

## **Mendocino City Community Services District**

*The Mendocino City Community Services District (hereinafter Discharger or District) submitted comments on the draft NPDES permit (Order No. R1-2010-0020) on February 12, 2010. The comments identified requested clarification of certain provisions of the draft Order. Minor changes resulting from the Discharger's inquiries have been incorporated in the revised draft Order. The following are staff responses to comments from the Discharger:*

**Comment 1: Coliform Sampling For Water Reclamation Discharge.** Table F-12 (see page F-30) identifies the reclamation sampling location for the coliform test as EFF-001. It looks like this is a 15 tube test. Is a 15 tube test required for each transfer? Or can we use the results from the weekly 15 tube test we already send out to Alpha Lab to meet the effluent monitoring requirement (see Table E-3; page E-4)?

**Staff Response:** The result of weekly coliform testing for the ocean discharge may be used to demonstrate compliance with total coliform effluent limitations for the water reclamation discharge. The required analytical method for total coliform bacteria is Method 9221B Standard Total Coliform Fermentation Technique (Most Probable Number, 5 tube, 3 dilution series), a fifteen-tube test.

**Comment 2: Effluent Monitoring Locations.** We collect the current weekly effluent coli sample from the contact tank prior to dechlorination. Is this location OK? I do not think we can get a representative sample for BOD, TSS, settleable solids or oil and grease from Structure-A following the equalization pond with ducks and geese swimming in it. I have attached several diagrams that identify where we plan to collect samples for both the effluent and recycled water permit requirements. Depending on what is being sampled, the sample location identified in the draft as EFF-001 would be in one of three possible locations: effluent wet well, chlorine contact tank, or Structure-A. Do we need to re-identify these location as EFF-001, 002, 003, or do we need to take all samples from Structure-A?

**Staff Response:** The draft Order has been revised to reflect this request.

**Comment 3: Surface Load Rate of Effluent Filters.** The filter surface loading location is INT-001 at the filter splitter box. The box is located under a grate in Filter No. 1. This is an impossible location for determining filter loading. According to the O & M Manual, each filter has 16.8 sq ft of surface area, and the total area for the four filters is 67.2 sq ft. Can we use plant flow to determine filter loading (plant flow, gpm/67.2 sq ft)? Our average dry weather flow over the last 30 years was 0.081 mgd. Based on average flow in the dry season, average filter loading would only be 0.83gpm/sq ft. The permit limit is 5gpm/sq ft. Filter loading will be less than 1 gpm/sq ft during the summer when we transfer recycled water to the school.

**Staff Response:** The draft Order has been revised to specify that the surface load rate for the effluent filters should be calculated using the plant flow and the dimensions of the effluent filters.

**Comment 4: Coliform Testing for Water Reclamation.** The controlling factor for the recycled water program is the coliform testing. If we are required to perform 15 tube analysis, we will only be able to pump about 50,000 gallons per week. We can transfer at least three 50,000 gallon loads per week. If we are allowed to use the results of the current weekly 15 tube coliform test to prove bacteria compliance for the recycled water requirement, we'll continue to do the presence/absence tests for process control.

**Staff Response:** Comment noted. Please see response to Comment 1.