



23 July 2014

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Jeanie,

Please accept my comments on the Draft General Waste Discharge Requirements for Discharges to Land by Small Domestic Systems.

Attachment C

Aerobic Treatment Unit Monitoring

"It is highly recommended that a service agreement with a qualified service provider/vender be required by the Regional Water Board. I suggest changing this to 'will be required by the RWQCB.

Under this same section, I would recommend requiring annual turbidity readings

Findings

8. "Summary of Domestic Wastewater Characteristics"

Data does not match source (d. Data from Table 8-4 Small and Decentralized Wastewater Management Systems, Crites and Tchobanoglous.

B. Requirements by Wastewater System Type

g. "the Discharger must demonstrate a good faith effort to connect to the centralized system.." This goes against the goals by the State of California to allow water reuse

A. Prohibitions

4. "Bypass or overflow of treated or untreated waste is prohibited" I would recommend adding "unless a secondary system accepting the bypass/overflow wastewater is capable of providing adequate protection of surface waters

Table 4: Summary of Wastewater System Setbacks

It will be very difficult for some sites to meet the minimum 25' setback to Property Line. I would suggest 10' setbacks to property line would be more reasonable.

Best regards,

Joseph R. Soulia
Government Relations Representative

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