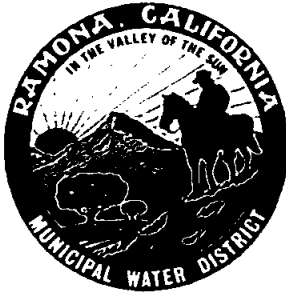


C Henning

SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD



2009 MAR -2 P 4: 29

RAMONA MUNICIPAL WATER DISTRICT

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March 2, 2009

Ms. Julie Chan, P.G.
California Regional Water Quality Control Board, San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4353

Re: Tentative Order R9-2009-0005

Dear Ms. Chan,

The Ramona Municipal Water District (District) is pleased to offer comments on Tentative Order No. R9-2009-0005 which, when adopted, will replace the previous waste discharge permit for the San Vicente Wastewater Treatment Plant (SVWTP), order R9-1993-0003.

The District welcomes the adoption of this Master Reclamation Permit which will support our efforts to recycle one hundred percent of the wastewater treated at the SVWTP for beneficial use, and off-set demands for imported water in our region.

Several years have been spent in the process of developing this new permit and District staff appreciates the time and effort that Regional Board staff expended in reviewing the Salt Reduction Plan Proposal, and developing an understanding of the unique aspects of our facilities and service area. There are just a few remaining recommendations for modifications to this Order that the District requests be considered for inclusion in the final document. These recommendations are as follows:

Page 6, Item A.4.

The District requests that the new permit reflect a prohibition of "Total effluent flow from the SVWTP in excess of a 30-day average flow rate of 0.80 mgd." based on the Capacity Re-rating Study provided to the Regional Board staff on August 31, 2005.

Page 8, Table 3.

The discharge specification of 1.0 mg/l Nitrate as N is too restrictive as the nitrates required to be removed prior to discharge of the recycled water will simply be added back to the flow by the customer. The recycled water users add fertilizers to the recycled water for the benefit of their crops as detailed in the letter provided to Regional Board staff in 2007. The District requests that this limit be relaxed, with the requirement that the District provide the recycled water customers with the data from the quarterly monitoring reports regarding nitrate content in order to assist them in the proper application of their fertilizers, keeping in mind the criteria for protecting the groundwater as well.

Page 32, Item 2. D.

It is recommended that the daily minimum CT value shall be reported quarterly (rather than monthly), to be consistent with the monitoring and reporting requirements elsewhere in the document.

Page 33, Item F. Special Studies

Requirements under Item F., Special Studies, are of concern to the District. These studies appear to be based on elements of the *Draft* SWRCB Recycled Water Policy (as also indicated in Finding 12, page 5). To the District's knowledge this policy has not yet been adopted, and in addition, these types of studies have not been imposed on other agencies thus far. The District attempted to develop a salt management methodology for the Gower Hydrologic Subarea, as evidenced by the District's Salt Reduction Plan submitted to the Regional Board staff for consideration over the years 2002 through 2005. However, based on concerns expressed by Regional Board staff regarding implementation and enforcement of the proposed plan, the funding that was reserved for implementation of this effort was ultimately utilized to construct the new Reverse Osmosis Process at the wastewater treatment plant. This funding is no longer available to pursue the implementation of a Salt Reduction Plan or similar Salt and Nutrient Management Plan. The District requests that the Regional Board set aside this requirement for Special Studies until they have had the opportunity to establish policies and guidelines related to the development and implementation of these plans.

In reviewing other aspects of the Tentative Order, District staff had questions regarding the implementation of some elements of the order. For clarification purposes, the District staff has indicated their understanding of the following items:

Page 6, A. Prohibitions, 1.

District staff understands that no discharge of recycled water, including runoff and spray, is acceptable, and will perform routine inspections to ensure this requirement is being met by all customers. Proper management of runoff related to storms, when no recycled water has been applied for a period of time, continues to be a concern of the District and their recycled water customers. District staff anticipates the potential need for additional dialog with Regional Board staff on best practices for addressing these situations to ensure our continued compliance with this prohibition.

Page 8, Table 2 and Page 31, Table 1, Note a:

Table 2 reflects the secondary treatment standards, including 30-day and 7-day average data. Page 31, Table 1, note a., is interpreted to mean that as long as the weekly monitoring sample reflects a BOD and TSS that does not exceed 30mg/l, and a pH within the limits of 6.0 to 9.0, this is considered to meet the Table 2 secondary treatment standards.

Page 30, Item C.1. and Page 31, Table 1:

Much discussion took place in 2008 regarding the proper sampling location and methods for the biochemical oxygen demand. This monitoring program indicates that the District will provide a composite sample, downstream of the disinfection process, for analysis of BOD.

Page 31, Title 22 inorganic chemicals – required to be Monitored Once every 5 Years

The sampling and analysis for those constituents required under the existing permit (Aluminum, Arsenic, Barium, Cadmium, Mercury, and Selenium) was just completed in February of this year. Unless directed otherwise, the District will initiate the five year sampling cycle in 2010 to provide on-going data in years 2015, 2020, and so forth.

Once again, the District appreciates the time and effort that Regional Board staff has spent in the development of this Tentative Order and looks forward to working together on future endeavors.



Alice Benson

Wastewater Operations Manager
Ramona Municipal Water District

Cc: Mr. Ralph McIntosh, General Manager RMWD
Ms. Cathryn Henning, RWQCB