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Kenneth A. Harris Jr.
Executive Officer
California Water Boards
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Subject: **Comments on Draft Proposed Waste Discharge Requirements Order R3-2014-0025, Mission Springs Christian Camp and Conference Center, Scotts Valley, Santa Cruz County**

Dear Mr. Harris:

On behalf of the Mission Springs Christian Camp and Conference Center (Mission Springs), Fall Creek Engineering, Inc. (FCE) has prepared this letter to provide our comments on the draft Waste Discharge Requirements (WDRs) for the new onsite wastewater treatment system for the facility. Based on our review of the WDR, FCE offers the following comments:

Draft Waste Discharge Requirements Order No. R3-2014-0025

1. On Page 1 Finding 2 of the WDR, FCE requests that the second sentence be revised to say the following:

Mission Springs is responsible for providing wastewater collection, treatment, and disposal services to the conference center, camps, and a limited number of single family residences (up to 20 homes owned by the Mission Springs).

FCE requests this revision because the community includes over 140 individual residents that are not served by the Mission Springs Conference Center wastewater system.

2. On the Page 2, Finding 13, FCE requests that the finding be revised as follows:

Once to twice a year, solids should be removed from the lift station and ABR tank, as required.

3. On Page 2, Finding 14, FCE requests that the second sentence be revised as follows:

In case of power failure, all wastewater will flow by gravity to emergency overflow leachfields.

4. On Page 6, Finding 40 indicates that monitoring reports will be submitted quarterly; however, in the attached Monitoring and Reporting Program (MRP) the frequency of submitting reports is semiannually. Please revise this finding to be consistent with the MRP. FCE recommends that the WDR not specify the frequency of reporting to allow the Executive Officer the flexibility to modify the MRP without modifying the WDR.
5. On Page 10, Specification 17 indicates the treatment system (“the Facility”) shall enroll in “the State of California Office of Operator Certification program and shall be maintained and operated by a California State certified Grade II Wastewater Treatment Plant Operator”. FCE requests the specification be revised to state the Facility be maintained and operated by a County-Approved operator., if possible.
6. On Page 10, Specification 20 indicates that each leachfield zone shall be alternated on a yearly basis to the other 100% disposal zone to maximize life of the disposal capacity. Please note that primary leachfield system is designed as a pressure dosed leachfield and the application of wastewater is alternated continuously to maximize the disposal areas, rest leachfields, and to maximize the life of the system. FCE requests that this specification be revised to reflect that.
7. On page 12, Specification 6 states that the Discharger shall submit an engineering technical report on a biennially basis. FCE requests the last sentence of the be revised as follows:

The first biennial engineering technical report is due January 30, 2017.
8. On Page 13, Specification 10, the date of the monitoring well installation should be revised to April 30, 2015.

Monitoring and Reporting Program No. R3-2014-0025

9. FCE requests the frequency of Water Supply Monitoring for the onsite water supply wells be reduced to annual testing of total dissolved solids, sodium, chloride, sulfate, boron and nitrate (as nitrogen). These parameters are all conservative constituents are not expected to vary substantially on a seasonal basis.
10. FCE requests the frequency of Influent and Effluent Monitoring be modified. FCE requests that the primary constituents as listed in the following table be tested on a monthly basis for the first six months after the adoption of the order and the frequency of testing be reduced to quarterly testing if the treatment system is performing within compliance with the effluent limitations set forth in the WDR. FCE requests the following influent and effluent monitoring programs:

Parameter	Units	Sample Type	Minimum Sampling and Analyzing Frequency
Flow Volume	GPD	Metered	Daily
Maximum Daily Flow	GPD	Metered	Monthly
Average Daily Flow	GPD	Calculated	30-day running average
Primary Parameters			
pH	Std. Units	Grab	Monthly*
BOD5	mg/L	Grab	Monthly*
Total Suspended Solids	mg/L	Grab	Monthly*
Ammonia (as nitrogen)	mg/L	Grab	Monthly*
Total Kjeldahl Nitrogen	mg/L	Grab	Monthly*
Nitrite (as nitrogen)	mg/L	Grab	Monthly*
Nitrate (as nitrogen)	mg/L	Grab	Monthly*
Oil and Grease	mg/L	Grab	Monthly*
Secondary Parameters			
Total Dissolved Solids	mg/L	Grab	Semiannually
Sodium	mg/L	Grab	Semiannually
Chloride	mg/L	Grab	Semiannually
Sulfate	mg/L	Grab	Semiannually
Boron	mg/L	Grab	Semiannually

* Primary constituents as listed in the table above shall be tested on a monthly basis for the first six months after the adoption of the order, and the frequency of testing may be reduced to quarterly testing if the treatment system is performing within compliance with the effluent limitations set forth in the WDR.

This concludes our comments on the draft WDRs and MRP. Thank you for the opportunity to review these. Please contact me if you have any questions or comments.

Sincerely,

PETER HAASE, M.S., P.E.
Principal Engineer

cc: Bryan Hayes, Mission Springs, Scotts Valley
Cheryl Wong, SCCEHA, Santa Cruz