

APPENDIX C

Response to Comments

RESPONSE TO WRITTEN COMMENTS

on Tentative Order for
Port Costa Wastewater Treatment Plant
Port Costa, Contra Costa County

The Regional Water Board received written comments from the Crockett Community Services District on a tentative order distributed for public comment in July 2013. This response to comments summarizes each comment in *italics*, followed by a Regional Water Board staff response. For the full content and context of each comment, refer to the comment letters. Revisions to the tentative order are shown with underline for additions and ~~striketrough~~ for deletions.

CROCKETT COMMUNITY SERVICES DISTRICT

District Comment 1: *The District requests that language related to compliance during a temporary stay of enforcement be removed. The District makes this request for consistency among NPDES permits recently adopted in the region.*

Response: We agree and revised page 3 of the tentative order as follows:

THEREFORE, IT IS HEREBY ORDERED that Order No. R2-2008-0005 (previous order) is rescinded upon the effective date of this Order except for enforcement purposes, and, in order to meet the provisions of Water Code division 7 (commencing with § 13000)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.~~

District Comment 2: *The District requests additional time for reporting related to the Effluent Characterization Study and Report requirements. The District, which is a small organization with a small staff, makes this request to ensure that it can properly process its results. After sampling pursuant to this requirement, the provision requires the District to identify whether any priority pollutants are detected at concentrations that exceed water quality criteria and submit the results within 30 days of receiving the analytical results. The District claims that, if it receives analytical results close to the self-monitoring report deadline, there could be insufficient time to process the data and make the determination.*

Response: We agree and revised Provision VI.C.2.b.i of the tentative order as follows:

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.

District Comment 3: *The District requests that the Fact Sheet be modified to more accurately describe collection system maintenance. Valley Operators is currently the contract operator for the treatment plant, not the collection system. The District manages and operates the collection system with limited assistance from contractors, and is currently assisted by L.R. Paulsell Consulting.*

Response: We agree and revised Fact Sheet section I.A as follows:

Crockett Community Services District (Discharger) is the owner of the Port Costa Wastewater Treatment Plant (the Plant) and its collection system (collectively, the Facility), a publically-owned treatment works. The Discharger currently operates the Facility ~~through a contract with Valley Operators (390 Noni Ave., Escalon, CA 95320)~~ with the assistance of contractors.

We agree and revised Fact Sheet section II.A.2 as follows:

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.

District Comment 4: *The District requests that the Fact Sheet be modified 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 1.7 µg/L value was the method detection limit, not the effluent concentration.*

Response: We agree and revised Fact Sheet Table F-5 as follows:

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]
13	Zinc	86	51	5.1	No
14	Cyanide	2.9	≤ 1.7	< 0.4	Yes
15	Asbestos	No Criteria	Unavailable	Unavailable	Ud

STAFF INITIATED CHANGES

In addition to minor formatting and grammatical edits, we made the following staff-initiated changes to the tentative order:

We revised Fact Sheet section II.D as follows:

The Discharger exceeded a numeric effluent limitations for pH, ammonia, total coliform, and acute toxicity ~~one~~ during the previous order term. The Regional Water Board will consider appropriate enforcement for these exceedances.

On June 29, 2012, the Discharger recorded a pH value of 5.8 (the minimum pH effluent limit was 6.0 mg/L). The exceedance likely resulted from too much chlorine and dechlorination agent in the effluent, which consumed alkalinity and decreased the effluent pH. Corrective actions included improvements to the chemical dosing pumps and programmable logic controllers that control them. As a result, there has been decreased chemical use, which should help prevent future pH violations.

In May and June 2013, shortly after a maintenance shut-down, the Discharger exceeded numeric effluent limits for ammonia, total coliform, and acute toxicity. In March 2013, one of the two sand filters routinely used for treatment was taken out of service so it could dry out. In April 2013, both filter beds were taken out of service for cleaning and leveling. Operations restarted on May 1, 2013. On May 6, 2013, the Discharger recorded an ammonia value of 31 mg/L (the average monthly ammonia effluent limit was 13 mg/L), a total coliform value of 110,000 MPN/100 mL (the daily maximum total coliform effluent limit was 10,000 MPN/100 mL), and an acute toxicity value of 0% survival (the single-sample and three-sample median acute toxicity effluent limits were 70% and 90% survival). On May 23, 2013, the Discharger recorded an acute toxicity value of 5% survival; on June 18, 2013, the Discharger recorded an acute toxicity value of 48% survival; and on July 23, 2013 the Discharger recorded an acute toxicity value of 98% survival. The poor acute toxicity test results may reflect high ammonia concentrations. By July 2013, operations stabilized. August 2013 effluent samples complied with all effluent limits.