



Matthew Rodriguez
Secretary for
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California Regional Water Quality Control Board Central Valley Region

Katherine Hart, Chair

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9/19/11 Bd Mtg. Item 12
City of Colfax
Deadline: 9/15/11 by 12:00 noon



Edmund G. Brown Jr.
Governor

TO: Charles Hopkins
Chairman
State Water Resources Control Board

FROM: Pamela Creedon
Executive Officer



DATE: 14 September 2011

SIGNATURE: *[Signature]*

SUBJECT: **SUPPORT FOR CWSRF PRELIMINARY FUNDING COMMITMENT FOR THE CITY OF COLFAX**

I fully support adoption of Item No.12 on the State Water Board's agenda for the 19 September 2011 meeting, which is a Resolution adopting a Clean Water State Revolving Fund Program Preliminary Funding Commitment for the City of Colfax, Collection System Infiltration and Inflow Repair/Replacement and Wastewater Treatment Plant Reservoir Pond Lining Project.

Central Valley Water Board staff has reviewed two recent documents prepared by the Division of Financial Assurance:

- The *Facility Plan Approval, Clean Water State Revolving Fund Program, City of Colfax Collection System Inflow & Infiltration Repair/Replacement and Wastewater Treatment Plan Reservoir Pond Lining Project*; and
- The agenda package for Item #12: *Consideration of a Resolution Adopting a Clean Water State Revolving Fund Program Preliminary Funding Commitment for the City of Colfax Collection System Inflow & Infiltration Repair/Replacement and Wastewater Treatment Plan Reservoir Pond Lining Project*.

If adopted as proposed, the City of Colfax would receive approximately \$5.06 million from the Clean Water State Revolving Fund. In addition, the City has received, or will receive, \$1 million from USDA and \$50,000 from USEPA. These funds will be combined to finance three improvement projects: repairing the collection system (\$3,175,000); linking the four lift stations to the master SCADA controller at the wastewater treatment plant (\$190,000), and installing a liner in wastewater treatment plant pond #3 (\$3,273,000).

The City of Colfax is currently regulated under Waste Discharge Requirements R5-2007-0130 and Cease and Desist Order R5-2007-0131. In addition, the Central Valley Water Board will consider a revised CDO at its 30 November-2 December 2011 meeting. The tentative CDO was released for public comment on 6 September 2011, and is intended to address all of the compliance issues at the wastewater treatment facility.

Approval of the funding is critical for the City to comply with the Central Valley Board's enforcement Orders, and to attain final compliance with the WDRs. Repairs to the collection system are necessary to reduce the volume of non-stormwater entering the wastewater treatment plant. Linking the lift stations to the SCADA system will allow immediate notification of overflows or blockages within the system. Once Pond #3 is lined, the seepage issues should be resolved and the City will no longer need to capture and treat an extra 100,000 to 200,000 gallons per day of diluted wastewater. The tentative CDO describes all three of these tasks and provides timelines by which they must be completed. The timelines are consistent with those presented in the *Facility Plan Approval*.

Within the last few weeks, there has been some discussion about whether the State Water Board should not fund these projects and instead should fund a pipeline to route treated and partially treated wastewater around a neighboring property. However, a number of studies must be completed to determine whether a pipeline is a viable option for bringing the City into compliance with the WDRs. Central Valley Water Board staff estimates that the studies could take several years to complete.

Central Valley Water Board staff supports projects that will provide a known benefit and have a high likelihood of achieving compliance with the permit in the shortest possible time. We believe that the three projects under consideration for CWSRF funding meet these criteria and are major steps toward full compliance for the City of Colfax. We ask that the State Water Board adopt the Resolution as proposed.

Both Cris Carrigan (Office of Enforcement) and Wendy Wyels (Supervisor of the Compliance and Enforcement Section) will attend Monday's hearing and will be happy to answer any questions you may have.

cc: Danielle Siebal, Division of Financial Assistance, State Water Board
Cris Carrigan, Office of Enforcement, State Water Board
Bruce Kranz, City of Colfax