

**From:** Lindsay Cruckshank  
**To:** [McSmith, Justin@Waterboards](mailto:McSmith.Justin@Waterboards)  
**Subject:** Fwd: Draft NPDES Check-in  
**Date:** Tuesday, April 24, 2018 10:32:41 AM  
**Attachments:** [image001.jpg](#)

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Hi Justin,

I believe these are the questions we had on the permit. I think there may have been some others we had that I submitted with the ROWD. I am out of town today, but I will forward those as well if I can find that tomorrow.

Thank you,  
Lindsay

----- Forwarded message -----

**From:** **Lindsay Cruckshank** <[cruckshank@gmail.com](mailto:cruckshank@gmail.com)>  
**Date:** Wed, Nov 22, 2017 at 1:19 PM  
**Subject:** Re: Draft NPDES Check-in  
**To:** "McSmith, Justin@Waterboards" <[Justin.McSmith@waterboards.ca.gov](mailto:Justin.McSmith@waterboards.ca.gov)>  
**Cc:** john <[john@gratoncsd.org](mailto:john@gratoncsd.org)>

Hi Justin,

We did have a few comments/questions about a few things on the new permit.

1. On page E-19 it details groundwater monitoring. We currently have our regular well in our field that we use for water around the plant. We also have 15 or so monitoring wells in different areas all around the field. Will we be able to use our regular well for all the sampling requirements? As for the other wells that are required, do those have to be wells with pumps down in them or can we use the existing monitoring wells for that?
2. On page E-18 the permit shows electrical conductivity testing for RSW-001 and RSW-002. We are wondering why this will be required, and we will need to talk to you at some point to get more information on how to collect these samples.
3. On page E-6, footnote 4 states "Total coliform sampling shall occur daily when discharging to the recycled water distribution system." Is this saying that we need to take a coliform from EFF-001 any time we are irrigating from REC-001 like before, or only if EFF-001 were to be sent directly out for irrigation? In the ROWD we made that case that it should only be if EFF-001 were to be sent directly out for irrigation, but I'm not sure on the wording here in the new permit which case applies.
4. On page F-3 under "Authorized Person to Sign and Submit Reports", it only has my name. John Gibson and Hope Sturges should be listed as well since they are authorized as well.
5. On page E-21, section 2a still shows reporting requirements for INT-001a. I was under the impression that since we had made the case that since the filters will backwash any time INT-001b reaches 2 NTU that the reporting for INT-001a would no longer be necessary. Also, as long as the daily average for INT-001b is under 2, then the other INT-001b reporting seems unnecessary as well.
6. Page E-7 shows that we need to sample TCDD equivalents quarterly from EFF-002. I'm just curious, is this required due to any poor results we had or is this just a new requirement for dischargers? Also, it says quarterly for sampling frequency, so does that mean if we only discharge for 3 months that we would only sample once during the season?

7. On page E-4, we feel that the monitoring location descriptions for INT-002A and INT-002B should be changed to "Pasteurization contact chamber influent" and "Pasteurization contact chamber effluent". The current description of pasteurization preheater influent/effluent is not quite accurate and could be mistaken for another location in the system.

8. Page E-20, under Effluent Filter Monitoring, states "The Permittee shall calculate, on a daily basis, the surface loading rate in gallons per minute per square foot, and report the maximum surface loading rate and any exceedances of the surface loading rate limitations". The filters are programmed not to allow more than their rating of 30 GPM/sqft at any time, even if we were to set the flow higher than that. We therefore feel that this reporting should not be required.

Let me know what you think of these items. I understand why most of these requirements are in place, and if we have to report them we will, I just wanted to make the case against some of the items I felt weren't relevant to our plant.

Thank you,  
Lindsay

On Wed, Oct 18, 2017 at 2:38 PM, McSmith, Justin@Waterboards  
<[Justin.McSmith@waterboards.ca.gov](mailto:Justin.McSmith@waterboards.ca.gov)> wrote:

Good afternoon Gentlemen,

I just wanted to check in and see how the review of GCSD's Draft NPDES permit is going. Please let me know if you guys have any questions or comments. I would like to tackle any concerns before they become public comments. I hope all of you made it out of the fires ok. It has been heartbreaking to watch. We can set up a time to talk if you think that is best. Let me know. Thanks guys.

**Justin McSmith**

Water Resource Control Engineer

NPDES Wastewater and Storm Water Unit

North Coast Regional Water Quality Control Board

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