

FILE:CF/70-13-9 RUSSIAN RIVER NPDES PERMIT
FILE:CF/70-13-16 STATE WATER RESOURCES CONTROL
BOARD STATE REVOLVING FUND (SRF) RUSSIAN
RIVER CSD DISINFECTION UPGRADE PROJECT
(NO. 5201-110)

October 26, 2009

Ms. Catherine Kuhlman
Executive Officer
California Regional Water Quality
Control Board, North Coast Region
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

**RE: SUBMITTAL OF COMMENTS ON PROPOSED CEASE AND DESIST
ORDER NO. R1-2009-0107 FOR THE RUSSIAN RIVER COUNTY SANITATION
DISTRICT WASTEWATER TREATMENT FACILITY (WDID NO. 1B820450SON)**

Dear Ms. Kuhlman:

Enclosed, please find Russian River County Sanitation District's comments regarding Cease and Desist Order No. R1-2009-0107 for the Russian River Wastewater Treatment Facility. The transmittal letter for the Order requested that comments be submitted to your office by October 26, 2009 for consideration during the December 10th, 2009 Regional Water Quality Control Board (RWQCB) Hearing. Representatives of the District (Pam Jeane or Wendy Gjestland) may speak at the December 10th Water Board Hearing. However, a final decision on District participation has not been made.

RRCSD appreciates the good work of RWQCB staff on this Order, including your willingness to consider approaches that satisfy the common goals that both of our agencies share, namely protection of water quality.

Please review the comments and contact me at (707 521-1866 or Wendy.Gjestland@scwa.ca.gov if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Wendy C. Gjestland".

Wendy C. Gjestland, P.E.

Attachment 1 - Comments on Proposed Cease and Desist Order No. R1-2009-0107
Attachment 2 - Copper and DBCM Effluent Concentrations (Jan. 2004 through May 2009)

C Pam Jeane, Kevin Booker, Ellen Simm, Randy Cullen, Denise Connors (LWA)

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Attachment 1

Russian River County Sanitation District Russian River Wastewater Treatment Facility

Comments Regarding Proposed Cease and Desist Order No. R1-2009-0107

The Russian River County Sanitation District (RRCSD) appreciates the opportunity to submit the following comments on the proposed Cease and Desist Order (CDO) released for review and comment on September 19, 2009.

For suggested revisions to the text of the CDO, ~~strike-through~~ indicates suggested deletions and underline indicates suggested additions.

Substantive Comments

1. **Finding 7 (page 3).** The Finding currently states the range of DCBM concentrations measured from January 2004 through April 2009 as 0.6 µg/L to 4.4 µg/L. However, RRCSD requests that all data collected from January 2004 through May 2009 be cited in the Finding. The expanded dataset includes a maximum value of 5.72 µg/L (measured on 5/6/09) which is requested as the performance-based interim limit. The data are shown in Attachment 2 and the change should be incorporated as follows:

During the term of Order No. R1-2003-0026, the Discharger collected additional monitoring data for DCBM that continued to reveal that the discharge contains levels of DCBM that may be discharged at a level that will cause, have the reasonable potential to cause, or contribute to an excursion above water quality objectives for DCBM. The data collected between January 2004 and ~~April~~ May 2009 consists of ~~48~~50 samples that reveal that DCBM is present in the Discharger's effluent at levels ranging from 0.6 to 4.4 5.72 µg/L. ~~Forty-seven~~ nine of these concentrations exceed the final average monthly effluent limitations and ~~forty-four~~ six of these concentrations exceed the final maximum daily effluent limitations, which are set out for DCBM in the table in Finding 6, above.

2. **Finding 9 (page 4).** RRCSD requests that the Finding indicate that the Compliance Project approved in ACLO No. R1-2008-0045 is still valid, but the time schedule is superseded by Compliance Schedule 1.a. and the extension issued by letter from the Regional Water Board on October 5, 2009. The change may be incorporated by including a sentence at the end of the Finding as follows:

...The CP will ensure compliance with final DCBM effluent limitation because it removes chlorine, the source of THM formation from the effluent. The ACLO time schedule was extended by the Regional Water Board Executive Officer on October 5, 2009 and requires completion of the CP by ~~July~~ December 1, 2011. This Order continues the approval of a

compliance project granted in R1-2008-0045, but incorporates the extended schedule for completion of the UV disinfection project as Compliance Schedule 1.a.

3. **Finding 10 (page 4).** The Finding incorrectly indicates the completion date for the UV disinfection project. This change is indicated below along with the approval date of the timeline extension. RRCSD also requests that compliance with lower chlorine residual limits (or the demonstration that chlorine residual is no longer present in the effluent) be delayed until the UV system is completed.

On September 9, 2009, the Discharger submitted a progress report on the status of the Discharger securing a State Revolving Fund loan to construct the UV disinfection system as required by Requirement 2 of the ACLO. The progress report requests additional time, six additional months, for the Discharger to secure funding for the UV disinfection project, stating that the Discharger has an opportunity to secure possible grant funding for construction of the UV disinfection system. The Discharger proposes to complete the UV disinfection system by December 1, ~~2010~~ 2011, five months later than the schedule in the ACLO. On ~~September~~—October 5, 2009, the Regional Water Board Executive Officer approved the compliance schedule extension request. This Order incorporates the revised schedule for completion of the UV disinfection project. Compliance with chlorine residual limits specified in the NPDES Permit (page 19, Order No. R1-2009-0003) may be demonstrated using the Discharger's current methodology and detection limit until completion of the UV system.

4. **Finding 11 (page 4).** RRCSD requests that all copper data collected from January 2004 through May 2009 be cited in the Finding. The inclusion of the additional data does not change the minimum or maximum values. The data are shown in Attachment 2 and the change should be incorporated as follows:

During the term of Order No. R1-2003-0026, the Discharger collected monitoring data for copper that revealed that the discharge contains levels of copper that may be discharged at a level that will cause, have the reasonable potential to cause, or contribute to an excursion above water quality objectives for copper. The data collected between January 2004 and ~~April~~ May 2009 consists of ~~464~~ 49 samples that reveal that copper is present in the Discharger's effluent at levels ranging from 1.8 to 34 µg/L with hardness concentrations ranging from 50 to 128 mg/L. ~~Forty two~~ of these concentrations exceed the final monthly average effluent limitation and ~~267~~ of these concentrations exceed the maximum daily effluent limitation for copper required by R1-2009-0003, which is identified in the table Finding 6, above.

5. **Finding 13 (page 5).** RRCSD requests that a statement be included to indicate that the Regional Water Board agrees with the Discharger's claims of infeasibility to comply with DCBM and copper final limits. The change may be incorporated as follows:

...The Request contains an analysis of the Discharger's inability to comply with final effluent limitations for DCBM and copper and identifies proposed actions and compliance schedules to comply with final DCBM and copper effluent limitations. The Regional Water Board concurs with the Discharger's assessment of inability to comply with final effluent limits for copper and DCBM.

6. **Finding 19 (page 7).** The Finding includes an incorrect statement regarding interim limits for DCBM. The interim limit proposed in this Order is not the same as included in the previous permit. The interim limit of 5.72 ug/L is actually stricter than the 32 µg/L required in Order No. R1-2003-0026. The statement may be corrected as follows:

...The interim limitations are based on past performance or limits in previous orders, whichever is more stringent. The interim limitation for DCBM is based on the existing performance of the WWTF and is stricter than the ~~identical~~ interim limitation from the previous permit, Order No. R1-2003-0026, while the interim limitations for copper are new and are based on existing performance of the WWTF.

7. **Compliance Schedule 1.a. (page 8).** RRCSD requests that the pollution prevention plan (required in Task A) be included in the Annual Report that is due March 1, 2010. The change may be incorporated as follows:

Task	Task Description	Compliance Date
A	Submit a pollution prevention plan for Regional Water Board Executive Officer approval that identifies measures that the Discharger will take to minimize the potential for DCBM formation in its effluent until the UV disinfection system project (Project) is completed.	February <u>March</u> 1, 2010

8. **Compliance Schedule 1.b. (page 9).** RRCSD requests that Task C indicate a start date rather than a completion date and Task E be changed to include the required action. The changes may be incorporated as follows:

Task	Task Description	Compliance Date
C	Implement plans to control water supply corrosivity by starting in February 2010. The Discharger shall submit a written report to the Regional Water Board Executive Officer after one year of implementing measures to control water supply corrosivity describing the effectiveness of this action.	February 1, 2011
E	Conduct translator study (using samples collected over one entire discharge season) and <u>submit</u> translator study report to Regional Water Board Executive Officer.	August 1, 2012

9. **Requirement 2 (page 11).** RRCSD requests that the DCBM interim limit be established at 5.72 µg/L. This value represents current wastewater treatment facility performance and is the maximum effluent concentration (measured in May 2009).

Interim Effluent Limitations for Discharge Point 002

Parameter	Units	Maximum Daily Effluent Limitations
Dichlorobromomethane	µg/L	4 <u>5.72</u>
Copper	µg/L	34

10. **Requirement 3 (page 11).** RRCSD requests that compliance with lower chlorine residual limits (as specified in Order No. R1-2009-0003) not be required until the UV system is completed. A suggestion for approving this delay is included below.

In the interim period for the Discharger to achieve full compliance with Order No. R1-2009-0003, the Discharger shall operate and maintain as efficiently as possible, all facilities and systems necessary to comply with all prohibitions, effluent limitation and requirements identified in Order No. R1-2009-0003 or any future waste discharge requirements issued for the WWTF. Compliance with final effluent limitations for chlorine residual (Effluent Limitations and Discharge Specifications IV.A.3.b.) may be demonstrated using a minimum detection level of 0.1 mg/L until the UV system is completed.

Typos

11. **Table 9 (page 3)** should be edited as follows. The final MDEL for dichlorobromomethane is incorrectly listed.

Table 9. Final Effluent Limitations for Discharge Point 002

Parameter	Units	Effluent Limitations		
		Average Monthly	Average Weekly	Maximum Daily
Dichlorobromomethane	µg/L	0.56	---	1.12 <u>0.94</u>
Copper	µg/L	[4]	---	[4]

12. **Finding 2 (page 1)** should be edited as follows:

Order No R1-2009-0003 includes discharge prohibitions, effluent and receiving water limitations, and compliance provisions, including final effluent limitations for dichlorobromomethane (DCBM) that were effective on the permit ~~adoption~~ effective date and interim effluent limitations and a compliance schedule for copper requiring the Discharger to comply with final effluent limitations for copper by May 18, 2010.

13. **Finding 12 (page 4/5)** should be edited as follows:

On May 22, 2009, the Discharger submitted a Copper Compliance Update Report that summarizes its efforts to identify sources of copper in its effluent that include source control monitoring to attempt to identify industrial/commercial users discharging copper, influent monitoring to assess source water corrosivity and assessment of copper removals following ~~installing~~ installation of new tertiary filters in 2004.

Attachment 2

Russian River County Sanitation District
Russian River Wastewater Treatment Facility

Copper and Dichlorobromomethane Effluent Concentrations

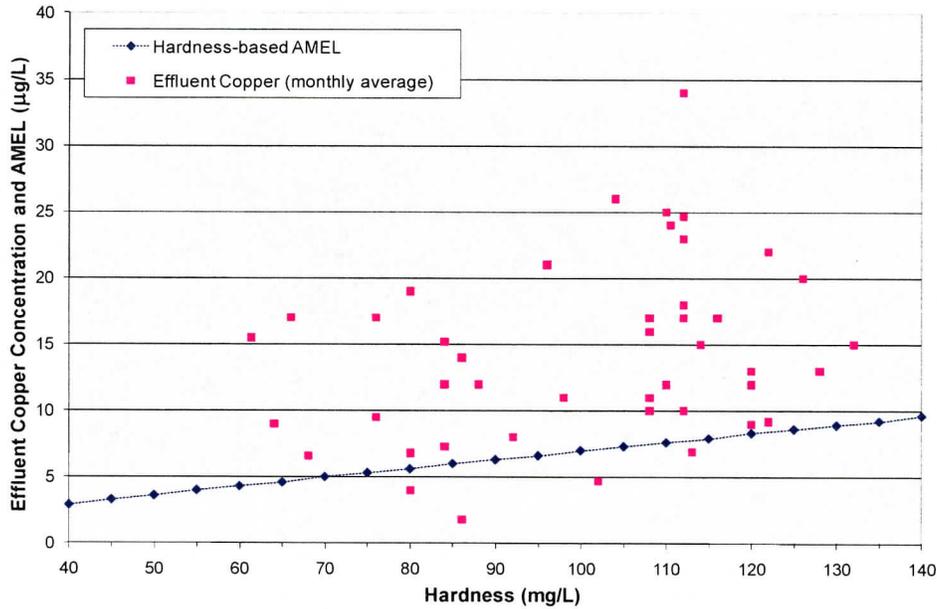


Figure 1. WWTF Effluent Copper Monthly Average Concentrations (January 2004 to May 2009) with Proposed Hardness-based AMELs

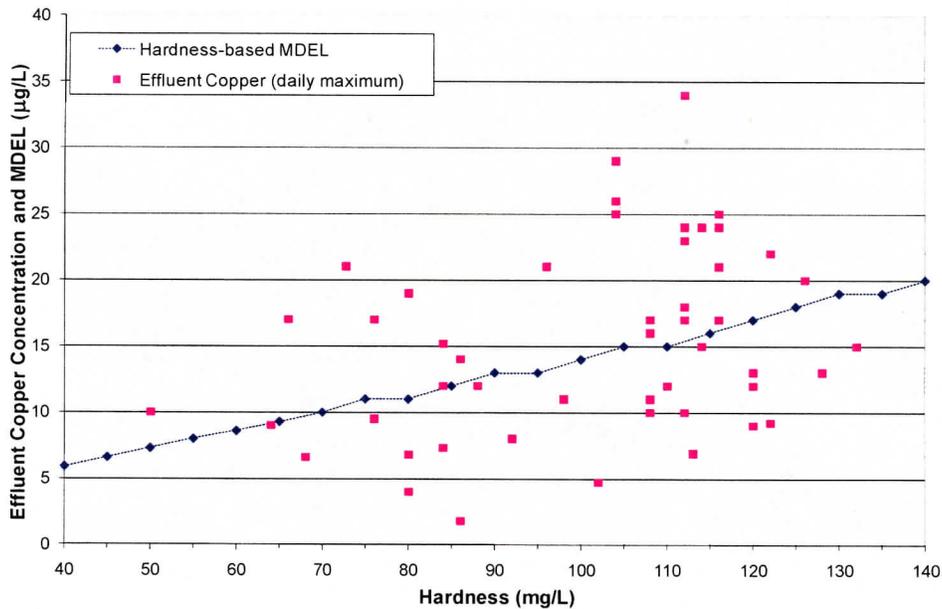


Figure 2. WWTF Effluent Copper Daily Maximum Concentrations (January 2004 to May 2009) with Proposed Hardness-based MDELs

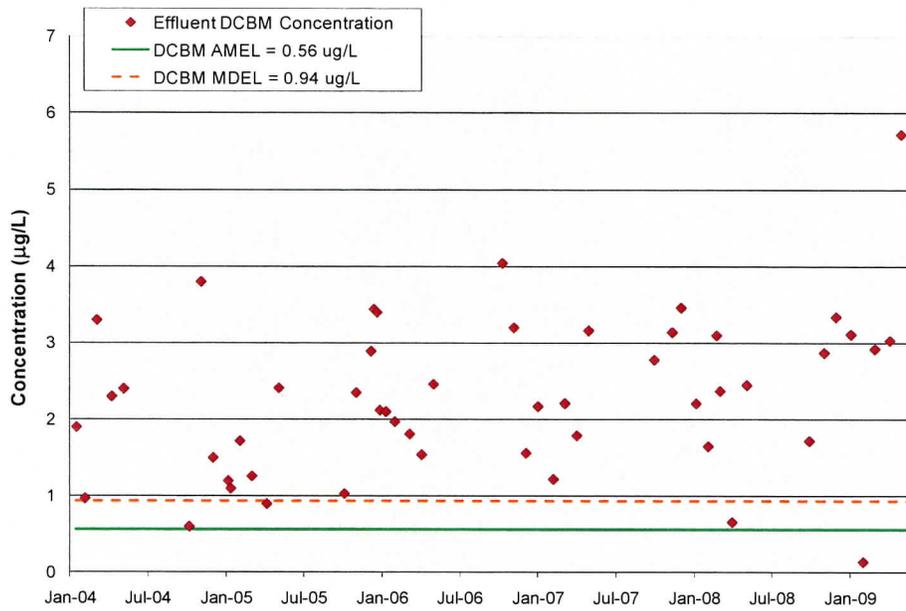


Figure 3. WWTF Effluent Dichlorobromomethane Concentrations (January 2004 to May 2009) with Proposed Final Effluent Limits