



377 J STREET

CRESCENT CITY, CALIFORNIA 95531-4025

Administration/Finance: 707-464-7483
Utilities: 707-464-6517

Public Works/Planning: 707-464-9506
FAX: 707-465-4405

March 7, 2011

North Coast Regional Water Quality Control Board
Attention: Charles Reed
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403-1072

Job Number: 3838.2

NCRWQCB

MAR - 8 2011

RE: Draft NPDES Permit for Crescent City

Dear Charles:

We appreciate the opportunity to provide comments on the tentative Order No. R1-2011-0019 published by the North Coast Regional Water Quality Control Board with the Notice of Application and Public Hearing issued on February 4 2011. Our comments are as follows:

1. Page 11 section M. paragraph three requires an "annual assessment of conditions" instead of the once per permit term outlined on page E-11 under section B. Biological survey and Page F-35 section E.1., paragraph two.

The information collected in the proposed Biological Survey would be extensive, comprehensive and real time information that would detect possible degradation related to the facility's discharge. Performing such an extensive investigation once during the 5-year permit compliance period satisfies the goals of receiving water monitoring.

2. Page 15 Table 8.

Please remove monitoring of BOD₅ at REC-001. BOD monitoring is not required by the comprehensive and well established Title 22 requirements and has little value when water is being applied to land using spray irrigation.

3. Page 15 Table 8.

Please remove monitoring of TSS at REC-001. TSS monitoring is not required by the comprehensive and well established Title 22 that requires a more rigorous maximum turbidity limit of 0.5 NTU. TSS monitoring at REC-001 is redundant and an unnecessary additional expense that provides no added value.

4. Page 17 IV. D. 2. b.

Please remove UV power monitoring. The City SCADA system is already capable of continuously monitoring all of the remaining proposed indicators including recycled water flow, UV transmittance, UV intensity, UV dose, and turbidity. We propose that these be the only items monitored with respect to monitoring of the UV disinfection system.

5. Page 21

Section VI. C. 1. d. Effluent Limitations for BOD₅: Please note that any improvement in water quality is due to the recently constructed MBR process train that aids the overall performance of the existing RBC plant. The Crescent City MBR contains only one process train and relies upon the existing RBCs for complimentary and backup process capacity. The City must rely on the older RBC technology when the MBR is out-of-service for maintenance or troubleshooting. The RBCs are capable of meeting the current "30/30" permit limits and would not be capable of reliably meeting stricter effluent limits. We do not recommend that the permit be reopened without first considering Crescent City's process limitations.

6. Page 21. C.-Page 28. f.

Please remove all references to monitoring of septage receiving except the proposed reopener clause suggested below. Current City policy is that no septage will be received at the Crescent City facility. Please coordinate this Order with current City policy and consider this proposed reopener clause with respect to septage receiving:

"This order may be reopened for modification to include septage reporting and monitoring requirements. The City shall submit a plan that describes how and where septage would be incorporated into plant operations. The Regional Water Board will consider reopening this Order or making modifications after receiving plans from the City."

7. Page 23. Toxicity Reduction Evaluations.

Please revise paragraph (a) to read "A TRE shall be initiated within 45 days of the date of completion of the accelerated monitoring tests, required by Section V of the MRP, observed to exceed the chronic toxicity parameter." This provides the City with adequate time to mobilize the necessary resources.

8. Page 28 Adequate Capacity.

Please note that the design data provided in the recent construction plans does not necessarily represent the plant or individual process capacity available at the Crescent City facility. The design data was developed based on 20-year planning levels and divided into three potential expansion phases based on actual growth and loads. The actual capacity of the plant exceeds the Stage 1 design data values in some cases.

9. Page E-2-Table E-1 Monitoring Location EFF-011.

The description requires sampling prior to mixing with seafood processing plant effluent. The City plans to direct future seafood processing plant effluent through the plant and will therefore be unable to meet the express requirements. Please consider revising the statement as follows:

"Location where representative samples of treated wastewater, to be discharged to the Pacific Ocean at Discharge Point 001, can be collected at a point after treatment, including chlorination/dechlorination, but before mixing with other effluent of various sources utilizing the same outfall and contact with the receiving water."

10. Attachment E, V. Whole Effluent Toxicity Testing Requirements.

Please revise the specified dates for performing the testing from January and August to the first and third quarter of the year. It has been difficult at times for the laboratories used by the City to have the specified sensitive species available during those limited timeframes. Better test results will be achieved if the laboratories are given some flexibility to assure that the tests meet all acceptable test criteria.

11. Attachment E, Page E-11.

Please reduce the frequency of ocean outfall structural investigations to once during the term of the 5-year permit. The Crescent City outfall does not extend into the ocean or have diffusers or other structurally sensitive features that could be damaged. The outfall discharges through a bored opening in the face of solid rock and is very secure. The City is concerned about the liability of frequent inspections in a violently turbulent formation that presents serious hazards to divers. Based on the secure nature of the outfall and the life-safety issues, the City requests that the outfall inspection be required only once during the term of the permit.

12. Attachment E, Page E-12 IX. C. 1.

Based on the Carrollo checkpoint Bioassay Testing dated 1/6/2011, which was submitted by Aquionics to the Department of Public Health, they suggest a control equation that eliminates the need for using lamp age and sleeve fouling factors due to the fact that "UV light intensity will be monitored in real time." Based on this analysis and the fact that the City will be able to report measured dose, please remove lamp age and fouling factors from the permit.

13. Attachment E, Page E-12 IX. C.

Please require monitoring of the UV system only when irrigating with recycled water by including language similar to section VII. A. 1. "When reclaimed water is being used for irrigation, monitor the parameters as indicated."

14. Attachment E, Page E-12 IX C. Disinfection Process Monitoring for UV Disinfection System.

Please add the following: "When reclaimed water is being used for irrigation purposes, monitoring and reporting shall be required." The proposed addition will provide consistent monitoring and reporting with the schedule of monitoring location REC-001 and provide more meaningful data.

Sincerely,



Jim Barnts
Director of Public Works