Comments on WDR Order R5-2022-XXXX

By: 11/03/2022

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Wastewater Plant Manager
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Salt and Nitrate Control Programs – page 14

53 b**. Sets a Salinity Action Level of 500 mg/L for TDS for the discharge of wastewater to the evaporation/percolation ponds.**

Comments: The plant is not equipped to handle TDS. It is necessary Reverse Osmosis (RO) installation to remove a certain percentage of TDS and then by blending the final effluent of the plant with RO effluent, it would be possible to meet 500 mg/L TDS.

Antidegradation policy – page 15

58 c (1) …Prior to effluent reaching groundwater, effluent percolates through at least 100 feet of fine grain soils, which is expected to be sufficient to filter out coliform organism and to prevent groundwater degradation.

58 c (2) …The Order requires the Discharger to submit a Groundwater Monitoring Disinfection Workplan to disinfect monitoring wells...

Comments:

52 c (1) According to the Table 8 – Total Coliform Groundwater Monitoring Data (2021) the Total Coliform in the Monitoring Wells (MO) fluctuate from >1600 to <1.8 It would be unreasonable to rely on the 100 feet of fine grain soil to get the Total Coliform as 2.2 MPN since it did not filtrate all the coliform bacteria. Since the final effluent that percolates in the ground is undisinfected effluent, any short cut through the soil will give a higher than 2.2 mg/L Total Coliform in some of the Monitoring Wells.

52 c (2) We need more details regarding the requirement and the meaning of "disinfecting monitoring wells". See the "Provisions" 3 – page 29.

Discharge Specifications – page 24

3   Wastewater contained in any unlined pond shall not have a pH less than 6.0 or greater than 10.0.

Comments:

During the summertime the pH in the ponds is higher during daytime and lower during nighttime.

During the month of May 2022, the pH for pond 1 North fluctuated between 8.63 and 9.96. the pH for Pond 2 South fluctuated between 7.41 and 10.06. The pH for pond 2 North fluctuated between 6.79 and 9.48.

During the month of June 2022, the pH for pond 3 South fluctuated between 8.33 and 10.22. And so forth.

Suggestion: to control the algae in the pond with high pH, could the discharger use the copper sulfide?