

FACILITY PLANNING, CONSTRUCTION AND MANAGEMENT

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October 21, 2015

- - Via Electronic Mail Only - -

Mr. Scott Armstrong P.G., C.HG.
Waste Discharge to Land Unit
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Dear Mr. Armstrong:

TENTATIVE WASTE DISCHARGE REQUIREMENTS FOR CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, MULE CREEK STATE PRISON AND CALIFORNIA DEPARTMENT OF FORESTRY FIRE ACADEMY, AMADOR COUNTY

Thank you for the opportunity to review the Tentative Waste Discharge Requirements (Tentative WDRs) regarding the California Department of Corrections and Rehabilitation (CDCR) Mule Creek State Prison (MCSP) Wastewater Treatment Facility in Amador County, which also serves the Fire Academy of the California Department of Forestry and Fire Protection. Based on our review of the Tentative WDRs, Tentative Monitoring and Reporting Program, and associated Information Sheet, we submit the following comments for the Regional Water Quality Control Board's consideration.

Tentative Waste Discharge Requirements

Finding No. 6, Page 2:

Please add: "...and improvements to the land application methods on remaining existing LAAs." after the end of the fourth sentence, ending in ...new LAAs onsite. The land application area disposal capacity requested by CDCR is based on improvements to the existing LAAs as well as constructing additional LAAs.

Planned Changes in the Facility and Discharge Finding No. 23, Page 7:

Please consider the following revisions to this Finding:

1. Add: "...and enhance application methods to the remaining existing LAAs" to the end of the first sentence for consistency with our comment to Finding No. 6.
2. Based on the CDCR's expected occupancy and timeframe for needed additional disposal capacity, all modifications are expected to be completed by April 2017. This finding should be revised to reflect this planned date.

Effluent Limitations No. C.2, Page 24:

We request that the formula in Effluent Limitations No. C.2 be revised to include an allowance for soil denitrification as justified by available literature or a site specific study or characterization.

Discharge Specifications No. D.2, Page 24:

Change this Specification such that it reads "...transport of wastewater from its facilities to the CDCR Manhole No. CF-1 at the edge of LAA Number 7..."

Discharge Specifications No. D.16, Page 26:

Due to seasonal algal photosynthesis, the effluent storage reservoir pH can exceed 10 units. Consistent with other recently adopted waste discharge requirements¹, we request that the upper limit be changed to a pH of 10.

Land Application Area Specifications No. F.3, Page 27:

Add after "Each LAA" in the first sentence: "..., except LAA Number 8 as described below,...". Add to the end of Specification No. F. 3 the following: "LAA Number 8 tailwater containment may be provided by Preston Reservoir."

Land Application Area Specifications No. F.4, Page 27:

Consistent with our comment to Finding No. 25, Replace with "The discharge shall remain within the permitted waste treatment/containment structures and LAAs at all times."² This proposed alternative specification is consistent with other recently adopted orders and we believe more than adequately addresses the requirement for CDCR to contain effluent within all permitted facilities, including the effluent storage reservoir and Preston Reservoir (which is a permitted point of discharge for effluent originating from the MCSP WWTP or MCSP effluent storage reservoir).

Land Application Area Specifications No. F.12, Page 28:

Change Land Application Specification No. F.12 to read: "Sprinkler heads shall be designed, operated and maintained to minimize migration of mist beyond the limits of the LAAs." We are requesting this revision since the sprinkler system has been specifically designed with the site soils and soil infiltration rates considered. The system design minimizes migration of mist beyond the limits of the LAAs without adversely affecting application rates and potential for ponding and runoff.

¹ Based on Order No. R5-2013-014, Lake Berryessa resort Improvement District, Napa County.

² Based on Discharge Specification No. D. 3 of Order R5-2015-0018, Riverstone WWTF, and Discharge Specification No. D. 3 of Order R5-0215-0006, Lathrop Consolidated Treatment Facility, and as allowed in R5-2014-0067, Colusa Industrial Properties, Inc., and R5-2014-00165/R5-2008-0167 for SierraPine-Ampine Division.

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We would welcome meeting with you to review these comments and discuss their incorporation into the Waste Discharge Requirements to be presented to the Board in December of this year. If you have any questions, please contact me at (916) 255-1141 or via email at Bob.Sleppy@cdcr.ca.gov.

Sincerely,



ROBERT SLEPPY

Environmental Services Liaison

Facility Planning, Construction and Management

cc: Tim Vice, Project Director II, CDCR
Mark Hardcastle, Departmental Construction and Maintenance Supervisor, CDCR
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Neal Colwell, KSN