

**From:** [remerson](mailto:remerson)  
**To:** [Prat, Rachel@Waterboards](mailto:Prat.Rachel@Waterboards)  
**Subject:** Re: Request for review of Miranda CSD Comments Summary  
**Date:** Wednesday, February 20, 2019 12:41:23 PM

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Rachel

What you have presented is what we discussed and descriptive in a manner that explains why these changes should be made. I have no additional comments that would be useful in making changes to the WDR and am in full agreement with what you have recommended.

Thank You for your assistance

Ralph

General Manager  
Garberville Sanitary District  
919 Redwood Dr.  
Garberville, CA. 95542  
(707)923-9566

> -----Original Message-----

> From: Prat, Rachel@Waterboards <Rachel.Prat@waterboards.ca.gov>  
> To: Ralph Emerson <remerson@garbervillesd.org>  
> Subject: Request for review of Miranda CSD Comments Summary  
> Sent: Feb 20 '19 10:58

>

>

>

> Hi Ralph,

>

> I'm putting together the Response to Comments document for the  
> Proposed Miranda WWTF WDR and was hoping you could review the  
> following summary I put together. The summary is based on the comment  
> email dated 1/30/19 and the two telephone conversations we had (2/15 &  
> 2/19). Please let me know if this summary adequately reflects Miranda  
> CSD's comment on the Special Study Evaluation (Provision R) of the  
> Draft WDR Order and if you want me to make any updates or changes.

>

> GENERAL PROVISION R OF THE DRAFT ORDER IS UNNECESSARY AND COSTLY. IT  
> REQUIRES THE INSTALLATION OF MONITORING WELLS TO CONFIRM COMPLIANCE OF  
> THE PERCOLATION POND DISCHARGE WITH BASIN PLAN GROUNDWATER  
> LIMITATIONS.

>

> THE MIRANDA CSD PERCOLATION POND IS LOCATED ADJACENT TO THE EAST BANK  
> OF THE SOUTH FORK OF THE EEL RIVER. THERE IS NO AVAILABLE SPACE TO  
> INSTALL A MONITORING WELL LOCATED BETWEEN THE PERCOLATION POND AND THE  
> SOUTH FORK OF THE EEL RIVER. THE MONITORING WELLS WOULD HAVE TO BE  
> INSTALLED WITHIN THE BANKS OF THE SOUTH FORK OF THE EEL RIVER.

>

> WATER SAMPLES COLLECTED FROM MONITORING WELLS INSTALLED WITHIN THE  
> BANKS OF THE SOUTH FORK OF THE EEL RIVER WOULD BE REPRESENTATIVE OF  
> SURFACE WATER QUALITY.

>

> WE RECOMMEND THE REMOVAL OF GENERAL PROVISION R OF THE DRAFT ORDER OR

> MODIFICATION OF GENERAL PROVISION R BECAUSE THE INSTALLATION OF  
> MONITORING WELLS WITHIN THE BANKS OF THE SOUTH FORK EEL RIVER WILL  
> PROVIDE DATA ON SURFACE WATER QUALITY RATHER THAN GROUNDWATER QUALITY  
> AND THE USE OF MONITORING WELLS TO ASSESS SURFACE WATER QUALITY IS NOT  
> A BENEFICIAL USE OF PUBLIC FUNDS.  
>  
> INSTEAD THE PROVISION, IF NOT REMOVED, SHOULD BE MODIFIED TO HAVE THE  
> EVALUATION INCLUDE UPSTREAM AND DOWNSTREAM SAMPLING OF THE SOUTH FORK  
> EEL RIVER RATHER THAN INSTALLATION OF GROUNDWATER MONITORING WELLS.  
>  
> Thank you for your help,  
>  
> Rachel  
>  
> Rachel Prat  
>  
> Environmental Scientist  
>  
> Land Disposal & Groundwater Permitting Unit  
>  
> North Coast Water Quality Control Board  
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