



## AVILA BEACH COMMUNITY SERVICES DISTRICT

Post Office Box 309, Avila Beach, CA 93424  
Office and Meeting Room - 191 San Miguel Street, Avila Beach  
Telephone (805) 595-2664 FAX (805) 595-7623  
E-Mail Avilacsd@gmail.com

July 13, 2017

Ms. Sheila Soderberg  
Central Coast Regional Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

**Subject: Comments on Draft Waste Discharge Requirement Order No. R3-2017-0025 , NPDES Permit No. CA0047830, for the Avila Beach Community Services District (District) Wastewater Treatment Plant**

Dear Ms. Soderberg,

Thank you for the opportunity to provide comments on the Subject draft permit. As requested the District the posted the Notice of Public Hearing at their Administrative Office in Avila Beach and published the Notice in the San Luis Tribune on Wednesday June 21. We have requested the Proof of Publication from the Tribune and we will forward that to you as soon as we receive it.

The District's Comments are as follows:

### **Order**

1. Discharger: The Avila Beach Community Services District is the sole owner of the wastewater treatment plant. The Port San Luis Harbor District has contracted with the CSD for a prescribed amount of capacity in the plant. The District has contracted with Fluid Resource Management for operating and maintaining the wastewater treatment plant through November 2018. As the sole owner of wastewater treatment plant, the District requests that the Avila Beach Community Services District be named as the only Discharger on the Permit.
2. We noted that the proposed draft Permit has added effluent limits for copper and zinc. The District has no objection to those new effluent limits.

3. We noted that Water Board staff added a provision for brine waste disposal through the ocean outfall. The District appreciates this added provision and will likely prepare a Brine Waste Disposal Study for a limited amount of brine waste disposal.
4. The first sentence in Paragraph 5.a.viii., on Page 14 appears to be a sentence fragment.
5. Attachment C, Flow Schematic of the Order shows the Sludge Disposal going to the Santa Paula WWTP. The District is no longer disposing of sludge at Santa Paula. The District has been hauling sludge to the City of Soledad WWTP and/or Liberty Composting.

### **Monitoring and Reporting Program (MRP) & Fact Sheet**

1. The proposed MRP includes a new requirement to meter Influent and Effluent (daily flow & maximum daily flow). The District currently only meters and records the effluent flow. The District requests that they not be required to install an influent flow metering and recording device (at a cost of \$5,000 - \$7,500) since the existing effluent monitoring device provides the same information.
2. The draft permit does not require semiannual chloroform or tributyltin monitoring, but these constituents are still mentioned in the reporting schedule with the semiannual report (table E-10 on page E-16).
3. Page F-37 of the Fact Sheet refers to the BOD/TSS removal rate as 85%, although the main body of the Order at paragraph III.A.1.c. (page 7) maintains the BOD/TSS removal at 75%.
4. Fact Sheet, Paragraph VII.E.2. (bottom of page F-37) states that “The Order retains the requirements of the previous permit to conduct pretreatment monitoring and reporting.” However, the pretreatment monitoring does not appear to be included in the draft MRP. Staff agrees that continuation of additional pretreatment monitoring may not be appropriate based on the results of the previous year’s data. The District requests clarification of this issue.

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### **General Comments**

1. Recycled Water Facilities Planning Grant – As Board staff knows, the District and the San Miguelito Mutual Water Company are collaborating on Proposition 13 Water Recycling Facilities Planning Grant Project. The project agreement was approved by the State Board in March 2016, for a funding amount of up to \$75,000. The District retained Water Systems Consulting, Inc. to conduct the study and we anticipate the draft report will be completed by late July or early August, 2017. Staff is optimistic that the report will provide the analysis and framework for consideration of a regional water recycling project that will minimize the District’s discharge to the ocean.

2. Chevron Environmental Management Company recently approached the District regarding the possibility of discharging up to 2,000 gallons per day of extracted and treated groundwater from the former Avila Tank Terminal to the District's sewage collection system.

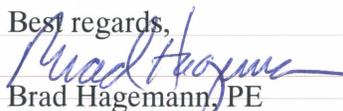
The groundwater cleanup project has historically and, is currently regulated by the Central Coast Water Board. CEMC is currently trucking the treated groundwater off-site. As you would expect the treated groundwater contains very little Biochemical Oxygen Demand or Suspended Solids (less than 10 mg/L) and no coliform. Total dissolved solids (TDS) are on the order of 11,000 – 12,000 mg/L due to the ocean influence on the extracted water.

CEMC believes disposing of the treated groundwater to the District's WWTP will reduce traffic impacts, safety risks, and greenhouse gas emissions associated with trucking the wastewater off-site. District staff has reviewed the water quality data from the groundwater cleanup project and all pollutants are well below the proposed permit effluent limitations. District staff intends to continue the discussion with CEMC including making arrangements for additional water quality analysis and discharging a 2,000 – 3,000 gallon batch of treated groundwater to the collection system to determine if the discharge has any negative impacts on the plant.

District staff does not recommend the proposed Permit be revised in any way to allow the District to accept this relatively small, but new discharge. We wanted to simply advise Water Board staff that the District is considering the discharge and would welcome any comments. Based on input from CEMC staff, District staff anticipates that the discharge will be temporary in nature (up to 3 years) until the CEMC cleanup project is completed. In addition, if/when the District moves forward with a water recycling project we would likely cease accepting the discharge due to the relatively high TDS levels.

Thank you again for the opportunity to comment on the draft order and we look forward to working with you and the Central Coast Water Board on the Permit renewal.

Best regards,



Brad Hagemann, PE

General Manager