



October 3, 2012

Mr. Scott Hatton  
Central Valley Regional Water Quality Control Board  
1685 E Street  
Fresno, CA 93706

Subject:           Comments on the Tentative Waste Discharges Requirements and the Monitoring and Reporting Program R5-2012-XXXX for Hume Lake Christian Camps Waste Water Treatment Facility

Dear Mr. Hatton,

The following are comments on the 'Tentative Waste Discharge Requirements for Hume Lake Christian Camps Waste Water Treatment Facility' and the Monitoring and Reporting Program R5-2012-XXXX. The comments will be ordered according to the layout of the 'Discharge Requirement' and MRP documents referencing finding # and page, not in order of significance. The comment will be italicized and bolded.

Thank you for your time in preparing the 'tentative Waste Discharge Requirements for Hume Lake Christian Camps Waste Water Treatment Facility'. I hope these comments and recommendations compliment your direction for this document.

We appreciate the openness of the Regional Water Quality Control Board for allowing public comment on such documents.

Sincerely,

A handwritten signature in cursive script that reads "Jon O. Nelson".

Jon Nelson  
Hume Lake Christian Camps  
Utility Manager

Comments regarding 'tentative Waste Discharge Requirements for Hume Lake Christian Camps Waste Water Treatment Facility':

Finding 5 on page 2 states, "The WWTF consists of a 103,000 gallon flow equalization tank..." this is taken from the engineer's report submitted by Rabe Engineering in behalf of Hume Lake Christian Camps.

Comment: ***We have found that the actual capacity based of design reports and as built plans actually show that the tank holds 140,000 gallons. We will provide documentation to clarify this increase.***

Finding 11 on page 3 states, "...Polymer (ZETAG 7878) is added to aid flocculation..." this is taken from the engineer's report submitted by Rabe Engineering in behalf of Hume Lake Christian Camps.

Comment: ***The plant currently uses Drewfloc 2479 polymer.***

Finding 42 on page 9 states, "...the plant is determined to be classified as 2A..."

Comment: ***Looking at 2011-2012 Fee Schedules CCOR Title 23. Division 3 Chapter 9 Waste Discharge Reports and Requirements Article 1. Fees, Section 2200. Annual Fee Schedules, specifically at the letter designation, the 'Complexity' the Hume Lake Christian Camps plant is better described in category "B", since we do not meet the criteria of Category "A". We do not discharge Toxic wastes; also we do not have numerous discharge points and ground water monitoring. We only fall into the single category of ground water monitoring which would put us in Category "B".***

Recommendation: ***Change the plant classification to 2B.***

Finding 3 on page 14 under the 'Effluent Limitations' section defines turbidity standards for the WWTF.

Comment: ***These turbidity standards set forth in this finding are the most stringent possible, reflecting the WWTF use of recycled water for lawns with public access, "spray field". While using recycled water on the lawns with public access, "spray field" this criteria is appropriate, but when over 95% of recycled water created by the WWTF goes to ponds or leach fields this standard is excessive. The turbidity standard should be relaxed/ eliminated when the recycled water goes to ponds or the leach fields.***

Recommendation: ***This finding would be better placed under the 'Water Recycling Specifications'.***

Continuation of comments regarding 'tentative Waste Discharge Requirements for Hume Lake Christian Camps Waste Water Treatment Facility':

Finding 4 on page 14 under the 'Effluent Limitations' section defines total coliform standards for the WWTF.

Comment: *These Total Coliform standards set forth in this finding are the most stringent possible, reflecting the WWTF use of recycled water for lawns with public access, "spray field". While using recycled water on the lawns with public access, "spray field" this criteria is appropriate, but when over 95% of recycled water created by the WWTF goes to ponds or leach fields this standard is excessive.*

Recommendation: *The Coliform standard should be relaxed when the recycled water goes to ponds or the leach field.*

Finding 5 on page 14 under the 'Effluent Limitations' section defines modal contact time (CT Value) standard for the WWTF.

Comment 1: *The modal contact time (CT Value) set forth in this finding is the most stringent possible, reflecting the WWTF use of recycled water for lawns with public access, "spray field". While using recycled water on the lawns with public access, "spray field" this criteria is appropriate, but when over 95% of recycled water created by the WWTF goes to ponds or leach fields this standard is excessive. The modal contact time (CT Value) should be eliminated when the recycled water goes to ponds or the leach fields.*

Recommendation: *This finding would be better placed in the 'Water Recycling Specifications'.*

Finding 11 on page 15 under the 'Water Recycling Specifications', mandates an appropriately trained personnel are on duty when irrigation with recycled water occurs,

Comment: *This finding would mandate that we have a night shift because as detailed in finding 13, irrigation typically occurs between 9PM and 6AM. This recycled spray field has both a locked irrigation timer for sprinklers and a special recycled water lockout timer in an locked enclosure that does not allow recycled water to be used during daylight hours (the typical hours where public use happens). Appropriately trained personnel walk through the field each morning after the spray field has been used to assess the performance and needs of the spray field.*

Recommendation: *Since the WWTF has an appropriately trained personnel on-call and on-site (personnel live in same location) that morning inspections and assessments would be sufficient.*

Finding 13 on page 15 under the 'Water Recycling Specifications', determines the timing of when irrigation with recycled water can occur (typically between 9 PM and 6 AM)

Comment: *This finding would mandate that we have a night shift because of the typical hours of spray field use. As described in finding 11, we have a redundant system lockout system to prevent recycled water from being used during daylight hours (typical public use times) and we have an appropriately trained personnel daily assess performance and needs of the spray field.*

Recommendation: *Since the WWTF has an appropriately trained personnel on-call and on-site (personnel live in same location) that morning inspections and assessments would be sufficient.*

Page 3

Continuation of comments regarding 'tentative Waste Discharge Requirements for Hume Lake Christian Camps Waste Water Treatment Facility':

Finding 5 on page 19 under the 'Provisions', Discharger shall supply a Salinity Management Plan by, 30 September 2012

Comment: ***This should read 30 September 2013.***

These comments are regarding the 'Monitoring and Reporting Program `R5-2012-XXXX', for the Hume Lake Christian Camps Waste Water Treatment Facility:

Page 2 Effluent Monitoring: "Effluent samples shall be collected after treatment, just prior to discharge to ponds or leach fields"

Comment: ***Continuous flow monitoring, Continuous Turbidity, and Continuous Chlorine Dose are all taken at the treatment plant. Flow and Chlorine dose are measured prior to disinfection.***

Page 2 Effluent Monitoring: Continuous Chlorine Residual

Comment: ***Should have clarifier that states, "Continuous monitoring of Residual Chlorine needed only when spray field (with public access) is active, per title 22, Daily monitoring sufficient via grab sample for recycled water going to ponds and no monitoring required for recycled water going to leach fields.***

Page 2 Effluent Monitoring: Daily CT

Comment: ***Should have clarifier that states, "Calculations need only when spray field with public assess (title 22) is in use, CT Calculations NOT needed for ponds or leach fields"***

Page 4 Leach Trench Monitoring: Visually inspect on a daily basis as discharge is occurring.

Comment: ***Hume Lake's WWTF Leach trenches are SCADA actuated with high level floats and pipe flow indicators that automatically shut off water to trench when high level occurs. Also most often leach fields are used in the winter with snow on the ground.***

Recommendation: ***Historically we have had a weekly visual inspection or have a clarifier that states, "The Frequency of monitoring shall be performed only when safe access to leach fields is permissible."***