



## Mountain House Community Services District

251 E Main Street, Mountain House, CA 95391

Tel (209) 831-2300 • Fax (209) 831-5610

[www.mountainhousecsd.org](http://www.mountainhousecsd.org)

June 1, 2023

Danielle Goode, P.E.  
NPDES Permitting, San Joaquin Delta Unit  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670

Subject: Comments on Tentative Waste Discharge Requirements for the Mountain House Wastewater Treatment Plant (NPDES No. CA0084271)

Dear Danielle,

The Mountain House Community Services District (District) has reviewed the Tentative Waste Discharge Requirements (WDRs) for the Mountain House Wastewater Treatment Plant (MHWTP) issued on May 2, 2023. The District generally supports issuance of the Tentative WDRs. However, the District is requesting a modification to the Filtration System Operating Specifications for turbidity as outlined below.

Tentative WDRs Section IV.C.4.a, Filtration System Operating Specifications, states the following:

“To ensure the filtration system is operating properly to provide adequate disinfection of the wastewater, the turbidity of the filter effluent measured at Monitoring Location FIL-001 shall not exceed:

- i. 0.2 NTU more than 5 percent of the time within a 24-hour period; and
- ii. 0.5 NTU, at any time.”

These turbidity specifications come from California Code of Regulations, Title 22 definition for “filtered wastewater.” The above specifications are for wastewater that has been passed through a microfiltration, ultrafiltration, nanofiltration, or reverse osmosis membrane. The District is in the process of modifying the MHWTP to replace the sequencing batch reactors (SBR) with membrane bioreactors (MBR). The MBR plant will be capable of meeting these turbidity specifications. However, the current SBR plant, which uses cloth media filtration, cannot meet these turbidity specifications. The District requests that the Filtration System Operating Specifications in the Tentative WDRs be modified to include the turbidity specifications in the current MHWTP WDRs, provided below, applicable from the effective date of the WDRs until the MBR plant becomes fully operational.

“To ensure the filtration system is operating properly to provide adequate disinfection of the wastewater, the turbidity of the filter effluent measured at Monitoring Location FIL-001 shall not exceed:

- i. 2 NTU as a daily average;
- ii. 5 NTU more than 5 percent of the time within a 24-hour period; and
- iii. 10 NTU, at any time.”

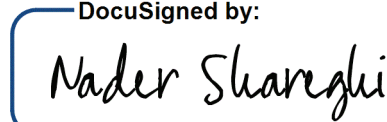
Also, the District requests that the Median Monthly Monitoring Trigger (MMET) be explained in Section V of the Monitoring and Reporting Program. Without this explanation, the District will not know when the MMET has been exceeded.

Finally, District has also identified editorial revisions necessary related to numbering of section cross-references; these are identified in the MS Word version of the Tentative WDRs transmitted via email with this letter.

Please contact me or our consultant, Michelle Brown at Robertson-Bryan, Inc. (916-405-8933; michelle@robertson-bryan.com) if you have any questions regarding these comments.

Sincerely,

DocuSigned by:



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Nader Shareghi, P.E.

Public Works Director

Attachment: MS Word version of Tentative WDRs with editorial comments

cc: Michael Buckley, Inframark  
Michelle Brown, Robertson-Bryan, Inc.