



August 8, 2013

Mr. Greg Cash  
Central Valley Regional Water Quality Control Board  
364 Knollcrest Drive, Suite 205  
Redding, CA 96002

RE: Comments to the Waste Discharge Requirement  
TravelCenters of America, LLC Facility No. 057  
19483 Knighton Road  
Redding, Shasta County, California 96002  
Order No. 98-014

Dear Mr. Cash:

Apex Companies, LLC (Apex), prepared the Report of Waste Discharge for the above-referenced facility. The Order is fairly complete and accurate for the wastewater treatment plant modifications as submitted in our report. We have the following comments on the proposed order that may require minor changes to the language of the notice and/or the order. The comments and suggestions are as follows:

- Notice of Public Hearing: The first paragraph is confusing. The second and third sentences claim that the current plant has anoxic treatment and a 7,000-gallon equalization tank. The current plant does not have these features but they are included in the current design.
- Notice of Public Hearing: The end of the second paragraph states that the discharger will be able to immediately comply with the order. We want to note that we cannot purchase the new plant until the Board Order is approved and that fabrication, construction, and establishing the biology in the new plant for proper operation will take time.
- Order, Findings: The findings of the order mention in item No. 3. and item No. 5. that additional treatment is provided as indicated by "...new 7,000 equalization tank...". These items do not include the volume unit of "gallons". Also, both item No. 3 and No. 5 indicate the equalization is new. This is also included in the order item No. 4. The existing plant does have an equalization tank, so it may not be correct to say the unit is a new part of the treatment process. The equalization tank in the new plant will be larger and provide better equalization. If the language is changed, the 7,000-gallon volume could be removed, or say the equalization tank of 7,000-gallons is larger to provide surge flow capacity.

- Order, Findings and Order: Item No. 3 of the findings say that the modifications will result in treatment that will exceed the current treatment capability as indicated by "...designed to have equal or better water quality...". Our report shows that the new treatment plant will provide typical effluent limits for secondary treatment (i.e., extended aeration with clarification) and by utilizing the MLE process will provide for nitrate reduction. I assume the reference to better water quality directly relates to the new anoxic tank and the MLE process. While the statement does apply to nitrate, it is misleading regarding secondary treatment. The current treatment plant is in poor mechanical condition, but the effluent far exceeds the effluent quality typically achieved by secondary treatment. The BOD average for 2012 was 9 mg/l, which is much lower than the typical secondary effluent quality of 30 mg/l. The plant is operating exceptionally well and is producing effluent typically expected for more advanced type treatment plants. By the order indicating the quality will be equal or better, the new plant may be expected to have an average BOD effluent of 9 mg/l or less. Since this is not expected to occur on a consistent basis, we would like this language changed to reflect the intent of what is being provided. One suggestion is that the Order state the treatment operations will be improved with the installation of the new equipment and/or the anoxic tank/MLE process. If more substance is required for controlling the effluent quality, discharge limits for secondary treatment could be required as provided in the Report of Waste Discharge.

These are suggestions that we are open for discussion and look forward to responding to any of your recommendations. If you have any questions, please feel free to contact me at (256) 261-1317 should you have any questions or concerns.

Sincerely,  
Apex Companies, LLC



Scott S. Huismann,  
California RCE 51574  
Director

