Response to Comments
Camrosa Water District
Camrosa Water Reclamation Facility
(Camrosa WRF)
Tentative Waste Discharge Requirements and Water Reclamation Requirements

This table describes all significant comments received from interested persons regarding the tentative permit described above. Each comment has a corresponding response and action taken.

Comments received from the Camrosa Water District on September 11, 2019

#	Comment	Response	Action Taken
1	**Page 12, Section VII, Paragraph K** Please change the sentence that says that the desalter is at the Camrosa WRF to one that states the desalter is adjacent to the Camrosa WRF as these two plants are fully independent facilities.	The Regional Water Board agrees.	Revision was made to the permit.
2	**Page 12, Section VII, Paragraph K** It appears that when describing the upper aquifer system, a nitrate concentration of 36.8 appears to be expressed as Nitrate, not as Nitrate-N. If this is the case, then the 36.8 would be converted to 8.3 mg/L Nitrate-N and not be exceeding basin water quality objectives of 10 mg/L which are expressed as Nitrate-N. Please check this.	The 36.8 mg/L is the median nitrate as nitrogen concentration from a well in the Lower Aquifer System (LAS) of the Pleasant Valley Groundwater Basin between 2010 and 2014. This data point is from Figure 9 of the July 2016 draft Salt and Nutrient Management Plan (SNMP) for the Oxnard Forebay, Oxnard Plain and the Pleasant Valley Groundwater Basins. Figure 6 of the draft SNMP includes median nitrate as nitrogen concentrations from a well in the Upper Aquifer System (UAS) of the Pleasant Valley Groundwater Basin between 2010 and 2014. The highest median	Revisions were made to the permit.

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		concentration observed in the Pleasant Valley Groundwater Basin in the UAS between 2010 and 2014 based on Figure 6 was 42.6 mg/L nitrate as nitrogen. Since this section of the Order refers to the UAS and the median concentration referenced refers to the LAS, this section of the Order was modified to refer to the correct data point.	
3	**Page 15, Section IX, Paragraph A5** Since the recycled water use area is located over the unconfined and semi-perched aquifer for which there are no groundwater quality objectives for salts in the Basin Plan, in what California statute is the regional Water Board given the authority to substitute the water quality objectives for another area.	The Regional Water Board agrees that there are no groundwater quality objectives for salts that are applicable to the unconfined and perched aquifers of the Pleasant Valley Groundwater Basin as indicated in Table 3-13 of the *Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan). Table 3-13 only includes groundwater objectives for confined aquifers in the Pleasant Valley Groundwater Basin for TDS, sulfate, chloride, and boron. Since the Permittee's recycled water storage ponds are above the unconfined and semi-perched aquifers of the Pleasant Valley Groundwater Basin for which there are no objectives in the Basin Plan, performance-based final effluent limitations are included in the Tentative Order for TDS and chloride. Since the final effluent limitations for sulfate and boron in the Tentative Order are based on the water quality objectives for the confined aquifers and there are no water	Revisions were made to the permit.

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		quality objectives for these constituents in the unconfined and semi-perched aquifers, performance-based final effluent limitations were also developed for sulfate and boron in the Revised Tentative Order. This is consistent with the methodology used to develop the final effluent limitations for TDS and chloride since there is limited connectivity between the confined and unconfined aquifers and the water quality objectives for the confined aquifer are not applicable to the unconfined and perched aquifers. The final effluent limitations for TDS, chloride, sulfate, and boron are intended to protect the potential MUN beneficial use of the underlying groundwater basin and are all below the drinking water secondary MCL upper limit consumer acceptance contaminant level ranges (for TDS, chloride, and sulfate) and notification level (for boron).	
4	**Page E-7 Section IV Groundwater Monitoring** This paragraph mandates a minimum of three monitoring wells yet it does not tell us where. Shall we reestablish the MW-3 well at its prior location or close by or elsewhere downgradient of the holding ponds?	This section of the Order requires the Permittee to establish suitable and accessible monitoring wells and update the Groundwater Monitoring Work Plan within 90 days. The updated work plan and the proposed monitoring location for the third well is subject to approval by the Executive Officer of the Regional Water Board. This gives the Permittee some flexibility as to where the third well will be located. It would be ideal for the	Revisions were made to the permit.

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		third well to be in the same location it was located during monitoring for the "1998 Annual Groundwater Monitoring Report Final Findings from 2-year Baseline Study," since some data was already collected in this location in 1998. If the original location for the third well is no longer suitable or accessible for a monitoring well, the Permittee may propose a different location for the third well. The Tentative Order requires the Permittee to submit an updated Groundwater Monitoring Work Plan within 90 days following the adoption of the Order but did not indicate that the Permittee shall propose a third monitoring well, the location of which is subject to approval by the Executive Officer of the Regional Water Board. This section was modified to clarify this requirement.	
5	**Page E-10 Section VIII Part B, paragraph iv** Please change the wording in the first sentence from "A salt balance including…" to, "A cumulative salt balance including…" By this, Camrosa is asking that the salts balance portion of the annual monitoring report would include a running total of salts percolated through the recycled water holding pond 4 and removed by the desalter and would extend from October 10, 2019 to the date of submittal each year.	Section XIX.N of the Order requires the Permittee to operate the Round Mountain Desalter such that the amount of salts exported from the groundwater basin exceeds the amount of salts the Permittee introduces into the groundwater basin via percolation due to the recycled water storage ponds. In addition, section VIII.B.iv. of the Monitoring and Reporting Program requires the Permittee to submit an annual salt balance for the previous calendar year. Section XIX.O. of the Tentative Order also requires the Permittee to	Revisions were made to the permit.

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		continue to work with stakeholders in the Pleasant Valley Groundwater Basin to complete the Salt and Nutrient Management Plan within one year of completion of the Groundwater Sustainability Plan. The order does not specify the timeframe that will be used to confirm a net loss of salts from the watershed. The Regional Water Board will consider all data the Permittee submits regarding the salt balance to determine if the Permittee is exporting more salts than it is introducing to the groundwater basin. The annual salt balance shall include data for the previous calendar year. The Permittee may include the salt balance from previous years to discuss how they are meeting the requirement to export more salts from the watershed than are introduced via the recycled water storage ponds. This section was modified to require a discussion to confirm that the mass of salts exported from the groundwater basin exceeds the mass of salts introduced to the groundwater basin via the recycled water storage ponds. The Permittee may use salt balance data submitted to the Regional Water Board for the discussion.	