



City of Lakeport Utilities

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Over 100 years of community, pride, progress and service.

February 17, 2012

Anne L. Olson, P.E.
Senior Water Resource Control Engineer
11020 Sun Center Drive, #200
Rancho Cordova, CA. 95670-6114

Dear Anne Olson:

This letter is in response to the “Tentative Waste Discharge Requirements for City of Lakeport Municipal Sewer District Wastewater Treatment Facility Lake County” dated 18 January 2012, and provides written comments and recommendations due on 17 February 2012.

Comments/Suggestions:

Cover page paragraph 3, remove “tertiary water treatment facility’s”

Page 2 paragraph 7b, final sentence, “*Removal of the solids is accomplished by dredging the ponds every 8 to 10 years.*” Suggest changing requirement of “every 8 to 10 years” to “as needed”. Page 16, Paragraph B18, states that “*Discharger...shall periodically remove sludge as necessary to maintain adequate storage capacity. Specifically, if the estimated volume of sludge in the reservoir exceeds five percent of the permitted reservoir capacity, the Discharge shall complete sludge cleanout within 12 months after the date of the estimate.*”

Page 4, paragraph 10, suggest modifying language to address Notice of Violation issued on 12 October 2011 which showed a seasonal trend that is believed to be an algae bloom.

Page 10, paragraph 35c, CLMSD does not use sodium hypochlorite so I recommend the following sentence be reworded or removed: “*Disinfection reduces the potential threat, but the use of sodium hypochlorite also increases the salinity of the effluent and creates trihalomethanes, neither of which is desirable.*”

Page 11, paragraph 40, final sentence “*The wastewater treatment plant has a design capacity more than 1.0 mgd, and therefore the Discharger is required to obtain coverage under NPDES General Permit No. CAS000001.*” Please remove this requirement since plant design is permitted at 0.53 MGD ADWF.

Page 14, Discharge Prohibitions A6, and Page 17 Water Recycling Specifications D on pages 17, 18 and 19 deal with the water recycling requirements and grazing of cattle on the lands where water recycling takes place on CLMSD owned and operated property. Article 3. Uses of Recycled Water, 60303. Exceptions; states the following: “*The requirements set forth in this chapter shall not apply to the use of*

recycled water onsite at a water recycling plant, or wastewater treatment plant, provided access by the public to the area of onsite recycled water use is restricted.” The City of Lakeport’s wastewater treatment plant restricts access by the public to the area of onsite recycled water. Please remove Order Discharge Prohibition A6 and revise Order D. (Water Recycling Specifications) D1 – D21 to account for Exception 60303.

Page 14, paragraph B1, please adjust annual flow limit from 205 MG to 310 MG.

Page 22, Provision H, paragraph 1a, please remove this requirement since CLMSD capacity is only 0.53 MGD ADWF.

Required Reports.

The following reports require that “Each technical report submitted by the Discharger shall bear the professional’s signature and stamp.” Currently CLMSD does not have funds appropriated in this fiscal year’s budget which ends June 30, 2012. Funds will be programmed next fiscal year, which begins on 1 July 2012, so that Engineering firms that provide the required services can be evaluated and contracted. Because of the funding and contracting process the following requests that additional time is provided.

Page 22, paragraph 1b, please change required report due date of 1 July 2012 to 1 October 2012 and adjust the “schedule to complete the work” to 1 February 2013.

Page 22, paragraph 1c, please change required report due date of 1 October 2012 to 1 January 2013 and adjust the possible “Disinfection Improvements Completion Report” to 1 January 2014.

Page 23, paragraph 1d, please change required report due date of 1 October 2012 to 1 March 2013.

Page 23, paragraph 1e, please change required report due date of 1 December 2012 to 1 May 2013.

Comments/Suggestions Continued.

Page 23, paragraph 1g, please remove this requirement under Exception 60303. This requirement would place CLMSD in violation if adopted as cattle grazing on the property is currently allowed through a lease agreement that has taken place for the past 25+ years. CLMSD receives \$30,000 annually for the grazing of cattle and the loss of this income would have a negative impact on operations and the small disadvantaged community for which it serves.

Monitoring and Reporting Program Section

Page 2, effluent Monitoring footnote 3, please change Total Coliform Organisms Sampling Frequency to account for furlough days and representative employee bargained work schedule. Currently the City works one Friday per month on average.

The City of Lakeport Municipal Sewer District staff is concerned with its ability to meet compliance with the above noted issues as currently worded within the Tentative Order, and requests that additional time is provided to allow RWQCB permitting and CLMSD staff to review permitting requirements, and ensure that they are obtainable prior to Board consideration.

Sincerely,

Mark Brannigan
Utilities Director
City of Lakeport