

Item 7. Supporting Document 8.

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Subject: Agenda

The Sierra Club San Diego Chapter submits the attached on the Basin Plan Amendments Conditional Waivers of Waste Discharge Requirements for Specific Types of Discharge within the San Diego Region

Agenda Item 7 RWQCB hearing Wednesday October 16, 2007

Edward Kimura

Sierra Club

San Diego Chapter

CC: "Wayne Chiu" <wchiu@waterboards.ca.gov>



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October 2, 2007

State of California Regional Water Quality Board
San Diego Region
9174 Sky Park Court Suite 100
San Diego, California 92123
Attn: Mr. Wayne Chiu

Subject: Basin Plan Amendment, Conditional Waivers of Waste Discharge Requirements for
Specific Types of Discharge within the San Diego Region Tentative Resolution
No. R9-2007-0104

Dear Susan Ritschell, Chair, and Members of the Board:

We have reviewed the revised Conditional Waivers of Waste Discharge Requirements for Specific Types of Discharge and concur with most of the responses to our prior comments. However, we cannot support it unless the following concern described below is corrected.

Conditional Waiver 1.II.A Specific Waiver Conditions for On-Site Septic and Sewerage Systems Poses a Threat to Water Quality

In response to the objection from the SDCDEH (Land and Water Quality Division) the following requirement was deleted:

1.a) Existing on-site septic or sewerage systems must not allow connections from recreational vehicles.

We disagree with the deletion and support the original requirement that existing onsite septic or sewerage systems must not allow connections from recreational vehicles. The SDRWQCB staff and the SDCDEH (Land and Water Quality Division) have not provided substantial data to show that discharge of RV wastes would not cause failures of the onsite septic or sewerage systems. No monitoring data are provided for septic systems in existing campgrounds that allow RV connections to indicate that RV wastes cause no harm to the septic system operation and do not pollute the groundwater.

The Sierra Club has previously submitted information to the SDRWQCB ¹ concerning the highly toxic chemicals that are used as odor control in RV holding tanks. EPA Region 9² has sent out an

¹ Sierra Club letter to SDRWQCB, Attention: Bryan Ott. Subject: Comments on TO No. R9-2002-0343, WDR for the Lake Cuyamaca Recreation and Park District, November 4, 2002

² USEPA Region 9, Alert for RV, *Boat and Mobile Home Owners and Park Operators ABOUT SAFE WASTEWATER DISPOSAL* EPA 909-F-99-002, July 1999 <http://epa.gov/region09/water/groundwater/uic-docs/rv-wastewater.pdf>

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alert for RV, boat, and mobile home owners and park operators not to use chemicals in holding tanks that harm septic systems. These chemicals are known to cause septic system failures by killing the essential biological treatment process. The toxic chemicals can also infiltrate into and contaminate the groundwater. The EPA alert lists two chemicals used as deodorizers; formaldehyde, a probable carcinogen and para-dichlorobenzene, a known carcinogen and drinking water contaminant.

The California RWQCB Region 7 cited the Bureau of Land Management South Mesa Long Term Visitor Area campsite RV waste discharge station for noncompliance due to high levels of nitrogen and total dissolved solids being discharged into the septic system leach fields. In response to this incident, BLM conducted an investigation to determine the cause of the failure and recommended design measures to prevent failures.³ They found that RV wastes are much more concentrated than typical domestic wastewater and the chemical additives in the RV wastes degrade the septic system treatment process. These factors indicate that RV wastes require more treatment than the equivalent waste stream from a permanent home. That is to say, septic systems designed to treat typical domestic wastewater are not suitable for treating RV wastes. Additional RV waste collection systems at BLM recreation sites have been closed due to failure. BLM notes that pollution the ground and/or surface water can go unnoticed for extended periods when a septic system fails. Cost to remediate a failed system is very expensive. The EPA alert and the BLM experience clearly indicate that existing septic systems that accept RV wastes do pose a threat to water quality and should not be granted the conditional waiver.

Monitoring data should be collected for the existing septic systems that have accepted RV wastes to determine if they are failing and determine compliance with the water quality standards. This action is implied in paragraph 1.II.A. Specific Waiver Conditions for On-site Septic and Sewerage Systems subparagraph 1.a) to evaluate compliance.

The State Water Resources Control Board is also aware of the RV waste issue as noted in their proposed regulations for onsite wastewater treatment systems⁴. It states that "Wastes from holding tanks, recreational vehicles, and portable toilets that contain materials deleterious and inhibiting to OWTS operation shall not be discharged to OWTS."

We ask that you do not accept the revision to allow RV wastes to be discharged into existing septic systems because this would allow discharges that pose a threat to water quality and therefore, should not be granted a conditional waiver.

Thank you.

Sincerely,



Edward Kimura
Sierra Club
San Diego Chapter

³ Pat Fleming, Lead Civil Engineer National Science and Technology Center, BLM Denver, Colorado *Dealing With Holding Tank Wastes at BLM Sites, Aug. 15, 2000* <http://www.blm.gov/nstc/resourcenotes/rn38.html>

⁴ California Code of Regulations Title 27, Division 2, Subdivision 1 Chapter 7, §22910 (g)