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November 28, 2007

Nipomo Community Services District
148 Wilson Street
P.O. Box 326
Nipomo, CA 93444

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Dear Bruce Buel:

At the November 28, 2007 board meeting, as part of item E1, during a discussion of drilling to resolve the problems at the southland site, it was stated that the RWQCB had made some comments on drilling as a solution/option/project.

I am requesting a copy of those comments from the RWQCB and any NCSD communications to the RWQCB on that issue.

Thank You



Harold Snyder

NIPOMO COMMUNITY

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December 10, 2007

Mr. Harold Snyder
P. O. Box 926
Nipomo, CA 93444

SUBJECT: NOVEMBER 29, 2007 PUBLIC RECORDS REQUEST RE RWQCB INPUT

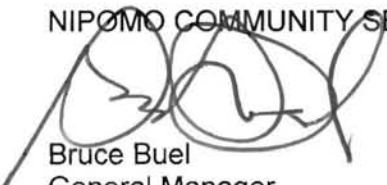
Dear Mr. Snyder,

Attached is a copy of the August 20, 2007 Letter from the RWQCB regarding disposal of treated wastewater from the Southland WWTF. This letter is the only public record of interaction with the RWQCB that I could find in our files.

If you have any questions, please don't hesitate to call me.

Sincerely,

NIPOMO COMMUNITY SERVICES DISTRICT



Bruce Buel
General Manager

CC: Public Records Request File
Chronological File

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California Regional Water Quality Control Board
Central Coast Region



Linda S. Adams,
Secretary for
Environmental Protection

895 Aerovista Place, Suite 101, San Luis Obispo, California 93401-7906
(805) 549-3147 • Fax (805) 543-0397
<http://www.waterboards.ca.gov/centralcoast>

Arnold Schwarzenegger
Governor

August 20, 2007

Bruce Buel, General Manager
Nipomo Community Services District
P. O. Box 326
Nipomo, CA 93444-0326

Dear Mr. Buel:

**HYDROGEOLOGIC CHARACTERIZATION AND UPGRADE OF NIPOMO
COMMUNITY SERVICES DISTRICT SOUTHLAND WASTEWATER FACILITY, SAN
LUIS OBISPO COUNTY**

Thank you for the opportunity to review and comment on the report "*Hydrogeologic Characterization Southland Wastewater Treatment Facility Nipomo, California*" prepared by Fugro West, Inc. This letter provides our comments on that report, and responds to questions raised in your August 3, 2007, meeting with Central Coast Water Board staff, Sorrel Marks. We concur with the District's plans (described during the meeting) to further investigate impacts associated with the current discharge and to develop long-term plans for community wastewater disposal needs.

1. The report concludes that the shallow groundwater and effluent are similar in the characteristics measured. The constituent trend graphs (figures 9a-c) show groundwater constituent concentrations approximating effluent concentrations for TDS, chloride, and sodium. However, some of the constituent data indicate increasing groundwater values and some indicate decreasing groundwater values, as they approach the effluent concentration. It is unclear whether the effluent discharge is degrading groundwater quality or diluting poorer quality water from other sources. This distinction between sources of pollutants (effluent or others) should be clarified in order to evaluate water quality impacts that might be eliminated by improving effluent quality or altering disposal practices.
2. Water quality degradation caused by the discharge is prohibited. Prior reviews of the District's wastewater disposal have considered potential impacts to groundwater as the first and most likely indicator of impacts caused by the discharge. If the discharge is ultimately migrating to Nipomo Creek, further investigation should evaluate potential water quality impacts to the creek. The Clean Water Act 303(d) list of impaired waters includes Nipomo Creek as impaired with fecal coliform bacteria. Further investigation of effluent migration should include fecal bacteria analyses in order to assess or preclude effluent as a source for such impairment.

California Environmental Protection Agency

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AUG 21 2007
NIPOMO COMMUNITY
SERVICES DISTRICT

3. Investigation should focus on whether groundwater downgradient from the discharge is degraded when compared with upgradient constituents. Your report indicates that additional monitoring wells may need to be located outside the groundwater/effluent mound, in order to properly characterize water quality impacts. Water quality objectives for the Nipomo area are specified in the Basin Plan and include: TDS 710 mg/L, chloride 95 mg/L, sulfate 250 mg/L, boron 0.15 mg/L, sodium 90 mg/L, and nitrate (as N) 5.7 mg/L. However, these values are area-wide average concentrations and may not be comparable to groundwater conditions near the wastewater facility.
4. During the recent meeting, you inquired what level of treatment is needed and what discharge criteria apply if water quality impacts are observed. The answer is - whatever level of treatment will eliminate the impact. The District currently operates an advanced primary treatment facility that removes approximately 75% of the wastewater solids. Water quality protection depends upon additional pollutant removal in the soil column and assimilative capacity of underlying groundwater. The discharge requirements specified in Order No. 97-75 (Waste Discharge Requirements for Nipomo Community Services District, Southland Wastewater Works) are typical of requirements for discharges in settings such as yours. We do not anticipate that those requirements will significantly change in the foreseeable future, provided water quality impacts do not result from the discharge. If impacts to groundwater and/or the creek are identified, then additional treatment (such as nitrogen removal) may be required. If nitrogen removal is required, an effluent limitation of 10 mg/L total nitrogen is likely to be proposed by staff to the Central Coast Water Board. The basis of such a limit is that it would preclude degradation of groundwater above 10 mg/L, even if the groundwater is primarily effluent. Discharge requirements may be revised if alternative disposal methods or locations are used. Direct discharges to Nipomo Creek are not allowed.
5. Regarding your proposal to discharge water harvested from below the Southland discharge area and transported to a disposal site near Mesa/Osage, requirements similar to those specified in Order No. 97-75 would likely apply. The District would need to demonstrate that the discharge will not cause degradation of underlying groundwater or pose a public health risk.
6. We have reviewed the August 13, 2007 memorandum from Boyle Engineers to Sorrel Marks. The memorandum describes anticipated effluent quality from an upgraded facility (using Biolac technology) that would meet the District's needs for land application even if nitrogen reduction becomes necessary. However, the last statement of the memorandum refers to penetration of the aquitard and disposal of effluent directly into the deeper groundwater - such practice would not be allowed.

We whole-heartedly support the District's efforts to characterize water quality impacts and develop long-term, sustainable wastewater treatment and disposal plans. If you have questions, please call **Sorrel Marks at 805/549-3695** or Harvey Packard at 805/542-4639.

Sincerely,


Roger W. Briggs
Executive Officer

S:/wdr/wdr facilities/san luis obispo co/Nipomo/hydro&upgrade study comments
Task: 126-01
File: Nipomo CSD Southland Plant