

RESPONSE TO WRITTEN COMMENTS

TENTATIVE ORDER NO. R9-2015-0104

Master Recycling Permit  
 for the Valley Center Municipal Water District,  
 Woods Valley Ranch Water Reclamation Facility, San Diego County

Comments were received from the Valley Center Municipal Water District (VCMWD or District).

Comment No.	Tentative Order No. R9-2015-0104 Section	Comment	Responses
1.	Special Provision VII.C	<p>The District is concerned that, as currently drafted, Special Provision VII.C of Tentative Order No. R9-2015-0104 could be misinterpreted as requiring the District to:</p> <ul style="list-style-type: none"> <li>• Develop or establish quantifiable agronomic rates for each and every reuse site, and/or</li> <li>• Control or regulate recycled water and fertilizer use at each site to ensure that nitrogen applications are within assigned quantified agronomic limits at each site.</li> </ul> <p>To prevent such misinterpretation, the District recommends that the first sentence of Special Provision VII.C (top of page 15 of the Tentative Order) be modified as follows:</p>	<p>Sections VII.C.2 and VII.C.3 were moved from the Special Provisions section and added to the Rules and Regulations for Recycled Water Use, Attachment B of the Tentative Order.</p> <p>The language below pertains to recycled water use for landscape irrigation and is a part of the Basin Plan Amendment that was adopted by the San Diego Water Board in April 2015.</p> <p>Practices to ensure that recycled water and fertilizer are applied at agronomic rates in end use areas should be included in the Rules and Regulations for Recycled Water Use, Attachment B of the Tentative Order. Below are some example practices that lead to the application of recycled water and fertilizer at agronomic rates.</p> <ul style="list-style-type: none"> <li>• Monitor nutrient levels in recycled water supplies and notify end users of the nutrient value of recycled water.</li> <li>• Educate and train site supervisors on how to (1)</li> </ul>

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		<p>VII.C            The Discharger <u>shall perform <del>must do</del></u> the following to <u>ensure that encourage and promote</u> recycled water and fertilizer <u>use practices that</u> are <u>consistent with applied in use sites at typical</u> agronomic rates.</p>	<p>minimize the potential for runoff or over-irrigation; and (2) take into account the nutrient value of the recycled water.</p> <ul style="list-style-type: none"> <li>• Conduct periodic inspections of end use areas.</li> </ul>
2.	Recycled Water Users Summary Reports III.B.1.j	<p>In lieu of requiring perpetual fertilizer monitoring at each and every District use site, the District proposes that the lack of recycled water irrigation impacts on nitrate compliance can be adequately demonstrated within a one-time, 12-month long study of nitrate use at the District's largest reuse site (Woods Valley Ranch Golf Course). To implement this approach, the District recommends that Monitoring and Reporting Requirement III.B.1.j be deleted and a new one-time study requirement be inserted prior to Monitoring and Reporting Requirement III.A, as follows:</p> <p><u>III.A</u>  <u>The Discharger shall conduct a 12-month study at its largest reuse site that</u></p>	<p>Added section III.D to the Monitoring and Reporting Program to incorporate VCMWD's Comment No. 2 with slight modification. A study workplan is required as well as a study results report. The requirements of the workplan and study are found in the Monitoring and Reporting section III.D.1 and III.D.2. Section III.B.1.j was deleted as requested.</p>

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		<p><u>quantifies total applied nitrogen loads (nitrogen loads in recycled water plus nitrogen load in applied fertilizers) applied to the site during the 12-month period, identifies target agronomic rates for the site, and documents how applied nitrogen loads are consistent with typical agronomic rates. Results of the study shall be reported to the Regional Water Board within 18 months of adoption of this Order. The report shall also include (1) a review of groundwater quality monitoring data, (2) an evaluation of groundwater nitrate concentrations in the vicinity of the use sites, and (3) a summary of actions the Discharger has taken to comply with the requirements established within Special Provisions VII.C of this Order.</u></p> <p>III.B.1.j  <del>The amount of nitrogen (in pounds per acre) applied as fertilizer on each landscape irrigation site.</del></p>	
3.1	IV.A	As currently drafted, Table 2 of the Tentative Monitoring and Reporting program requires the District to conduct quarterly	The requested change was accepted with a slight modification, and Section IV.C was added to continue use of the monitoring network established in the

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		<p>groundwater monitoring, but the proposed Monitoring and Reporting Program does not identify which wells are to be monitored. To address this oversight and allow for updating monitoring sites to match anticipated recycled water uses, it is recommended that Groundwater Monitoring Requirement IV.A and IV.B be modified as follows:</p> <p>IV.A  <u>Within 90 days of the adoption of this Order, the Discharger shall submit a proposed groundwater monitoring plan and map that identifies proposed groundwater monitoring wells for characterizing groundwater quality in the vicinity of the recycled water use sites.</u> The Discharger shall provide a location map with each quarterly groundwater monitoring report that includes the location of the Facility, recycled water use sites, and monitoring wells</p>	<p>previous Order No. 98-09, until the Groundwater Monitoring Plan is approved by the San Diego Water Board.</p>
3.2	IV.B	<p>As currently drafted, Table 2 of the Tentative Monitoring and Reporting program requires the District to conduct quarterly groundwater monitoring, but the proposed</p>	<p>The requested change was accepted, and Section IV.C was added to continue use of the monitoring network established with the previous Order No. 98-09, until the Groundwater Monitoring Plan is approved by the San Diego</p>

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		<p>Monitoring and Reporting Program does not identify which wells are to be monitored. To address this oversight and allow for updating monitoring sites to match anticipated recycled water uses, it is recommended that Groundwater Monitoring Requirement IV.A and IV.B be modified as follows:</p> <p>IV.B  <u>For each of the wells identified within the monitoring plan submitted pursuant to Groundwater Monitoring Requirement IV.A, t</u>The Discharger shall conduct groundwater monitoring in accordance with the groundwater monitoring program outlined in Table 2. Results of the groundwater monitoring program shall be submitted quarterly.</p>	<p>Water Board.</p>