

Introduction

I am Leif Utegaard, Chief Operator of Costanoa WWTP since 2004. I appreciate the opportunity to comment on the proposed order.

In that orders define the limits for the operation of a given plant, there are few treatment plants that can meet the limits 100% of the time. The limits are points not to be exceeded by order, but as upsets occur, these limits are exceeded on occasion and it is the duty of the operators to return the system to compliance as soon as possible.

The current WDR order 89-23 is a very workable one. It has limitations that should be updated.

Improvements

Costanoa plans to install a diversion pipeline to dispose of "off-spec effluent". This diversion will be to the area defined for this purpose. We would like to see if this area as shown in the engineering report maps is designated and approved for these purposes. Regarding item # 24, under the section titled Compliance in the new order, we ask that the term "off specification wastewater" be defined as any effluent exceeding the Maximum not-to-exceed Limits and not the averages since those levels are not determined until after the production has been averaged. Costanoa would also like to ask the board for a timeframe allowing for the construction of the diversion pipeline.

Costanoa has completed the restoration of its alarm system. It can now alarm on and off site personnel via email or text.

Not mentioned in the new order is the addition of a tube settler clarifier that includes polymer flocculation and coagulation. The clarifier was installed in 2006 and is place in the flow between the SBR effluent and the static sand filters. The sand filters were configured to be operated in a static mode rather than the original continuously moving mode. These changes were approved by Mike Higgins (CWQCB staff) at the time.

Environment

Order No. R3-2013-0010 appears to be citing the risks listed under the Basin Plan as rational implying a need to increase monitoring and reporting requirements. Costanoa would like to ask for an exemption from the threat to groundwater proposed under the Basin Plan as it applies to Whitehouse Creek. If the board sees fit, Costanoa hopes to be eligible for a WDR under the General Permitting for landscape irrigation uses of municipal recycled water.

Costanoa is remotely located near the coast. It is bordered by a Ca. State park, farmland and the Pacific coast. The property as described in WDR 98-23 is on a 20 to 30% (westward) sloping topography. The soils are composed of "medium-dense to dense silty clayey sands to depth ranging from 6 to 15 ft. A very dense sandstone or siltstone exists below this terrace deposit soil." The same paragraph goes on to state that the ground water generally flows in a

south westerly direction. That is away from the direction of Whitehouse Creek.

Paragraph 9 (WDR 98-23) reads: "Present and anticipated beneficial uses of groundwater and surface waters should experience insignificant effects by this discharge." It is our opinion that this is still a statement of fact.

Both Whitehouse Creek and the main source water well are located more than a mile to the northeast of the reclaim storage pond, on the other side of the drainage divide. This well is intermittently operated at a max. flow rate of 25 gpm. The cone of influence during use is extremely minimal in relation to the expansive distances and transmissivity of the underground formations. The source well site was chosen at this distance from the campground and wastewater system because there was not adequate water supply on the closer side of the drainage divide. This should suggest that any possible aquifer structure on the southwest side would be different than the aquifer used in which Whitehouse Creek passes over.

The observation well at the foot of the reclaimed water pond does not contain water, demonstrating that the pond's integrity is intact. It is under these circumstances that Costanoa feels could justify the board's reconsideration regarding the implied impact on the Whitehouse Creek area.

Monitoring

Costanoa has proven over many years of comparative Nitrogen Sampling between the plant effluent and the pond, that the pond provides a very adequate level of denitrification. It has been allowed by CWQCB staff, after review of this data, for Nitrate sampling to come from the pond. As a result, there have been no samples over the Nitrate limits. We ask that this sampling location be listed in the new order.

Costanoa Treatment plant was not designed to remove salts. The salt limits in the old order have not been exceeded. The suggested new limits that appear to be lowered due to the assumed threat to surface and ground water supply are too limiting in our opinion since the treat to groundwater is overstated as discussed in previous paragraphs. The limits to Boron and Sulfate also apply this above discussion. The main difference here is that there was no limit to these elements before, so we don't know the present levels relative to the proposed limits.

Formaldehyde, 1,4-Dichlorobenzene and Methanol are analytes that in all likelihood don't exist in the influent or effluent. Costanoa would ask for board consideration when applying limits to unknowns. We don't understand these requirements other than to guess that they too apply to the threat to Whitehouse Creek as discussed above.

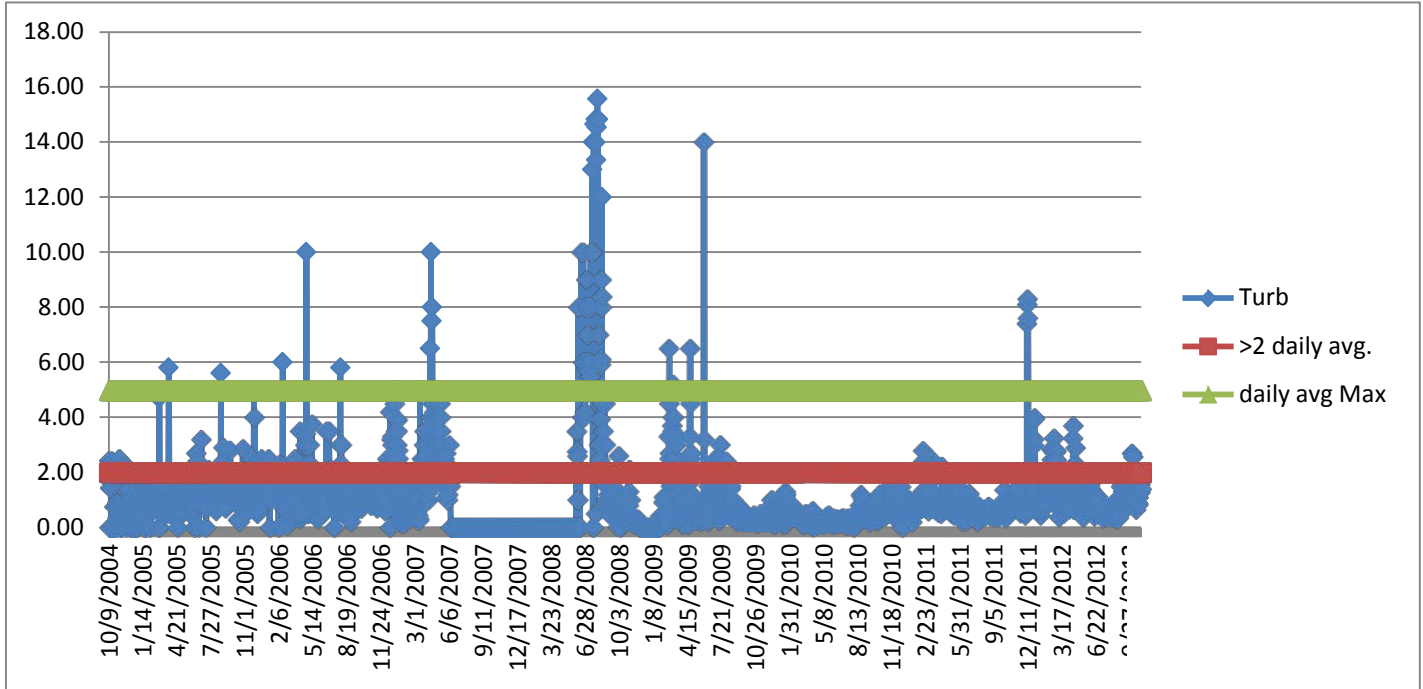
In the staff report, it is reported that the pond was not properly maintained and that the aquatic plants may have disturbed the clay seal of the pond. As stated in the engineering report received from CDPH, they were going to line the pond, but found that the natural soil was very retentive. This suggests that the shallowness of aquatic roots could not have penetrated the mass of the pond berms or clay body. The plant life can also be advantageous as part of the nitrogen removal process.

Potable water production is around 4.6 MG/year. Fe and Mn are removed at an annual loading of around 290 lbs. of Fe sludge and 18 lbs. of Mn sludge combined. The sludge is discharged into the reclaim pond. The reclaim pond is 15 acre feet. The WWTP currently

produces an average effluent of 9.2 acre feet a year. Costanoa would like to request the board's permission to continue to discharge this nominal amount of sludge to be diluted into reclaim pond allowing these nutrients to be used in our irrigation water.

Attachment

Turbidity History



Excepting for missing data, there are 64 daily averages that are >5 NTU out of 2530 data points, most of which occurred during periods of upset and recovery. Missing data records were caused by computer changes over time.

In the last 9 years, we have continuously maintained a high chlorine level in the effluent. The max coliform limit of 23 MPN per 100 ml sample has been exceeded once. The Nitrate limit of 8 mg/L has never been exceeded. The max. BOD limit of 25 mg/L has never been exceeded. The max TSS limit of 15 mg/L has been exceeded 5 times. For Turbidity please note there have only been two upsets that caused NTUs to exceed the max. of 10 NTUs.