

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN DIEGO REGION**

**ITEM NO. 6**

**TENTATIVE ORDER NO. R9-2006-0063**

**WASTE DISCHARGE REQUIREMENTS FOR CALIFORNIA DEPARTMENT OF TRANSPORTATION  
DESCANSO MAINTENANCE STATION, SAN DIEGO COUNTY**

**RESPONSES TO COMMENTS FROM INTERESTED PARTIES**

<b>Comment #</b>	<b>Comment</b>	<b>Staff Response</b>
<i>Comments received from California Department of Transportation Division of Engineering Services via e-mail on May 24, 2006</i>		
1	Page 8, Provision #3, Table 1, The septic effluent limits are unachievable. An appropriate level as identified in the Basin Plan for Total Dissolved Solids is 500 mg/l.	<p>The total dissolved solids effluent limitations in the table under Provision B.3 of the tentative Order are incorrect. The correct effluent limitations should be 450 mg/L as a 12-month average and 750 mg/L as a daily maximum. These corrections are included in the Errata Sheet.</p> <p>The correct effluent limitations implement the groundwater water quality objective (WQO) for HSA 11.30 of 500 mg/L, which the Basin Plan stipulates is a "concentration not to be exceeded more than 10% of the time during any one year period." The effluent limitations have been calculated from the WQO using a statistical approach.</p>

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2	<p>Page 8, Provision #3, Table 1,</p> <p>Total nitrogen level for raw sewage as stated in the 2002 EPA Onsite Wastewater Treatment Systems Manual is between 26-75 mg/l. Including the washwater total nitrogen level of 3 mg/l, the level of the combined discharge total nitrogen level would be 29-79 mg/l. Assuming a 30% nitrification rate the total nitrogen daily maximum would be 55 mg/l. Request this limit be changed to reflect this value.</p> <p>Methylene Blue Active Substances (MBAS) is an analytical procedure to identify detergents. The inclusion of these extremely low effluent limits would prevent the use of soap and other detergents at the facility. If effluent limits are necessary for this permit, they should be included in the groundwater performance requirement and not prior to the discharge.</p>	<p>HSA 11.30 has a Basin Plan groundwater water quality objective for nitrates of 10 mg/L as N, not to be exceeded more than 10% of the time during any one-year period. The total nitrogen effluent limitation under Provision B.3 implements the groundwater water quality objective.</p> <p>In calculating total nitrogen effluent limitations, the Regional Board assumes that all effluent nitrogen discharged to land is nitrified to nitrates and could therefore cause the water quality objective to be exceeded. The Regional Board does take into consideration denitrification that occurs in the unsaturated soil prior to the water table and allows for 30% denitrification in the calculation of effluent limitations when site-specific denitrification rate information is not available.</p> <p>The Regional Board recognizes that the septic tank effluent discharged from the Descanso Maintenance Station will not meet the total nitrogen effluent limitation under Provision B.3. However, the discharge is not prohibited provided that there is sufficient assimilative capacity in the receiving groundwater and water quality objectives are not exceeded. If the groundwater performance requirements under Provision B.4 are exceeded, therefore indicating no groundwater assimilative capacity, then the effluent must comply with the total nitrogen effluent limitation under Provision B.3 at the point of discharge, otherwise the discharge would be out of compliance. The discharge of boron in the effluent is regulated in the same manner under Provisions B.3 and B.4 as total nitrogen.</p> <p>MBAS effluent limitations are also based on the Basin Plan MBAS groundwater water quality objective of 0.5</p>

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		<p>mg/L, not to be exceeded more than 10% of the time during any one year period. The discharge of MBAS in the effluent can be regulated in the same manner under Provisions B.3 and B.4 as total nitrogen and boron, and the Errata Sheet includes changes to reflect this regulatory approach.</p> <p>After reviewing Provisions B.3 and B.4, the Regional Board has decided that these discharge specifications can be simplified. Provisions B.3 and B.4 have been eliminated from the tentative Order as indicated in the Errata Sheet. A new Provision B.3 has been added which still takes groundwater assimilative capacity into consideration when it is available.</p> <p>The new Provision B.3 would allow the discharge if either groundwater in downgradient monitoring wells satisfy performance requirements or if the effluent complies with effluent limitations. Except for total nitrogen, the groundwater performance requirements and the effluent limitations are numerically the same because when there is no assimilative capacity, a discharge can only be allowed if the discharge meets water quality objectives at the point of discharge. Effluent limitations for nitrogen are higher than performance requirements to account for denitrification of the effluent in the subsurface prior to entering the water table.</p>
3	<p>Page 9, Provision 5, Table 1</p> <p>Di (2-ethylhexyl) phthalate is a plasticizer and not normally expected to found in wastewater from the washing of vehicles. Di (2ethylhexyl) phthalate was detected in the lab results submitted for a similar Caltrans facility. However, due to the very low level detected it is very likely that this</p>	<p>Analytical results provided by Caltrans for vehicle washrack wastewater from a facility similar to the Descanso Maintenance Station indicated the presence of di (2ethylhexyl) phthalate and tetrachloroethylene at levels above the groundwater water quality objectives based on drinking water MCLs. Based on this information, the Regional Board determined there was</p>

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	<p>detection was the result of lab contamination from laboratory equipment plastic tubing. Furthermore, Di (2ethylhexyl) phthalate should not be included as an effluent limit for the wash rack wastewater samples because the wastewater has not been fully treated by the facilities wastewater facilities that include the oil water separator, septic tank, and leach field. These treatments systems use a combination of physical and biological treatment technologies to reduce the concentration of this pollutant. The Department does not recommend setting an effluent standard for this constituent.</p> <p>As stated above, tetrachloroethylene constituents should be not be included as an effluent limit for the washwater due to the presence of numerous treatments systems at the facility. The Department has also switched to citrus cleaners for vehicle maintenance and eliminated the use of chlorinated solvents for cleaning products. The Department does not recommend setting an effluent standard for this constituent.</p>	<p>sufficient reasonable potential to warrant inclusion of effluent limitations for both detected constituents in the tentative Order.</p> <p>The Regional Board does not established effluent limitations for point discharges based on the existing or proposed level of treatment capabilities of a facility's wastewater treatment system. Instead, effluent limitations are established based on the level of treatment that a treatment system should be able to achieve or the level of treatment that is necessary to protect water quality, whichever is more stringent.</p> <p>The effluent limitations for di (2ethylhexyl) phthalate and tetrachloroethylene in the tentative Order are retained. If Caltrans ensures that its contract laboratory does not contaminate samples and if Caltrans eliminates the use of chlorinated solvents in vehicle maintenance, then the vehicle washrack wastewater should be able to comply with the effluent limitations. The Regional Board agrees to modify the tentative Order, as indicated in the Errata Sheet, such that these effluent limitations expire if two cycles of monitoring during the first year of the permit demonstrate that these two constituents are not present in the washrack effluent. Note that if other constituents are found to be present in the discharge at levels that could impair groundwater quality, then effluent limitations or groundwater performance requirements for these constituents may be added in the future.</p> <p>See also response to Comment #5</p>

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4	<p>Page 20, Provision B , Table 1</p> <p>Page 21, Table 1 (cont)</p> <p>Septic tank effluent monitoring on a quarterly basis is costly and would provide very little information because of the uniformity of the discharge of sewage and wash water waste water. The Department recommends yearly sampling or the first year of semiannually sampling and subsequent sampling on a yearly basis.</p>	<p>The tentative Order requires quarterly effluent monitoring for nitrogen constituents. The Regional Board disagrees with the comment that quarterly monitoring would provide very little information because of the uniformity of the discharged effluent. The coefficient of variation of constituents in septic tank effluent has been observed to range from 0.2 to 0.5 which indicates effluent variability. However, the Regional Board agrees to reduce the effluent monitoring frequency for nitrogen constituents to once in December and once in June, to match the frequency of other constituents. Based on the two samples per year, the Regional Board may later determine that more frequent monitoring is necessary.</p>
5	<p>Page 21, Provision 2, Table 1</p> <p>Asbestos: Caltrans maintenance staff does not use asbestos related products in maintaining the highway system. This constituent was tested and found to be non-detected. Monitoring for asbestos is not justified and Caltrans requests that it be removed from the permit.</p> <p>Mercury: This constituent was detected in the lab results submitted for a similar Caltrans facility in trace levels. However, mercury is present in soils and is the likely to be the source of the very low levels in the submitted data. Monitoring for mercury is not justified and Caltrans requests that it be removed from the permit.</p> <p>Tributyltin: Is a biocide used in marine paints and not used on Caltrans maintenance equipment. This constituent was detected in the lab results submitted for a similar Caltrans facility in trace levels. However, due to the very low levels detected it is very likely that this detection was the result of lab contamination. Monitoring for tributyltin is not justified and Caltrans requests that it be removed from the permit.</p>	<p>With the exception of asbestos, the constituents listed under Monitoring and Reporting Provision B.2 have a requirement to be monitored in the vehicle washrack wastewater because they were detected in vehicle washrack wastewater from a facility similar to Descanso Maintenance Station. Data for washrack wastewater from the similar facility was submitted by Caltrans. Asbestos was included in error in the list under Monitoring and Reporting Provision B.2.</p> <p>Comment #5 suggests that the washrack effluent data from the similar facility may not be representative of the Descanso washrack effluent and/or that the data is unreliable due to laboratory contamination. The Descanso washrack effluent should be properly characterized in order to establish appropriate waste discharge requirements.</p> <p>The Errata Sheet includes changes to the tentative Order that would revise Monitoring and Reporting Program Provision B.2 in order to implement the following instead:</p>

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	<p>Phthalates: Are plasticizers not normally expected to be found in wastewater from the washing of vehicles. Phthalate was detected in the lab results submitted for a similar Caltrans facility. However, due to the very low levels detected it is very likely these detections were the result of lab contamination from laboratory equipment plastic tubing or other sources. Monitoring for phthalates is not justified and Caltrans requests that it be removed from the permit.</p> <p>Dibromochloromethane – is a byproduct of chlorination. The Descanso Maintenance Station drinking water is from a well and is not chlorinated. Dibromochloromethane was detected in the lab results submitted for a similar Caltrans facility that used chlorinated water. Monitoring for dibromochloromethane is not justified and Caltrans requests that it be removed from the permit.</p> <p>1,2-Dichloroethylene-Testing at similar facilities detected the presence at trace levels of 1,2-dichloroethylene. The Department has switched to citrus cleaners for vehicle maintenance and eliminated the use of chlorinated solvents for cleaning products. Therefore, any monitoring is not justified and Caltrans requests that it be removed from the permit.</p> <p>Tetrachloroethene Testing at similar facilities detected low levels of tetrachloroethene. The Department has also switched to citrus cleaners for vehicle maintenance and eliminated the use of chlorinated solvents for cleaning products. Therefore, any monitoring is not justified and Caltrans requests that it be removed from the permit.</p> <p>Trichloroethene-Testing at similar facilities did not detect the presence of trichloroethene. The Department has also switched to citrus cleaners for vehicle maintenance and eliminated the use of chlorinated solvents for cleaning</p>	<ul style="list-style-type: none"> <li>• Require two full scans of the Descanso washrack effluent prior to the septic tank for all constituents listed under Tables 3-4 and 3-6 of our Basin Plan during the first year</li> <li>• After the two scans, monitoring for any constituent detected above the analytical quantitation detection level will continue every three years</li> <li>• Retain the effluent limitations for di (2-ethylhexyl) phthalate and tetrachloroethylene. If after the two scans, these constituents are not detected above the MCLs, the effluent limitations will expire.</li> <li>• After the two scans, if any additional constituents are detected above the MCL, the Regional Board can amend the permit to include effluent limitations for those constituents.</li> </ul>

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	<p>products. Therefore, any monitoring is not justified and Caltrans requests that it be removed from the permit.</p> <p>1,2-dibromo-3-chloropropane-Is a soil fumigant and not used on Caltrans maintenance equipment. – Testing at similar facilities found to the levels to be Non-Detect. Monitoring for tributyltin is not justified and Caltrans requests that it be removed from the permit.</p> <p>Dinoseb-is an EPA banned pesticide and not normally expected to found in wastewater from the washing of vehicles. Testing at similar facilities found to the levels to be Non-Detect. Monitoring for dinoseb is not justified and Caltrans requests that it be removed from the permit.</p> <p>Molinate- Caltrans maintenance staff does not use herbicides. This constituent was detected in the lab results submitted for a similar Caltrans facility in trace levels. However, due to the very low levels detected it is very likely that this detection was the result of lab contamination. Monitoring for molinate is not justified and Caltrans requests that it be removed from the permit.</p> <p>Pentachlorophenol-Most of Caltrans sign posts or guard rail posts are creosote treated and not pentachlorophenol. The levels found at a similar facility was tested and found at trace levels of .09 parts per billion. Monitoring for pentachlorophenol is not justified and Caltrans requests that it be removed from the permit.</p> <p>Simazine-Algecide Caltrans maintenance staff does not use algaecides. : This constituent was detected in the lab results submitted for a similar Caltrans facility in trace levels. However, due to the very low levels detected it is very likely that this detection was the result of lab contamination. Monitoring for simazine is not justified and Caltrans requests that it be removed from the permit.</p> <p>2,3,7,8 TCDD (dioxin) Caltrans maintenance staff does not</p>	

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	<p>use products containing 2, 3, 7, 8 TCDD (dioxin). This constituent was detected in the lab results submitted for a similar Caltrans facility in trace levels. However, due to the very low levels detected it is very likely that this detection was the result of lab contamination. Monitoring for 2, 3, 7, 8 TCDD (dioxin) is not justified and Caltrans requests that it be removed from the permit.</p>	
6	<p>Page 20, 21, and 23, Provision 3, Table 1, 2 and 3</p> <p>Samples taken quarterly are not necessary or reasonable. Caltrans maintenance station washing procedures are based on the Caltrans Best Management Practice Manual preventing the release of elevated levels of pollutants. The waste stream will not vary significantly and to require sampling at such frequency is not practical or cost effective. Semiannual sampling for the first year with sampling yearly thereafter may be reasonable and assure groundwater protection.</p>	<p>The Regional Board disagrees that the effluent quality will not vary significantly, (see also response to Comment #4). However, in order to make the monitoring and reporting program more cost efficient, the Regional Board agrees to revise the monitoring frequency to a semiannual basis (i.e., December and June) for all effluent and groundwater monitoring except for those constituents on an annual monitoring frequency. All quarterly monitoring requirements have been reduced to monitoring in December and June every year, as indicated in the Errata Sheet.</p>
<p><i>Comments received from California Department of Transportation Division of Environmental Analysis via correspondence dated May 31, 2006</i></p>		
7.	<p>This proposed TO appears directed at a much larger facility than the Descanso Maintenance Station and will consequently result in the unnecessary expenditure of state funds. This is a small facility used intermittently by eight employees during working hours. They produce an estimated 160 gallons per day (GPD) of domestic wastewater. In addition, vehicles are washed at the facility producing an estimated 250 gallons per week of washrack water. The washrack is for vehicle exterior cleaning, with only occasional use of detergents, and includes neither steam cleaning nor undercarriage cleaning. In other words,</p>	<p>The tentative Order was specifically developed for the Descanso Maintenance Station in conjunction with Basin Plan requirements to maintain beneficial uses and water quality of groundwaters in the Barret Lake Hydrologic Subarea (see Findings 2-4 and 12-16).</p> <p>As discussed in Finding 12, the Regional Board implements a waiver program for discharges of domestic wastewater from conventional septic tank/leachfield systems which defers regulation of such discharges to the appropriate county health officer. The discharge from the Descanso Maintenance Station does</p>

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	the volume and characteristics will be similar to that produced by a single family using a septic tank and leachfield.	not qualify for the waiver program because the Discharger is an agency of the State of California and the discharge from the Facility will include non-domestic wastewater.
8.	The proposed requirements, however, appear more appropriate for a publicly-owned treatment works or large industrial facility. The Biosolids Specifications appear to be standard permit requirements for POTWs, and are not appropriate for a small septic tank and leach field. Also, the monitoring requirements include an extensive list of priority pollutants such as pesticides (Dinoseb, Molinate, Simazine) and industrial chemicals (Butylbenzyl phthalate, 1,2-dibromo-3-Chloropropane, etc.) that are very unlikely to be present. In addition, the draft TO requires construction of three groundwater monitoring wells. All of these onerous requirements for such a small facility would require very expensive initial and ongoing expenses that cannot be justified for what is essentially a very limited discharge.	<p>Septage (i.e., solids and liquids pumped out of septic tanks) is also subject to certain requirements contained in 40 CFR Parts 503, 257 and 258, Clean Water Act Part 405 (d), and Title 27 of the California Code of Regulations. The biosolids provisions of the tentative Order have previously been included in other waste discharge requirements for discharges from septic tank/leachfield systems. These biosolids provisions have been revised, as indicated in the Errata Sheet, based on consultation with USEPA Region IX. (See also response to Comment #18)</p> <p>The constituents listed under Monitoring and Reporting Provision B.2 have a requirement to be monitored in the vehicle washrack wastewater because they were detected in vehicle washrack wastewater from a facility similar to Descanso Maintenance Station. Data for washrack wastewater from the similar facility was submitted by Caltrans. See also response to Comment #5.</p> <p>The commenter suggests that the existing and proposed discharge from the Descanso Maintenance Station is not significant due to its volume and should be minimally regulated. The Regional Board maintains that the requirements of the tentative Order are necessary and offers the following comments for consideration:</p> <ul style="list-style-type: none"> <li>• The Regional Board has always regulated discharges from septic tank/leachfield systems in order to protect groundwater.</li> </ul>

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		<ul style="list-style-type: none"> <li>• The Basin Plan recommends a minimum lot size for a given volume of septic tank effluent discharged in order to protect groundwater. As stated in Finding 16, the existing and proposed discharge from the Descanso Maintenance Station does not meet the Basin Plan recommendations.</li> <li>• Currently proposed AB 885 regulations for on-site wastewater treatment systems are an acknowledgement of the impacts of septic tank/leachfield systems and other onsite systems on groundwater quality.</li> <li>• Specifically in the case of the Descanso Maintenance Station, the disposal of vehicle washrack effluent to the septic tank/leachfield system elevates the threat to groundwater quality.</li> </ul>
9.	<p>Finally, the Department is concerned that the proposed TO may deviate from regulations being developed by the State Water Board for onsite wastewater treatment systems (OWTS) under Assembly Bill 885. We would like the opportunity to follow the OWTS regulations, as appropriate, once they are finalized.</p> <p>We suggest that these requirements be held in abeyance while we work with the State Board staff involved in developing the OWTS to identify appropriate interim specifications for remote Department maintenance facilities like the Descanso facility.</p>	<p>In developing the requirements contained in the tentative Order, the Regional Board considered the proposed AB 885 regulations as they were available in draft form.</p> <p>The AB 885 regulations, when adopted, would establish minimum regulations that would apply to onsite wastewater treatment and disposal systems. The Regional Board retains the option of issuing more stringent requirements as may be necessary to protect groundwater within its jurisdiction and/or as required by the Basin Plan. Furthermore, when the AB 885 regulations will be adopted is uncertain at this time.</p> <p>While minor modifications to the tentative Order are being made as indicated in the Errata Sheet, the Regional Board does not believe it is necessary to postpone adoption of the tentative Order.</p>

<b>Comment #</b>	<b>Comment</b>	<b>Staff Response</b>
10.	<p>Page 8, Provision B.3, Table</p> <p>The TDS limitations of 7 and 3.9 mg/L appear to be in error. The TDS objective for the hydrologic area in which the facility is located (Barret Lake HA) is 500 mg/L (concentration not to be exceeded more than 10% of the time during any one year period).</p>	See response to Comment #1.
11.	<p>Page 8, Provision B.3, Table</p> <p>TDS, Boron, and sulfate will be present in concentrations characteristic of the groundwater from the facility's well. These parameters may increase slightly due to concentration caused by evaporation but are not likely to be added by the facility. We see no reason for limiting them since they are very unlikely to increase significantly over background concentrations. In addition, their concentration is not controllable by actions taken at the facility.</p> <p>Problems may arise if the groundwater used to supply the facility contains concentrations near the limits. In this situation, a minor amount of evaporation may cause the effluent to exceed the limits.</p>	<p>Typically, the use of potable water results in moderate to significant increases in TDS, boron and sulfate concentrations in the resulting wastewater. Furthermore, effluent limitations for point source discharges, for the most part, are established based on those necessary to protect groundwater quality rather than the current treatment capabilities of a facility.</p> <p>The Regional Board acknowledges that evaporation during the use of groundwater can affect effluent concentrations, particularly during vehicle washing, but this effect is not expected to be significant compared to amounts added to the water during its use. With regard to evaporation in the leachfield, per Monitoring and Reporting Provision B.1, the effluent is required to be monitored prior to discharge to the leachfield. The tentative Order, as originally drafted and as modified through the Errata sheet, also allows the discharge to be determined to be in compliance provided that upgradient groundwater has assimilative capacity and downgradient groundwater meets groundwater performance requirements based on water quality objectives.</p>

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12.	<p>Page 8, Provision B.3 and B.4</p> <p>We do not understand table footnote #3 (for discharge specification #3) in conjunction with this table for specification #4. The footnote appears to be saying that if upgradient groundwater has high concentration of boron or nitrogen then effluent limitations for boron and total nitrogen are enforceable. However, in these situations the effluent will always be in violation of the boron and likely the nitrogen limitations. The intent in table footnote #3 may have been to say "downgradient" rather than "upgradient."</p>	<p>Footnote 3 to the table under Provision B.3 of the tentative Order is correct. The intent of Footnote 3 and Provision B.4, was to allow the discharge if upgradient groundwater indicates assimilative capacity, otherwise the effluent must comply with the effluent limitations under Provision B.3 at the point of discharge.</p> <p>After reviewing Provisions B.3 and B.4, the Regional Board has decided that these discharge specifications can be simplified. Provisions B.3 and B.4 have been eliminated from the tentative Order as indicated in the Errata Sheet. A new Provision B.3 has been added which still takes groundwater assimilative capacity into consideration when it is available. See response to Comment #2 for further discussion of the new Provision B.3.</p> <p>The new Provision B.3 would allow the discharge if either the effluent complies with effluent limitations or if groundwater in downgradient monitoring wells satisfy performance requirements. Except for total nitrogen, the groundwater performance requirements and the effluent limitations are numerically the same because when there is no assimilative capacity, a discharge can only be allowed if the discharge meets water quality objectives at the point of discharge. Effluent limitations for nitrogen are higher than performance requirements to account for denitrification of the effluent in the subsurface prior to entering the water table.</p>
13.	<p>Page 8, Provision B.4</p> <p>We also do not understand the rationale for setting the downgradient total nitrogen limitation at 9 m a . The Basin Plan objective is 10 m a (not to be exceeded more than 10% of the time during any one year period). A limitation of 10 mg/L would seem more appropriate.</p>	<p>The total nitrogen effluent limitations and performance requirements have been calculated from the WQO using a statistical approach that takes into consideration that the WQO is not to be exceeded more than 10% of the time during any one year period, denitrification, effluent or groundwater quality variability, and sampling frequency.</p>

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14.	<p>Page 9, Provision B.5</p> <p>Di (2-ethylhexyl) phthalate is a common laboratory contaminant and sometimes appears in analyses as a lab artifact. We believe it was not actually present at the facility and we would like the opportunity to eliminate it as a regulated and monitored constituent if subsequent monitoring does not detect it.</p>	See response to Comments #3 and 5.
15.	<p>Page 9, Provision B.5</p> <p>Tetrachloroethylene is not a common lab contaminant but we are unsure of why it would be present. We also request that this constituent be eliminated as a monitored constituent if subsequent monitoring does not detect it.</p>	See response to Comments #3 and 5.
16.	<p>Page 9, Provision C.2</p> <p>Many of the specifications in this section appear intended for a larger facility rather than a septic tank and disposal field. This maintenance facility does not have a laboratory and process controls, which are required in this specification for proper operation. The specifications should be appropriate for this type of facility.</p> <p>This specification refers to the "Recycled Water Agency" rather than to the "Descanso Maintenance Station".</p>	<p>This provision is a standard provision included in most Regional Board permits and ensure reliability of the treatment systems and further protect water quality. The wastewater treatment system at Descanso Maintenance Station does have basic process controls such as the ability to close off the washrack drainage during rain events and measurement of sludge and scum layers in the septic tank. Where a facility does not have a laboratory, the quality assurance procedures would apply to the facility's contract laboratory.</p> <p>Reference to "Recycled Water Agency" should have been to "Discharger" or "Caltrans". However, the last two sentences of this provision are being deleted in the tentative Order, as indicated in the Errata Sheet, in order to make the provision consistent with the way it has been included in other San Diego Regional Board permits.</p>

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17.	<p>Page 10, Provisions C.3 - Operation Manual, C.4 - Flood Protection, and C.5 - Runoff Protection.</p> <p>We question whether these specification relevant for a septic tank and leach field.</p>	<p>These provisions are standard provisions included in most Regional Board permits which ensure reliability of the treatment systems and further protect water quality. These provisions are retained in the tentative Order.</p> <p>The wastewater treatment facilities at Descanso Maintenance Station include a sediment interceptor and oil/water separator for the vehicle washrack in addition to the septic tank and leachfield system. Operation manuals for all these facilities should be available to ensure that they are operated and maintained properly.</p>
18.	<p>Page 10, Provision D</p> <p>These specifications including comprehensive monitoring, record keeping, and reporting are applicable to publicly owned treatment plants and possibly to drinking water treatment facilities. They are not or should not be applicable to solids pumped from septic tanks. Typically, septage is periodically removed by vacuum-pump tank trucks and disposed of at a POTW with a septage receiving station. This usual process would be prohibited by the specifications which require that the solids removed be "disposed of in a municipal solid waste landfill, reused by land application, or disposed of in a sludge-only landfill. . ."</p>	<p>The biosolids provisions have been revised, as indicated in the Errata Sheet, based on consultation with USEPA Region IX. The revise provisions include pumping of septage and subsequent transfer to a POTW as an allowed disposal option for small septic tank systems. (See also response to Comment #8)</p>
19.	<p>Pages 20-24, Monitoring and Reporting Program Provision B – Discharger Monitoring and Provision C – Groundwater Monitoring.</p> <p>As discussed earlier in this letter, the monitoring requirements are excessive for a minor discharge such at that from the Descanso facility.</p> <ul style="list-style-type: none"> <li>The requirement to install three monitoring wells is excessive - we question whether any monitoring is necessary for such a small discharge. If it is necessary, it should be acceptable to install one</li> </ul>	<p>The installation of one upgradient and two down gradient groundwater monitoring wells is necessary for the following reasons: 1) to ensure that the discharge is not impacting groundwater quality, 2) to determine whether or not upgradient groundwater has assimilative capacity, and 3) to ensure that any detected impacts on downgradient groundwater quality are not improperly attributed to the discharge by accounting for background upgradient concentrations. Installation of three wells is also necessary to determine groundwater flow direction and ensure that downgradient wells are properly</p>

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	<p>downgradient well. An upgradient well should only be required if monitoring indicates that upgradient constituent concentrations are significant (i.e., potentially contributing to exceedances).</p> <ul style="list-style-type: none"> <li>• The list of monitored constituents is also excessive. Many of these constituents are very unlikely to be present in the effluent. The rationale for these constituents has not been documented.</li> <li>• The monitoring frequency is excessive. For example, groundwater monitoring for many of the constituents (boron, nitrogen, TDS, nitrite, etc.) is as frequent or more frequent than the groundwater monitoring required of the Recycled Water Agency in proposed TO R9-2006-0064 (page 37, item #3)</li> </ul>	<p>located.</p> <p>MRP Provision B.1 requires monitoring for constituents typically found in domestic wastewater. MRP Provision B.2 requires monitoring for constituents that were detected in vehicle washrack effluent from a facility similar to the Descanso Maintenance Station; however, in light of other comments from Caltrans, Provision B.2 has been revised, as indicated in the Errata Sheet. (See also response to Comment #5)</p> <p>Quarterly monitoring frequencies for effluent and groundwater monitoring have been reduced to twice a year (see response to Comment # ).</p> <p>It is not appropriate to compare the septic tank discharge from the Descanso Maintenance Facility with the use of recycled water that will be regulated under tentative Order No. R9-2006-0064 for the Fallbrook Public Utility District. Recycled water is water that has undergone secondary and tertiary treatment and disinfection. Also, the recycled water is being used primarily for irrigation of landscaping and vegetation which inherently attenuates impacts to groundwater through the proper application of recycled water at agronomic rates, plant uptake of nitrogen and water, and evapotranspiration. Furthermore, the monitoring requirements of tentative Order No. R9-2006-0064 have been specifically developed for the application of recycled water within different hydrologic areas.</p>

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20.	<p>Pages 25, Monitoring and Reporting Program Provision D – Sewage Solids and Biosolids</p> <p>These requirements appear more appropriate for a POTW than the Descanso facility.</p>	<p>This provision is a standard provision included in Regional Board permits including permits for septic tank systems. Septage is also subject to certain requirements contained in 40 CFR Parts 503, 257 and 258, Clean Water Act Part 405 (d), and Title 27 of the California Code of Regulations. The provision is retained.</p>