

# CROCKETT COMMUNITY SERVICES DISTRICT

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October 29, 2012

Robert Schlipf  
California Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

(via PDF email to: [rschlipf@waterboards.ca.gov](mailto:rschlipf@waterboards.ca.gov))

Re: Comments to the Tentative Order for Municipal and Industrial Wastewater Discharges of Mercury and PCBs to San Francisco Bay No. R2-201XX-XXXX, NPDES Permit No. CA0038849.

Dear Mr. Schlipf:

In my capacity as the General Manager for the Crockett Community Services District ("District"), I am providing comments with regard to San Francisco Regional Water Quality Control Board ("Regional Board") Tentative Order for Municipal and Industrial Wastewater Discharges of Mercury and PCBs to San Francisco Bay. The District appreciates the opportunity to comment on the Tentative Order.

The District has two Sanitary Departments, each overseeing their own facility and NPDES permit for wastewater discharge. The Crockett Sanitary Department is responsible for the collection system in the town of Crockett and for issues related to the Joint Use Philip F. Meads Water Treatment Plant ("JTP") along with C&H Sugar Company ("C&H"). The Port Costa Sanitary Department is responsible for the collection system in the town of Port Costa and for issues related to the Port Costa Wastewater Treatment Plant ("PCWWTP").

It is important to note that the District was not listed on the Regional Board's distribution list, even though the District is listed as a discharger along with C&H on the permit for the JTP. The Port Costa Sanitary Department did not receive notification. The notice was sent to the prior Chief Plant Operator of the PCWWTP. The District notified the State Water Resources Control Board on September 4, 2012 that Ryan LaMunyon replaced Dennis Moniz as the Chief Plant Operator for the PCWWTP pursuant to Title 23, Division 3, Chapter 26, Article 2, Section 3676 of the California Code of Regulations but this information was not updated on the distribution list. Thankfully, C&H notified the District on September 26, 2012 that a public hearing was announced and a Tentative Order was available for review. Because the Regional Board did not initially include the District in its public review process, and because the District never had an opportunity to provide comments on an administrative draft order, the District is understandably concerned about its due process rights during this quasi-adjudicative matter. As a result, the

District asks that the Regional Board carefully review its comments and work with the District to resolve the issues raised before the forthcoming hearing.

Specific Comments

*Table 1A, 2A, 4A, and additional references elsewhere*

Tables that refer to the Discharger “Contra Costa Sanitation District No. 5, Port Costa” are incorrect. As the Regional Board is aware, Contra Costa County transferred responsibility of the PCWWTP and Port Costa collection system to the District in June 2008. The correct Discharger name for Port Costa is “Crockett Community Services District, Port Costa Sanitary Dept.”.

The facility address is correct but the facility contact, title, phone number, and mailing address is incorrect. The correct information is:

Facility Contact:	Michael Kirker
Title:	Port Costa Dept. Manager
Phone:	(510) 787-2992
Mailing Address:	Crockett Community Services District Port Costa Sanitary Department P.O. Box 578 Crockett, CA 94525

*Table 1B, 2B, 4B, and additional references elsewhere*

Tables that refer to the Discharger “C&H Sugar and Crockett Community Services District” should be clarified to read “C&H Sugar and Crockett Community Services District, Crockett Sanitary Dept.”

As the Regional Board is aware, C&H owns and operates the JTP Plant and the District, which owns and operates the collection system, subleases an interest in the Plant from C&H pursuant to a Joint Use Agreement between C&H and the District. Because the Tentative Order applies to both C&H and the District as co-permittees, the “Name of Facility” should be revised as follows: “Joint Use Philip F. Meads Water Treatment Plant”.

Even though the District does not operate the JTP Plant, it is important that representatives from both C&H and the District are included in correspondence from the Regional Board relating to the NPDES permit and its reporting requirements. In addition to the primary “Facility Contact” Tanya Akkerman, the following contact information must include the representative from the Crockett Community Services District:

Facility Contact:	Dale McDonald
Title:	General Manager

Phone: (510) 787-2992  
Mailing Address: Crockett Community Services District  
Crockett Sanitary Department  
P.O. Box 578  
Crockett, CA 94525

*Attachment B, Existing Order Nos. and NPDES Permit Nos. Industrial Discharges Table.*

The San Francisco Bay Regional Water Quality Control Board has scheduled a public hearing on C&H Sugar and the District's NPDES Permit No. CA0005240, Tentative Order No. R2-2012-00XX for November 14, 2012. Given that the order for discharge of mercury and PCBs to San Francisco Bay will be for 5 years, the tentative order for Mercury and PCBs should reflect the most recently reviewed and adopted NPDES Permit No. CA0005240. The Industrial Discharges Table needs to be updated to reflect the most current Existing Order No., Existing Order Adoption Date, and Existing Order Expiration Date for the discharger C&H Sugar and Crockett Community Services District, Crockett Sanitary Dept.

*Attachment E, Monitoring and Reporting Program. II. Table E-1. Monitoring Locations.*

Likewise, the Discharge Point Name for C&H Sugar Company, location M-002 is anticipated to be changed to EFF-02 under NPDES Permit No. CA0005240, Tentative Order No. R2-2012-00XX.

*Attachment E, Monitoring and Reporting Program. III. Table E-2. Monitoring Requirements*

The Port Costa Treatment Plant NPDES Permit No. CA0037885, Order No. R2-2008-005, Attachment E, IV. Effluent Monitoring Requirements. Table E-4 requires the Discharger to monitor the treated effluent, with a minimum sampling frequency for Mercury at once annually.

The small town of Port Costa has a population of just 235 people. Within the District's boundaries there are 113 properties, of which 86 are receiving sewer service. The average daily flow rate is only 15,000 gallons. Virtually the only source of revenue received by the Department is from sewer service charges. No property taxes are available to fund operations of the tiny sewage treatment plant and collection system. There is no industry that would contribute mercury or PCBs to the collection system. The PCWWTP is considered a minor discharger.

The District is asking that the Crockett Community Services District, Port Costa Department PCWWTP be allowed to monitor total mercury on a minimum sampling frequency annually instead of quarterly, as is currently allowed NPDES Permit No. CA0037885, Order No. R2-2008-005 and as is allowed for Marin County Sanitary District No. 5, Paradise Cove. The lowered costs of testing once per year compared to

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four times per year would have a direct benefit in controlling sewer use charges in the small community of Port Costa.

*Attachment F, Fact Sheet. Table F-1B. Additional Information for Industrial Facilities*

The Tentative Order should clarify that C&H, as operator of the Joint Treatment Plant, is responsible for submitting the SMRs.

The authorized person to sign and submit reports for the discharger "C&H Sugar and Crockett Community Services District, Crockett Sanitary Dept." is Tanya Akkerman, Environmental Manager, C&H Sugar Company, Inc. (510) 787-4352.

The District urges the Regional Board to carefully consider the above comments and to address the noted deficiencies in the Draft Order. The District looks forward to your responses and to working with you on further revisions. If you have questions or concerns concerning the comments set forth herein, please feel free to contact me at (510) 787-2992.

Sincerely,



Dale McDonald  
General Manager  
Crockett Community Services District

cc: Tanya Akkerman, C&H Sugar (via email)