

Response to Comments

Camrosa Water District
Camrosa Water Reclamation Facility
Tentative Time Schedule Order (TSO)

This Table describes all significant comments received from interested persons with regard to the above-mentioned tentative permit. Each comment has a corresponding response and action taken.

Commenter	#	Comment	Response	Action Taken
Camrosa Water District		<p>TSO page 8, #2</p> <p>The CWD proposed the condition to maintain 100% recycled water use. However, it has come to our attention that the Adjustment Factor prescribed in the Salts TMDL allowing agencies to offset their salts loadings to the watershed with salt removal from the watershed (or subwatershed), may not be applicable to the WRR Orders governing Title 22 reuse. If this is true, the only ways Camrosa may achieve compliance would be to either discharge to the creek under these NPDES orders thereby removing the agricultural beneficial use, or to discharge directly to the brine line which would have the same effect. In addition, Camrosa would be placed in a position where we would have to import water from outside the watershed to replace this lost resource which would both violate this TSO as well as our mandate to reduce imported water usage by 20 percent as a result of the ongoing drought. Furthermore, with respect to the watershed wide approach under which the Salts TMDL was created and approved by the EPA and this Regional Board, importing more water from outside the watershed will serve to introduce even more salts onto the watershed. Camrosa is following the Salts TMDL work plan by aiding in the transport of salts out of the watershed while reducing</p>	<p>The Camrosa Water District (CWD) typically does achieve 100% recycled water use; however, it is not the intention of the Regional Water Board to restrict the CWD to 100% recycled water use. The CWD should have the option to discharge to Calleguas Creek if needed. The language in the TSO on page 8, section 2 has been revised to clarify that the CWD shall recycle <i>up to</i> 100% recycled water so that the option to discharge is still available.</p> <p>The CWD's concerns regarding the salts limits in the Water Recycling Requirements (WRRs) are currently being addressed internally at the Regional Water Board. These concerns will be formally addressed in the upcoming renewal of the CWD's WRRs.</p>	Revision made to the TSO

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		imported water use which applies extra salts to the watershed and maintaining agricultural and municipal beneficial uses. It is our hope that these administrative inconsistencies may be addressed and corrected for the overall benefit of our customers and our watershed. For the above reasons, we respectfully request that this condition be rescinded.		