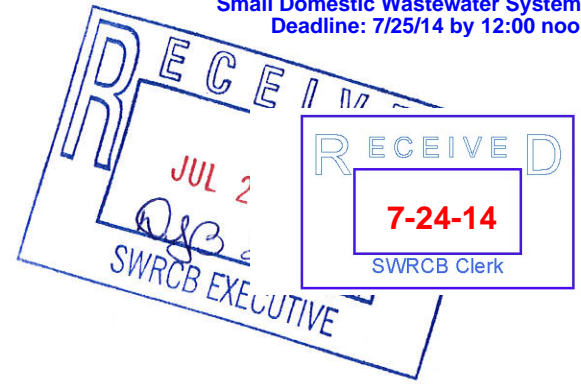




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(9/23/14) Public Hearing
Small Domestic Wastewater Systems
Deadline: 7/25/14 by 12:00 noon



July 20, 2014

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

RE: Public Hearing Tuesday Sept 23, 2014
General Order for small Domestic Wastewater Systems

Jeanine,

The following is my written comments to allow me to speak at the upcoming public hearing. I'm an Operations, Maintenance & Monitoring provider primarily for Paradise and Chico, located in Butte County. I also provide for a dozen or more sites located from Sacramento to the Oregon border.

For the upcoming public hearing, I am looking for clarification of parts of the new General Order, beginning with page 27 (K). Item K states: "Wastewater facilities shall be supervised and operated by persons possessing a wastewater treatment plant operator certificate of the appropriate grade". It then references Title 23 div. 3, ch. 26. On page 8 of title 23, it has definitions of treatment plant processes as follows:

1. "Primary" (septic tanks) classified as a class 1 wastewater treatment process.
2. "Biofiltration" (trickling filters, packed bed filters etc,) classified as a class 2 wastewater treatment process.
3. "Activated Sludge" classified as a class 3 wastewater treatment process.

On page 14 of title 23 (a) it states that the Chief plant operator needs to have a grade 1 for a process classification 1, Grade 2 for classification 2, Grade 3 for classification 3. It also states that any employee performing routine tasks at the treatment plant needs to have an operator grade not less than one class lower than the Chief operator.

In 1983, I started a sewer and drain company in the Chico / Paradise area. Around early 1993, there became a need for an O&M provider for local secondary wastewater treatment processes. It started small but steadily grew to the point that I sold the sewer and drain company and opened Hydrotec Solutions, Inc. I do not possess an operator grade, nor do my two technicians. If I read the New General Plan and Title 23 correctly, I will no longer be able to serve the North State. This would severely impact the four families that depend on Hydrotec's survival.

Here are a couple real life examples of sites already impacted by the new general order:

Keefer Creek HOA, CSA 135

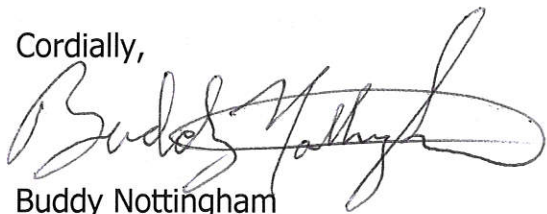
In February of this year, under the New General Order, CSA 135 was re-classified as an "Activated Sludge Plant". This classification has increased their operating budget by approximately 75% due to increased frequency of effluent testing and added influent testing. This site treats screened septic tank effluent using two AX 100 Pods (trickling filters). It is not, by any definition I can find, an "Activated Sludge Plant". Under the original WDR's, this site had monthly sampling frequencies which were more than enough to enable me to monitor effluent quality. CSA #135 has been on-line since approximately 2000 and has not failed in meeting BOD or TSS limitations. Added sampling frequencies and influent sampling are of no benefit to me as an operator, and a waste of my clients' money. Can you please reconsider this classification?

Tuscan Ridge Golf Club

This site is located in Chico. It treats wastewater with a Chromaglass unit capable of treating 500 GPD residential waste strength. WDR's for this site allow a discharge limit of 275 GPD. This unit is without a doubt an Activated Sludge process. It has recently been reclassified as a class 3 process requiring a grade 3 operator, and of course the increased influent / effluent sampling. Their current budget to maintain the plant is approximately \$100 dollars per month. The new classification will increase their budget at least 10-fold if Hydotec is allowed to continue to be its Operator. If a grade 3 Operator could be found that would want to take on this site, they would easily come at a much greater cost. My question is this: for 275 GPD, is the increase in monitoring costs to the property owner a consideration in the reclassification process?

Thank you for your time and consideration.

Cordially,

A handwritten signature in black ink, appearing to read "Buddy Nottingham". The signature is fluid and cursive, with a large loop at the end.

Buddy Nottingham
Owner