

DEPARTMENT OF TRANSPORTATION

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SEP 24 10 09 AM '09

September 23, 2009

Robert Morris
Senior WRC Engineer
California Regional Water Quality Control Board,
Groundwater Basins Branch
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4353

RE: Comments to Tentative Order No. R9-2009-0105 at Buckman Springs SRRA

Dear Mr Morris:

Caltrans reviewed the tentative order regarding Waste Discharge Requirements (WDR) for the existing sewer system at Buckman Springs Safety Roadside Rest Area (SRRA).

We request modifying portions of the WDR as followed:

1.) Finding # 10, Page 3: "... the Discharger will complete a water quality investigation of the discharge by January 30, 2011."

Recommendation:

We recommend the following: *"... the Discharger will complete a water quality investigation of the discharge by April 30, 2011."*

Reason:

Assuming the tentative order is adopted in mid October, the time required to develop a contract, schedule drilling, etc would result in the monitoring wells installed within the first quarter of 2010. Moreover, the Regional Board wishes to collect one year's worth of data for inclusion in the technical report, which would result in the last sample being collected within the first quarter of 2011, excluding the time for laboratory to turn around the results and subsequent data analysis.

2.) Finding # 11, Page 3: "A deadline of January 30, 2011 (16 months from the adoption of this Order) for submittal ..."

Recommendation:

We recommend the following: *"A deadline of April 30, 2011 (18 months from the adoption of this Order)..."*

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Reason:
Same as comment #1.

3.) Facility Design and Operation, Item #4, Page 7: "... after periods of rainfall when disposal by subsurface irrigation cannot be successfully practiced ..."

Recommendation:
We recommend the following: *"... after periods of rainfall when disposal by subsurface disposal cannot be successfully practiced ..."*

Reason:
The on-site sewer disposal system is not intended for irrigation use.

4.) Facility Design and Operation, Item #9, Page 7: "... submit results of a water quality investigation by January 30, 2011 that demonstrates that the discharge of wastes ..."

Recommendation:
We recommend the following: *"... submit results of a water quality investigation by April 30, 2011 that demonstrates the discharge ..."*

Reason:
Same as comment #1.

5.) Standard Provisions, Item #7, Page 9: "A defense for the discharger shall not be that halting or reducing the permitted activity would have been necessary to maintain compliance with this Order. Upon reduction ..."

Recommendation:
We should be allowed to shut down the waste discharge when necessary for operational needs.

Reason:
We cannot monitor what is discharged by the public. It is necessary to shut down the sewer system at some point.

6.) Table 3 RV Septic Tank Effluent Monitoring, Page 18-19:

Recommendation #1:
Eliminate the organic and inorganic chemicals as defined in Title 22 of the Drinking Water Regulations, from Aluminum to 2,3,5-TP-Silvex. We recommend the following criteria for Table 3:

CONSTITUENT	UNIT	TYPE OF SAMPLE	SAMPLING FREQUENCY	REPORTING FREQUENCY
pH	PH Units	Grab	Quarterly	Annually
Total Dissolved Solids (TDS)	mg/L	Grab	Quarterly	Annually
Total Nitrogen (as N)	mg/L	Grab	Quarterly	Annually
Boron	mg/L	Grab	Quarterly	Annually
Chloride	mg/L	Grab	Quarterly	Annually
Sulfate	mg/L	Grab	Quarterly	Annually
Manganese	mg/L	Grab	Quarterly	Annually
Fluoride	mg/L	Grab	Quarterly	Annually
MBAS	mg/L	Grab	Quarterly	Annually
Iron	mg/L	Grab	Quarterly	Annually
Percent Sodium	Percent (%)	Grab	Quarterly	Annually
Formaldehyde	mg/L	Grab	Quarterly	Annually
1,4-Dichlorobenzene	mg/L	Grab	Quarterly	Annually

Reason:

Based on the attached price quote from FDL the extensive monitoring list would be a significant cost burden to the State. Overall the monitoring would be irrelevant since it is extremely unlikely any of the constituents from Aluminum to 2,3,5-TP-Silvex in Table 3 would be present. Caltrans Groundwater and Septic Tank Monitoring Workplan submitted on May 27, 2009 identifies constituents that typically comprise RV effluent, for which water quality objectives exist. There is no evidence suggesting other parameters (VOC, SOCs, herbicides, pesticides, etc) present in RV septic tank effluent, thus they should be removed from the monitoring list. In addition, some of these compounds are banned and have not been produced or available for many years. Alternatively, if the Regional Board staff does have documentation of the presence of these compounds in RV tank wastewater, they should be considered for monitoring by Caltrans according to the tentative MRP.

Table 3 lists VOC, SOCs, herbicides, pesticides etc., however no detection limits for reporting are listed. We are concerned that detection limits at or less than levels required according to Title 22 may not be achievable in the septic tank effluent if these low levels are expected. In particular, pesticide analytes which have drinking water methods (such as benzo(a)pyrene, di(2-ethylhexyl)adipate, endothal, and diquat) but no corresponding wastewater method, may have problems in sample preparation and therefore obtaining representative results from the septic tank effluent.

Please note, the potential for an unauthorized discharge to the wastewater system should not be considered as a rationale for including them as a monitoring requirement. Unauthorized discharges can occur in any public wastewater system; however the monitoring requirements given are not typical of the monitoring contained in recent public wastewater disposal systems for land discharge. Attached are examples showing the constituents typically found in similar facilities – the 2008 MRP for Caltrans Trinidad SRRA with RV dump and the 2005 WDR and MRP for Skyline Ranch wastewater treatment plant in Region 9. Even though regions operate semi-autonomously, many additional examples can be provided in Region 5.

Recommendation #2:

1,4-Dichlorobenzene spell as 1,4-Dichlorobenzene, Thibencarb spell as Thiobencarb, and 2,3,5-TP-Silvex should be renamed as 2,4,5-TP (Silvex).

Reason:

These constituents appear to be typographical errors are identified in Title 22 of the Drinking Water Regulations.

7.) *Groundwater Monitoring, Item #1, Page 20: "Within 60 days of adoption of this Order, the Discharger shall construct ..."*

Recommendation:

We recommend changing the following: *"Within 120 days of adoption of this Order, the Discharger shall construct ..."*

Reason:

Given the constraints of the State contracting requirements, we request 120 days following the adoption to construct monitoring wells.

8.) *Table 4 Groundwater Monitoring, Page 22*

Recommendation #1:

Eliminate the organic and inorganic chemicals as defined in Title 22 of the Drinking Water Regulations, from Aluminum to 2,3,5-TP-Silvex. We recommend the following criteria for Table 4:

CONSTITUENT	UNIT	TYPE OF SAMPLE	SAMPLING FREQUENCY	REPORTING FREQUENCY
pH	PH Units	Grab	Quarterly	Annually
Total Dissolved Solids (TDS)	mg/L	Grab	Quarterly	Annually
Total Nitrogen (as N)	mg/L	Grab	Quarterly	Annually
Boron	mg/L	Grab	Quarterly	Annually
Chloride	mg/L	Grab	Quarterly	Annually
Sulfate	mg/L	Grab	Quarterly	Annually
Manganese	mg/L	Grab	Quarterly	Annually
Fluoride	mg/L	Grab	Quarterly	Annually
MBAS	mg/L	Grab	Quarterly	Annually
Iron	mg/L	Grab	Quarterly	Annually
Percent Sodium	Percent (%)	Grab	Quarterly	Annually
Formaldehyde	mg/L	Grab	Quarterly	Annually
1,4-Dichlorobenzene	mg/L	Grab	Quarterly	Annually

Reason:

Same as comment #6.

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Recommendation #2:

1,4-Dichlorobenzene spell as 1,4-Dichlorobenzene, Thibencarb spell as Thiobencarb, and 2,3,5-TP-Silvex should be renamed as 2,4,5-TP (Silvex).

Reason:

These constituents appear to be typographical errors are identified in Title 22 of the Drinking Water Regulations.

9.) *Report Schedule, Page 24*

Recommendation:

We recommend changing January 30 to April 30 as the due date for the report.

Reason:

Same as comment #1.

10.) *Tentative Monitoring and Reporting Program*

Question:

Would monitoring continue during the period when the SRRA is closed for demolition & construction of new comfort station?

Recommendation:

We recommend the monitoring be suspended during construction and resumed after 6 months of re-opening the SRRA.

Sincerely,



TOM HAM
District Senior Landscape Architect

c: Constantine Kontaxis, Kenny Mah, Jerry Marcotte, Andy Quan

bc: