

Aide Ortiz - NPDES Comments

From: "Manrique, Alfonso" <Alfonso.Manrique@aecom.com>
To: <aortiz@waterboards.ca.gov>
Date: 5/6/2011 1:50 PM
Subject: NPDES Comments
CC: Lee Fremming <lfremming@fppeng.com>, <Tjkeene2@aol.com>, Pcsd <pcsd103@aol.com>
Attachments: 0061_001.pdf

Aide,

Following our conversation, enclosed are our comments to the proposed NPDES permit.

Thanks,

Alfonso Manrique, MS, PE
Senior Sanitary Engineer

Water

D 559.448.8222 C 559.288.9172

alfonso.manrique@aecom.com

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<<0061_001.pdf>>

May 6, 2011

Aide Ortiz
WRC Engineer
Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706

Subject: Comments to NPDES and Time Schedule Order for Planada Community Services District

On behalf of the Planada Community Services District we are providing the following comments to the proposed NPDES and Time Schedule Order.

Proposed NPDES

1. Page 3 – II. Findings, paragraph B: The District doesn't use the intermittent sand filters. We suggest to either eliminate them from the description or state that are no longer part of the treatment process.
2. Page 19 – 2.a.i.: We request postponing the preparation of the TRE Work Plan to after the full compliance date of November 8, 2013. The District is a small community with limited resources and the California Toxic Rule will not be applicable after the completion of this project.

Monitoring and Reporting Program within NPDES Permit

1. We request eliminating or reducing the sampling frequency of the following new compounds: bis(2-ethyhexyl)phthalate, total recoverable copper and total recoverable lead from effluent and receiving water.
2. We request reducing the frequency of WET and chronic toxicity testing to once every two years.

Time Schedule Order

1. Page 2 – Item 5: The District will not be able to comply with effluent limitations and operational requirements listed in Findings 2, 3, and 4 on the date the Order is adopted. Those requirements are final limits. We suggest changing the requirements to be the interim limits or change the compliance date.
2. Page 4 – Item 10: The District has an option to purchase 109 acres.

We appreciate your understanding and consideration of these requested changes. If you have any questions or requests for additional information, do not hesitate to contact me at (559) 448-8222.

Sincerely,



Alfonso Manrique, PE
Senior Sanitary Engineer

Copy to: Martha Mayo, District Manager, Planada CSD
Lee Fremming, District Engineer, Fremming, Parsons and Pecchenino
Tom Keene, Legal Counsel, Planada CSD

Aide Ortiz - Planada

From: "Manrique, Alfonso" <Alfonso.Manrique@aecom.com>
To: <aortiz@waterboards.ca.gov>
Date: 5/9/2011 2:22 PM
Subject: Planada

Aide,

I am writing you regarding the letter dated May 6, 2011 with our review comments. The first review comment regarding the use of the intermittent sand filters is incorrect. After discussing it with the WWTP operator, the District uses the intermittent sand filters seasonally, usually during the summer months. Please disregard that comment in our letter.

Thanks,

Alfonso Manrique, MS, PE
Senior Sanitary Engineer

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