

**From:** Tracy L Vacura <tracy\_l\_vacura@dot.ca.gov>  
**To:** "Victor Vasquez" <VVasquez@waterboards.ca.gov>  
**Date:** Fri, May 26, 2006 1:45 PM  
**Subject:** Re: Descanso comments

Victor,

I have enclosed Caltrans comments on the Draft Waste Discharge Permit Tentative Order No. R9-2006-0063. Please call me if you have any questions.

(See attached file:  
Caltrans\_response\_to\_comments\_to\_Order\_No.\_R9-2006-0063\_Descanso\_Maintenance\_Station.doc)

Thanks,

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**CC:** Jerry Marcotte <jerry\_marcotte@dot.ca.gov>, Steve Schoff <steve\_schoff@dot.ca.gov>

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

ITEM NO. #

**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 via correspondence dated <b>DATE</b></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.	

Comment #	Comment	Staff Response
2	<p data-bbox="380 277 800 310">Page 8, Provision #3, Table 1,</p> <p data-bbox="380 383 1146 667">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 data-bbox="380 724 1125 1008">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>	

Comment #	Comment	Staff Response
3	<p>Page 9, Provision 5, Table 1</p> <p>Di (2ethylhexyl) 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 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>	

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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>	
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>Phthalates: Are plasticizers not normally expected to be</p>	

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	<p>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</p>	

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	<p>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>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>	

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	<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 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>	



<b>Comment #</b>	<b>Comment</b>	<b>Staff Response</b>
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>	