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# MALAGA COUNTY WATER DISTRICT

3580 SOUTH FRANK STREET - FRESNO, CALIFORNIA 93725  
PHONE (559) 485-7353 - FAX (559) 485-7319

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November 30, 2013

Warren W. Gross, Senior Engineering Geologist  
Central Valley Regional Water Quality Control Board  
1685 E. Street  
Fresno, CA 93706

**RECEIVED**

DEC - 4 2013

RWQCB-CVR  
FRESNO, CALIF.

Dear Mr. Gross:

This letter is in response to your September 6, 2013, Notice of Violation to the Malaga County Water District ("District"). The District will provide a complete response to the Notice of Violation on or before February 28, 2014.

The purpose of this letter is to provide a progress report to the Central Valley Water Board on or about the 30<sup>th</sup> day of each month. To that end, attached hereto please find the District's November 30, 2013, report on the items identified by and numbered to correspond to the requirements and recommendations set forth in the September 6, 2013, Notice of Violation and accompanying Pre-treatment Compliant Inspection Report ("PCI Report") sections 10.1 and 10.2. As you will see from the Report, many of the requirements and recommendations addressed in the PCI Report were corrected by the District prior to the issuance of the Notice of Violation as the PCI Report was based on an inspection performed on February 18, 2010.

Also, please find attached exhibits corresponding to documents identified in the District's response to the requirements and recommendations sections.

If you have any comments or questions regarding the foregoing, please do not hesitate to contact the District.

Sincerely,

Russ Holcomb, General Manager

Enc.

- cc: Charles E. Garabedian, Jr., President
- Malaga County Water District
- Board of Directors (via email)
- Michael Taylor, Provost & Pritchard (via email)

**MALAGA COUNTY WATER DISTRICT**

**EVALUATION OF SIU's NEED FOR A PLAN TO CONTROL SLUG DISCHARGE**

INDUSTRY: Smurfit Stone - Fresno

**Purpose:** The questions below are used to help the inspector determine whether the SIU needs a plan to control slug discharge. The following procedure shall be fully and effectively exercised and implemented once a year.

- 1) Did SIU have slug discharge in the past year?  yes  no

If yes, the inspector should investigate the results of such activity by interview or by requesting to review reports on the slug discharge. The inspector should retain a copy of the report (if available) for IU's file or summarize the activities when the slug discharge occurred.

- 2) To determine whether a "slug control plan" is needed by the SIU, the inspector should ask the following question:

- a) Does the SIU have spill containment for uncontrolled discharge?  yes  
 no
- b) Is there a notice board for employees advising them to call the District office (559-485-7353) or Wastewater Treatment Plant (559-495-1070) in the event of an uncontrolled discharge (ASAP or within 1 hour)?  yes  
 no
- c) Does the notice have the District office or treatment plant's phone number?  yes  no
- d) Does the notice identify the following as minimum requirements; time, location, type, concentration, volume of discharge, and corrective action taken?  yes  no

**If #2a-d are all answered "yes", no slug plan is needed.**

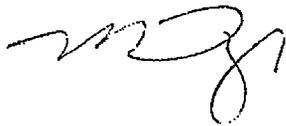
3) a) Based on question #2a-d and site observation, does the SIU need a plan to control slug discharge? \_\_\_\_\_ yes  no

**If the answer to question #3a is "no", write comments and conclude this part of the inspection.**

b) If the answer to question #3 is a "yes" then the inspector should indicate to the SIU that clearly identified practices to control slug discharge are needed and shall include, at the minimum, items a-d in question #2. The IU will satisfy the District's requirements for adequate control of slug discharged when the IU meets the spill containment and notice uncontrolled discharges may occur, but not the notice requirement. An example of a notice requirement should be given to IU during inspection which will satisfy the "notice" requirements. For SIU's that do not have the District's spill containment and notice requirements, the inspector will direct the SIU to submit a plan to control slug discharge.

Comments: \_\_\_\_\_

Reviewer: Travis Johnson Date: 9-17-10 Time: \_\_\_\_\_



9-23-10

12:20 p.m.

Slug discharge according to 40 CFR Section 403.8 f (2) v is any discharge of a non-routine episodic nature, including, but not limited to, an accidental spill or a non customary batch discharge.

KPH  
11/7/13

### Malaga County Water District Non-Residential Wastewater Discharger Facility Inspection Record

Facility Name	Air Products	Date	11-13-13
Address		MCWD Acct#	
Contact/Initials	Oscar Abundes	Inspector	Taylor
Title		Permit #	
Phone Number			

- Site Plan -  
*No change*
- Waste Removal (Hauling) Records (List haulers and type of waste removed):  
*N/A*
- Pretreatment Facilities: (List type, additives, and operational conditions)  
*N/A*
- Sand Separator & Grease Traps (List Size, condition, liquid levels, sludge levels etc.)  
*N/A*
- Floor Drains (List number, location and proximity of potential contaminants)  
*N/A*
- Waste Generating Processes  
*Fluorimeter*
- Slug Discharge Provisions  
*posted*
- Other General Observations  
*Containment of chemical storage*

# Malaga County Water District

## Non-Residential Wastewater Discharger Facility Inspection Record

<b>Facility Name</b>	Air Products	<b>Date</b>	11-13-13
<b>Address</b>	3333 S. Peach Ave., Fresno	<b>MCWD Acct#</b>	008
<b>Contact/Initials</b>	Oscar Abundes	<b>Inspector</b>	Taylor
<b>Title</b>	Plant Superintendent	<b>Permit #</b>	1140
<b>Phone Number</b>	559-237-5509		

Site Plan -

Included in Permit file

Waste Removal (Hauling) Records (List haulers and type of waste removed):

N/A

Pretreatment Facilities: (List type, additives, and operational conditions)

N/A.

Sand Separator & Grease Traps (List Size, condition, liquid levels, sludge levels etc.)

N/A

Floor Drains (List number, location and proximity of potential contaminants)

N/A.

Waste Generating Processes

N/A.

Slug Discharge Provisions

Slug discharge review performed previously. No potential for slug discharge. Air Products has contact information for Chris Lopes and for the WWTP.

Other General Observations

# Malaga County Water District

## Non-Residential Wastewater Discharger Facility Inspection Record

<b>Facility Name</b>	Rio Bravo	<b>Date</b>	10-29-13
<b>Address</b>	3350 S. Willow Ave., Fresno	<b>MCWD Acct#</b>	005
<b>Contact/Initials</b>	Bill Henson	<b>Inspector</b>	Taylor/Lopes
<b>Title</b>	Plant Engineer	<b>Permit #</b>	1005
<b>Phone Number</b>	559-264-4575		

Site Plan -  
Included in Permit file

Waste Removal (Hauling) Records (List haulers and type of waste removed):  
N/A

Pretreatment Facilities: (List type, additives, and operational conditions)

N/A. Reviewed flowmeter location prior to discharge to the MCWD sanitary sewer system. Rio Bravo has an internal continuous Ec monitor with an alarm to notify the system prior to exceeding the Ec limit.

Sand Separator & Grease Traps (List Size, condition, liquid levels, sludge levels etc.)  
N/A

Floor Drains (List number, location and proximity of potential contaminants)  
N/A.

Waste Generating Processes

N/A. All boiler blowdown. Discussed the ability that Rio Bravo has to temporarily restrain from discharge of boiler blowdown if the District WWTP is experiencing temporary peak flows. Mr. Henson and the WWTP staff communicate as required.

Slug Discharge Provisions

Slug discharge review performed previously. No potential for slug discharge. Rio Bravo has contact information for Chris Lopes and for the WWTP.

Other General Observations

# Malaga County Water District

## Non-Residential Wastewater Discharger Facility Inspection Record

<b>Facility Name</b>	RockTenn	<b>Date</b>	10-29-13
<b>Address</b>	3366 E. Muscat Ave., Fresno	<b>MCWD Acct#</b>	
<b>Contact/Initials</b>	Travis Johnson	<b>Inspector</b>	Taylor/Lopes
<b>Title</b>	Safety and Environmental Coordinator	<b>Permit #</b>	1001
<b>Phone Number</b>	559-519-7268		

Site Plan -  
Included in Permit file

Waste Removal (Hauling) Records (List haulers and type of waste removed):

Records of hauling submitted to the District monthly. List of haulers available at the site. Type of waste removed – high Ec, color laden water.

Pretreatment Facilities: (List type, additives, and operational conditions)

Reviewed condition of tanks, monitoring equipment. All in working order. Continuous monitoring of tank levels, Ec, pH, flow discharge to the District.

Sand Separator & Grease Traps (List Size, condition, liquid levels, sludge levels etc.)

N/A

Floor Drains (List number, location and proximity of potential contaminants)

Floor drains previously inspected.

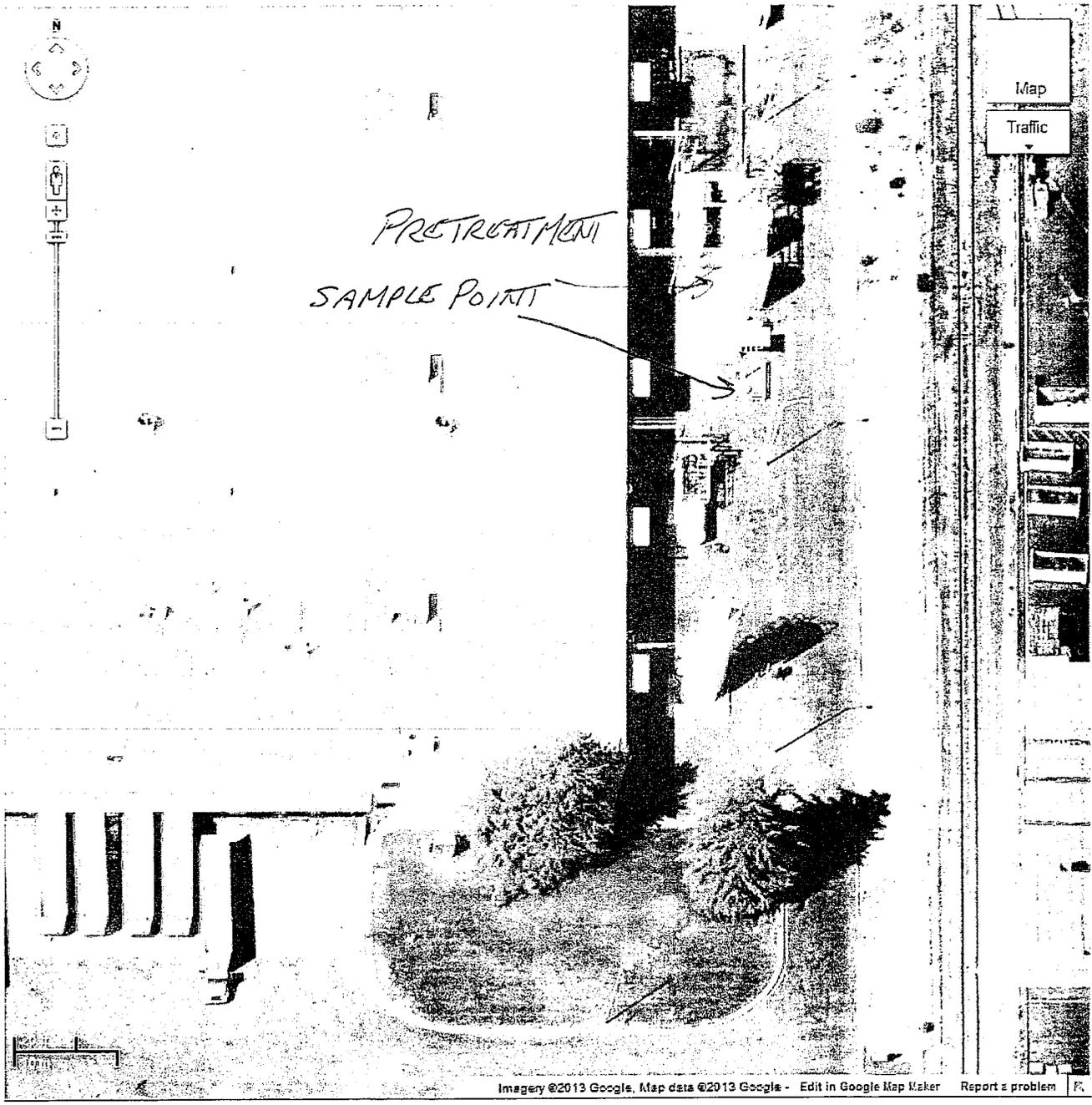
Waste Generating Processes

Waste generating processes previously inspected. High Ec waste contained and hauled off site.

Slug Discharge Provisions

Slug discharge review performed previously. No potential for slug discharge.  
RockTenn has contact information for Chris Lopes and for the WWTP.

Other General Observations



PRETREATMENT  
SAMPLE POINT

ROCKTENN

# Malaga County Water District

## Non-Residential Wastewater Discharger Facility Inspection Record

<b>Facility Name</b>	Stratas	<b>Date</b>	11-13-13
<b>Address</b>	3390 S. Chestnut Ave., Fresno	<b>MCWD Acct#</b>	024
<b>Contact/Initials</b>	Roger Metzler	<b>Inspector</b>	Taylor
<b>Title</b>	Plant Manager	<b>Permit #</b>	1008
<b>Phone Number</b>	559-495-4503		

Site Plan -  
Included in Permit file

Waste Removal (Hauling) Records (List haulers and type of waste removed):

Records of hauling submitted to the District monthly. List of haulers available at the site. Type of waste removed – greases and oils.

Pretreatment Facilities: (List type, additives, and operational conditions)

Reviewed condition of the pretreatment air flotation system. All equipment is in working order. Stratas is planning to modify piping and valving to allow for recirculation of wastewater if the characteristics are not acceptable for discharge to Malaga.

Due to the batch discharge operation, the requirement for a composite sampler will be reviewed.

Sand Separator & Grease Traps (List Size, condition, liquid levels, sludge levels etc.)

N/A

Floor Drains (List number, location and proximity of potential contaminants)

Floor drains previously inspected.

Waste Generating Processes

Waste generating processes previously inspected. High Ec waste contained and

hauled off site.

Slug Discharge Provisions

Slug discharge review performed previously. No potential for slug discharge. ADM has contact information for Chris Lopes and for the WWTP.

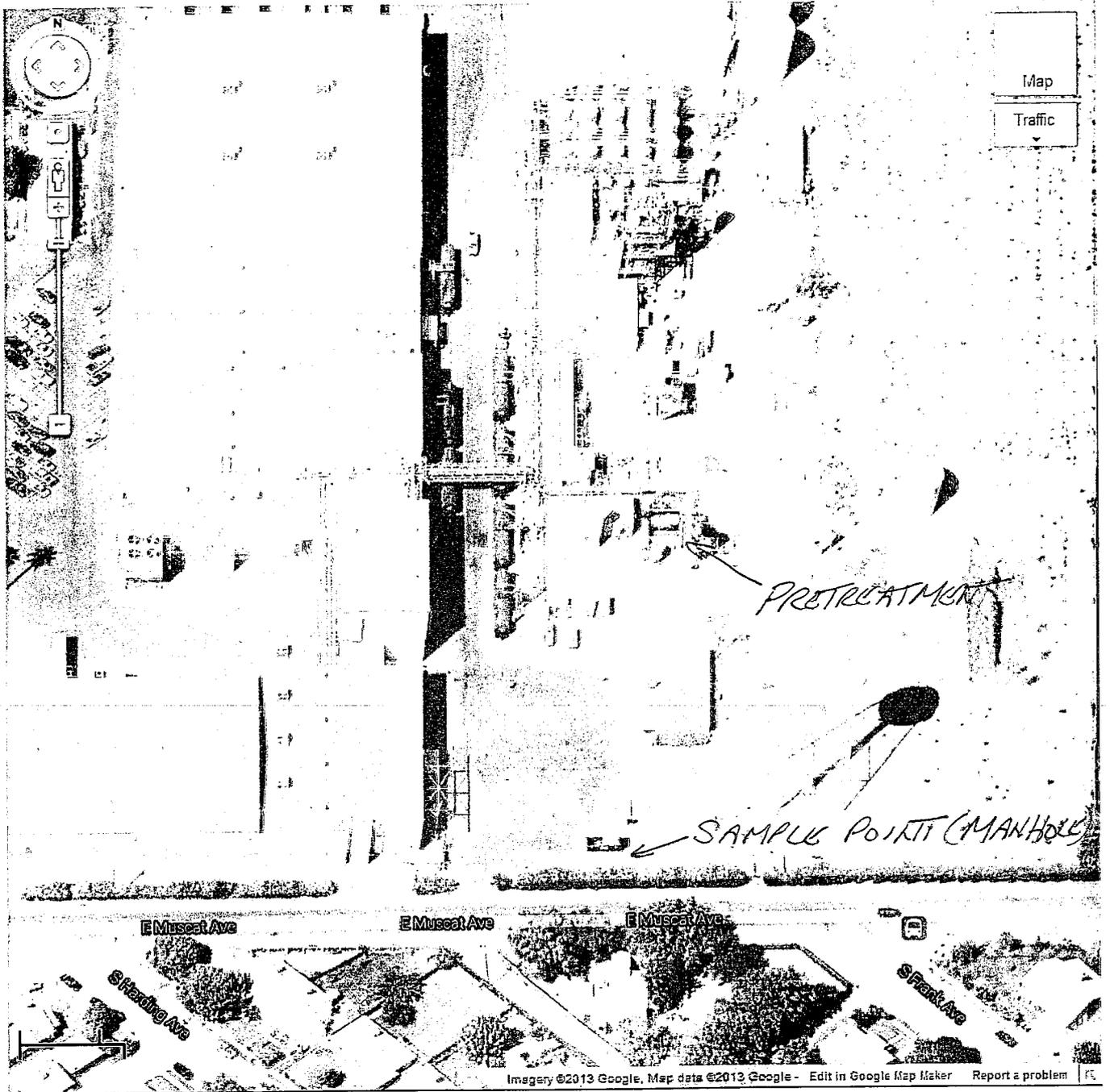
Other General Observations

Presently, Stratas texts Chris Lopes testing of batch discharges. Stratas staff check the characteristics of the wastewater prior to consideration of batch discharges. A means to improve the interim reporting of characteristics will be considered and potentially incorporated into the Non Residential Wastewater Discharge Permit.

The requirement to calibrate the magnetic flowmeter will be reviewed.

Stratas continues to incorporate modifications of process to reduce water use, therefore reducing wastewater discharge.

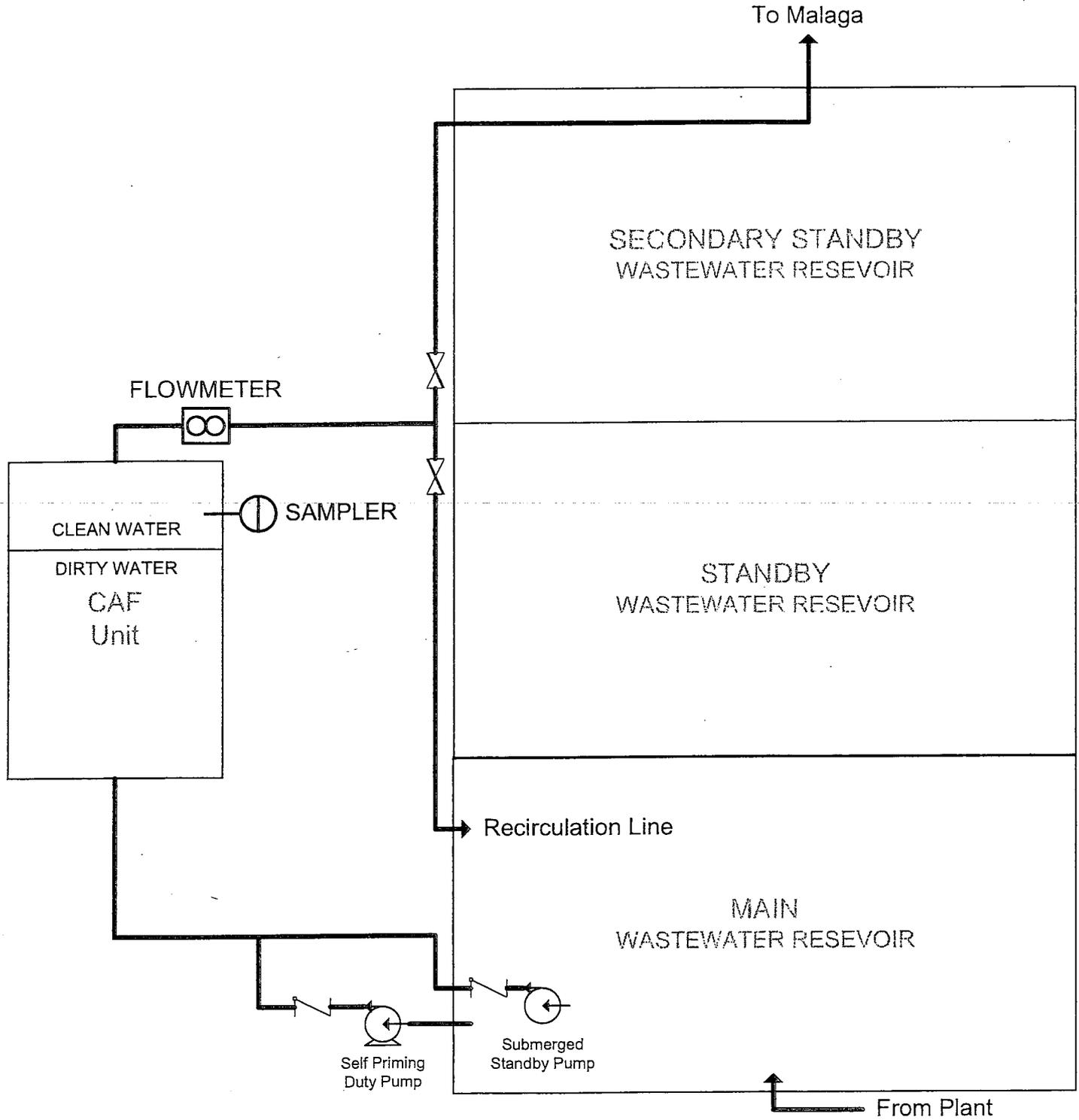
Stratas recently flushed the sewer line in Muscat Avenue between Willow and Chestnut to confirm there is no grease buildup in the sewer line.



STRATAS

# Waste Water System

Stratas Foods  
Fresno, CA



**Malaga County Water District**  
**Non-Residential Wastewater Discharger**  
**Facility Inspection Record**

<b>Facility Name</b>	PPG	<b>Date</b>	10-29-13
<b>Address</b>	3333 S. Peach Ave., Fresno	<b>MCWD Acct#</b>	008
<b>Contact/Initials</b>	Keith Gaines	<b>Inspector</b>	Taylor/Lopes
<b>Title</b>	Environmental Engineer	<b>Permit #</b>	1038
<b>Phone Number</b>	559-485-4600		

Site Plan -  
Included in Permit file

Waste Removal (Hauling) Records (List haulers and type of waste removed):

PPG retains records of any waste hauling.

Pretreatment Facilities: (List type, additives, and operational conditions)

Rainfall in portions of the site is directed to the FRIT Pit. PPG has plans to add an oil/water separator to remove oil from the FRIT Pit prior to allowing the rainfall to continue to the storm pond. The oil/water separator is anticipated to be in place by March, 2014.

Reviewed the final effluent lift station and monitoring equipment. All equipment is in working order. Continuous monitoring of Ec, pH, flow discharge to the District. PPG has alarm setpoints to notify PPG staff prior to the effluent reaching discharge limits for Ec and pH.

Sand Separator & Grease Traps (List Size, condition, liquid levels, sludge levels etc.)

Condensate oil/water separators are also in the process of being installed for the air compressors near the FRIT Pit. The oil collected is hauled off site by a contract hauler.

Floor Drains (List number, location and proximity of potential contaminants)

Floor drains previously inspected.

Waste Generating Processes

Industrial waste is primarily boiler blowdown.

Slug Discharge Provisions

Slug discharge review performed previously. No potential for slug discharge. PPG has contact information for Chris Lopes and for the WWTP.

Other General Observations

PEACH

AVENUE

EMPLOYEE PARKING (871 CARS)

VISITOR PARKING (82 CARS)

GATE HOUSE

TEMPERING

OFFICES

G.C. LAB

LUMBER PAD

OLD DRAW BLDG

OLD TANK BLDG

BATCH HOUSE

OIL STORAGE AREA

WAREROOM AND CUTTING BUILDING

NEW SHIPPING & STORAGE BUILDING

BATTERY SHOP

BOX SHOP

MAINT.

CLAY HOUSE

GARAGE

1 BAY BUILDING

MAINLINE LEHR

12 KV

TANK

FORMING CHAMBER

TINT GLASS

CULLET

PAD

SAMPLING POINT

Sewer Discharge

REF. STRG. BLDG.

H<sub>2</sub>

FACILITY

N<sub>2</sub> FIRE PUMP

STORM DRAIN POND



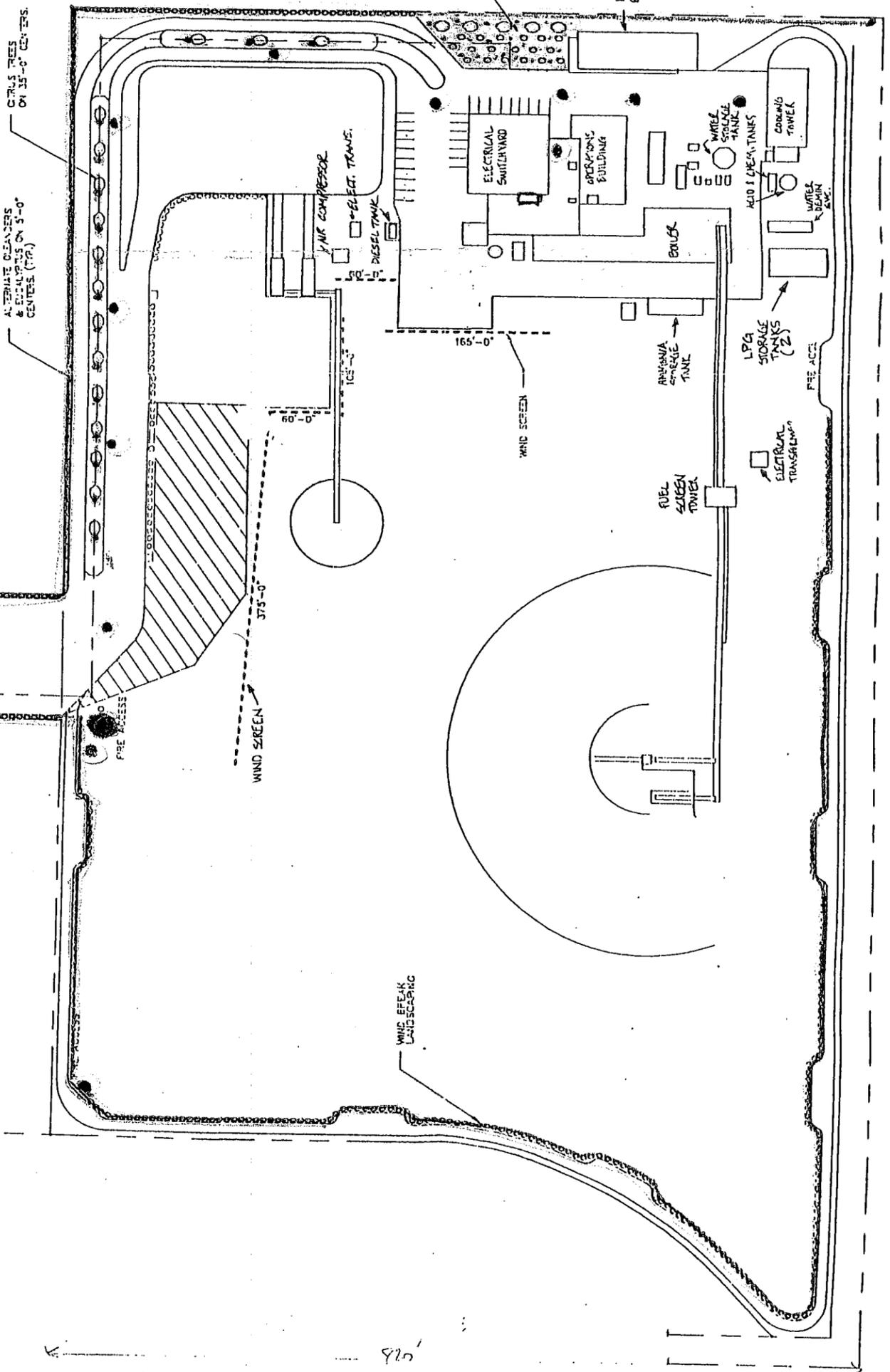


Willow Ave.

SAMPLING POINT  
PLANT SIGN (SETBACK 50')

GENERAL NOTES :

- 1 - WIND SCREEN TO BE 40'-0" HIGH.
- 2 - WIND SCREEN POLES TO BE 18'-0" CENTER TO CENTER. FOR APPROXIMATE AND DETAILS SEE DWG 0071-02.



8.7 = 118.9

133 -

- IRRIGATION SYSTEM
- SANDWICH OFFFLOOR OUTFALL
- STORM DRAINS
- ~~SEWERAGE~~
- OILY WATER SEPARATOR
- SANDWICH LEFT SIDEWALK
- LEFT SIDEWALK

ITEM	PART NO	MAINT. QTY	DESCRIPTION
CUSTOMER : RUD BRAVO FRESNO			CONTRACT NO : #UP-7-746
<del>HERBPOWER FRESNO MALAGA</del>			REV 0
TITLE : LANDSCAPING SITE PLAN			E.M. NO : NONE
			DWG NO : 0071-03
			SCALE : NONE
			SHEET 1 OF 1