

Smith River Rancheria Wastewater Treatment Facility

The Smith River Rancheria (hereinafter Discharger) submitted comments on the draft Waste Discharge Requirements (Order No. R1-2009-0090) on August 25, 2009. In its comments, the Discharger requested 3 minor changes to the draft Order. These minor changes have been incorporated in the revised draft Order. The following is the staff response to comments from the Discharger:

Comment 1: Weekly Effluent Monitoring. *In the monitoring and reporting program we request that the requirements for weekly sampling of the effluent be changed to monthly after the first twelve months to reduce the financial burden of the sampling. The nature of the membrane process is such that it would essentially take a failure of the membrane to exceed any of the constituents that we are monitoring weekly. This failure would immediately show-up in a reduction in the trans-membrane pressure which is used to monitor and control the system and would immediately shut down the system.*

Response: Regional Water Board staff has modified the monitoring and reporting program to reflect monthly effluent monitoring. Monthly effluent monitoring is consistent with similar permits and is appropriate for this facility.

Comment 2: Phosphorus Monitoring. *Also, we request that the monitoring for total phosphorus be deleted since there is no effluent phosphorus limitation. We believe that this is an unnecessary requirement and will result in unnecessary expenditures on behalf of the tribe. It is our understanding that once monitoring for something is included in a permit, it is very difficult to later remove it. Based on current laboratory rates, this test alone will cost us over \$800*

Response: Regional Water Board staff has modified the monitoring and reporting program to eliminate the requirement for phosphorus monitoring. Elimination of phosphorus monitoring is consistent with similar permits and is appropriate for this facility.

Comment 3: Groundwater Monitoring. *.....these wells were drilled to a depth of between 20 and 30 feet based upon our knowledge of groundwater in the area at that time. After installation we are now finding groundwater is below 30 feet in two of the wells during portions of the summer. Therefore, we would request that we only provide groundwater monitoring information when water is present in the wells. When no water is present it will be noted in our report. In addition, we also request that the monitoring for total phosphorus be deleted since that is also not a limitation in our permit.*

Response: Regional Water Board staff has modified the monitoring and reporting program to eliminate the requirement for monitoring phosphorus in groundwater. We understand that 2 additional groundwater monitoring wells have recently been installed which monitor groundwater during seasonal high and seasonal low groundwater.