

Marshall, James@Waterboards

From: Salazar, Lorrene <lsalazar@sjgov.org>
Sent: Friday, December 14, 2012 5:16 PM
To: Marshall, James@Waterboards
Cc: Shareghi, Nader
Subject: FW: NPDES No. CA0084271 Letter
Attachments: 20121214165049319.pdf

Attached is a copy of the Comments on Tentative Waste Discharge Requirements for the MH WTP NPDES No. CA0084271. A hard copy has been mailed to you.

If you have any questions or concerns, please do not hesitate to call me at the number below.

Thank you.

Lorrene Salazar

District Secretary

lsalazar@sigov.org

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"Courage is being scared to death and saddling up anyway"



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December 14, 2012

Mr. James Marshall
Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

RE: Comments on Tentative Waste Discharge Requirements for the Mountain House Wastewater Treatment Plant (NPDES No. CA0084271)

Dear Mr. Marshall:

Attached are the Mountain House Community Services District's (District) comments on the Tentative Waste Discharge Requirements and NPDES permit (Tentative Permit) for the Mountain House Wastewater Treatment Plant (MHWWTTP). The comments generally consist of factual and editorial corrections to the Monitoring and Reporting Program and Fact Sheet.

Please contact me at (209) 831-2300 if you have any questions regarding these comments.

Sincerely,

MOUNTAIN HOUSE COMMUNITY SERVICES DISTRICT

Nader Shareghi

Nader Shareghi
Public Works Director

Attachment A – Comments on Tentative Permit

c: Kari Holmes, Central Valley Water Board
Michelle Brown, Robertson-Bryan, Inc.

ATTACHMENT A

MOUNTAIN HOUSE COMMUNITY SERVICES DISTRICT COMMENTS
ON
TENTATIVE WASTE DISCHARGE REQUIREMENTS
FOR THE
MOUNTAIN HOUSE COMMUNITY SERVICES DISTRICT
MOUNTAIN HOUSE WASTEWATER TREATMENT PLANT
SAN JOAQUIN COUNTY

Submitted December 14, 2012

Attachment E – Monitoring and Reporting Program

p. E-19, D. Other Reports, item #4. This section regarding reporting of sanitary sewer overflows (SSOs) should be deleted, or replaced to state that operation of the District’s wastewater collection system is permitted under the State Water Resources Control Board Order 2006-0003-DWQ, Statewide General Waste Discharge Requirements (WDRs) for Sanitary Sewer Systems, and reporting of sanitary sewer overflows shall be subject to that order’s reporting requirements. This item currently states that the “Sanitary sewer overflows are prohibited by this Order,” however, the Tentative Permit does not regulate SSOs; Order 2006-0003-DWQ regulates SSOs and reporting of SSO events.

Attachment F – Fact Sheet

p. F-43, Cyanide RPA. The District requests the following text modification to state that because the 16.8 µg/L is an outlier, it is not representative of the cyanide data set for the effluent.

The cyanide results fit a lognormal distribution, therefore, the data was transformed to their logarithms, and the Grubbs outlier test was performed. The Grubbs outlier test confirmed that the 1 April 2009 data point of 16.8 µg/L is an outlier. Therefore, the sample is not representative of effluent concentrations of cyanide and was not used to conduct the RPA.

p. F-44, Diazinon and Chlorpyrifos RPA. This section states that no receiving water data are available. This statement is incorrect; Old River was monitored for diazinon and chlorpyrifos and these data were transmitted to the Central Valley Water Board during the previous permit renewal process. These data are summarized below.

Sample Date	Chlorpyrifos	Diazinon
3/30/04	ND; < 2	ND; < 2
6/23/04	ND; < 0.27	ND; < 0.15
9/9/04	ND; < 0.26	ND; < 0.15
12/15/04	ND; < 0.26	ND; < 0.15
3/9/05	ND; < 0.5	ND; < 0.5
7/20/05	ND; < 1.0	ND; < 0.25

ND = non-detect

ATTACHMENT A

The District requests the following modification to Fact Sheet:

(b) RPA Results. Diazinon was not detected in six effluent samples collected between June 2004 and July 2005 (minimum MDL 0.15 µg/L). Chlorpyrifos was not detected in five effluent samples collected during the same time period (minimum MDL 0.26 µg/L). ~~No receiving water data is available.~~ Diazinon and chlorpyrifos were not detected in six samples collected between March 2004 and July 2005 (minimum chlorpyrifos MDL 0.26 µg/L; minimum diazinon MDL 0.15 µg/L). Based on the available data the discharge does not have reasonable potential to cause or contribute to an exceedance of the applicable water quality objectives in the receiving water.

In addition, the background concentration (B) for diazinon and chlorpyrifos in Attachment G should be shown as “ND,” not “NA.”

p. F-53, Nitrate and Nitrite WQO. The text describing the applicable water quality objectives (WQOs) for nitrate and nitrite sometimes uses the units of micrograms per liter (µg/L) and sometimes uses milligrams per liter (mg/L), which is somewhat confusing. Most data for nitrate and nitrite are reported as mg/L, and the effluent limitations are expressed as mg/L. Therefore, for simplicity, the District recommends using the units of mg/L in these paragraphs to define the WQOs.

p. F-60, WQBELs Header. The WQBELs header should be on a separate line.