

APPENDIX B

Comments

CROCKETT COMMUNITY SERVICES DISTRICT

P.O. Box 578 - Crockett, CA 94525
Telephone (510) 787-2992
Fax (510) 787-2459
e-mail: manager@town.crockett.ca.us
website: www.town.crockett.ca.us

August 22, 2013

VIA EMAIL: To: DGarner@waterboards.ca.gov
cc: LTang@waterboards.ca.gov; WJohnson@waterboards.ca.gov;
MOakley@rmcwater.com

Mr. Dylan Garner
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Comments Regarding Tentative Order Reissuing the NPDES Permit (CA0037885) for the Port Costa Wastewater Treatment Plant

Dear Mr. Garner:

Thank you for the opportunity to comment on the Tentative Order for the reissuance of the NPDES Permit for the Port Costa Wastewater Treatment Plant. We would particularly like to thank you and your staff for your diligence and care in preparing this document. Our detailed comments can be found in the numbered items 1 through 4, below.

- 1. The District requests that language related to compliance during a temporary stay enforcement be removed to reflect the recently adopted NPDES Permit for the San Francisco Southeast Water Pollution Control Plant (Order No. R2-2013-0029, CA0037664).**

The District makes this request for consistency among NPDES permits in the region.

Requested revision (page 3):

THEREFORE, IT IS HEREBY ORDERED that Order R2-2008-0005 (previous order) is rescinded upon the effective date of this Order except for enforcement purposes, and, in order to meet the provisions of Water Code division 7 (commencing with § 13000) and regulations adopted thereunder, and the provisions of the CWA and regulations and guidelines adopted thereunder, the Discharger shall comply with the requirements in this Order. This action in no way prevents the Regional Water Board from taking enforcement action for past violations of the previous order. ~~If any part of this Order is subject to a temporary stay of enforcement, unless otherwise specified, the Discharger shall comply with the analogous portions of the previous order, which shall remain in effect for all purposes during the pendency of the stay.~~

2. The District requests a modest amount of additional time for completion of the Effluent Characterization Study and Report in Section VLC.2 of the Permit.

This special provision requires the District to identify whether any priority pollutants were detected at concentrations that exceed applicable water quality criteria, as listed in the Fact Sheet of the Permit, and submit the results within 30 days of receipt of analytical results. These analytical results could be received very close to the next self-monitoring report deadline. If so, there would not be sufficient time to process the data and make the determination about exceedances of water quality criteria, since the District does not employ full-time staff dedicated to this subject area. Therefore, the District requests a modest time extension that would allow inclusion of this report in either of the monthly self-monitoring reports that occur within 60 days of receipt of the analytical results, rather than within 30 days.

Requested revision (page 8):

Routine Reporting. The Discharger shall, within ~~30~~ 60 days of receipt of analytical results, report the following in the transmittal letter for the appropriate self-monitoring report:

- (a) Indication that a sample for this characterization study was collected; and
- (b) Identity of priority pollutants detected at or above applicable water quality criteria (see Fact Sheet Table F-5 for the criteria), and the detected concentrations of those pollutants.

3. The District requests that the Fact Sheet be modified to more accurately describe maintenance of the collection system.

The Fact Sheet (page F-3) lists Valley Operators as a contract operator of the collection system, but this information is inaccurate. Valley Operators is currently the contract operator for the treatment plant only, not the collection system. The District manages and operates the collection system with limited assistance from contractors, and is currently being assisted by L.R. Paulsell Consulting.

Requested revision (page F-3):

- 1. Collection System.** The collection system consists of a few miles of terra-cotta pipe and the Discharger maintains it ~~through a contract (currently with Valley Operators)~~ with the assistance of contractors.
- 4. The District requests a modification to the Fact Sheet to reflect that cyanide was not detected in the February 2011 effluent sample.**

Both the District's February 2011 self-monitoring report and the Report of Waste Discharge erroneously excluded the "Not Detected" data qualifier for cyanide, and instead only showed a result of 1.7 µg/L. The laboratory report for this sample, which was provided to the District from Central Contra Costa Sanitary District, is included as Attachment A. As shown on page 2 of the attachment, 1.7 µg/L is the method detection limit, not the effluent concentration.

Requested revision (page F-13):

Add the qualifier "<" ahead of the reported concentration of 1.7 µg/L in Table F-5 to indicate that the value is the method detection limit.

Table F-5. Reasonable Potential Analysis

CTR #	Priority Pollutants	Governing criterion or objective (µg/L)	MEC or Minimum DL ⁽¹⁾⁽²⁾ (µg/L)	B or Minimum DL ⁽¹⁾⁽²⁾ (µg/L)	Results ⁽³⁾
⋮					
14	Cyanide	2.9	≤ 1.7	< 0.4	Yes
⋮					

Thank you for consideration of these comments. Please let me know if you have any questions or would like additional information.

Sincerely,



Michael Kirker
Manager

Attachment

cc: Lila Tang, Regional Water Board
Bill Johnson, Regional Water Board
Monica Oakley, RMC Water and Environment

Attachment A

February 2011 Laboratory Report for Cyanide



Central Contra Costa Sanitary District

Protecting public health and the environment

5019 Imhoff Place, Martinez, CA 94553-4392

FAX: (925) 689-1232

JAMES M. KELLY
General Manager

KENTON L. ALM
Counsel for the District
(510) 808-2000

ELAINE R. BOEHME
Secretary of the District


March 15, 2011

Mr. Michael Kirker
Crockett Community Services District
P.O. Box 578
Crockett, CA 94525

Dear Mr. Kirker:

The enclosed table presents the required analytical results of Port Costa Sanitation District influent and effluent for the month of February 2011.

Sincerely,


Bhupinder S. Dhaliwal
Laboratory Superintendent

BSD:mb

Enclosures

cc: M. Esparza
Mr. Paul Stovall, H. S. Operating Services, 3 Rolph Park Court,
Crockett, CA 94525

**CROCKETT COMMUNITY SERVICES DISTRICT
ANALYTICAL RESULTS FOR FEBRUARY 2011**

SAMPLE ID	FE	INF	FE	INF	FE	INF	FE	INF	FE	INF	FE	INF
DATE	2/2/11	2/2/11	2/8/11	2/11/11	2/11/11	2/11/11	2/15/11	2/15/11	2/16/11	2/15/11	2/23/11	2/23/11
Total Coliform, MPN/100 mL	ND (2)		ND (2)				ND (2)				ND (2)	
Oil and Grease, mg/L							ND (1.9)					
Bioassay, % Survival (2/15 - 2/18)							100					
pH, units												
Ammonia-N, mg/L			12.7									
Dissolved Oxygen, mg/L												
(C) Biochemical Oxygen	15	567									4	377
Settleable Solids, mL/L/hr												
Total Suspended Solids, mg/L	2	360			ND (2)	10815		1662	ND (2)	ND (2)		588
Cyanide, mg/L					ND (1.7)							
Organic-N, mg/L												
Metals			Attached		Attached							

INF = Influent
FE = Final Effluent
ND = Not detected, below MDL (value shown in parentheses)