

MENDOCINO COUNTY WATERWORKS DISTRICT II

35501 S. Highway One #4
Gualala, CA 95445
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April 20, 2010

Charles Reed
North Coast Regional Water Quality Control Board
5550 Skylane Blvd., Ste #A
Santa Rosa, CA 95403

Re: Proposed Waste Discharge Requirements Order No. R1-2010-0038
NPDES Permit No. CA0024040
WDID No. 1B831180MEN

Dear Mr. Reed:

The Staff and Board of Directors of the Mendocino County Water Works District #2/Anchor Bay Wastewater Treatment Facility have received and reviewed the proposed NPDES Permit and would like to comment on a few requirements and ask that you reconsider/revise the three specifications listed below as follows:

First, the Discharge Location/Point numbers are reversed compared to the previous/current permit. Therefore the Mendocino County Waterworks District #2 would like to request that this specification be changed to read the same as previous permits to prevent confusion among our records and employees. We would like the Permit to read Discharge Point 001 to represent the Forest Irrigation System and the Discharge Point 002 to represent the Pacific Ocean.

Second, the Influent Monitoring Requirements on page E-3 should specify that monitoring take place only when discharging to the Ocean, sampling the influent is used to rationalize and determine the percent removal of BOD and TSS as per our current permit.

Third, we would like you to reconsider the necessity of the Effluent Monitoring requirements on page F-32 for additional samples to be taken and analyzed for ammonia, nitrate, total dissolved solids, sodium, chloride and aluminum when discharging to the Forest Irrigation. It is my understanding that this additional testing per the Basin Plan be in place to protect from groundwater pollutants. There are no nearby bodies of water or streams that flow year round that may harbor animal or marine life in the proximity of the Forest Irrigation. I have also spoken with the Gualala Water Company to determine that there are no existing drinking water wells nor the possible addition of that they were aware of in this area either. Therefore there is no real potential for contamination of any sort in this area.

Forth, I am not commenting on the following just mentioning that I am a little confused by the Reporting Schedules and various Monitoring Requirements other than the

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weekly/monthly usual samples (for example the Biological Survey). I was hoping that you had available a list or summary of your requirements vs. a time line upon the permit renewal so that we are all under a better and simpler understanding of what you expect to receive from us.

I look forward to your response and thank you for your time.

Cordially,

Jennifer Caughey, Administrator

cc: Mendocino County Water Works District #2 Board of Directors

Keith VanRillaer, Chief Plant Operator

Kevin VanRillaer, Operator In Training