

**Response to Comments**  
 Camrosa Water District  
 Camrosa Water Reclamation Facility  
 (Camrosa WRF)

Tentative Waste Discharge Requirements and National Pollutant Discharge Elimination System Permit

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 May 18, 2020**

#	Comment	Response	Action Taken
1	<p><b>Page 8, Section 4.3 Recycling Specifications</b></p> <p>Camrosa respectfully requests “Not Applicable” for this feasibility study. Camrosa staff has continuously availed ourselves of opportunities to increase our recycled water availability in our system as well as from other agencies. We shall continue to look for recycling opportunities, but we feel we are recycling all waters that we possibly can. Future expansions of our recycled water system may not be possible in the next 5 years between permit cycles.</p>	<p>The Regional Water Board agrees that a recycled water feasibility study is not necessary for the Camrosa Water Reclamation Facility (WRF) because nearly 100% of the final effluent produced at the Camrosa WRF is recycled. However, the Camrosa Water District shall continue to investigate the feasibility of recycling, conservation, alternative methods of disposal of wastewater, and beneficial uses of stormwater and dry weather runoff.</p> <p>The feasibility study requirement was removed from section 4.3 on page 8 of the Order and section 4.7 on page F-48 of the Fact Sheet.</p>	<p>Revisions were made to the permit.</p>
2	<p><b>Page 12, Section 6.1.2, paragraph L</b></p> <p>The Camrosa Water Reclamation Facility (CWRF) has been designed to withstand a 100-year flood. What are the parameters for climate change readiness? Without these parameters,</p>	<p>Section 6.3.4.b. of the Order requires that a Climate Change Effects Vulnerability Assessment and Mitigation Plan be submitted to the Regional Water Board 12 months after the adoption of the Order. The parameters that need to be considered are described in this</p>	<p>None necessary.</p>

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	<p>how can the district know if we are satisfying this requirement? We respectfully request this paragraph be stricken.</p>	<p>section. The Camrosa Water District shall consider how climate change may impact operations at the Camrosa Water Reclamation Facility including the wastewater collection system, the recycled water distribution system, water quality, and water supplies. In addition to flooding, the Camrosa Water District shall also consider wildfires, changes in influent water quality, and any other impacts that may result from climate change. The purpose of this plan is to ensure the Camrosa Water District considers the potential challenges that may arise in the future in order to prevent otherwise unforeseen circumstances.</p>	
3	<p><b>Page 23, Section 6.3.6, subsection E</b>            Camrosa is referred to as a City. Camrosa is a California Special District. The paragraph should reflect this.</p>	<p>The Regional Water Board agrees. The “city of Camrosa” was changed to the “Camrosa Water District.”</p>	<p>Revision was made to the permit.</p>
4	<p><b>Page F-16 Section 3.5.2 and Page F-17 Section 3.5.3</b>            This section describes the Sources of Drinking Water Policy (SODW) which designated the aquifer in our service area as potential MUN. In the 1994 Basin Plan, the plan contained the implementation provision that no new effluent limitations will be placed in Waste Discharge Requirements as a result of potential</p>	<p>While the final effluent limitations in the Order are based on Title 22 of the California Code of Regulations, they are not based on the potential Municipal and Domestic Supply (MUN) designation for Calleguas Creek. These final effluent limitations were included based on the existing Groundwater Recharge (GWR) beneficial use for Calleguas Creek and the existing MUN beneficial use for the Pleasant</p>	<p>None necessary.</p>

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	<p>designations until a review of waters in the region that should be exempted. Until this is done, potential designations that are stemming from the SODW policy have no legal effect. If this is true then the Title 22 Requirements intended for a MUN designated aquifer should not apply. Camrosa requests that you clarify your position on this issue and, if there is no MUN designation, the Title 22 based MCLs in the permit should be adjusted or deleted.</p>	<p>Valley Groundwater Basin. Section 4.3.2.d. of the Fact Sheet describes this rationale in detail for methylene blue activated substances (MBAS).</p>	