

GENERAL COMMENTS & MAJOR CONCERNS	SAN DIEGO WATER BOARD RESPONSES
<p>1. On page 2, paragraph 6, a, iii, a polyethylene geomembrane (PE) is referred to as the containment layer. The specifications that have been prepared for the proposed brine evaporation pond call for a polyvinyl chloride (PVC) membrane liner for secondary containment.</p>	<p>References to “high-density polyethylene geomembrane” in the Addendum have been revised to “PVC.”</p>
<p>2. On page 2, paragraph 8, it states that there should be "more frequent monitoring of heavy metals". Our staff prefers for this to be quantified. Our understanding from speaking with RWQCB staff is that we will need to test once every 5 years and if that test is out of compliance we will need to test monthly until we are back in compliance. We would then go back to the 5 year cycle.</p>	<p>Finding No. 8 on page 2 of the Addendum provides the rationale for the modification of the monitoring requirement pertaining to heavy metals. More frequent monitoring is defined in the monitoring requirements contained in paragraph B.6.a (page 15) of the Addendum. The Discharger is required to test once every five years and if that test is out of compliance, the Discharger will need to test monthly until compliance is obtained for three consecutive months. The Discharger could then return to the five-year sampling cycle.</p>
<p>3. On page 4, paragraph 3, b, a freeboard of 6-inches is required at all times for each section of the pond. The outside perimeter wall will provide well beyond the 6-inches of freeboard, but one of the potential operational scenarios is to allow one pond to completely fill and spill into the next pond downhill from the pond being filled. If 6-inches of freeboard is desired for emergency storage capacity, the pond will never have that capacity because the control structures (weirs) will automatically spill into the next pond before ever filling the remaining storage capacity associated with the freeboard. It may be better to quantify the freeboard associated with the perimeter wall for splash action and quantify an emergency volume to be maintained in the overall pond. We would also point out that the RMWD controls</p>	<p>The basis for this requirement is California Code of Regulations Title 27 section 20375, which requires two feet of freeboard in surface impoundments absent specific conditions. The San Diego Water Board maintains that a minimum of six inches be maintained in pond section 13 (the section furthest downgradient). The San Diego Water Board, however, agrees that an emergency volume be maintained in the pond. The addendum has been modified to account for these changes.</p>

<p>the flow rate into the brine ponds. In an emergency scenario, we would stop sending brine to the evaporation ponds and discharge it into the existing brine pond at the treatment plant site to be stored and hauled off site.</p>	
<p>4. On page 4, paragraph 3, e, the solids buildup is required to be removed "sufficiently by October 31 of each year". Our calculations show that solids buildup will take approximately 4 years before impacting storage capacity. RMWD's preference is to remove solids "as-needed" to reserve wet weather storage capacity in the brine ponds.</p>	<p>The intent of this requirement was to remove solids on an as-needed basis. For further clarification, this requirement now reads:</p> <p>Solids buildup shall be removed annually, as-needed, by October 31st of each year to provide adequate storage capacity prior to the anticipated rainy season.</p>
<p>5. On page 9, paragraph 1, a, 3, states that a map of all monitoring points needs to be included in quarterly reports. Our assumption is that this is a map of the observation ports on the leachate collection system, but could be interpreted as being the locations of existing monitoring wells. It is also our understanding that additional monitoring wells will not be required due to the dual containment and collection system constructed with the brine ponds.</p>	<p>Your understanding is correct. The required map is of the observation ports on the leachate collection system. No additional monitoring wells are required.</p>
<p>6. On page 9, paragraph 2, b and page 10, 2, c, the references to HOPE liner should be changed to PVC liner.</p>	<p>References to "HDPE containment liner" in the Addendum have been revised to "PVC containment liner."</p>
<p>7. On page 11, paragraph B, 1, b the daily flow rates during any thirty day period should be 0.80 million gallons per day instead of 0.08 million gallons per day.</p>	<p>Paragraph B.1.b of the Addendum has been revised from "0.08 million gallons per day" to "0.80 million gallons per day."</p>