

## Central Coast Regional Water Quality Control Board

October 5, 2017

Jerry Gruber  
General Manager  
Cambria Community Services District  
[jgruber@cambriacsd.org](mailto:jgruber@cambriacsd.org)

**Sent via Electronic Mail**

Dear Mr. Gruber:

### **COMMENTS ON CAMBRIA COMMUNITY SERVICES DISTRICT'S IMPOUNDMENT BASIN CLOSURE PLAN - REVISED**

Central Coast Regional Water Quality Control Board (RWQCB) staff received a revised Impoundment Basin Closure Plan on September 29, 2017, submitted pursuant to Cease and Desist Order (CDO) No. R3-2017-0016.

RWQCB staff has reviewed the closure plan and is in agreement with the basic approach and majority of the closure plan's contents. We request clarification, correction, revision, or changes to the following items:

- On page 1, please correct the RWQCB order citations so that "R2-2-17-0016" reads R3-2017-0016 and "R3-2-14-0047" reads R3-2014-0047.
- Please clarify whether CCSD plans to follow the 5 days per week or the 7 days per week blending operations scenario, and explain how the chosen scenario meets the CDO's "as soon as possible" requirement.
- Please clarify how many hours per day the blending will be conducted. Table 9 states ~22 hours/day, the Pond Water Flow equation in section 5.2.3 uses 1,440 min/day (24 hours/day), and section 5.7 states that one operator will be required approximately 3 hours/day to fill the tanks, analyze water quality, and pump to the perc ponds.
- Please clarify why the workplan calls for having both tanks drain simultaneously, creating unnecessary down time when the tanks are refilled and are tested. Filling and testing one tank while the other drains would allow continuous blending.
- Please clarify where and how brine pond water will be blended with WWTP effluent (e.g., in manhole or ??)
- In section 5.2.3 please add an item to the pond pumping procedures for sampling and analyzing the blended effluent for boron at the point of discharge.
  - Blended effluent sampling should be conducted at least once per batch during the first week of operation to confirm the blend is  $\leq 0.75$  mg/L boron and once per day thereafter.

DR. JEAN-PIERRE WOLFF, CHAIR | JOHN M. ROBERTSON, EXECUTIVE OFFICER

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- If the blended effluent exceeds 0.75 mg/L of boron, flow from the baker tanks will be suspended until a corrected flow from the tanks is calculated and the pumping flow rate reset.
  - After the flow rate is adjusted, the blended effluent will be retested to confirm a  $\leq 0.75$  mg/L boron concentration.
- Please change the sentence in section 5.2.4 to require operators to visually examine pipes, pumps, and tanks for leaks once per day and for scaling once per month.
- Please explain why the Rain Contingency Plan calls for the blending of pond water to be discontinued on rainy days in section 5.4(1).
- In section 5.5, please identify the pond liquid boron concentration that constitutes “too concentrated” to be discharged and identify that as a project milestone.
- Please add a section which specifies that only operators and/or staff who have received sufficient training will operate the spectrophotometer for on-site boron analysis. Training is to be conducted by lab personnel familiar with operation of the actual instrument employed.
- All field instruments used to analyze boron concentrations shall be calibrated at least monthly, with a monthly sample split and sent to an ELAP-certified lab to confirm accurate calibration.

RWQCB staff thanks you for the progress to date toward arriving at a pond closure workplan that is acceptable to all parties and complies with the requirements of Cease and Desist Order No. R3-2017-0016. We look forward to receiving a finalized version which addresses the above-mentioned clarifications and changes.

Please contact Jon Rokke at (805) 549-3892 [jon.rokke@waterboards.ca.gov](mailto:jon.rokke@waterboards.ca.gov) or Chris Adair (805) 549-3761 [Chris.Adair@waterboards.ca.gov](mailto:Chris.Adair@waterboards.ca.gov) with any questions you may have concerning this matter.

Sincerely,



Digitally signed by Harvey C.  
Packard

Date: 2017.10.05 13:57:21 -07'00'

for John M. Robertson  
Executive Officer

Cc: Bob Gresens  
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