ATTACHMENT 2

Monterey Regional Water Pollution Control Agency

Comment Letter dated January 19, 2017

Monterey Regional Water Pollution Control Agency

"Dedicated to meeting the wastewater and reclamation needs of our member agencies, while protecting the environment."

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January 19, 2017

John M. Robertson
Executive Officer
Central Coast Regional Water
Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
By email: centralcoast@waterboards.ca.gov

SUBJECT: Comments on Draft Waste Discharge Requirements and Water Recycling Requirements, Pure Water Monterey Groundwater Replenishment Project (Order No. R3-2017-0003)

Dear Mr. Robertson:

The Monterey Regional Water Pollution Control Agency (MRWPCA) is submitting comments on the Draft Waste Discharge Requirements and Water Recycling Requirements (Draft Order) issued for the Pure Water Monterey (PWM) Groundwater Replenishment Project on December 15, 2016. MRWPCA's comments and requested changes are enumerated below. The proposed additions to the Draft Order are shown as underlined text and the proposed deletions are shown as ~~strikethrough~~.

SUBSTANTIVE COMMENTS

Comment No. 1 – Advanced Treatment Facility Name Change

MRWPCA has selected "Advanced Water Purification Facility" as the final name for the PWM advanced water treatment facility. This name is being used in the construction bid documents, public outreach materials, and facility signage. For consistency with the Draft Order and future regulatory correspondence, please change all facility references from the "Advanced Water Treatment Facility (AWTF)" to the "Advanced Water Purification Facility (AWPF)."

Comment No. 2 – Recycled Water Terminology

The Draft Order identifies recycled water produced at the AWPF as "product water," "recycled water," and "advanced treated recycled water." For clarity, MRWPCA requests consistent identification as "purified recycled water."

Comment No. 3 – AWPF Major Components

The list of AWPF major components should include the supply water and product water pump stations. These pump stations will be used to collect samples of AWPF influent and purified recycled water. The following changes are requested for completeness.

III.21. Primary Project Components (Page 3)

2. The Advanced Water Treatment Facility (AWTF) has the following major components:

   - Supply water pump station
   - Ozonation (membrane filtration pretreatment)
   - Membrane filtration feed water pump station
   - Low Pressure Membrane Filtration (MF)
   - Reverse osmosis (RO) feed water pump station
   - RO system
   - Ultraviolet light (UV) with hydrogen peroxide advanced oxidation Process (AOP)
   - Post treatment stabilization
   - Product water pump station

Comment No. 4 – Handling of AWPF Waste Streams

The APWF will produce seven waste streams and the waste solids will be sent to the RTP headworks and/or the RTP thickening process for treatment. The following changes are requested to accurately describe the waste stream production and processing.

III.22. AWTF Design Flows and Waste Streams (Page 4)

The proposed AWTF will have a design capacity to produce 4.0 MGD of purified ~~advanced treated~~ recycled water. The facility will also produce ~~six~~ seven waste streams: ozone injection strainer waste, MF backwash waste, neutralized MF enhanced flux maintenance waste, neutralized MF clean-in-place waste, neutralized RO clean-in-place waste, analytical instrument waste, and RO concentrate. The RO concentrate will be piped to MRWPCA's existing ocean outfall along with secondary wastewater effluent~~. And~~ and trucked brine. The other AWTF waste streams will be diverted ~~back~~ to the RTP ~~or the~~ headworks ~~or the trickling filters~~ or the RTP sludge thickening process for treatment.

Comment No. 5 – Modifications to Table 1

The list of constituents presented in Table 1 (page 8) is incomplete and includes numerous mistakes with regards to units, identified goals/objectives, and sources. MRWPCA suggests removal of Table 1 and expanding the narrative description (as needed) to describe the Basin Plan water quality goals and objectives in VIII.A.40. and VIII.A.41.

Comment No. 6 –Water Quality Objectives for Seaside Basin

The Basin Plan includes general objectives, Municipal and Domestic Supply (MUN) objectives, and Agricultural Supply (AGR) objectives that apply to Seaside Basin groundwater. To correctly identify applicable receiving water requirements in the Draft Order, the following changes are suggested.

VIII.A. Regional Board Water Quality Control Plan (Basin Plan) (Page 10)

46. The Basin Plan contains the following specific water quality objectives for Seaside Basin groundwater:

This Order protects Seaside Basin groundwater water quality objectives and is therefore consistent with the Basin Plan.

V. Provisions (Page 16)

1. Injection of the purified ~~advanced treated~~ recycled water shall not cause or contribute to an exceedance of water quality objectives in Seaside Basin groundwater.

Comment No. 7 – Changes to Table 4

The recycled water monitoring requirements in the MRP (Table M-3, Footnote 6) allows weekly analysis of total nitrogen if no problem is detected after 12 months of data collection. The following change is recommended to provide consistency between Table 4 and Table M-3.

III. Recycled Water Discharge Limits (Page 15)

Table 4 – Recycled Water Discharge Limits

Constituents	Units	Concentration	Monitoring Frequency	Compliance Interval
**Nitrogen – Total	mg/L	10	Twice per week (or Weekly[1])	Average of Last 4 Results

[1]MRP (Table 3) allows weekly monitoring if no problem is detected after 12 months of data collection.

Comment No. 8 – CCR Title 22 Requirements for Subsurface Application

The following changes are needed to correctly reference the CCR Title 22 requirements for groundwater replenishment utilizing subsurface application.

VI. State Water Resources Control Board Division of Drinking Water (DDW) Requirements (Pages 18 to 19)

3. The Project AWTF shall be operated to meet the requirements in section ~~60320.122.~~60320.222 Operation Optimization and Plan.

4. As required by Title 22 section ~~60320.122.~~ 60320.222 (Operation Optimization Plan), prior to operation, MRWPCA shall submit an Operation Optimization Plan for review and approval to DDW and the Central Coast Water Board...

11. MRWPCA shall verify that the recycled municipal wastewater used for the Project meets the requirements in Title 22 section ~~60320.106~~ 60320.206. Wastewater Source Control.

12. Pursuant to Title 22 section ~~60320.108~~ 60320.208 (a) Pathogenic Microorganism Control (a), MRWPCA shall operate the Project such that the recycled municipal wastewater used as recharge water receives...

13. If a pathogen reduction in Title 22 section ~~60320.108~~ 60320.208 (a) is not met based on the on-going monitoring required pursuant to subsection (c), within 24 hours of being aware, MRWPCA...

Comment No. 9 – Use of TOC as Surrogate for Pathogen Removal

MRWPCA is planning to measure total organic carbon (TOC) removal through reverse osmosis (RO) during commissioning and operation of the AWPF in order to determine if it can be used as a surrogate for pathogen removal instead of electrical conductivity. MRWPCA is planning to submit a report to DDW and the Central Coast Water Board after sufficient comparative data have been collected. If the results suggest that TOC can be used instead of conductivity, then

MRWPCA is planning to ask for a revision to the permit to allow for TOC monitoring of the RO feed and RO combined permeate instead of conductivity. Accordingly, the following change is requested for the Draft Order.

VI.15. State Water Resources Control Board Division of Drinking Water (DDW) Requirements (Page 19)

b. The Reverse Osmosis (RO) system shall be credited pathogen reduction at this facility in accordance with the amount demonstrated via online monitoring to ensure the integrity of the RO system. MRWPCA must monitor the effluent of each RO train (including each stage) continuously for conductivity at the AWTF. The daily average and maximum conductivity reading, and the percent of time that the reduction of conductivity is less than 1.0 log removal must be reported. The MRWPCA shall calculate the minimum removal achieved at the AWTF. An alternative surrogate may be utilized if approved by the Division of Drinking Water and the Central Coast Water Board.

III.1. Reporting Requirements (Page MRP-8)

c. The Reverse Osmosis (RO) system will be credited for virus, Giardia cysts and Cryptosporidium oocysts based upon reduction demonstrated via an approved surrogate, such as conductivity. MRWPCA shall monitor conductivity continuously in both the RO feed and RO permeate of each RO train, in order to demonstrate membrane integrity~~and a conductivity~~. The daily average and maximum conductivity reading and percent of time that the reduction of conductivity is less than 1.0 log removal must be reported. The report shall include calculation of minimum removal achieved at the AWTF. An alternative surrogate may be utilized (e.g., TOC) if approved by the Division of Drinking Water and the Central Coast Water Board. The proposal to change surrogates may also include different monitoring locations (e.g., combined RO permeate instead of train RO permeate), if approved by DDW and the Central Coast Water Board.

Comment No. 10 – Ultraviolet Light Transmittance Setpoint

AWPF commissioning may demonstrate that the 1,4-dioxane removal requirement is achieved at an ultraviolet light transmittance (UVT) other than 95% minimum. To allow for this possibility, and to be consistent with the other advanced oxidation process (AOP) requirements, MRWPCA requests the following change.

VI.15.f. State Water Resources Control Board Division of Drinking Water (DDW) Requirements (Page 20)

ii. UV transmittance less than 95%, *or a new setpoint approved by DDW after the AOP commissioning.*

Comment No. 11 – Startup 30 Day Report

A startup 30-day report has not been required for other all other groundwater replenishment projects except for the Cambria Community Services District Emergency Water Treatment Facility Recycle Water Re-injection Project. Given that the PWM project is not an emergency project and production of this report is an unnecessary burden, MRWPCA requests the requirements for a startup 30-day report be removed from the Draft Order.

I.1. Submittal of Reports (Page MRP-3)

~~a. Startup 30-day report:~~

~~The Discharger must evaluate and field-validate any operating assumptions for the AWTF (quality of water supplies, membrane filter backwash discharge, membrane filtrate discharge, and stabilized reverse osmosis product water re- injection) and compare the pre-project assumptions to documented operating data. The Discharger must submit a report detailing differences between documented operating values and assumed concentrations/conditions. The report must be submitted within 10 days following the first 30 days of AWTF operation.~~

Comment No. 12 – UV Dose Calculation

Chloramine removal has had inconsistent results as a surrogate for UV/AOP performance when hydroxyl radicals are present, such as in the AWPF UV/AOP system. MRWPCA requests the following changes until the industry has more clearly demonstrated the benefit of measuring chloramine removal through UV/AOP. The UV/AOP performance will be assessed through the measurements of flowrate, UV intensity, UVT, and hydrogen peroxide.

III.1.d. Monthly Reports (Page MRP-9)

i. For AOP (UV and hydrogen peroxide at the AWTF), MRWPCA shall report the calculated daily hydrogen peroxide dose (based on the pump speed and bulk feed concentration). ~~and percent reduction based on daily average of chloramine (via total residual chlorine) measured upstream and downstream of the AOP.~~

Comment No. 13 – Flow Measurements

The combined effluent from the waste equalization (EQ) basins is metered, which includes drainage from the chemical area, RO clean-in-place (CIP) waste, RO flush waste, MF strainer backwash, MF CIP/enhanced flux maintenance (EFM) waste, overflow from the MF filtrate tank, and MF backwash waste. Accordingly, MRWPCA requests the following changes to the flow volume reporting requirements:

III.2. Quarterly Reports (Page MRP-10)

a. The volume of:

- AWTF Influent – Secondary effluent from the RTP.
- ~~Membrane filter (MF) backwash~~ Waste EQ effluent discharged into the RTP.
- Purified ~~Fully treated~~ recycled water injected into the Seaside Basin.
- RO concentrate sent to the ocean outfall.
- If no water was pumped, the report shall so state.

Comment No. 14 – Quarterly Reporting

The following changes are needed to correctly describe the monitoring locations required for quarterly reporting. The constituents to be monitored are details in Tables M-2 and M-3 of the Draft Order.

III.2.a. Quarterly Reports (Page MRP-10)

ii. All analytical results of samples collected during the monitoring period at ~~of~~ the following locations:

- AWTF Influent,
- ~~MF feed water conductivity~~,
- ~~MF Pressure Decay Tests~~,
- RO feed ~~product~~ water ~~conductivity~~,
- ~~Chlorine concentrations at the injection well heads~~,
- Purified recycled water ~~RO recycled water injected to the Seaside Basin~~,
- Groundwater.

Comment No. 15 – Annual Reporting

There are no known domestic wells in the vicinity of the injection wells. The nearest downgradient wells are municipal and irrigation supply wells. CCR Title 22 data should be collected and reported for the public drinking water supply well that is closest to the injection wells and the following language is suggested to clarify the requirement.

III.3. Annual Summary Report (Page MRP-11)

f. Title 22 drinking water quality data for the nearest drinking ~~domestic~~ water supply well;

Comment No. 16 – AWPF Influent Monitoring Location

The source waters will be blended with RTP influent prior to treatment at the RTP. Clarified secondary effluent from the RTP will be sampled as AWPF influent. Accordingly, MRWPCA requests the following changes to correctly describe the AWPF influent monitoring location.

IV.1. AWTF Influent Monitoring (Page MRP-13)

b. The influent sampling station is located before ~~water from any of the various sources~~ clarified secondary effluent from the RTP enters the ozone pre-treatment system of the AWTF. Influent samples shall be obtained on the same day that stabilized purified ~~RO~~ recycled water samples are obtained...

Comment No. 17 – Consolidation of MRWPCA Monitoring Programs

The Draft Order establishes several new monitoring locations and significantly expands the frequency and list of monitored constituents for MRWPCA. Considerable investments will be undertaken to obtain/install sampling equipment, collect representative samples, and analyze/report sample results as prescribed by the Draft Order provisions. In 2013, the State Water Resources Control Board adopted a resolution to "identify and implement measures to reduce costs of compliance while maintaining water quality protection and improving regulatory program outcomes" (Resolution No. 2013-0029). In accordance with this resolution, MRWPCA requests review and consolidation of monitoring requirements as MRWPCA's other permits are modified to include the AWPF treatment train and/or changed influent or effluent quality.

Comment No. 18 – AWPF Influent Monitoring

MRWPCA requests the following changes to the AWPF influent monitoring requirements (Table M-2, Page MRP-14). These constituent concentrations are not required to assess compliance with CCR Title 22 and are not required to evaluate AWPF performance. To demonstrate compliance with the CCR Title 22 requirement for oxidized wastewater (Section 60301.650), MRWPCA proposes to use TSS and either TOC or $CBOD_5$. If ultraviolet light transmittance (UVT) must be monitored, then MRWPCA requests the type of sample be changed from metered to grab sample as a UVT meter is not included in the project design. The shortened list of influent monitoring requirements is consistent with permits issued recently for other

groundwater replenishment subsurface application projects (e.g., Dominguez Gap Barrier Project, Order No. R4-2016-0334).

- Delete Ammonia
- Change BOD_5 to $CBOD_5$ *(for consistency with NPDES permit requirements)*
- Delete Boron
- Delete Chloride
- Delete Nitrate
- Delete Nitrite
- Delete Total Nitrogen
- Delete Sodium
- Delete Sulfate
- Delete Total coliform
- Delete Total dissolved solids (TDS)
- Delete Total Kjeldahl nitrogen (TKN)
- Delete Ultraviolet light transmittance (UVT)
- Change the TOC sample type from 24-hour composite to grab (if demonstrate grab sampling is representative)
- Allow use of Non-Purgeable Organic Carbon (NPOC) for TOC measurement and reporting *(based on comparison monitoring currently underway by MRWPCA)*

Comment No. 19 – Recycled Water Monitoring

MRWPCA notes that all other approved subsurface application groundwater replenishment projects in California are required to monitor less frequently for inorganics with primary MCLs, constituents/parameters with secondary MCLs, radioactivity, regulated organic chemicals, disinfection byproducts, and constituents with notification levels. The monthly monitoring requirements specified in the Draft Order will add significant costs to the project. For constituents without recycled water discharge limits, MRWPCA will propose a reduction in monitored constituents and frequencies after the first full year of data collection. The following language is suggested to outline a process for compiling/reviewing data, proposing new monitoring frequencies, and receiving approval from DDW and the Central Coast Water Board.

IV.2. Recycled Water (AWTF) Discharge Limit Monitoring (Page MRP-14)

a. Advanced treated recycled water monitoring is required to:

   i. Determine compliance with the Permit conditions;
   ii. Identify operational problems and aid in improving facility performance; and,
   iii. Provide information on recycled water characteristics and flows for use in interpreting water quality and biological data.

Samples shall be collected downstream of the last chemical injection point, with the exception of constituents specified in Tables M-12 and M-13. Should the need for a change in the sampling station(s) arise in the future, the MRWPCA shall seek approval of the proposed station by the Executive Officer prior to use.

Table M-3 shall constitute the recycled water monitoring program. After the first full year of monitoring, MRWPCA shall compile results and submit a revised monitoring program to DDW and Central Coast Water Board for review and approval.

Comment No. 20 – Recycled Water Monitoring

MRWPCA requests the following changes to the recycled water monitoring requirements (Tables M-3 and M-4, Pages MRP-15 to MRP-16). Chlorine residual is not utilized for pathogen removal credit. However, if chlorine monitoring is required, MRWPCA suggests changing the constituent to total chlorine instead of free chlorine, as the chlorine species will be present as chloramines. UV dose and UVT will be monitored and reported based on requirements specified in the approved Operation Optimization Plan (OOP). MRWPCA is switching to a new analytical method for total nitrogen (ASTM D8083, pending publication) that does not require use of the TKN digestion process. As a result, TKN monitoring will become unnecessary and the results will no longer be relevant for total nitrogen calculations. The list of regulated organic chemicals contain volatile compounds that are better represented by collecting grab samples rather than 24-hour composite samples. Disinfection byproducts (DBP) will not be representative of the recycled water discharge concentrations if collected in a 24-hour composite sampler because DBP concentrations will increase as a result of longer chlorine contact times in the sampler. As allowed by CCR Title 22 Section 64432(a)(2), Chromium VI monitoring is not required if Total Chromium is monitored and the detection limit for purposes of reporting (DLR) is less than 0.01 mg/L.

- Delete free chlorine residual (or change to total chlorine residual)
- Delete UV dose
- Delete UVT
- Delete TKN
- Change the total nitrogen sample type from 24-hour composite to grab
- Change the nitrate sample type from 24-hour composite to grab
- Change the regulated organic chemical sample type from 24-hour composite to grab
- Change the disinfection byproduct sample type from 24-hour composite to grab

- Delete Chromium VI (Table M-4)
- Change the TOC sample type from 24-hour composite to grab (if demonstrate grab sampling is representative)
- Allow use of Non-Purgeable Organic Carbon (NPOC) for TOC measurement and reporting *(based on comparison monitoring currently underway by MRWPCA)*

Comment No. 21 – Evaluation of Pathogen Removal

Chloramine removal has had inconsistent results a surrogate for UV dose when hydroxyl radicals are present, such as in the AWPF UV/AOP system. MRWPCA requests the following changes for AOP reporting. Until the industry has more clearly demonstrated the benefit of chloramine removal through UV/AOP, the UV dose at the AWPF will be calculated from the flowrate, UV intensity, and UVT.

IV.2.d. Evaluation of Pathogenic Microorganism Removal (Page MRP-22)

ii. Advanced Oxidation Process (AOP) - (UV and hydrogen peroxide at the AWTF): For each day of operation, MRWPCA shall report the calculated daily peroxide dose (based on the peroxide pump speed and bulk feed concentration), ~~percent reduction based on daily average of chloramine (via total residual chlorine) measured upstream and downstream of AOP~~, and the applied UV power ~~shall be reported~~. For UV, MRWPCA shall report the UV system dose (expressed as greater than a certain threshold such as 300 milli-joules/cm2), UV transmittance (daily minimum, maximum, and average), UV intensity for each reactor (daily minimum, maximum, and average) and the total UV power applied; and

Comment No. 22 – Groundwater Monitoring

The groundwater monitoring program prescribed by the Draft Order significantly expands the approach detailed in the approved Engineering Report. MRWPCA estimates that implementing the Draft Order groundwater monitoring requirements will cost $110,000 more each year than originally budgeted for the Engineering Report program. MRWPCA requests a process to modify groundwater monitoring parameters and frequencies after the first full year of injection well operation. The following changes are suggested to outline a process for compiling/reviewing data, proposing a new monitoring program, and receiving approval from DDW and the Central Coast Water Board.

IV.4.a. Groundwater Monitoring (Page MRP-24)

The MRWPCA shall implement the following groundwater monitoring program as described in Tables M-14, M-15, and M-16 when the injection

wells begin operation. Some constituents may be eligible for reduced monitoring due to the consistent historic lack of detection and/or other hydrogeologic basis, upon approval by the Executive Officer. After the first full year of monitoring, MRWPCA shall compile results and submit a revised monitoring program to DDW and Central Coast Water Board for review and approval.

Comment No. 23 – Other Monitoring Requirements

The following monitoring requirements are already specified in Table M-3 and can be deleted as a separate section of the MRP. Section 60320.201 does not include a requirement for collecting the first effluent sample within the first five days of operation.

VI. Other Monitoring Requirements (Page MRP-32)

"Section 60320.201. Advanced Treatment Criteria"

~~(i) Each month a project sponsor shall collect samples (grab or composite) representative of the effluent of the advanced treatment process and have the samples analyzed for contaminants having MCLs and notification levels (NLs). After 12 consecutive months with no results exceeding an MCL or NL, a project sponsor may apply for a reduced monitoring frequency. The reduced monitoring frequency shall be no less than quarterly. Monitoring conducted pursuant to this subsection may be used in lieu of the monitoring (for the same contaminants) required pursuant to sections 60320.212 and 60320.220. The first sample of the effluent needs to be collected in the first five days of operation of the AWTF.~~

NON-SUBSTANTIVE COMMENTS

III.21. Primary Project Components (Page 3)

1. The following source waters will be treated to secondary standards at the RTP:

   - Sewage from the MRWPCA member entities

VIII.A. Regional Water Quality Control Plan (Basin Plan) (Page 8)

43. Four wells were used to establish existing groundwater water quality and assimilative capacity of the aquifer and sub-aquifers. The most recent five years of data (2011-2016) were analyzed for each well and the data are presented in Table 2. Two of the wells draw their water from both the Paso Robles and Santa Margarita aquifers (Ord Grove No. 2 and Paralta). One well draws water exclusively from the Paso Robles aquifer (City of Seaside No. 4) and one well draws exclusively from the Santa Margarita aquifer (ASR-1).

Table 2 – Existing Groundwater Quality in the Seaside Basin (Page 9)

Footnote Change

**Concentrations are in µg/L except chloride, nitrate, sodium, sulfate, TDS, and TOC, which are mg/L*

V. Provisions (Page 18)

11. The DDW conditions that are not explicitly included in this Order are incorporated herein by this reference, and are enforceable requirements of this Order. Any violation of a term in this Order that is identical to a DDW ~~C~~condition will constitute a single violation.

VI. State Water Resources Control Board Division of Drinking Water (DDW) Requirements (Page 20)

Redundant. Delete or merge with requirement in VI.2. on Page 18.

~~17. MRWPCA must submit for approval a draft AOP commissioning and testing protocol, to demonstrate the AOP will provide no less than 0.5-log (69 percent) reduction of 1,4-dioxane.~~

VI. State Water Resources Control Board Division of Drinking Water (DDW) Requirements (Page 20)

Merge requirement VI.19 with requirement VI.4.

4. As required by Title 22 section 60320.~~1~~2222. (Operation Optimization Plan), prior to operation, MRWPCA shall submit an Operation Optimization Plan for review and approval to DDW and the Central Coast Water Board. At a minimum, the Operation Optimization Plan shall identify and describe the operations, maintenance, analytical methods, monitoring (grab and online) necessary for the Project to meet the requirements and the reporting of monitoring results. MRWPCA must submit a draft of the Operation Optimization Plan prior to the construction and commissioning. This draft Operation Optimization Plan can be amended and finalized after the completion of full-scale commissioning and startup testing. A final Operation Optimization Plan must be submitted to DDW 90 days after completion of startup operations.

Figure 1 – Location of MRWPCA's RTP, AWTF, and Injection Wells (Page 23)

Change "RTF" to "RTP"

III.1. Monthly Reports (Page MRP-9)

g. MRWPCA shall monitor the RO effluent for TOC via grab sample weekly and report in the monthly report. MRWPCA shall also monitor RO influent and effluent for TOC online and report monthly. The daily average and maximum TOC reading and the percent of time that the TOC is greater than 0.5 mg/L must be reported.

III.2.a. Quarterly Reports (Page MRP-10)

vii. A summary of operational concerns describing changes in reporting conditions, including influent, MF filtrate, RO permeate ~~recycled water~~, UV/AOP water, and groundwater monitoring results, since the last report.

III.3.c. Annual Reports (Page MRP-11)

ii. a summary of any corrective actions and/or suspensions of ~~surface~~ subsurface application of recycled water resulting from a violation; and

IV.2.d. Evaluation of Pathogenic Microorganism Removal (Page MRP-22)

i. For the purpose of demonstrating that the necessary log reductions are achieved at the AWTF, MRWPCA shall report the daily average and maximum turbidity, percent of time more than 5 nephelometric turbidity units (NTU), and daily coliform results ~~associated~~ measured in the ~~with the WRP(s)~~ purified recycled water (as specified in Table M-3);

IV.4. Groundwater Monitoring (Page MRP-22)

Cite as Title 22 requirement. Delete unnecessary, incomplete language.

a. As required by Title 22, Section 60320.226, ~~P~~prior to operating any injection well, ~~a~~ MRWPCA shall site and construct at least two monitoring wells downgradient of the injection wells, such that:

(1) at least one monitoring well is located;

(A) no less than two weeks but no more than six months of travel time from ~~through the saturated zone affected by~~ the injection wells, and

(B) at least 30 days upgradient of the nearest drinking water well;

(2) in addition to the well(s) in paragraph (1) and after consultation with DDW, at least one monitoring well is located between the injection wells and the nearest downgradient drinking water well; and

(3) samples from the monitoring wells in paragraphs (1) and (2) can be;

(A) obtained independently from each aquifer, initially receiving the water used as a source of drinking water supply, that will receive the injection wells recharge water, and

(B) validated as receiving recharge water from the injection wells.

~~(b) In addition to the monitoring required pursuant to section 60320.12~~20, ~~from each monitoring well in subsection (a)(1), and each monitoring well in subsection (a)(2) that has recharge water located within one year travel time of the well(s), a project~~

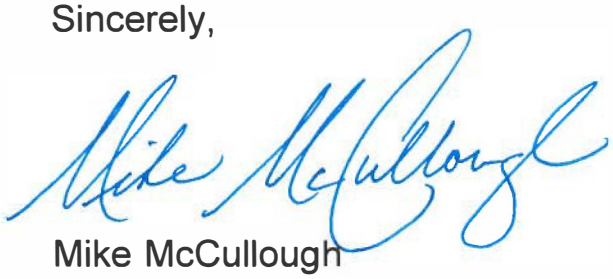
IV.4. Groundwater Monitoring (Page MRP-23)

- Siting an additional downgradient well between the Injection Facilities and the nearest downgradient potable water supply (in addition to the downgradient monitoring well used to demonstrate retention time, as described in the bullet point above).

MRWPCA appreciates the time and considerations granted by the Central Coast Water Board staff during development of the Draft Order. MRWPCA is a committed steward of water quality protection in the Monterey Peninsula and PWM is a vital component of the future water supply for its residents. The purified recycled water produced by PWM will be used to recharge the Seaside Groundwater Basin to reduce salinity, prevent seawater intrusion, and reduce diversions from the Carmel River. In addition, the diversion and treatment of new recycled water supplies will reduce the volume of recycled water and pollutant loads currently discharged to the Monterey Bay National Marine Sanctuary.

If you have any questions, please feel free to contact me at (831) 645-4618 or MikeM@mrwpca.com.

Sincerely,



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