



VALLECITOS WATER DISTRICT

A PUBLIC AGENCY

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February 20, 2007

Mr. Michael P. McCann, Supervising Engineer
San Diego Region
California Regional Water Quality Control Board
9174 Sky Park Court
San Diego CA 92123

**Subject: Tentative Order No. R9-2007-0018, Meadowlark Water Reclamation Facility
Ncrn:01-0247.02:ebecker**

Dear Mr. McCann:

The Vallecitos Water District (VWD) requests consideration of the following comments and changes to Tentative Order No. R9-2007-0018, Waste Discharge Requirements for Vallecitos Water District, Meadowlark Water Reclamation Plant, San Diego County.

Fact sheet Comments:

Page 1, Section 2, Facility Description

Paragraph 1, Corintia Street is misspelled.

Paragraph 2, add the word "to" after "directly" in the last line.

Page 2, Section 3, Proposed Improvements

Paragraph 1, add "roughing filters" after primary sedimentation basins; revise filters reference to read "new media granular filters" (delete "roughing").

Page 2, Section 5, Historical Monitoring Data

Reported value for CBOD daily maximum in Table 1 was due to a laboratory error. Replace with maximum value not associated with the maximum value observed by correctly completed testing. Meadowlark's highest daily maximum for BOD in May 2006 was at 18.8 mg/L.

Page 3, Section 5, Historical Monitoring Data

Last paragraph in the section: delete "form" insert "from" in the first line.

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Page 4, Section 6, Water Quality Control Plan Standards

Paragraph 2, add the words "in the" after "waters" in the last line.

Page 6, Section 8, Monitoring and Reporting Program

Paragraph 2, delete "form" insert "from" in the first line.

Tentative Order No. R9-2007-0018

Page 2, Finding 3: Revise first sentence to read "When upgraded, the MWRP, which is located at 7941 *Corintia* Street in Carlsbad, will consist of headworks, primary sedimentation tanks, *roughing filters*, aeration basins, secondary clarifiers, *new media granular filters and chlorination*.

Page 2, Finding 4: Request deletion of "up to 0.5 mgd of" with "all" in last line.

Discussion: All solids generated in the treatment process are sent to EWPCF. This language change provides more flexibility and avoids any indication of a liquid volume limitation.

Paragraph 2, add the word "the" after "to" in the first line.

Page 2, Finding 5: Request consideration to be classified as category 3B. This level of threat to water quality appears to better represent the use of effluent in the designated reuse areas.

Page 2, Finding 6: Delete "an", replace with "a". Revise projected effluent water quality for chloride from 200 mg/l to 260 mg/l (based on reported value in Report of Waste Discharge).

B. Discharge Specifications:

Page 5, Paragraph 2: Modify the numerical limit for chloride as an increment over potable water supply (200 mg/l) for 12 month average of a monthly average limit of 400 mg/l with a daily maximum limit of 500 mg/l.

Discussion: Water supply for the MWRP service area is imported water which contains chloride concentrations that cause effluent concentrations to exceed the proposed 12 month average limitation of 200 mg/l (reported as 261 mg/l in the Report of Waste Discharge). A 12 month average limitation of 400 mg/l is well below the Basin Plan objectives for the reuse area.

Page 5, Paragraph 2: Modify 12 month boron effluent limitation from 0.4 mg/l to 0.5 mg/l.

Discussion: The Basin Plan objectives for boron in the use areas range from 1.0 to 2.0 mg/l as noted in the Fact Sheet Table of Groundwater Quality Objectives. The 12 month

average boron concentration in the MWRFF effluent has averaged slightly below than the proposed 0.4 mg/l limitation and continuously below the current Order R9-1993-0023 limitation of 0.5 mg/l. Maintaining the current limitation of 0.5 mg/l is requested to ensure that compliance can be achieved at all times. This requested limitation is significantly lower than the groundwater objectives in the reuse areas.

Page 6, Paragraph 5: Add following sentence: *Portions of the new and/or modified unit processes may not exceed 2.25 mgd (average daily flow) pursuant to Section C.2 of this Order.*

C. Facility Design and Operation Specifications

Page 6, Paragraph 2: Certification Report: Add following sentence: *Portions of the new and/or upgraded unit processes shall be certified to accommodate the construction and startup process. A certification report shall be submitted for each unit process in accordance with this section prior to operation.*

Monitoring and Reporting Program

Page 17, Title: replace the word "Palnt" with "Plant".

A. Monitoring Provisions

Page 18, Paragraph 7: First sentence, delete reference to strip charts, or modify verbiage to include the phrase *where used*.

Discussion: A new SCADA system is being installed and all records will be generated electronically. Strip charts are being phased out and will not be available..

B. Effluent Monitoring

Page 20, Paragraph 3: Table Footnote 2: Last sentence requires clarification on meaning of "three consecutive periods". It is my understanding that increased sampling requirements shall continue until such time as three weeks of data show compliance with the discharge order.

Page 21, Paragraph 3: Request deletion of previous 12 month maximum reporting requirement in Footnote ****.

Discussion: The 12 month maximums will be reported in each monthly report.

D. Reporting Schedule

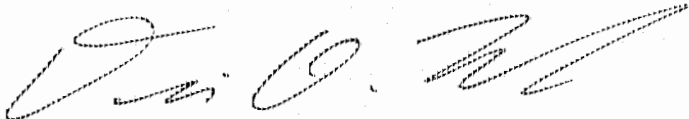
Confirm annual report is required. The format will be a compilation of the monthly data provided to the Board.

Mr. Michael P. McCann
Supervising Engineer
February 20, 2007
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Thank you for meeting with District staff last week to discuss the draft permit, and if you have any questions, please give me a call.

Sincerely,

VALLECITOS WATER DISTRICT

A handwritten signature in black ink, appearing to read "Dennis O. Lamb", written in a cursive style.

Dennis O. Lamb

Director of Engineering & Operations

Cc: William W, Rucker, General Manager

Dawn McDougle, MRF

Matt Tebbetts, Kennedy/Jenks Consultants

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