

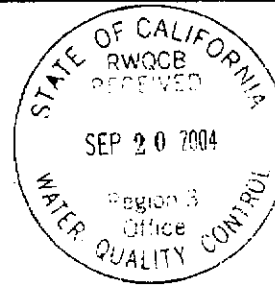


**Raines, Melton & Carella, Inc.**  
Consulting Engineers/Project Managers

**Innovative Solutions for Water and the Environment**

September 13, 2004

Mr. Matt Keeling  
California Regional Water Quality Control Board  
Central Cost Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401-5411



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**Subject: Comments on Sunnyslope County Water District's Tentative Draft Waste Discharge Requirements**

Dear Mr. Keeling:

Sunnyslope County Water District along with their consultant Raines, Melton and Carella, Inc. have reviewed the Tentative Draft Waste Discharge Requirements and offer the following comments:

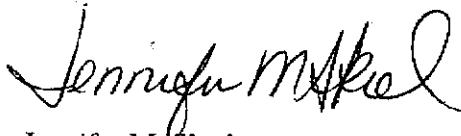
Location	Comment
Key Information, Page 1 Summary	Change the fifth sentence after the word "upgrade" to read, "by January 30, 2008 or the connection of the development to the City of Hollister wastewater collection system within two months after the City of Hollister's wastewater treatment plant becomes operational.
Key Information, Page 4/5 Compliance History paragraph 4	Monitoring wells are not suitably located to conclude a possible impact.
WDR, Page 2, Provision 10	At the end of the provision add, "and RM-II".
WDR, Page 2, Provision 19	Replace the last sentence with the following, "Flow from RM-II ponds has the ability to be pumped to RM-I Pond No. 5 to increase disposal capability at RM-II."
WDR, Page 3, Provision 27	Add at the end of the fourth sentence, "and photosynthesis".
WDR, Page 4, Provision 32	In the first sentence replace the word "Burial" with "Bird"
WDR, Page 7, Provision 54	Is the TMDL allocation for surface water only? This paragraph is slightly confusing.
WDR, Page 8, B2, Table 6 - Phased Effluent Limitations for Salt Constituents	Consideration should be given to setting monitoring well limits in lieu of ponds treatment requirements. Proposed effluent limits maybe overly restrictive based on the groundwater quality in the area. Credit should be given for soil filtration to improve effluent water prior to reaching groundwater. Consideration should be given to

	preparation of a Background Groundwater Study to set appropriate monitoring well requirements.
WDR, Page 9, B2, Table 7 – Phased Effluent Limitations for Nutrients	The Basin Plan states a 5 mg/l requirement as a median ground water objective. Consideration should be given to setting monitoring well limits in lieu of ponds treatment requirements. Proposed effluent limits maybe overly restrictive based on the groundwater quality in the area. Credit should be given for soil filtration to improve effluent water prior to reaching groundwater. Consideration should be given to preparation of a Background Groundwater Study to set appropriate monitoring well requirements.
WDR, Page 9, paragraph 3	Change “8.4” to “9.0”. In addition to detergent issue, photosynthesis may also be contributing. Consider if no impact to monitoring wells a limit of 6.5 to 8.4 in monitoring wells. The Basin Plan on page III-8 indicate these guidelines are flexible and should be modified when warranted by local experience or special conditions of crop, soil, and method of irrigation.
WDR, Page 9, Groundwater Limitations, paragraphs 4 through 9	Change the title of this section to, “Groundwater Limitations (for new monitoring wells proposed in Groundwater Assessment Workplan).
WDR, Page 10, paragraph C1	In the first sentence after the word “program” add, “, as long as the discharger maintains their own wastewater treatment facility, ...”
WDR, Page 11, paragraph D1c	Change paragraph to read, “By January 30, 2008, the Discharger shall either complete improvements to the facility to meet the phased effluent limitations in this Order and provide adequate disposal capacity, or successfully connect to the City of Hollister wastewater collection system within 2 months after the City of Hollister’s wastewater treatment plant becomes operational and cease all wastewater treatment and disposal operations at the facility.”
Monitoring and Reporting Program, pages 1 and 2, Influent Monitoring	Change all sample types from “24 hr composite” to grab. Type of sampling needs to be consistent for influent and effluent.
Monitoring and Reporting Program, page 2, Treatment and Disposal Pond Monitoring	In Note a) change the words, “at least three representative locations” to “a representative location”.
Monitoring and Reporting Program, Solids/Biosolids Monitoring, paragraph 1, 1 <sup>st</sup> sentence	After the word “Report” add the words “, if solids/biosolids are removed from the ponds,”.

Monitoring and Reporting Program, Solids/Biosolids Monitoring, paragraph 2, 1 <sup>st</sup> sentence	After the word "analyzed" add the words ", if solids/biosolids are removed from the ponds,".
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If you wish to discuss any of the above comments please call the undersigned or Bryan Yamaoka at 831-637-4670.

Very truly yours,  
Raines, Melton & Carella, Inc.



Jennifer M. Skrel

cc: Bryan Yamaoka