, the Tentative WDR Special Provision G.3. includes a requirement to prepare a Total Nitrogen Effluent Limit Feasibility Study within three years of adoption of the Order. This appears to be based on the Regional Water Board's assumption that the discharge of treated wastewater from the TRC WWTF may present a significant risk to beneficial uses of groundwater within the project location. However, the Tentative WDR states that between 2019 and 2023, the TRC WWTF's effluent had an average Total Nitrogen of 29.2 mg/L and that "*the assimilative capacity in local groundwater for nitrogen is unclear*" (Order R7-2024-XXXX, p.10). Additionally, there are no municipal wells within 500 feet of the discharge area and there exists overwhelmingly prevalent high salinity conditions ("*well above 3,000 mg/L at every point since 1968")* in the groundwater "*attributable to natural hydrologic conditions*". As such, it's not clear Special Provision G.3. is applicable at this time since the Tentative Order states that the surrounding groundwater is not suitable for municipal or agricultural applications (TRC WWTF Tentative Order R7-2024-XXXX, p.9). Based on the above, it seems prudent to implement the prescriptive Special Provisions G.1. monitoring program to complete an evaluation of groundwater quality and conditions prior to evaluating the necessity or feasibility for nitrogen removal at the TRC WWTF.

Staff Response

The Antidegradation Policy prohibits the Regional Water Board from authorizing discharges that would result in groundwater not meeting applicable WQOs. The policy further requires implementation of best treatment and control measures that are practicable under the circumstances.

As stated in the Water Quality Control Plan for the Colorado River Basin Region (Basin Plan), the chemical constituent WQO for groundwater designated for municipal and domestic beneficial uses (MUN) is the Title 22 Maximum Contaminant Level (MCL), which is 10 mg/L for combined nitrate and nitrite. Consequently, the Antidegradation Policy prohibits the Discharger from discharging wastewater that would result in groundwater exceeding 10 mg/L for combined nitrate and nitrite.

Even if groundwater is impacted by additional sources outside of the Facility, the discharge from the Facility is still a contributing source to Total Nitrogen concentrations observed in downgradient groundwater.

Special Provision G.3. provides three years for the total nitrogen effluent limit feasibility study to be completed. Three years provides sufficient time for an evaluation of groundwater quality and conditions prior to evaluating the necessity or feasibility for nitrogen removal at the Facility.

No changes to the Tentative Order.