

## Lahontan Regional Water Quality Control Board

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ECM: (LAMP) San Bernardino County

Brad S. Merrell, PE  
Consulting City Engineer  
220 East Mountain View Street, Suite A  
Barstow, CA 92311-2839  
[bmerrell@barstowca.org](mailto:bmerrell@barstowca.org)

### Water Board Comments – Draft Local Agency Management Plan for the City of Barstow

The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff has reviewed the Draft Local Agency Management Program (LAMP) for the City of Barstow (City), received on November 28, 2017. Please consider the following comments. We would appreciate the City's assistance in resolution of these comments by August 7, 2018 and to submit a final LAMP by August 12, 2018, to meet the schedule for Water Board consideration of the City's LAMP at its November 14-15, 2018 meeting in Apple Valley, California.

1. Limitations in Water Board's authority to specify treatment system design. In Section 3.2.3, the City states that it will, at its discretion refer projects to the Lahontan Water Board. In Section 5.1.1, a sentence states that alternative treatment systems (supplemental treatment systems) must meet a predetermined performance requirement according to the Water Board. In Section 5.1.4, a sentence states that the Water Board must provide preliminary approval for supplemental treatment systems. These sentences should be deleted because the California Water Code specifically states that Water Boards have no authority to specify or approve the design or manner of any wastewater treatment unit (Water Code section 13360). Water Board authority is to regulate the owner's continuous discharge of wastewater (Water Code section 13260).

If the City refers a new or replacement supplemental treatment system or a non-conventional dispersal system to the Lahontan Water Board for approval, the discharge from the proposed system does not qualify for the conditional waiver of waste discharge requirements (see OWTS Policy sec 12). In this case, the owner of the proposed system must submit a report of waste discharge, obtain waste discharge requirements from the Water Board, and pay fees (see OWTS Policy, Sec. 12). Please revise Section 3.2.3 to require the owner to submit a report of waste discharge per Water Code section 13260.

PETER C. PUMPHREY, CHAIR | PATTY Z. KOUYOUMDJIAN, EXECUTIVE OFFICER

2501 Lake Tahoe Blvd., So. Lake Tahoe, CA 96150 | 15095 Amargosa Road, Bldg 2, Ste 210, Victorville CA 92394  
e-mail [Lahontan@waterboards.ca.gov](mailto:Lahontan@waterboards.ca.gov) | website [www.waterboards.ca.gov/lahontan](http://www.waterboards.ca.gov/lahontan)

2. Additional requirements for supplemental treatment systems, LAMP section 5.1.8. These requirements are consistent with National Sanitation Foundation (NSF) 245 certification standard. Water Board staff suggests the LAMP specify NSF 245 certification standard to achieve 50% removal of nitrogen.
  - a. While the maximum NSF certified flow is 1,500 gal/day, multiple treatment units may be used for design flows above 1,500 gal/day. When conducting performance sampling and analysis for multiple treatment units, each unit's effluent must be sampled, analyzed, and compared to the influent concentration. This is needed because the NSF standard applies to each unit, and not the combined discharge from multiple units.
  - b. Achieving effluent fecal coliform bacteria concentration of 200 MPN/100 mL means that selected supplemental treatment systems will perform disinfection. Unless the discharge is near an impaired water body or other surface water, Lahontan Water Board staff does not recommend disinfection that uses chlorine. This is because chlorine disinfection typically produces disinfection byproducts in the receiving water that are harmful carcinogens. It may be possible to operate these systems without supplying chlorine to the supplemental treatment units.
3. Section 3.1, Minimum Setback Requirements Table, Division of Drinking Water Comments.
  - a. Please add a footnote for the seepage pit column and the non-public water supply well row to read as follows: The minimum distance between the bottom of the seepage pit and the well water level must be 11 feet.
  - b. Please add the same footnote for the seepage pit column and the public water supply well row.
  - c. Please change the minimum distance from public domestic water lines from 10 feet to 25 feet for septic tank, disposal field, and seepage pit columns.
4. Section 4.5.2, Requesting exemptions in Prohibition Areas. In the Lahontan Region, Water Board staff does not grant preliminary exemption approval from the Water Board.
5. Section 4.6.3, Designated management areas. The City states that "there are areas in the City which have a high density of OWTS." Please add one or more maps to the LAMP that identifies these areas.
6. Connection to public sewer. In section 7.2.3, the LAMP states that connection to public sewer systems is required ... when required by the regional water board. Water Boards have no authority to require connection to a public sewer. Instead, Water Boards can establish prohibition areas for OWTS, and require cease of discharge by a certain date. The individual property owners are responsible for connecting their buildings to a public sewer system.

7. Section 8.2.2. Water Board staff suggest that part of the collected data includes sample results from testing of new private drinking water wells. This assumes that unimproved lots or areas could be developed in the city without connection from a community water system.
8. Section 8.2.4. The draft LAMP states that the Salt Nutrient Management Plan has been incorporated into the Water Board's Basin Plan as water quality objectives. This text comes from the San Bernardino County LAMP, and it is specific to the Santa Ana Water Board jurisdiction to control the concentration of salts and nutrients as they pass through Prado Dam in route to groundwater replenishment works in Orange County. Lahontan Water Board staff suggests this statement be clarified. The Mojave Salt and Nutrient Management Plan has been accepted by the Water Board.
9. Section 8.3, LAMP 5-year assessment. We suggest an additional approach for assessing impacts of high density areas discussed in Section 4.6.3. The undertaking of additional monitoring in these areas should have an objective of determining when to extend the sewer system to these areas. Of particular concern are areas along the flood plain aquifer, where higher transmissivity may cause movement of nitrate contaminated groundwater to down gradient locations. We suggest that the status of planning, funding, and construction status be reported in the 5-year assessment. If sewers have not been budgeted or installed since the previous 5-year report, we suggest that the assessment consider formation of a designated management area (DMA). Lahontan Water Board also suggest private well monitoring be considered in areas north of the Mojave River that are within the City of Barstow sphere of influence. Finally, we suggest that the LAMP provide consideration of a dedicated groundwater monitoring well that is located and screened at a depth that monitors the presence and movement of groundwater contaminated with nitrate.
10. Draft LAMP "inline" comments. Separately, Water Board staff will send a redline/strikeout copy of the LAMP with suggested changes. Please respond to these comments in the final LAMP.

Please send all future correspondence to [lahontan@waterboards.ca.gov](mailto:lahontan@waterboards.ca.gov), and copy me, so that information is placed into the proper electronic file. If the City has any questions, please contact me at (760) 241-7353 [mike.coony@waterboards.ca.gov](mailto:mike.coony@waterboards.ca.gov), or Jehiel Cass P.E., Senior Engineer, at (760) 241-2434, [jehiel.cass@waterboards.ca.gov](mailto:jehiel.cass@waterboards.ca.gov).

*for*   
Mike Coony, P.E.  
Water Resources Control Engineer

cc: Mark Rowan, [Mark.Rowan@merrelljohnson.com](mailto:Mark.Rowan@merrelljohnson.com)  
Rob Tucker, [robert.tucker@waterboards.ca.gov](mailto:robert.tucker@waterboards.ca.gov)