Response to Comments
On
the Tentative Order issued on January 10, 2014
Calleguas Municipal Water District, Regional Salinity Management Pipeline (RSMP)
NPDES Permit No. CA0064521, CI No. 9404

This Table (matrix) summarizes comments received from interested parties with regard to the above-referenced tentative permit. Each comment presented has a corresponding Regional Water Board staff response and corresponding action taken, if any.

(Additions are underlined, and deletions are lined over.)

Agency	#	Comment	Agree	Disagree	Response to Comment	Action Taken
Letter dated February 10, 2014 from Calleguas Municipal Water District (CMWD)						
	Major Comments					
CMWD	1	***Toxicity Effluent Limitations*** The chronic toxicity effluent limits listed are based on a draft policy which is not intended to apply to ocean discharges and has not been finalized or adopted. In the Tentative Order, Table 4 *(Page4)* lists the chronic toxicity effluent limitations as 'Pass' for the Median Monthly Effluent Limit and 'Pass or <50% effect' as the Maximum Daily Effluent Limit. These terms are defined in Section VII.K. *(Page 20)* and are said to be determined based on the Test of Significant Toxicity (TST) approach. The Tentative Order further explains *(Pages F-22 – 23):* 'To implement the USEPA toxicity policy, this Order includes the chronic toxicity limit using USEPA's 2010 Test of Significant Toxicity (TST) hypothesis testing approach.' The USEPA document cited in the Fact Sheet is not USEPA policy, but rather a guidance document describing the TST approach. This guidance document may change as policies and guidance change. The disclaimer for this document notes it is not 'a permit or a regulation itself. The TST approach does not result in changes to EPA's WET test methods promulgated at Title 40 of the Code of Federal Regulations Part 136. The document does not and cannot impose any legally binding requirements on EPA, states, NPDES permittees, or laboratories conducting or using WET testing for permittees (or for states inevaluating ambient water quality). EPA could revise this document without public notice to reflect changes in EPA policy and guidance.' While the State Water Resources Control Board is in the process of developing a toxicity policy which may include the TST, the policy is still		X	EPA and Regional Water Board staff members disagree. The tentative permit does not impose draft policy for non-ocean waters on the discharge. The Discharger inappropriately references comment letters on the draft Toxicity Policy for inland surface waters and enclosed bays and estuaries. These comment letters do not pertain to the Ocean Plan, nor permits issued under the Ocean Plan, including this permit. Also, the Discharger incorrectly describes the Ocean Plan chronic toxicity objective as a "average monthly" objective. In fact, the Ocean Plan imposes a daily maximum objective of 1 TUc for chronic toxicity, which—for more than 20 years—has been implemented using the hypothesis test approach to set maximum daily effluent limits for toxicity, at the critical dilutions assigned to permitted discharges. Since 2010, EPA has recommended the Test of Significant Toxicity (TST) as another hypothesis testing approach to use for NPDES permit compliance. EPA has stated that the TST guidance does not change EPA's toxicity methods (40 CFR 136) which provide for states to choose the statistical approach for evaluating and reporting toxicity test results. The Regional Board's use of the TST for this permit is in step with California's decision to use the hypothesis test approach in the	None.

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		draft form at this time. Additionally, draft versions of the State's Toxicity Policy have explicitly stated it 'does not apply to ocean waters' As a result, no policy exists which specifies the use of the TST for ocean discharges. Therefore, the Ocean Plan is the only applicable policy and should be used to determine the effluent limitations for toxicity. Finally, chronic toxicity should not be evaluated based on a maximum daily value because chronic toxicity is based on exposure longer than 24 hours. A single test failure at a 50% chronic effect should not be deemed a violation. Despite the relatively high effect level associated with the MDEL, it is inappropriate to assess single sample violations for toxicity analyses due to the variability and uncertainty inherent in testing biological organisms. The promulgated EPA method for chronic toxicity states '[t]he interpretation of the results of the analysis of data from any of the toxicity tests described in this manual can become problematic because of the inherent variability and sometimes unavoidable anomalies in biological data.' By setting a MDEL, the permit imposes a single sample limit not supported by the testing method. Therefore, the maximum daily effluent limit for chronic toxicity should be removed from the tentative order. Calleguas requests the chronic toxicity effluent limit be 73 TUc which is the average monthly effluent limit in the current permit (Order No. R4-2008-0014). This limit is consistent with the water quality objective in Table 1 of the 2012 California Ocean Plan.			Ocean Plan, at the Discharger's assigned critical dilution of 72:1. The tentative permit's toxicity effluent limits are changed from the existing permit in one important way. While as protective as the previous permit, the tentative permit provides more flexibility for both the Regional Board and the Discharger to evaluate exceedances of the chronic toxicity objective during the period of discharge, by together setting both maximum daily and median monthly effluent limits. The Regional Board and EPA view the following to be equally protective and valid approaches to permitting chronic toxicity under the Ocean Plan: (1) the proposed effluent limits; (2) the existing permit's maximum daily effluent limit (i.e., 73 TUc, set at the Discharger's assigned critical dilution); or (3) the approach used in the Orange County Sanitation District permit issued by EPA and RB8 (i.e., maximum daily effluent limit of "Pass", set at the discharger's assigned critical dilution).	
CMWD	2	***Sediment Loading Study Work plan*** Page 17, Provision VI.C.2.c, of the Tentative Order requires Calleguas to prepare a Sediment Loading Study Work Plan. The SMP effluent is comprised of highly treated wastewater and reverse osmosis reject brine from groundwater. The discharge will not contain sediment and is not expected to add bioaccumulative constituents in measurable amounts to the sediment near the outfall. It would be more appropriate to consider such a study if effluent data, once available, indicates constituents of		X	Regional Water Board staff disagrees. The Calleguas Regional Salinity Management Pipeline (RSMP) is used to discharge both tertiary-treated municipal wastewaters and concentrates generated by membrane treatment of groundwater and wastewater treatment facilities to the Pacific Ocean. The concentrate has a density of 1023 kg/m^3 (as specified in the *Proposal for Physical Modeling of*	None.

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		concern are detected at levels above water quality objectives. Additionally, discharge is unlikely to deposit on the sediments because of the nature of the water. Ocean water total dissolved solids concentration (TDS) is typically around 40,000 ppm. Recent brine samples have showed a TDS concentration of around 4,000 ppm. The discharge from the SMP is not expected to sink since it is lighter than ocean water. Therefore, Calleguas requests this study requirement be removed from the Tentative Order.			*Brine Disposal Through Ocean Outfall,* March 24, 2005, Georgia Institute of Technology) that is close to the density of the sea water The worst scenario, with the discharge containing concentrates alone, the dense concentrates will run along the bottom of the seabed. Since the pollutants may have been concentrated by 4 to 5 times in the discharged concentrates, a comprehensive sediment loading study is justified. The TDS concentration is not the only factor to determine the buoyant effect when the discharges enter the receiving sea water.	
CMWD	3	***Radiological Monitoring Requirements*** In a letter dated June 30, 2011, (Attachment 1) the Los Angeles Regional Water Quality Control Board accepted Calleguas' proposal for radiological sampling. The proposal stated if the analyses for gross alpha and or/beta exceed the values of 15 and/or 50 pCi/L, analysis for combined radium-226 and 228 would be conducted. Additionally, if the combined radium results were above 5 pCi/L, tritium, strontium-90 and uranium analyses would be conducted. Calleguas would request this procedure of staggered monitoring be included in the permit.		X	The requested monitoring protocol has been included in the monitoring program as footnote 14 of Table E-2 (Effluent Monitoring).	None.
		While these Title 22 drinking water standards may be appropriate as triggers for additional monitoring, effluent limits based on drinking water standards are not applicable to an ocean discharge. Table 1 of the California Ocean Plan assigns limits for radioactivity prospectively based on Section 30253 of the California Code of Regulations (i.e., Title 17, for the protection of Marine Life). Section II.F of the Ocean Plan *(Page 10)* also includes a narrative: 'radioactive waste shall not degrade marine life.' Until numeric limits are developed in Section 30253 for radioactivity, Calleguas requests the effluent limits for radioactive constituents be removed from the Tentative Order and replaced with the narrative statement: 'radioactive waste shall not degrade marine life.'	X		The radioactivity limitations based on Title 22 drinking water standard have been replaced with limitations specified in Table 1 of the 2012 California Ocean Plan as prescribed in the previous Order (R4-2008-0014). Monitoring requirements for radioactive constituents mentioned above and based on Title 22 drinking water standard remain unchanged.	Changes have been made.

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CMWD	4	***Effluent Monitoring Frequencies*** Footnote 4 for Table E-2 *(Pages E-5, E-6, E-7)* states the monitoring frequency for most constituents can be reduced from monthly to quarterly if all results for that constituent are below detection limits for 2 years. Calleguas submitted monitoring data with the ROWD; the data indicates many constituents were never detected from any of the effluents to be discharged into the SMP. Therefore, Calleguas requests Footnote 4 be revised to allow reduced monitoring frequencies after 1 year of results with all samples below detection limits.		X	The RSMP began to collect wastewater in January 2014 with one of the designated dischargers online. No discharge from the RSMP has occurred. Because this is an on-going project with different dischargers and quantities of effluent coming online at different times, the first year monitoring results may not adequately reflect the actual characteristics of the effluent. Even after year one, as new desalters come online the characteristics of the discharge may change. Hence, 2 years of data is required.	None.
CMWD	5	***Receiving water Monitoring locations*** In Table E-1 *(Page E-4)* of the Monitoring and Reporting Program, receiving water locations are identified relative to the Zone of Initial Dilution (ZID) rather than to a specific location. The location of the ZID will be verified as part of the Mixing Zone Study, which is required by Provision VI.C.2.b. of the Tentative Order. In the meantime, Calleguas would prefer the Regional Board to specify latitudinal and longitudinal receiving water locations in Table E-1 with the understanding that these monitoring locations may be modified pending the results of the Mixing Zone Study. The ZID is defined on Page A-8 of the Tentative Order as 'the region within a horizontal distance equal to a specified water depth (usually depth of outfall or average depth of diffuser). The depth of the SMP diffuser is approximately 47 feet. It is requested this distance be used as the location of the edge of the ZID with a footnote stating this location will be verified by the Mixing Zone Study. In addition, the ZID is typically also considered a mixing zone (i.e., Page 14 of the 2012 California Ocean Plan). As defined on Page A-5 of the Tentative Order, a mixing zone 'is a limited volume of receiving water that is allocated for mixing with a wastewater discharge where water quality criteria can be exceeded without causing adverse effects to the overall water body.' Monitoring		X	Regional Water Board staff would like to keep the existing receiving water monitoring locations with the respective narrative descriptions in the tentative permit. Because this is a new discharge, the monitoring results at all receiving water stations are necessary for the evaluation of the impact of the discharges on the receiving water and the surrounding environment. Therefore, the monitoring location RSW-001 will not be removed even though it is within the theoretical ZID. Because the exact monitoring locations will be determined after the mixing zone study is completed, the narrative descriptions of monitoring locations (RSM-002, RSM-003 and RSM-004) will be revised as follows: **MONITORING LOCATION NAME** / **MONITORING LOCATION DESCRIPTION** RSW-002 / Edge of Mixing Zone (47 feet from the outfall at a depth of approximately 10 feet)*	None

<table>
<tr><th>Agency</th><th>#</th><th>Comment</th><th>Agree</th><th>Disagree</th><th>Response to Comment</th><th>Action Taken</th></tr>
<tr><td></td><td></td><td>location RSW-001 does not appear relevant because mixing occurs rapidly and the ZID is small. Any exceedances of water quality objectives within the ZID would be unlikely to cause adverse effects to the overall water body.

Therefore, Calleguas requests the elimination of monitoring location RSW-001 and the listing of RSW-002 as located approximately 47 feet from the outfall. It is requested RSW-003 be located 100 feet from the outfall, which would be outside the ZID. Finally, it is requested the upstream location be chosen to differentiate between impacts from the City of Oxnard and the SMP. Therefore, a possible upstream location (RSW-004) could be along the City of Oxnard’s 4500 transect. This location lies between the Oxnard Wastewater Treatment Plant Outfall and the SMP outfall. Table E-1 would then be revised as shown below:
<table>
<tr><th>DISCHARGE POINT NAME</th><th>MONITORING LOCATION NAME</th><th>MONITORING LOCATION DESCRIPTION</th></tr>
<tr><td>---</td><td>RSW-002</td><td>Edge of Mixing Zone (47 feet from the outfall)</td></tr>
<tr><td>---</td><td>RSW-003</td><td>Outside Zone of Initial Dilution (100 feet from the outfall)</td></tr>
<tr><td>---</td><td>RSW-004</td><td>Upstream of discharge location of the Pacific Ocean (along Oxnard’s 4500 transect)</td></tr>
</table></td><td></td><td></td><td>
<table>
<tr><td>RSW-003</td><td>Outside Zone of Initial Dilution (100 feet from the outfall at a depth of approximately 10 feet)*</td></tr>
<tr><td>RSW-004</td><td>Upstream of discharge location of the Pacific Ocean (along Oxnard’s 4500 transect)*</td></tr>
</table>
* The proposed monitoring locations were selected based on the modeling results. These monitoring locations may be modified pending the results of the Mixing Zone Study.</td><td></td></tr>
<tr><td></td><td colspan="6">Clarifications and Corrections</td></tr>
<tr><td>CMWD</td><td>A</td><td>Table 4. Effluent Limitations: Instantaneous Maximum for Phenolic Compounds should be 22,000. (Page 5)</td><td>X</td><td></td><td>Change Instantaneous Maximum effluent Limitation for Phenolic Compounds to 22,000.</td><td>Change has been made.</td></tr>
<tr><td>CMWD</td><td>B</td><td>Table 4. Bis (2-chloroethyl) Ether is misspelled. (Page 7)</td><td>X</td><td></td><td>Misspelling has been corrected.</td><td>Change has been</td></tr>
</table>

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						made.
CMWD	C	In Section V. Receiving Water Limitations, it is requested the last sentence of the paragraph be revised to clarify compliance with objectives must be achieved outside the zone of initial dilution. The requested revision is: '*Compliance with these objectives shall be determined by samples collected at stations representative of the area within the waste field where initial dilution is completed (i.e., **outside the zone of initial dilution**).' (Page 10)*	X		The "outside the zone of initial dilution" has been added as proposed.	Change has been made.
CMWD	D	In Section V.A.1 Subsection is misspelled. *(Page 11)*	X		Misspelling has been corrected.	Change has been made.
CMWD	E	Receiving Water Limitations V.C.4 and VI.C.7: Table B should be changed to Table 1. *(Pages 12, 13)*	X		Table B has been changed to Table 1 to reflect the table number in the 2012 Ocean Plan.	Change has been made.
CMWD	F	Section VI.A.2.g requires Calleguas to keep a copy of the permit at the discharge facility. This is not practical as the discharge location is a below ground vault. Calleguas requests the required location be changed to it control room, where the operation of the SMP is overseen. *(Page 14)*	X		Section VI.A.2.g has been revised as follows: "A copy of these waste discharge specifications shall be maintained at the ~~discharge facility~~ control room, where the operation of the RSMP is overseen, so as to be available at all times to operating personnel."	Changes have been made.
CMWD	G	Section IV.A.2.u: The tentative permit requires Calleguas to file a petition with the State Water Board if there is a change which would result in the decrease of flow in any portion of a watercourse. Since Calleguas does not operate the facilities which discharge into the SMP, it is not appropriate to require Calleguas to file a petition on their behalf. We request this section be removed. *(Page 15)*	X		Section IV.A.2.u has been removed.	Change has been made.
CMWD	H	The word applicable is misspelled in Section VI.C.6. *(Page 17)*	X		Misspelling has been corrected.	Change has been made.

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CMWD	I	In the Compliance Determination Section VII.D.2, it is requested the requirement for follow up samples be revised to provide flexibility in the number of samples required if an AMEL is exceeded. The requested revision is: '…the Discharger shall collect **up to** four additional samples at approximately equal intervals during the month. All ~~five~~ analytical results shall be reported in the monitoring report for that month, or 45 days after results for the additional samples were received, whichever is later.' *(Page18)*		X	This is the standard language in all NPDES permits. In order to reflect the exact characteristics of the effluent. We believe that four additional samples are required if an AMEL is exceeded.	None.
CMWD	J	Definitions: Degradation is misspelled. *(Page A-3)*	X		Misspelling has been corrected.	Change has been made.
CMWD	K	Definitions: Pollutant Minimization Program is listed twice. *(Page A-6)*	X		One of the duplicate definitions has been removed.	Change has been made.
CMWD	L	The permit should not refer to the California Department of Public Health as the former name of the Department of Health Services (Page A-7)	X		Change the Department of Health Services to the California Department of Public Health to reflect the organization's name change.	Change has been made.
CMWD	M	The permit should reference the 2012 version of the Ocean Plan wherever mentioned *(Pages E-7, E-15)*	X		The Ocean Plan (2009) has been replaced with the Ocean Plan (2012) in the footnote 1 of two tables (Table E-2 and Table E-3).	Changes have been made.
CMWD	N	Section V.A.1, the IWC for Chronic Toxicity Test is 1.37. This is the TST approach, which is currently in draft form. It is requested this be removed.		X	Please refer to the response to major comment #1.	None.
CMWD	O	Section V.A.6.g The word rationale is misspelled. *(Page E-10)*	X		Misspelling has been corrected.	Change has been made.

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CMWD	P	Discharge commenced January 2014, not December 2013. *(Pages F-4, F-6, F-12)*	X		The follow-up communication with the Discharger indicated that the wastewater discharged to the RSMP commenced in January 2014 and no discharge from the RSMP to the ocean had occurred as of February 20, 2014. Related portions on pages F-4, F-6 and F-12 have been revised accordingly.	Changes have been made.
CMWD	Q	Under Section II Facility Description, Phase IF is noted. This phase does not exist. Also, Phase 2 is comprised of five segments, not six. *(Page F-4)*	X		Thanks for the update. Phase 1F has been deleted. The number of segments in Phase 1 and 2 has been changed to five.	Changes have been made.
CMWD	R	The Camrosa Round Mountain Water Desalter in Section II.A is constructed and testing of the facility has begun. *(Pages F-5, F-6)*	X		Change on Page F-5 as follows: • Camrosa Round Mountain Water Treatment Plant (WTP) (~~future~~ existing) Changes on Page F-6 as follows: "The Camrosa Round Mountain WTP is currently~~ out for bid for construction and will be~~ located at the Camrosa WRF. The Facility~~ies will~~ includes a raw water supply pipeline from the existing University Well to the treatment plant site, finished water pipeline to pressure distribution system and a concentrate disposal line to the RSMP. The project ~~is scheduled to start~~ began discharging to the RSMP ~~testing~~ in January 2014~~December 2013~~. The WTP is expected to produce a maximum brine discharge of 0.16 MGD."	Changes have been made.
CMWD	S	In Section IV., nutrients are incorrectly listed as an anticipated constituent in the reverse osmosis reject from groundwater treatment. *(Page F-15)*	X		"Nutrients" has been removed at the end of the second paragraph in Section IV.	Change has been made.

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CMWD	T	In Table II-2, Table II-3 and Table-IV, the letters (a-i) in the column headings which correspond to the footnotes need to superscripted.	X		The column headings in Attachment H have been revised accordingly.	Changes have been made.
Letter dated February 7, 2014 from Heal the Bay (HtB)						
HtB	1	**Constituent Monitoring Frequency for Effluent and Receiving Waters should Return to Monthly when New Dischargers Connect to Salinity Management Pipeline** The Permit identifies eight possible sources of discharge to the salinity management pipeline ("SMP") over the five year permit cycle. Sources include both existing water treatment facilities (Camarillo Water Reclamation Plant, Camrosa Water Reclamation Plant, Port Hueneme Water Agency Brackish Water Reclamation Demonstration Facility) and future water treatment infrastructure (Ventura County Waterworks District Moorpark Desalter, Agricultural Somis Desalter, Camarillo North Pleasant Valley Desalter, Camrosa Round Mountain Valley Desalter, Agricultural Desalters). The Permit states effluent constituent frequency monitoring can be reduced to once per quarter if after two years all monitoring results for a constituent is reported as non-detect, using detection limits that are sufficiently sensitive to demonstrate compliance with effluent limitations. If monitoring results are reported at concentrations greater than the applicable effluent limitation after a reduction in monitoring frequency for a constituent is allowed, the monitoring frequency for this constituent reverts to monthly until at least four consecutive samples demonstrate compliance with effluent limitations. Similarly, receiving water constituent monitoring can be reduced to quarterly if monthly monitoring results demonstrate compliance with water quality objectives in the California Ocean Plan. If quarterly sampling exceeds water quality objectives for a constituent in the Ocean Plan, monitoring frequency for this constituent will return to monthly until at least four consecutive		X	One of the conditions for allowing additional flow to the RSMP is the new discharge does not exceed effluent and receiving water quality-based limitations established in the Order (page F-6). The modeling completed to predict the effluent concentrations in the discharge was completed using various scenarios. One such scenario, the worst case, considered the discharge of brine only from the desalter wells. We evaluated the discharge using data from similar discharges, the minimum flow and the outfall diffuser design and configuration. Using these parameters the model predicted the dilution that would occur and the effluent concentration at the edge of the mixing zone or ZID. Regional Water Board staff believes that based on the modeling output, the data from representative desalters and the historical data from the Camarillo and Camrosa treatment facilities the proposed monitoring will provide evidence of any potential adverse effects to the receiving water as a result of discharges from the RSMP. The connection of any new discharger is not expected to cause an exceedance of prescribed limitations in the Order. If an exceedance occurs in the final effluent in the quarterly sampling due to the connection of a new discharger, the monitoring	None.

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		samples demonstrate compliance with water quality objectives. We are concerned by the reduction in frequency, as this may not capture the variability in discharge. At a minimum, this reduction in effluent and receiving water monitoring should not be allowed if new discharging flows are added to the SMP; over the coming years numerous water infrastructure projects will be added to the region and ultimately connect to the pipeline. Chemical and physical characteristics of future discharging flows are unknown as these facilities are yet to be built and/or come online. Modeling effluent and receiving water characteristics for unbuilt facilities gives the Regional Board an idea of future pipeline discharges; however, it does not describe actual conditions of effluent and receiving water when new discharge is occurring. Furthermore, as new discharging flows are connected to the pipeline, commingling can occur that could lead to exceedances of effluent and receiving water limitations. Because of this, we feel the Permit **should, at a minimum, require effluent and receiving water monitoring to return to monthly for all constituents (when monthly is initial monitoring frequency) for a minimum of four months when new discharging flows connect to the pipeline.** This is essential as future water infrastructure projects design requirements can change over time. Additionally, it would safeguard against any impairments not identified in Regional Board modeling, as well as account for any unforeseen commingling impacts resulting from multiple discharges mixing.			frequency shall revert to monthly monitoring until at least four consecutive final effluent samples demonstrate compliance with the effluent limitation under the proposed monitoring protocol. The sampling frequency proposed is sufficient to detect any changes in the effluent such that there are exceedances of the toxic contaminants or in the toxicity of the effluent. Therefore, the proposed accelerated monitoring for effluent and receiving water is not required when new dischargers connect to RSMP.	
HtB	2	**Receiving Water Chronic Toxicity Minimum Monitoring Frequency Should be Monthly** The Permit requires Chronic Toxicity be conducted at a minimum once quarterly at monitoring locations RSW-001, RSW-002, RSW-003, and RSW-004. In the 2008 order, receiving water minimum monitoring frequency for Chronic Toxicity was monthly1. Why was Chronic Toxicity changed from monthly to quarterly in the tentative Permit? Monitoring for Chronic Toxicity is essential to protect aquatic life; monthly monitoring is	X		Regional Water Board staff agrees to increase the receiving water chronic toxicity monitoring frequency to monthly in the first year of the proposed permit as prescribed in the previous permit. Since monitoring locations RSW-001 and RSW-002 are within the mixing zone, the 100% receiving water samples will contain elevated concentrations of pollutants and may show toxicity. Hence, monitoring is required quarterly at these locations after the first year.	Changes have been made.

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		needed to ensure discharges do not impair receiving waters. Chronic Toxicity monitoring is the failsafe in the Permit to ensure SMP discharge is not negatively impacting receiving water and beneficial uses. Because of this, receiving water minimum monitoring frequency for Chronic Toxicity needs to be changed from quarterly to monthly.			Therefore, the monitoring frequency for chronic toxicity in the tentative permit has been changed from quarterly to monthly with the following footnote. "Monthly for the first year and quarterly after the first year. For RSW-003 and RSW-004, if a quarterly sample exceeds the chronic toxicity limitation, the monitoring frequency returns to monthly until at least four consecutive samples demonstrate compliance with the prescribed effluent chronic toxicity limitation."	
HtB	3	**The Region Should Develop a Plan to Reach 100% Beneficial Reuse of Tertiary Treated Wastewater** California is experiencing a water crisis. We are short of clean drinking water supplies, a condition exacerbated by the impacts of climate change, a severe drought in the State, a collapsing Bay-Delta ecosystem, and a steady rise in population. Meanwhile, we flush potable water down the toilet and water fertilized lawns with the precious resource. It's difficult to imagine a scenario where there would not be enough demand for reuse of this precious resource that we are so easily wasting. The fact that the Region is proposing to send up to 17.52 million gallons per day of water to the ocean that has undergone tertiary treatment demonstrates poor watershed management. The Region should pursue reuse of 100% of the water intended to exit the ocean outfall. The tertiary treated water can be used to irrigate landscaped areas as well as flush toilets in retrofits and new developments. Also, indirect potable reuse should be explored. Developing a plan to reach 100% beneficial reuse would decrease potable water demand as well as increase water security for the region in light of climate change, drought, and population growth.	X		Regional Water Board staff agrees with your comment. The water discharged to the RSMP has high concentrations of salt. The concentration of salts in the discharges from the facilities that are planning to connect to the RSMP when allowed to infiltrate to the groundwater increases the salt concentration in the groundwater basin and causes the water to not be suitable for municipal and domestic uses. The two wastewater treatment facilities within the region have comprehensive water recycling programs. Camrosa WRF produces approximately 1,600 acre feet of recycled water a year which is pumped into a storage pond used by several agricultural users. Camrosa has a secondary empty emergency storage pond for winter use (wet months) to store excess recycled water when demands are low. During rare events when the demand is low, they will put that water into the RSMP. The Camarillo wastewater plant may discharge to	None.

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					the RSMP during times when recycled water use is not in demand, most likely in the winter time (30-45 days/yr). The plant discharges about 2.6 MGD into Conejo Creek even though the plant treats 3.8 MGD; 1.2 MGD is being recycled. Camarillo anticipates new recycled water users once the 24-inch pipeline along Howard Road is completed. With the addition of the new recycled water users, Camarillo expects 100% of the recycled water to be utilized. Camarillo Sanitary District will complete the construction of the 24-inch pipeline by the end of 2014 and it should be operational by the middle of 2015.	
HtB	4	**Support the Inclusion of Test of Significant Toxicity Approach in the Tentative Permit** We support the inclusion of the Test of Significant Toxicity ("TST") approach in the tentative Permit. The TST method is superior to the method included in the 2008 order as it is a more powerful statistic approach resulting in greater confidence for WET conclusions. Furthermore, the TST approach establishes a false negative error rate that was not included in previous permit.	X		Regional Water Board staff appreciates your support.	None.