



FORT BRAGG MUNICIPAL IMPROVEMENT DISTRICT NO. 1
 416 N. Franklin Street, Fort Bragg, CA 95437
 707-961-2834 / 707-961-2825 FAX 707-961-2838

N C R W Q C B

APR 20 2009

April 13, 2009

Comments Draft NPDES Permit

<input type="checkbox"/> EO	<input type="checkbox"/> WMgmt	<input type="checkbox"/> Admin
<input type="checkbox"/> AEO	<input type="checkbox"/> Timber	<input type="checkbox"/> Legal
<input checked="" type="checkbox"/> Reg/NPS/CLER	<input type="checkbox"/> Cleanups	<input type="checkbox"/> Date

Charles Reed
 Water Resource Control Engineer
 North Coast Regional Water Quality Control Board
 5550 Skylane Blvd.; Suite A
 Santa Rosa, CA 95403

Dear Charles:

Having received the copy of the Draft National Pollution Discharge Elimination System Permit on March 18th, 2009, I have distributed for comments and read through the document myself. Based upon input from staff and consultants, I have the following comments for consideration by the Regional Board and staff when preparing and acting on the final NPDES permit for the City of Fort Bragg. Some comments are minor technical clarifications while others are a bit more substantive.

I. FACILITY INFORMATION –
 number: 707-961-4141

Pg. 4 Add second (now primary) phone

II. FINDINGS - Pg. 5 Under B; Second Paragraph should read -"Sludge from the secondary clarifier is pumped to the primary clarifier in route to the thickener." Change from – pumped directly to anaerobic digestion.

Page 22 – Annual permit reporting due date changed to February 1st. Request due date remain February 28th as currently to allow sufficient time to prepare and finalize report.

Page A-6 – Not clear what is being proposed/required under the Pollutant Minimization Program (PMP). Please clarify, keeping in mind that the Fort Bragg Municipal Improvement District does not have available funding for any additional monitoring requirements or plans.

Pg. E-3 – Influent Monitoring – The chart indicates metered monitoring on a daily basis of the influent, and a monthly reporting requirement of max daily and mean daily flow rates. District staff has previously discussed with Regional Board staff, especially as part of the Headworks Construction Project that influent metering was not required and no provisions were or could be made to properly locate an influent meter. District staff requests this be eliminated from the new permit; effluent flows are still available to identify what goes through the treatment plant.

Pg. E-4 - Total residual chlorine is to be monitored daily. The table indicates "grab" sample type but Footnote #4 on page E-4 indicates that monitoring for this constituent shall be "continuous" using a method with a reporting limit of 0.05 mg/L or as low as technically feasible. The previous permit required daily "meter" sampling with a higher detection limit of 0.1 mg/L. The required detection limit of 0.05 mg/L for total residual chlorine is too low, District staff would like a more realistic detection limit – at least 0.1 mg/L and request a modification from the draft to the final permit.

Request that monitoring for the Ocean Plan Table B analytes be reduced from annually to once during the life of the permit. The Proposed Draft Amendments to the Standard Monitoring Procedures (Appendix III) of the California Ocean Plan (August 2006) proposes a minimum monitoring frequency of once per permit term for discharges less than 10 MGD, and our request of a reduction to once during the permit term would fit in with the proposed amendment.

Pg. F-4 Second to last paragraph, last sentence change liquid chlorine to "gaseous", as the change over has not been made yet. Plans are nearly complete to change from gaseous chlorine, but additional funding to construct necessary changes has yet to be identified.

Last paragraph, last sentence change to read as follows: "Sludge from the secondary clarifier is pumped to the primary clarifier in route to the thickener."

Pg. F-12 Continuation of Discharge Prohibition III.A; Last paragraph in the middle of the page. It appears that this is left open ended to interpretation and appears to leave the District in a precarious position. How are you supposed to disclose a pollutant whether or not the presence can be reasonably contemplated? What is this really aimed at?

Pg. F-13 Item 6; Why is there no reference to the 2.2 MGD Wet Weather Flow? There is a reference under the footnote No. 6 on the next page.

April 16, 2009

Pg. F-15 – Last sentence before C; flow limitations of (1.0 mgd) referenced, but nothing regarding wet weather flow at this location.

Sincerely,

A handwritten signature in cursive script, appearing to read "David W. Goble".

David W. Goble
Director of Public Works