

**A. Verbal comments received by the Ramona Municipal Water District (District)**

<b>GENERAL COMMENTS &amp; MAJOR CONCERNS</b>	<b>REGIONAL BOARD RESPONSES</b>
<p>1. The District interpreted tentative Order Prohibition A.4 which restricts the total effluent flow from the San Vicente Wastewater Treatment Plant as a value not to be exceeded on a daily basis. This value is currently established at the previous Order's limit of 0.75 million gallons per day. The District pointed to an engineering report certifying the plant has a design flow of 0.8 million gallons per day, the District would like to have the 0.05 mgd available.</p>	<p>The design report does indicate the San Vicente Wastewater Treatment Plant has a design flow of 0.8 million gallons per day. In order to clarify the intent of Prohibition A.4, the following language from the current Order No. R9-1993-0003 will replace the language currently in the tentative Order:</p> <p>"A 30-day average flowrate from the San Vicente Wastewater Treatment Plant in excess of 0.80 mgd is prohibited unless the discharger obtains revised waste discharge requirements for the proposed increased flow."</p>
<p>2. In order to comply with the discharge specification for total nitrogen, the District would have to construct additional treatment to remove the excess nitrogen. Considering the recycled water users add nitrogen to their use areas as fertilizer, complying with the discharge specification for total nitrogen will be economically and socially impractical.</p>	<p>The 1.0 mg/L discharge specification for total nitrogen was calculated based on the Basin Plan water quality objective and on an allowance for vegetation uptake.</p> <p>Based on a previously submitted nutrient budget for recycled water use sites, it is evident that additional nitrogen is being applied to use sites as fertilizers. Consequently, in lieu of numerical discharge specification for nitrogen, application of site specific controls on nitrogen application is more appropriate.</p>
<p>3. Table 1, footnote (d) of the Monitoring and Reporting Program requires daily minimum CT values be reported monthly in one sentence and quarterly in the next.</p>	<p>This will be corrected in the Monitoring and Reporting Program by replacing Table 1, footnote (d) with the following:</p> <p>"Calculated CT (chlorine concentration multiplied by modal contact time) values shall be determined and recorded continuously. The daily minimum CT value shall be reported quarterly. The Discharger shall report quarterly the date, value, time, and duration when the CT value falls below 450 mg-min/L, and/or the modal contact time falls below 90 minutes."</p>
<p>4. The District was concerned that the data required to be submitted for secondary effluent will not be representative of the actual concentration of total dissolved solids.</p>	<p>In order to determine if the value submitted for the concentration of total dissolved solids in the secondary effluent is representative, the District will be required to conduct continuous conductivity measurements and verify, based upon those data, that the sample is representative. The sampling frequency for total dissolved solids (Table 2 of the Monitoring and Reporting Program will be modified to include footnote (e) that reads the following:</p> <p>"The Recycled Water Agency shall submit continuous conductivity measurements to determine if the composite sample collected for total dissolved solids is representative of the secondary effluent."</p>

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5. The District intends to comply with the requirements for a Salt and Nutrient Management Plan required in Special Study E.1 and E.2 of the Monitoring and Reporting Program; however, the District is unsure of how to develop a plan that will achieve the goals outlined.	The Regional Board will work with the District by providing feedback in order for the District to develop an effective workplan that will meet the goals of the Salt and Nutrient Management Plan.