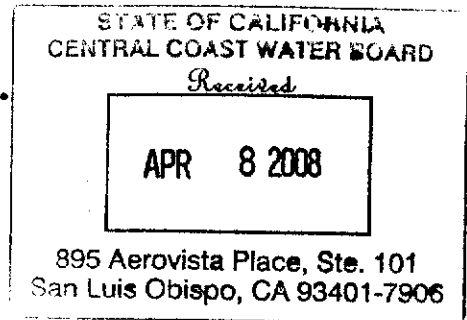


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April 6, 2008

Ms. Sorrel Marks
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

RE: Basin Plan Revisions for On-site Wastewater Systems

Dear Ms. Marks,

Thank you for the opportunity to review the proposed revisions to the Basin Plan regarding on-site wastewater disposal. I offer the following comments:

Draft revisions to Chapter 4

General – Section 4.4.3 Depth of the infiltrative surface, EPA Onsite Wastewater Treatment Systems Manual, February 2002, states, in part, “The maximum depth [of the infiltrative surface] should be limited to no more than 3 to 4 feet below final grade to adequately reaerate the soil and satisfy the daily oxygen demand of the applied wastewater.” Section 4.4.6 Geometry, states, in part, “Seepage pits can be effective for wastewater dispersal, but they provide little treatment because they extend deep into the soil profile, where oxygen transfer and treatment are limited and the separation distance to ground water is reduced. They are not recommended for onsite wastewater treatment and are not included as an option in this manual”. If seepage pits are not recognized as effective by the EPA for onsite wastewater treatment, why are they still allowed in the Basin Plan? ①

Page 3 – definition of Watercourse – The definition given here appears to be only a portion of the commonly accepted definition of a watercourse. To be less vague, I recommend using the full description of a watercourse as found in Black’s Law Dictionary to include the requirement for the presence of a bed and banks. ②

Page 4 – regarding expansion area reservation – The revision to this section requires a local jurisdiction to restrict future land use of property designated for expansion areas. It does not indicate what uses would be restricted or if this ③

restriction must be in a recorded document. Please clarify if the intent is to have a legal description (i.e., meets and bounds) and if it is to be recorded.

Page 7 – recommendations item #2 – It would be helpful if the basin plan included language on the acceptable method for conducting hand augered percolation tests, or referenced an acceptable method in other literature. Is this intended for deep pit systems as well? (4)

Page 7 – requirements item #4 – The added language is vague. Who determines the definition of “the wet season” and what “shortly after” means? (4)

Page 7 – requirements item #5 – It is virtually impossible to detect the presence of mottling in soils where deep pit systems are proposed as the soil is typically removed with an auger. Split spoon sampling would be required as open backhoe test pits cannot be excavated to the typical depth (40-50'). Please clarify if recovery of undisturbed samples is intended. (4)

Page 7 – requirements item #6 – Are three percolation tests required for deep pit systems? Please clarify the acceptable method for deep pit percolation testing. (4)

Page 8 – requirements item #11 – What is the definition of “highest seasonal usable groundwater”? Would it be better to eliminate the word “usable”? (5)

Page 8 – prohibitions item #13 – This restriction does not take into account either average daily flow rates or percolation rates. It would make more sense, in my opinion, to limit the application to 375 to 450 GPD per acre when percolation rates equal 60 minutes per inch, or greater. This method would be geared toward acceptable loading rates (total bedrooms) as opposed to number of housing units (zoning). (6)

Page 8 – prohibitions item #22 – I recommend you use the same definition for low permeability material as found on page 2, or simply direct the reader to that definition for seepage pit limitations. (7)

Page 11 – recommendations item #2 – Past experience has indicated that alternating fields one a year is adequate and can be incorporated as part of an annual maintenance and inspection routine. Is there data that indicates that alternating systems more frequently than once a year is necessary? (8)

Draft revision Chapter 5

Page 1 – section V.D. – Why does this section still use the term “should”? (9)

Page 1 section V.H.3 – I recommend that “County governments” be replaced with “local jurisdictions”. (9)

Thank you again for the opportunity to review the proposed revisions; I appreciate all of the hard work by staff to make this a reality. I look forward to attending the hearing on May 9th.

Please feel free to contact me if you have questions or need additional information.

Best regards,

A handwritten signature in black ink, appearing to read 'J. A. Chouinard', written in a cursive style.

Joseph A. Chouinard, PE
RCE 58865 exp. 06/30/09