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October 21, 2011

Cecile DeMartini  
895 Aerovista Place, Suite 101  
San Luis Obispo,  
CA 93401-7906

RE: Proposed WDRs Order No. R3-2011-0214, MHC Thousand Trails Inc. – RV Facility, San Benito Preserve

Dear Ms. DeMartini:

On behalf of the MHC Thousand Trails Inc., San Benito Preserve Recreational Vehicle Park (San Benito), this responds to your draft proposed Waste Discharge Requirements Order (WDRs) letter dated September 20, 2011. Our reviewed comments and recommendations for consideration regarding this Draft are summarized in **Table 1** below.

**Table 1 – Comments and Recommendations Regarding Proposed WDRs Order No. R3-2011-0214**

Item No.	Section	Questions/Recommendations for Consideration
1	Cover letter	Suggest change to Caitlin McAuliffe, Permits & License Coordinator
2	WDRs Order No. R3-2011-0214 <b>B.1. Discharge Specifications</b>	<p>The septic tank effluent discharge limits of the following three constituents are too low for primary wastewater treatment septic system. In drinking water regulations:</p> <ul style="list-style-type: none"><li>• Formaldehyde limit listed in the DRAFT WDO (0.1 mg/L) is the California Department of Public Health "notification level" for drinking water systems.</li><li>• The 1,4-DCB limit listed in the DRAFT WDO (0.075 mg/l) is the USEPA MCL (maximum contaminant level) for drinking water, which is higher than the California Preliminary Health Goal of 0.006 mg/L.</li><li>• Daily maximum for methanol is too low at 0.012 mg/L when</li></ul>

		USEPA Preliminary Remediation Goal for tap water is 18 mg/L.  Subsurface disposal with soil aquifer treatment can substantially remove these RV holding tank additives and byproducts. Suggest revise the daily maximum limits and move these requirements to Section C. Groundwater Limitations.
3	WDRs Order No. R3-2011-0214 <b>C. 3. Groundwater Limitations</b>	Coliform organisms is not an appropriate constituent for monitoring because coliform organisms are naturally occurring in soil, and would therefore be anticipated to be present.
4	WDRs Order No. R3-2011-0214 <b>C. 3. Groundwater Limitations</b>	What is the definition of statistically significant? In general, the acceptable laboratory quality control allows variations in some laboratory results of 65-150%. Also, increase in mineral or organic constituents may not pose a threat to water quality/beneficial use, and increase in organic constituents would be anticipated in any wastewater discharge.
5	WDRs Order No. R3-2011-0214 <b>Provisions, Section D.2.</b>	Change of deadline for monitor well installation to July 31, 2012 to accommodate potentially wet winter which could make access by drilling rigs difficult.

Please feel free to contact me with any questions or comments you may have on this response. I welcome the opportunity to discuss these matters further with you. I can be reached on my cell phone at (480) 373-5721-2347 or email at [Pengfei\\_Chao@equitylifestyle.com](mailto: Pengfei_Chao@equitylifestyle.com).

Sincerely,

PengFei Chao, PhD, PE  
Civil Engineer  
Equity LifeStyle Properties, Inc.

Enclosures

cc:

Dan Perlis, Equity LifeStyle Properties, Inc.  
Jennifer Barrett, Equity LifeStyle Properties, Inc.  
Scott Brown, Equity LifeStyle Properties, Inc.