

RAMONA MUNICIPAL WATER DISTRICT

105 Earlham Street Ramona, California 92065-1599 Telephone: (760) 789-1330

August 11, 2010

James G Smith Regional Water Quality Control Board 9174 Sky Park Court, #100 San Diego, CA 92123-4353

SUBJECT: <u>255468:CHENNING:</u> TENTATIVE ADDENDUM NO. 1 TO ORDER NO. R9-2009-0005: AN ADDENDUM TO INCORPORATE REQUIREMENTS FOR THE DISCHARGE OF BRINE AND TO CLARIFY EXISTING REQUIREMENTS.

Dear Mr. Smith:

Thank you for your letter of July 21, 2010 (Letter) and the opportunity to respond to the proposed addendum to the Waste Discharge Requirements for our San Vicente Wastewater Treatment Plant. Staff has reviewed the document and has the following comments on the Tentative Addendum No. 1 to Order No. R9-2009-0005:

- 1. On page 2, paragraph 6, a, iii, a polyethylene geomembrane (PE) is referred to as the containment layer. The specifications that have been prepared for the proposed brine evaporation pond call for a polyvinyl chloride (PVC) membrane liner for secondary containment.
- 2. On page 2, paragraph 8, it states that there should be "more frequent monitoring of heavy metals". Our staff prefers for this to be quantified. Our understanding from speaking with RWQCB staff is that we will need to test once every 5 years and if that test is out of compliance we will need to test monthly until we are back in compliance. We would then go back to the 5 year cycle.
- 3. On page 4, paragraph 3, b, a freeboard of 6-inches is required at all times for each section of the pond. The outside perimeter wall will provide well beyond the 6-inches of freeboard, but one of the potential operational scenarios is to allow one pond to completely fill and spill into the next pond downhill from the pond being filled. If 6-inches of freeboard is desired for emergency storage capacity, the pond will never have that capacity because the control structures (weirs) will automatically spill into the next pond before ever filling the remaining storage capacity associated with the freeboard. It may be better to quantify the freeboard associated with the perimeter wall for splash action and quantify an emergency volume to be maintained in the overall pond. We would also point out that the RMWD controls the flow rate into the brine ponds. In an emergency scenario, we would stop sending brine to the evaporation ponds and discharge it into the existing brine pond at the treatment plant site to be stored and hauled off site.
- 4. On page 4, paragraph 3, e, the solids buildup is required to be removed "sufficiently by October 31 of each year". Our calculations show that solids buildup will take **WATER FIRE PROTECTION RESCUE SEWER PARK & RECREATION**

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approximately 4 years before impacting storage capacity. RMWD's preference is to remove solids "as-needed" to reserve wet weather storage capacity in the brine ponds.

- 5. On page 9, paragraph 1, a, 3, states that a map of all monitoring points needs to be included in quarterly reports. Our assumption is that this is a map of the observation ports on the leachate collection system, but could be interpreted as being the locations of existing monitoring wells. It is also our understanding that additional monitoring wells will not be required due to the dual containment and collection system constructed with the brine ponds. Attached is a half sized plan of the proposed observation ports on the brine pond.
- 6. On page 9, paragraph 2, b and page 10, 2, c, the references to HDPE liner should be changed to PVC liner.
- 7. On page 11, paragraph B, 1, b the daily flow rates during any thirty day period should be 0.80 million gallons per day instead of 0.08 million gallons per day.

If you have any questions with respect to our comments, please feel free to contact me at 760-788-2249 or tstanton@rwmd.org.

Sincerely Timothy Stanton.

District Engineer

Attachment

Cc: Alice Benson, RMWD Wastewater Operations Manager Joe Cortez, RMWD Wastewater Treatment Supervisor





- 1. CONFORMING TO REGIONAL WATER QUALITY CONTROL BOARDS STANDARDS TO PREVENT LEAKAGE.
- 2. ASSUMPTION BASED ON EVAPORATION RATE OF 48-INCHES PER YEAR.
- PONDS ARE EQUIPPED WITH BOTH SWALE AND BERM TO PREVENT STORM RUN-OFF TO ENTER THE STRUCTURE.
- 4. ASSUMED DAILY FLOW RATE OF 800,000 GPD FROM R0-1 & R0-2 UNITS COMBINED. THE EQUIVALENT VOLUME IS 88,862 CUBIC FEET. ACTUAL DESIGN INFLOW TO BRINE POND IS 11 GPM OR 16,000 GPD.
- 5. POND AREA OF 2.342 ACRES WITH A LIQUID DEPTH OF 0.91' AND 0.75' OF FREEBOARD UNDER NORMAL OPERATING CONDITION. THE ADDITION OF STORM WATER FLOW BASED ON A 24-HR, 100-YR STORM FREQUENCY WILL PRODUCED A COMBINED DEPTH OF 1.49' AND 0.17' OF FREEBOARD WITHIN THE INTERIOR WALLS. TYPICAL INTERIOR WALLS ARE AT LEAST 0.33' LOWER THAN PERIMETER WALLS.
- 6. POND LINERS CONSISTING OF 4" THICK CONCRETE OVER 4" MINIMUM SAND AS PRIMARY CONTAINMENT BELOW THE SAND LAYER WILL BE A 20 MIL PVC MEMBRANE TO SERVE AS THE SECONDARY

AINMENT.				
1308.7 307.7,H 309.2	D			
303.2	BRINE POND DATA TABLE			
	#	AVAIL AREA (SF)	AVAIL VOL (CF)	DESIGN VOL (CF)
	POND 1	5,676	9,478	5,165
	POND 2	8,698	14,525	7,915
	POND 3	8,561	14,297	7,790
	POND 4	8,912	14,883	8,110
	POND 5	9,131	15,249	8,309
	POND 6	9,350	15,614	8,509
	POND 7	9,569	15,979	8,708
	POND 8	10,150	16,951	9,236
	TOTAL	70,047	116,976	63,742

C-2 33 RAMONA MUNICIPAL WATER DISTRICT SAN VICENTE WASTEWATER RECLAMATION FACILITY BRINE EVAPORATION PONDS **GRADING/IMPROVEMENT PLAN** pproved By: DISTRICT ENGINEER WATER OPERATIONS MANAGER

