

STOVER ENGINEERING

Civil Engineers and Consultants

PO Box 783 - 711 H Street
Crescent City CA 95531
Tel: 707.465.6742
Fax: 707.465.5922
info@stovereng.com

Charles Reed
North Coast Region 1
Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

Job Number: 3914

3 June 2009

VIA Fax and E-mail

Subject: Draft Order No. R1-2009-0040 Waste Discharge Requirements
Crescent City Harbor District, Crescent City, California

Dear Mr. Reed:

Thank you for your consideration of changes proposed in the 31 December 2008 letter from Stover Engineering, especially regarding the clarification of the 24-hour composite sample period. We have reviewed the Draft Order and offer the following comments on behalf of my client, Crescent City Harbor District.

Comment 1: Pump Maintenance Discharge Description

The Harbor District respectfully requests that the description of pump maintenance discharge sources in the Draft Order be modified to reflect the current discharge practice. The letter dated 31 December 2008 requested clarification of the definitions of seafood processing and pump maintenance in order to reduce uncertainty about when to apply the effluent limits. The Draft Order adds a description of the permitted sources for pump maintenance; however, the description does not appear to be consistent with current practices at the Harbor District Treatment Plant.

The Draft Order includes the following description of pump maintenance in Section II.B, Facility Description:

When process wastewater is not being treated, up to 1,000 gallons of non-process water, which may include noncontact cooling water, boiler water, freshwater, refrigerator condensate and other non-process water, may be discharged weekly to exercise the wastewater pumps.

The Fact Sheet expands on that description in Attachment F, Section II.A, Description of Wastewater and Solids Treatment or Controls as follows:

Up to 1,000 gallons of non-process wastewater may also be discharged weekly when wastewater pumps are maintained during non-processing periods. Non-process water consists of non-contact cooling water, boiler water, freshwater, pressure relief water, refrigerator condensate, water used to transfer seafood to the facility, life tank water,

other non-process water (excluding wastewater from floor drains), and chemicals used during cleanup at the seafood processor.

The only sources of water to the Harbor District Treatment Plant are processing water from Alber Seafood, or fresh water from hoses at the Harbor District Treatment Plant. The influent to the Harbor District Treatment Plant is a combined influent of all streams from Alber Seafood, and as a result, it is not possible to separate non-process wastewater from the influent stream. When the Harbor District Treatment Plant has not received processing water discharged from Alber Seafood for an extended period of time, then the pumps and equipment must periodically be run briefly to maintain the condition of moving parts and keep the bearings lubricated. The discharge during this period is considered pump maintenance discharge, and is composed of residual process water diluted with fresh water.

Comment 2: Ocean Plan Table B Sampling Requirements – EFF-001A

The Harbor District respectfully requests that the monthly sampling requirement be modified to the first day of processing for each calendar month, instead of the day of highest seafood processing. The Monitoring and Reporting Program (MRP) of the Draft Order, Attachment E, Section IV.A.1, Table E-2 Effluent Monitoring Requirements – EFF-001A indicates a change in the minimum sampling frequency for Ocean Plan Table B Pollutants with specific effluent limits from once per year to once per month. Footnote 1 to the table specifies that monitoring for monthly samples must be conducted on the day with the largest quantity of seafood processed. This increased monitoring requirement will be extremely onerous for the Harbor District Treatment Plant as it essentially changes the sampling frequency from annually to daily and the analysis frequency from annually to weekly.

Due to the episodic nature of seafood processing, the day with the largest quantity of seafood processing is not known in advance. As a result, samples must be collected daily to ensure that a sample was collected on the day of highest processing. The lab must extract the submitted sample within one week in order to stay within the hold time for the analysis of the phenolic compounds, and this extraction incurs costs for the Harbor District Treatment Plant.

In order to reduce the risk of financial hardship interfering with monitoring requirement compliance, the day of the month when monthly samples are to be collected should be specified in advance. Previously, the sampling was required on the first day of processing for the calendar year. The new MRP could specify that monthly sampling be conducted on the first day of processing for each calendar month; or on the day of highest seafood processing during the first week of processing each calendar month.

Comment 3: Ocean Plan Table B Sampling Requirements – EFF-001B

The Harbor District respectfully requests that the Chronic WET monitoring and Ocean Plan Table B Pollutants monitoring requirement for pump maintenance discharge be removed from the Draft Order. The MRP of the Draft Order, Attachment E, Section IV.B.1, Table E-3 Effluent Monitoring Requirements, Monitoring Location EFF-001B adds a requirement during pump maintenance to conduct Chronic Whole Effluent Toxicity (WET) monitoring annually, and Ocean Plan Table B Pollutants monitoring once during the permit term. These monitoring requirements seem excessive considering that the discharge is limited to 1,000 gallons per week, and that the pump maintenance discharge is a dilution of the discharge during seafood processing.

Charles Reed
3 June 2008
Page 3

The California Ocean Plan Reasonable Potential Analysis Procedure (Appendix VI) indicates that an RPA may be conducted based on best professional judgment if effluent monitoring data is not available. The Harbor District Treatment Plant will be conducting the Chronic WET monitoring annually and the Ocean Plan Table B Pollutants monitoring once for the seafood processing wastewater. Pump maintenance discharge is only a small fraction of the volume of seafood processing discharge, and it occurs sporadically for a brief period of time. The only additional water source to the residual seafood processing wastewater during pump maintenance is fresh water, so the monitoring conducted during seafood processing is a more rigorous characterization of the pump maintenance discharge than direct monitoring would be.

Summary

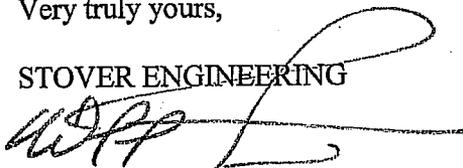
The Crescent City Harbor District appreciates the incorporation of some of our past comments into this most recent Draft Order such as the change in the definition of composite sampling. The District believes the following clarifications should be incorporated into the permit before it is adopted:

1. The description of pump maintenance discharge sources should be modified to reflect the current discharge practice
2. The monthly sampling requirement be modified to the first day of processing for each calendar month
3. The monitoring requirements for Chronic WET and Ocean Plan Table B Pollutants for pump maintenance discharge should be removed from the renewed permit.

We would again like to thank RWQCB staff for the opportunity to provide comments on the Draft Order and look forward to our comments being addressed. If you have any questions or comments, please contact Ward Stover of Stover Engineering (707/465-6742).

Very truly yours,

STOVER ENGINEERING



Ward Stover, P.E.
Principal

cc: Richard Young

STOVER ENGINEERING