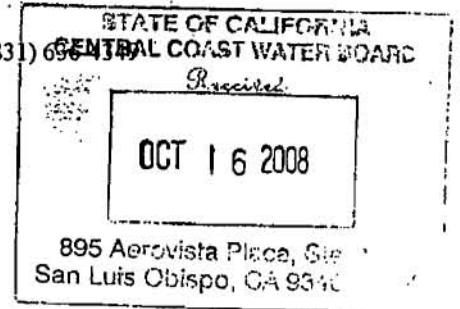




# CITY OF HOLLISTER

Send All Mail To:  
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**ENGINEERING DIVISION**  
Office Location: 420 Hill Street • Building C • (831) 636-4340 Fax: (831) 696-6969



October 13, 2008

Cecile DeMartini  
California Regional Water Quality Control Board - Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

**Subject:** City of Hollister Wastewater Treatment and Reclamation Facility

Dear Ms. DeMartini:

The City appreciates your help in facilitating the Permit development process:

We have reviewed the draft Staff Report, Master Reclamation Requirements and Monitoring and Reporting Program (R3-2008-0069) that you sent to us on September 9, 2008. Our comments are summarized below.

### **Staff Report**

**Page 1.** The Key Information section should identify the 1.5 mgd of current disposal capacity as disinfected treated wastewater to seasonal storage, not non-disinfected.

**Page 2.** The Summary section should identify the date of completion for the DWTP project as October 23, which is the date of the plant dedication.

**Page 2.** The Discussion section includes the statement that the DWTP has not had enough capacity to treat the water. Actually, the problem has been the lack of adequate disposal.

**Page 3.** The Discussion section should include two additional improvements in the list of new facilities at the DWTP: the new seasonal storage ponds, and the return water pumping station.

**Page 11.** Supplier Requirements should indicate average dry weather flow wastewater flows will increase from 2.69 to 4.9 mgd.

### **Master Reclamation Requirements Order**

*please note page numbering of our copy of the MRRs starts with page 7*

Item No. 30 Attachment No. D  
WDR Hollister DWTP & Reclamation  
December 4-5 2008 Meeting

**Facility Information 4** (p. 7) Same comment as Staff Report page 3 above, should include two additional improvements in the list of new facilities at the DWTP: the new seasonal storage ponds, and the return water pumping station.

**Prohibition A-8** (p. 12) seems to conflict with Prohibition A-13 and Specification B-4 in that the latter two clearly allow discharge of disinfected, tertiary treated wastewater to disposal at the IWTP perc ponds, while Prohibition A-8 could be read as disallowing that practice. Prohibition A-8 refers to "recycled water" and the other two cited sections of the draft Permit refer to "disinfected tertiary treated wastewater", but in practice, there is no difference between the two for this project. The City should have the management option to send treated disinfected water from seasonal storage to disposal, if there exists no ready user for that water, and operational conditions require that storage.

**Specification B-2** (p. 13) specifies monthly average of daily discharge quantities to the DWTP perc ponds be limited to 2.38 mgd. Once constructed and operating, the Brigantino Riverside Park and Hollister Airport reclaimed water irrigation projects are estimated to ultimately use over 0.60 mgd of recycled water. However, irrigation water demand variations at these sites since they are weather-dependent natural systems. Therefore, the limitation of flow to the perc ponds should be 2.60 mgd to account for irrigation demand variations. Limiting the on-site disposal to 2.60 mgd will ensure that all flow, over and above the existing baseline, will be used off-site as recycled water in accordance with the MOU between the City and the San Benito County Water District.

In addition, stating the limit in terms of a monthly average (of daily discharge quantities) will not accommodate the seasonal variation in water management options that this facility will need to address. The specification should state the limitation in terms of an annual average (of daily discharge quantities).

**Specification B-5, Table 2, TSS** (p. 14) Both tables (interim and final) indicate effluent limitations for total suspended solids of 0.2 mg/L and 0.1 mg/L as the daily max and annual average respectively. These are typical limits for total settleable solids (although the units for total settleable solids would be ml/L); typical limits for total suspended solids are an order of magnitude higher. The permit should be edited to either change the parameter or change the numeric limits.

**Specification B-5, Table 2, Salts** (p. 14) It does not appear that the interim effluent limitations for chloride and boron can be met by the existing facility. Recent operating data, proposed limits, and the effluent quality projection from the RWD, for chloride, sulfate, TDS, sodium and boron, are compared in **Table 1** below.

Table 1 RWD Projected Effluent Characterization, Proposed Limits, and Recent Sampling Data						
PARAMETER	EXPECTED ANNUAL AVERAGE (from March 2007 RWD Table 3-15)	DRAFT INTERIM EFFLUENT LIMITATION	JULY 2008 AVERAGE	AUGUST 2008 AVERAGE	JULY 2008 MAXIMUM	AUGUST 2008 MAXIMUM
Total dissolved solids [mg/L] <sup>1</sup>	1,190	1,200	1,175	1,033	1,237	1,100
Chloride [mg/L] <sup>1</sup>	272	240	269	269	292	280
Sulfate [mg/L] <sup>1</sup>	207	250	~	~	~	~
Sodium [mg/L] <sup>1</sup>	242	250	225	221	240	228
Boron <sup>2</sup>	0.7	1.0				

<sup>1</sup> DWTP Operating records, 2006.  
<sup>2</sup> City of Hollister, 2006, cited in EIR, AES, 2006.

In general, the salt effluent limitations should be enforced as annual averages, not as monthly averages. The projected effluent quality for the first phase of MBR operation was stated in the RWD in Table 3-15 as annual averages. Enforcing an annual average on a monthly basis is overly restrictive, and does not allow for variance between months. For example, consider Hollister DWTP in 2006. The May 2006 monthly grab sample was measured at 262 mg/L effluent sulfate. The average for all 12 months was 207 mg/L. The interim limit of 250 mg/L, if enforced as a monthly standard, would have resulted in a violation in May 2006. If enforced as an annual average, the discharge would have been considered compliant.

Specific to chloride, the interim limit for chloride has been set below the expected effluent chloride stated in RWD Table 3-15. The RWD stated expected annual average effluent chloride of 272 mg/L. Rounded up to two significant figures, the expected annual average effluent chloride would be 280 mg/L. The limit for effluent chloride should be raised from 240 mg/L to 280 mg/L, and enforced as an annual average.

Specific to boron, the characterization in Table 3-15 was based on the EIR for the project. Data supplied by the WWTP Operating staff are shown for boron in **Table 2** below.

MONTH	2005	2006	2007	2008
January	1.1			
April	2.2	0.9	1.2	0.9
July		1.3	1.1	
October			1.1	
December	1.1			
Average, all samples	1.2			

Recent sampling data indicate the average effluent boron is 1.2 mg/L. The interim and final effluent limitations for boron should be raised to 1.5 mg/L.

If interim limits for effluent boron and chloride can not be increased, then a time schedule for compliance should be considered.

**Specification B-6**, Table 2 (p. 14) sets enforceable limits for a date outside the period to be covered by this Permit. This information should be included as a finding, if at all.

**Specification B-8**, (p. 15) Specifies turbidity after disinfection. Because turbidity at the start of the disinfection process is the key parameter, and because chlorination itself can increase turbidity, the proper place to measure continuous turbidity is after the membrane basins and ahead of the chlorine contact basins. The turbidity meters at the new DWTP are on the individual membrane trains, ahead of disinfection. Specification B-8 should specify turbidity of the filtered wastewater, not turbidity of the disinfected wastewater.

**Specification B-8**, (p. 15) includes three turbidity standards. According to 22CCR60301.32, the first standard cited (average turbidity must be <0.2 NTU for any 24-hour period) is applicable only to media filtered water, and should be struck from the Permit. The second two standards in the draft Permit (0.2 NTU < 5% of any 24-hour period, and <0.5 NTU always) are applicable to membrane filtered water.

**Specification B-10**, (p. 15) As evidence of compliance with the disinfection process standards (CT greater than or equal to 450 mg-min/L, and MCT of 90 minutes or more), the City proposes to submit SCADA-calculated CT trends. The SCADA system at the DWTP can provide and record real-time calculations of CT and HRT on a continuous basis. From

the trend, compliance or non-compliance with the process standards will be immediately apparent. The proposed protocol would be more accurate and considerably more reliable than a series of manual calculations over time.

**Supplier and Distributor Requirement / Alarms C-16** (p. 17) requires alarms to be sent to "...a police station, fire station or other full-time service unit with which arrangements have been made to alert the person in charge at times that the reclamation plant is unattended." Steve Ferry of HSe clarified with Van Tsang of DPH that a SCADA system with an autodialer that notifies the operation staff of any alarm conditions that exists 24 hours per day meets the intent of the reliability criteria of Section 60335 (d). This clarification should be added to the Permit language.

**Supplier and Distributor Requirement / Maintenance C-25** (p. 18) requires monthly summary of operating records to be filed monthly. Performance reports are set for quarterly reporting. Shouldn't this be quarterly also?

**General Requirement C-39** (p. 20) requires that "all storm water contacting raw domestic wastewater or disinfected tertiary recycled water shall be contained and managed as raw domestic wastewater." If this comment is intended to apply only to the DWTP Operations area surrounding the MBRs, then the Requirement should be re-worded to clearly indicate that fact. However, if this Requirement is intended to apply to the areas including the seasonal storage ponds or use areas, then the following considerations must be addressed. Rain water falling into the seasonal storage ponds when they are filled with disinfected tertiary (recycled) water could be interpreted as requiring re-treatment under this requirement. In addition, if for some reason an incident resulting in contact between rain water and compliant recycled water occurred within a use area, then the re-application of the resulting mixture back onto the use area should be allowed as a management option. In summary, including raw wastewater in this requirement is acceptable for all sites, however, including disinfected tertiary recycled water in this requirement is problematic if the requirement applies to the seasonal storage ponds, use areas, or any area beyond the DWTP MBR operations area.

**General Requirement C-40** (p. 20) requires that the Supplier send weekly reports to Users containing information which is reported to the Regional Board quarterly. Generating and distributing weekly reports to Users would be a large demand of time, and the utility of the frequent reports is not clear. In the MRP, Distributor Requirement G-6 requires that "Each individual User Reclaimed Water Site Supervisor shall provide quarterly updates to the Distributor regarding irrigation frequency and flow rates, proposed system modifications . . . ." The frequency of Supplier reports to Users should match the frequency of User reports to the Distributor, namely, quarterly. Changing MRR C-40 report frequency to quarterly would be consistent and reasonable.



**User Requirement D-2** (p. 20) provides that "the Supplier and Distributor may add additional use areas/Users for the application of disinfected tertiary treated wastewater as long as they meet all applicable requirements contained within this Order and the California Code of Regulations." User Requirement D-2 should clarify that additional use areas can be added upon Executive Officer approval (without full Board action) after fulfillment of the stated conditions.

**Design Requirement D-14** (p. 21) requires that "All pipes installed above or below the ground, on and after June 1, 1993, that are designed to carry recycled water, shall be colored purple or distinctively wrapped with purple tape." There currently exists some limited piping on the DWTP premises which was installed after 1993, has been incorporated into the recycled water system, and is not purple. The existence of this underground, converted piping must allowed under the new Permit. All above-ground pipes, valves and appurtenances for recycled water at the DWTP have been appropriately marked or colored, regardless of age. All future pipes, valves and appurtenances for recycled water will be appropriately marked or colored, be they above ground or below ground.

**Groundwater Limitations D-27** (p. 24) There is evidence that many of the monitoring wells in Hollister are already over 8 mg/l nitrate. See *Hydrogeologic Report, City of Hollister Hydrogeologic Assessment*, Geomatrix, May, 2004. The following description of local groundwater nitrate levels is excerpted from page 46 of that report, and is based on groundwater samples collected during the second half of 2003:

"Nitrate has a primary MCL of 45 mg/L as nitrate (10 mg/L as nitrogen). Nitrate was detected at concentrations exceeding the standard at 10 of 19 locations where groundwater samples were collected in the San Juan sub basin. Detected concentrations ranged from non-detect (less than 1 mg/L) to 440 mg/L. Nitrate was detected at concentrations exceeding the standards at 3 of 22 locations where groundwater samples were collected in the Hollister West sub basin. Detected concentrations ranged from non-detect to 360 mg/L.

The highest concentrations of nitrates are in shallow groundwater in the San Juan sub basin (up to 440 mg/L) in an area of agricultural land use, and in the Hollister West sub basin in an area downgradient of a former poultry facility (up to 360 mg/L). Nitrate was detected at concentrations greater than the MCL in groundwater collected from three water supply wells (GW-7, GW-11, and GW-14) and eight monitoring wells (GW-2, GW-4, GW-6, H-4A, H-5A, H-5B, H-5C, and H-6A) located in agricultural areas, ranging from 56 to 440 mg/L."

*ref: Hydrogeologic Report, City of Hollister Hydrogeologic Assessment,  
Geomatrix, May, 2004*

### **Monitoring and Reporting Program**

**Section B, Influent Monitoring.** The requirement to monitor sulfate, boron, total dissolved solids, sodium, chloride, perchlorate, total trihalomethanes, and total trihaloacetic acid should be deleted.

**Section C, Effluent Monitoring.** The composite sampling point is located between the membranes and the chlorine contact tank. There is currently no provision to composite sample after the contact tank.

**Section H, Groundwater Monitoring.** The requirement to monitor for perchlorate, total trihalomethanes and total trihaloacetic acid should be deleted since these are not constituents that are present in significant concentrations in the effluent.

**Reporting Requirement I-1** (p. 7) requires submittal of quarterly self-monitoring reports by the City, one month after the end of each quarter. The Reports must include quarterly data submitted by Users on the same quarterly schedule. It may be difficult to gather all data from all User sites in time to prepare and submit the reports. The Report Due dates listed in the table in Requirement I-1 should be pushed back 30 days (to March 31, August 31, November 30, and February 28).

### **SPARRs**

**SPARR #14** states that all disposal areas shall be on land owned or controlled by the discharger. The distribution of recycled water to properties not owned or directly controlled by the City must be allowed under the MRRO. This could be just a terminology question.

### **GENERAL**

1. Provisions B.5 - B.6. Daily maximum and monthly average limits are not necessary.

The recycled water limitations set forth in Provisions B.5 and B.6 are either technology-based limits, set for BOD and TSS to equate to tertiary treatment, or are set based on objectives set as long term annual averages for human health protection over 70 years of exposure from drinking water from that source. Thus, these limits need not be set as daily maximum limits. Further, many of the objectives on which the monthly average limits are based are set to be "annual mean values." See e.g., Basin Plan at III-13. As such, no need

exists to set daily and monthly limits on the recycled water and statistically derived annual average limits would be adequate to protect the quality of the groundwater.

The Regional Board has not performed an analysis under Water Code section 13263, including an analysis of the factors set forth in Water Code section 13241 before imposing the proposed limits. Furthermore, the sampling is not performed on a daily basis to determine compliance with daily limits. The Tentative Order should be revised to impose annual average limits, and perhaps maintain daily, weekly, or monthly average values as "performance goals" instead of enforceable limits.

REQUEST: Remove all of the proposed daily and monthly limits, and impose limits as annual averages to be consistent with Basin Plan requirements, or undertake an analysis under section 13263 of the Water Code to ensure that each of the requisite 13241 factors are considered prior to imposing the currently proposed limits.

## 2. Requirements included without supporting findings and evidence.

The Tentative Order includes many requirements that do not contain supporting findings and evidence. For example, the Tentative Order requires nitrate limits of 7.0 mg/L for Nitrate as N. No explanation is given for this requirement, and this requirement seems particularly stringent when the Basin Plan requires: "Wastes discharged to ground waters shall be free of toxic substances in excess of accepted drinking water standards; taste, odor, or color producing substances; and nitrogenous compounds in quantities which could result in a ground water nitrate concentration above 45 mg/L." See Basin Plan at pg. V-9.

Similarly, the Tentative Order requires mineral limits more stringent than the lowest Basin Plan objective. For example, the current Total Dissolved Solids limit of 1,200 mg/L as a monthly average is more stringent than the surface water objective for the San Benito River of 1,400 mg/L and more stringent than the annual mean objective of 1,200 mg/L for groundwater.

Finally, the MRP requires extensive influent monitoring without an explanation as to why these constituents must be monitored in the influent.

REQUEST: Remove all of the proposed limits more stringent than annual average objectives for groundwater with Basin Plan requirements, or undertake an analysis under section 13263 of the Water Code to ensure that each of the requisite 13241 factors are considered prior to imposing the currently proposed limits.



Cecile DeMartini  
Page 9  
October 13, 2008

We would like to schedule a meeting with you to discuss these comments at your earliest convenience. Please contact me at 831-636-4340 or at [Steve.Wittry@Hollister.ca.gov](mailto:Steve.Wittry@Hollister.ca.gov) to schedule the meeting. Thank you for your cooperation.

Sincerely,

City of Hollister



Steve Wittry  
City Engineer

cc: Clint Quilter, City of Hollister  
Stephen Ferry, HydroScience Engineers  
Dave Jones, CH2M HILL

**Cecile DeMartini - RE: Hollister Permit**

**From:** "Stephen Ferry" <sferry@hydroscience.com>  
**To:** "Cecile DeMartini" <CDeMartini@waterboards.ca.gov>, <Dave.Jones@CH2M.com>  
**Date:** 11/10/2008 4:37 PM  
**Subject:** RE: Hollister Permit  
**CC:** <steve.wittry@hollister.ca.gov>, "Mike Jensen" <mjensen@hydroscience.com>

Cecile -

That will certainly work -- Thanks very much

Steve

Stephen Ferry P.E., R.E.A.  
 Sr. Project Manager  
**HydroScience Engineers, Inc.**  
 221 Gateway Road West - Suite 403  
 Napa CA 94558  
 P 707-254-1900  
 F 707-254-1901

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**From:** Cecile DeMartini [mailto:CDeMartini@waterboards.ca.gov]  
**Sent:** Monday, November 10, 2008 4:10 PM  
**To:** Dave.Jones@CH2M.com; Stephen Ferry  
**Cc:** steve.wittry@hollister.ca.gov; Mike Jensen  
**Subject:** RE: Hollister Permit

Hi Steve,

Reclaimed water is required to be applied at agronomic rates for the area it is being used. The MRR requires a nutrient management plan in order to manage the nitrogen levels for this type of application. In the meantime, the effluent limits for Total Nitrogen will be enforced when going straight to perc and not for reuse. The only time MMPs will come into play is if the effluent is being discharged to a surface water body, so no worries there, right?! As far as it being a violation, considering this is a land discharge, we will enforce the violation of this effluent limit as a single event and not 12.

Cecile

>>> "Stephen Ferry" <sferry@hydroscience.com> 11/10/2008 4:01 PM >>>  
 Hello Cecile -

The total N limit of 5 as an annual average is more restrictive than we see in most discharge permits, but we understand that the Basin Plan has recognized a pre-existing condition of high local ground water nitrogen levels. The standard is one which the new DWTP should be able to meet.

However, please take note. In the future, the City hopes to apply all of its treated wastewater to land by irrigation, where the potential for nutrient loading to ground water will be attenuated by plant uptake, and by soil processes occurring in the vadose (unsaturated) soil zone. Nitrogen effluent limitations for wastewater applied to land should not be as restrictive as those for treated wastewater discharged to perc ponds because of the additional nutrient

attenuation pathways inherent in land application. It is the City's hope that the nitrogen limits can be re-validated and increased, as the effluent management program moves from perc ponds to land irrigation.

Finally, we would like to clarify, if one excursion beyond the rolling 12-month average of 10 mg total N were to occur, would that be considered one violation or twelve, for the purposes of considering mandatory minimum penalties?

Thanks for your help and attention.

Steve F

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**From:** Cecile DeMartini [mailto:CDeMartini@waterboards.ca.gov]  
**Sent:** Monday, November 10, 2008 2:17 PM  
**To:** Dave.Jones@CH2M.com; Stephen Ferry  
**Cc:** steve.wittry@hollister.ca.gov  
**Subject:** RE: Hollister Permit

Tables 2 and 3 state "Total Nitrogen (as N)" as an **Annual Average** where compliance with annual averages will be determined on a rolling 12-month basis. Thanks for catching that Stephen. Table 2 has been renamed to "Interim Effluent Limits" and the chloride annual average is set to 280 mg/L through 2015. After then Table 3 sets the chloride annual average at 150 mg/L.

Keeling and I believe the new WWTP will achieve the Total Nitrogen effluent limits with no problems. Unless I hear any other comments on the Total Nitrogen effluent limits, I will take this to be an agreeable effluent limit?

>>> "Stephen Ferry" <sferry@hydroscience.com> 11/10/2008 2:11 PM >>>  
Cecile -

Thanks for clarifying that. One question - the final criterion you mention - - is that 5 mg/L total N as an annual average (not annual max)?

Also, will the "interim" chloride limit be raised above the value of 240 mg/L which we discussed last week? If you recall I expressed concern, because the recent data I have seen indicates the DWTP effluent chloride is often 270-290 mg/L. It is not clear that the DWTP could comply with a chloride limit of 240 even, if it was imposed as an annual average of monthly reported values.

Please advise.

Thanks

Steve Ferry

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**From:** Cecile DeMartini [mailto:CDeMartini@waterboards.ca.gov]  
**Sent:** Monday, November 10, 2008 1:58 PM  
**To:** Dave.Jones@CH2M.com  
**Cc:** steve.wittry@hollister.ca.gov; Stephen Ferry  
**Subject:** RE: Hollister Permit

That is right. I did agree to making that an annual average. I've forwarded that along to Harvey and Chris for their final christening. I changed one other thing in Table 2 and 3 of the MRR after our discussion. After discussing nitrate limits with Matt Keeling, he pointed out to me that the Basin Plan has a specific water quality objective for Total Nitrogen as N and not Nitrate as N. He also suggested eliminating the ammonia effluent limits but keeping it in the monitoring and reporting program. Therefore, ammonia has been eliminated from both tables 2 and 3. Effluent limits for Nitrate as N has been removed from both tables. Effluent limits for Total Nitrogen as N has been added to both tables. The limits for Total Nitrogen as N are 10 mg/L as a daily max and 5 mg/L as an annual max (which is the Basin Plan objective for that groundwater basin).

Please let me know your comments on these last modifications.

Cecile DeMartini  
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 Central Coast Regional Water Quality Control Board  
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 San Luis Obispo, CA 93401-7906  
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 Please consider the environment before printing this e-mail

>>> <Dave.Jones@CH2M.com> 11/10/2008 12:40 PM >>>  
 Cecile,

The proposed language does not consider the seasonal (wet vs. dry weather) flow variations. For wet weather months, the flow to the basins will exceed 2.60 mgd with the excess flow stored and then later withdrawn in the dry weather months for irrigation. I see 2 ways to revise the requirement language. One way is to say that the 2.60 mgd is an annual average and I have modified the language below to reflect this. The other way is to acknowledge that the excess flow above 2.60 mgd will be stored in the ponds (up to 916.3 AF) during wet weather and withdrawn later during dry weather for off-site irrigation. Measurement and confirmation of this latter point can be accomplished through comparing the DWTP influent flow records to the Recycled Water Pump Station discharge flow meter records by making sure that any amount of influent flow above 2.60 is compensated for by an equal or greater amount of flow that goes to off-site irrigation on an annual average basis to account for seasonal weather variations.

**Dave Jones CH2MHILL** 2485 Natomas Park Dr, #600, Sacramento, CA 95833-2937 (916) 286-0390 office (916) 614-3580 fax (916) 769-8753 cell

**From:** Cecile DeMartini [mailto:CDeMartini@waterboards.ca.gov]  
**Sent:** Monday, November 10, 2008 11:26 AM  
**To:** Jones, Dave/SAC  
**Cc:** Steve Wittry; Stephen Ferry  
**Subject:** RE: Hollister Permit

This is how I've rewritten Provision B.2. Let me know if this works for the City. I'm still waiting for final review of this response in-house so it isn't quite final.

2. "Daily flow of treated wastewater to the DWTP percolation basins shall not exceed 2.60 MGD calculated on an annual average basis . Percolation volume reduction will occur as each percolation basin is lined. The Discharger will submit a percolation technical memorandum prior to the lining of each percolation basin indicating the volume of percolation which will be eliminated. The daily flow of treated wastewater to the DWTP percolation basins averaged over each month will be reduced as indicated in the percolation technical memorandum and as approved by the Executive Officer."

>>> <Dave.Jones@CH2M.com> 11/10/2008 11:21 AM >>>

Correct.  
 - Dave

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**From:** Cecile DeMartini [mailto:CDeMartini@waterboards.ca.gov]  
**Sent:** Monday, November 10, 2008 11:12 AM  
**To:** Jones, Dave/SAC  
**Cc:** steve.wittry@hollister.ca.gov; sferry@hydroscience.com  
**Subject:** Re: Hollister Permit

Hi Dave,

Just to clarify, total percolation at the three west side perc/storage basins is 2.60 MGD with an additional (i.e., on top of the perc flow) storage capacity of 916.3 acre feet?

Cecile

>>> <Dave.Jones@CH2M.com> 11/8/2008 10:11 AM >>>

Hi Cecile,

Following up on our conference call this past Tuesday (Nov. 4), here is the information you requested to revise the draft permit:

1. The three local agencies have approved a "Preferred Alternative" in the Hollister Urban Area Water and Wastewater Master Plan that commits to a regional salinity reduction plan by demineralizing water supply wells that will result in a reduction in total dissolved solids and related minerals in the DWTP effluent. I have attached the minutes of the San Benito County Water District, San Benito County Board of Supervisors, and Hollister City Council meetings documenting the approval. I have also included information on the schedule of the Preferred Alternative shown in the 2 attachments entitled "Master Plan Phasing" and "Implementation Schedule." In summary, the agencies are committed in following through on the Master Plan recommendations that target achieving the salinity reduction goals by 2015. However, full compliance with the Master Plan target of less than 700 mg/L of TDS is not in the City's full control. Therefore, we request that it not become a permit limit at this time.
2. The storage capacity of the three Seasonal Storage Ponds located west of Hwy 156 is as follows: Pond 1: 222.1 Acre Feet, Pond 2: 351.2 Acre Feet, Pond 3: 343.0 Acre Feet, Total : 916.3 Acre Feet.

Regarding boron concentrations in the domestic water supply, I will follow up with the City's water department to get you this information as soon as possible.

Thank you for your understanding and cooperation.

**Dave Jones CH2MHILL** 2485 Natomas Park Dr, #600, Sacramento, CA 95833-2937 ? (916) 286-0390 office ? (916) 614-3580 fax ? (916) 769-8753 cell