



CITY of COLFAX

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March 20th, 2013

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Central Valley Region
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SUBJECT: Comments on Cease and Desist Order and Tentative Order National Pollution Discharge Elimination System (NPDES) Permit No. CA0079529 – Waste Discharge Requirements for the City of Colfax Wastewater Treatment Facility, Placer County.

Dear Gayleen:

City of Colfax (City) staff wishes to extend our thanks to you and your staff for meeting and conferring with us through the permit development process to discuss policy and technical issues. We have organized comments on the Cease and Desist Order (CDO) and Tentative Order (Order) into two sections - specific comments where we discuss issues to be resolved and editorial comments which are generally minor corrections.

Specific Comments

Pond 3 Lining and Groundwater

In November 2012, the City completed the installation of a high density polyethylene (HDPE) liner to the Pond 3 Storage Reservoir to comply with permit requirements to prevent unauthorized discharges from the wastewater treatment plant (WWTP). Prior to installing the liner, the City operated a seepage collection system below the earthen dam forming the pond consisting of both surface collection and shallow groundwater interception of pond seepage. It has been our view that the seepage collection system was effective at preventing unauthorized discharge to groundwater or surface water. However, proving the seepage collection was completely effective would have been an exceedingly difficult task. To ensure discharges were not occurring from the pond, the City chose to line the pond in an effort to unambiguously comply with permit requirements.

The City wishes to clarify that changes in groundwater composition between groundwater measured down-gradient from Pond 3 (well RGW-003) and upstream of the WWTP (well RGW-001) should not be used as the sole basis for determining if Pond 3 is influencing local groundwater. Instead, the engineered lining of all three ponds should serve the basis of demonstrating that the City's WWTP activities do not have an influence on local groundwater. Due to the steep geographic terrain of the

facility and that the system is in a valley, groundwater sampled from RGW-001 will likely be different than the groundwater measured from RGW-003. The potential difference in quality is a natural occurrence due to the steep terrain and varying groundwater gradients. The City agrees that RGW-001 is a representative sample of groundwater that exists in the valley up-gradient from the WWTP. However, the groundwater down-gradient from Pond 3 receives contributions from both sides of the valley which may be of different character than the quality measured at RGW-001 due to varying geology along the valley. The City maintains that the groundwater measured at RGW-003 is reflective of the natural groundwater character at the base of the valley where the WWTP facility happens to be located. At times of the year there is no groundwater at RGW-001, where as there historically always has been groundwater present at RGW-003, which is evidence that there are groundwater contributions from the valley sides which may be of different quality than the groundwater at RGW-001. However, with the liner in place preventing seepage into or out of Pond 3, the City does not see any necessity for investigation of potential groundwater differences between valley head and sides. With the completed lining, water retained in Pond 3 is physically prevented from seeping into the groundwater.

During the water balance investigations, the City found that groundwater from the pond sides was inflowing into the pond. One of the reasons the pond had historically been so difficult to dewater was that local groundwater seeped into the pond. The City installed a slurry cut-off wall in a high seepage area to redirect groundwater flow from entering the pond area and to protect the liner. In the City's view, the available evidence is that groundwater entered the pond via the artesianal pressure from groundwater along the valley, seeped out through the earth dam face, and was intercepted by the seepage collection system.

To conclusively demonstrate the flux of groundwater into the pond and that the seepage collection was effective would be a daunting task that would cost a significant amount of money, take several years, and ultimately would likely be inconclusive. The City chose to line Pond 3 using HDPE and a standard pond lining design to unambiguously demonstrate the protection of the groundwater.

The City maintains that if groundwater quality does not change in the future, it will be evidence that the Pond 3 seepage collection system was effective and that unauthorized discharges were not occurring. The City has lined Pond 3 to ensure the protection of groundwater. In future groundwater evaluations we would intend to include consideration of the surface and groundwater seepage collection system operation. As written in the permit, it is implied that if the groundwater does not improve, the assumption will be that the liner is not effective, with which we do not agree. If groundwater quality is found to be consistent with the historic groundwater quality at RGW-003 the City will conclude the seepage collection system was an effective means for groundwater protection.

Chlorine Monitoring Requirement (EFF-001)

The City uses ultraviolet disinfection as its mode of disinfecting its final effluent. Chlorine may be used from time to time to control filamentous organism growth in the WWTP. Otherwise, chlorine is not used in the treatment system. The Order currently requires continuous monitoring of chlorine residual. The City requests that the continuous requirement be replaced with continuous monitoring when chlorine is actively being used at the treatment plant.

Editorial Comments

Cease and Desist Order (R5-2013-XXXX). Item 7, page. 2. The interim maximum daily effluent limitation (MDEL) is more stringent than the proposed final MDEL (20 µg/L). The City requests that the interim MDEL be changed to the proposed final MDEL (20 µg/L).

Cease and Desist Order (R5-2013-XXXX). Item 11, page. 3. The City seeks clarification on the reasoning behind the final compliance date of 8 December 2016.

Tentative Order. Section X.A.1.f.iii. Total Coliform maximum effluent limit should be 240 MPN/100 mL.

Tentative Order. Section IV.C.2.c, Attachment I.II.A. The details on the timing for the priority pollutant monitoring are unclear. Please clarify in the permit that the quarterly priority pollutant monitoring is to occur during the 3rd year of the permit.

Tentative Order. Attachment E.II, Table E-1. The effluent sampling coordinates are incorrect. As displayed on Figure 1, the coordinates listed in the Tentative Order for EFF-001 plot at a location south of the WWTP property. The coordinates for the effluent sampling point at the UV system are 39° 4' 58"N, 120° 56' 12"W.



Figure 1. Colfax WWTP EFF-001 Sampling Coordinates.

Tentative Order. Attachment E.V.B and Attachment E.X.D.5. The referenced permit sections (Sections VI.C.2.c.i and ii) are incorrect. Please replace these with the correct references: Section VI.C.2.d.i and ii.

Tentative Order. Attachment E.VII.B.3 – There is no referenced Section VI.A.2.I. The correct reference is unclear.

Thank you for the opportunity to provide these comments on the Tentative Order. Please, do not hesitate to contact me or the City's Environmental Engineer, Mitchell Mysliwicz, at (530) 753-6400 to discuss the comments in particular or the Order in general.

Sincerely,



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