

**LATE REVISIONS TO RESPONSE TO COMMENTS FOR THE
CALAVERAS COUNTY WATER DISTRICT AND SADDLE CREEK GOLF CLUB, LLC
COPPER COVE WASTEWATER RECLAMATION FACILITY
TENTATIVE WASTE DISCHARGE REQUIREMENTS**

Central Valley Regional Water Quality Control Board

Board Meeting – 27 April 2023

The Response to Comments for the Calaveras County Water District and Saddle Creek Golf Club, LLC, Copper Cove Wastewater Reclamation Facility proposed Order has late revisions after discussion with the Central Valley Clean Water Association on 25 April 2023 to add further clarification in the response to Comment 1: Performance-Based Trigger for Electrical Conductivity (EC).

Revisions to Response 1

RESPONSE: Central Valley Water Board staff do not concur. The performance-based EC trigger was implemented to maintain existing salinity levels using the most recent data collected during the term of Order R5-2018-0040. This aligns with the intent of the Facility's participation in the Prioritization and Optimization Study under the Central Valley Salinity Alternatives for Long-Term Sustainability's Salinity Control Program. The Facility has been able to achieve lower effluent EC concentrations than in previous permit terms. Effluent EC data from March 2019 to February 2022 resulted in a maximum annual average effluent EC of 300 µmhos/cm, and a performance-based annual average effluent EC trigger of 375 µmhos/cm has been established in the proposed Order to account for temporary salinity changes while maintaining existing salinity levels. An exceedance of the performance-based annual average effluent EC trigger requires an update to the Discharger's Salinity Evaluation and Minimization Plan (SEMP) for submittal with the Report of Waste Discharge (ROWD) to account for long-term changes in salinity. If an update is not performed during the permit term, the Discharger shall evaluate the effectiveness of the SEMP and provide a summary with the ROWD.