

Gaslan, Milasol@Waterboards

From: Perez, Michael@Waterboards
Sent: Wednesday, February 28, 2018 1:37 PM
To: sskigen-caird@geiconsultants.com
Cc: Gaslan, Milasol@Waterboards; Beeson, Susan@Waterboards; Cali, Alex@Waterboards
Subject: FW: Orange County LAMP - Final (Email 1)
Attachments: Memo_Response to RB Comments_020918.pdf; OC_LAMP_Final_Comments.pdf

Hello Sarah,

Following up on our conversation earlier today, below covers our discussion of the attached Memo addressed to our Santa Ana Regional Board and the changes we would require on the *Orange County Local Agency Management Program for Onsite Wastewater Treatment Systems (OWTS) in Unincorporated Orange County (OC-LAMP)*.

Green font are the changes we find necessary.

1. Section 3.2, 2015 Survey and Evaluation Update: Gaps and Future Needs: The County identified the need to update the 2002-2003 inventory of septic systems...Please identify a schedule for updating the inventory and indicate in Section 5, Annual Reporting that a status report will be provided annually.

County Response: Section 5.0 has been updated reflecting the status report submitted annually. The County intends to initiate electronic tracking of new or replacement OWTS upon adoption of this LAMP guidance. The records collected 2002-2003 through 2017 will need to be transferred from hardcopy to electronic format and will be updated as time and staffing permits.

Providing the 2002-2003 through 2017 information as time permits is not acceptable. Please include a definite completion date. Please incorporate the task as part of the five year reporting schedule. If you'd like we are open for discussion as to what information is available to the County and what information would be necessary for the Regional Board to complete its obligation and goal.

11. Section 4.3.2, Water Quality Assessment Program: Section 4.1.8 of the draft LAMP reported that the high density area within Yorba Linda has the greatest system density at 56 OWTS per square mile. Please explain why the Santa Ana River downstream of the City of Yorba Linda is not identified in the list of surface water to focus extensive water quality data collection in order to closely monitor the impacts of current OWTS on water quality.

County Response: Water quality monitoring locations have been added to account for any gaps in the current program. Discrete monitoring locations have been added within the Santa Ana River downstream of Yorba Linda. A map detailing all OCSD groundwater well monitoring locations within the County is attached, data from OCSD monitoring will be shared with the County. Additional (surface) locations will be added on an as-needed basis, should failing systems be detected.

Thank you for identifying and providing maps of the 303(d) listed waterbodies. Our Wastewater Section agrees that to assess the impacts of OWTS on the 303(d) listed waterbodies (a surface water listing), surface water monitoring must be included in your OC-LAMP. As we discussed please provide the sampling locations already in place (including the sampling frequency and parameters analyzed) and include any proposed New surface water sampling locations.

12. Section 4.3.2, Water Quality Assessment Program: Consistent with Section 9.2.8 of the OWTS Policy, please describe consideration given to the Salt Nutrient Management Plan for Orange County areas within Region 8.

County Response: Consideration was given, additional information has been included in Section 4.1.1.1 specific to the SNMP. The unincorporated regions of the County where OWTS currently exist should not be in conflict with any of the groundwater basins designated as priority basins by the State Water Board's Groundwater Ambient Monitoring and Assessment (GAMA) program.

Please include a plan to collect data on OWTS and their potential as sources of salts and nutrients. A Plan such one to collect data of water softener use by parcels with OWTS would be acceptable. Implementing such a plan not only coordinates with the Salt and Nutrient Management Plan but, would be a progressive move to compliment current efforts.

We are currently looking to send the Final agreed upon OC-LAMP for public comment next Friday, March 9th. Please provide your response as soon as possible.

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