

July 19, 2019

Steven Webb, P.E.
Water Resource Control Engineer
Regional Water Quality Control Board
320 W 4th Street, Suite 200
Los Angeles, CA 90013

Hello Steven,

The purpose of this letter is to comment on the tentative WDR/WRR permit (File No. 54-035).

Location in Permit	Comment
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.
Same paragraph as above	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.
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 Board given the authority to substitute the water quality objectives for another area.
Page E-4 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 it's prior location or close by or elsewhere else downgradient of the holding ponds?
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.

Thank you for your consideration of these requests and the opportunity to comment.

Sincerely,



Michael Phelps
Water Quality Manager
Camrosa Water District