

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

**TENTATIVE WASTE DISCHARGE REQUIREMENT ORDER NO. R9-2007-0018
FOR**

**VALLECITOS WATER DISTRICT
MEADOWLARK WATER RECLAMATION PLANT
SAN DIEGO COUNTY**

RESPONSES TO SIGNIFICANT WATER QULITY RELATED COMMENTS RECEIVED BEFORE APRIL 1, 2007

Com ment No.	Summary of Comment	Regional Board Staff Response	Suggested Revision	Permit Section
WRITTEN COMMENTS				
<i>Comments received from Vallecitos Water District Dated February 20, 2007</i>				
1	Reported value for BOD daily maximum in Table 1 was due to 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.	Tentative Order will be changed to address comment.	See Errata Item 1	Fact Sheet, Page 2, Table 1
2	Revise first sentence to read 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.	Tentative Order will be changed to address comment.	See Errata Item 2	Tentative Order Finding 3
3	Request deletion of "up to 0.5 MGD of with "all" in last line. All solids generated in the treatment process are sent to EWPCF. This language change provides more flexibility and avoids any indication of liquid volume limitation. Paragraph 2, add the word "the" after "to" in the first line.	Tentative Order will be changed to address comment.	See Errata Item 3	Tentative Order Finding 4

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4	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.	The discharge of effluent from the MWRP has the potential to cause violations of water quality objectives or cause a nuisance and therefore falls under Category 2. This is consistent with other water reclamation plants within the region.	None	Tentative Order Finding 5
5	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).	Tentative Order will be changed to address comment.	See Errata Item 4	Tentative Order Finding 6
6	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. 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.	Tentative Order will be changed to address comment. Change in effluent limitations consistent with Basin Plan.	See Errata Item 5	Tentative Order Discharge Specification B.2
7	Modify 12 month boron effluent limitation from 0.4 mg/L to 0.5 mg/L. The Basin Plan objectives for boron in the reuse areas range from 1.0 to 2.0 mg/L as noted in the Fact Sheet. The 12 month average boron concentration in the MWRP 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.	Tentative Order will be changed to address comment. Change in effluent limitations consistent with Basin Plan.	See Errata Item 6	Tentative Order Discharge Specification B.2
8	Add the 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 .	Comment will addressed by removing “existing” from the first sentence to make it clear that flow through new/modified components can be discharged provided total flow does not exceed 2.25 MGD.	See Errata Item 7	Tentative Order Discharge Specification B.5

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9	Certification Report: Add following sentence: Portions of the new and/or modified 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.	Comment will addressed by new wording in Sections C.2 & C.3.	See Errata Item 8	Facility Design and Operation Specifications C.2
10	First sentence, delete reference to strip charts, or modify verbiage to include the phrase where used. A new SCDA system is being installed and all records will be generated electronically. Strip charts are being phased out and will not be available.	Tentative Order will be changed to address comment.	See Errata Item 9	Monitoring & Reporting Program A.7
11	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.	The three consecutive periods of compliance applies to the increased frequency. For example, if monthly sampling is increased to weekly, compliance must be achieved for three consecutive weeks prior to returning to the normal monthly sampling.	None	Monitoring & Reporting Program B.3
12	Request deletion of previous 12 month maximum reporting requirement in footnote ****. The 12 month maximums will be reported in each monthly report.	Wording has been changed added to clarify the requirement. Should the monthly maximum for bacteria exceed a MPN of 23 per 100 mL, then the Discharger will have to certify whether or not the MPN of 23 per 100 mL was exceeded in the previous 30-day period.	See Errata Item 10	Monitoring & Reporting Program B.3
13	Confirm annual report is required. The format will be a compilation of the monthly data provided to the Board.	Annual summary report will not be required. The Annual reporting schedule in Monitoring & Reporting Program will be removed.	See Errata Item 11	Monitoring & Reporting Program D.1
14	Various minor spelling and wording errors were also noted in the letter.	These minor errors will be corrected in the Tentative Order.	See Errata Item 12	Various