



## City of Placerville

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December 4, 2013

*Via email and First-Class Mail*

Ms. Gayleen Perreira  
Senior Water Resources Control Engineer  
Regional Water Quality Control Board, Central Valley Region  
11020 Sun Center Drive # 200  
Rancho Cordova, CA 95670

Re: Comments on Tentative Waste Discharge Requirements (WDRs) and  
Cease and Desist Order Amendment  
City of Placerville Hangtown Creek Water Reclamation Facility (NPDES No. CA0078956)

Dear Ms. Perreira:

Thank you for the opportunity to review and comment on the Tentative Waste Discharge Requirements and NPDES Permit (Tentative Permit) and Draft Cease and Desist Order (CDO) Amendment for the Hangtown Creek Water Reclamation Facility. Attached please find the City's comments on the Tentative Permit and Draft CDO Amendment, which are provided as Attachment A.

Please contact me at (530) 642-5250 or Steve Herrera at Herrera Engineering Consultants, Inc. at (530) 677-1854 if you have any questions regarding these comments. We would like to meet to discuss these comments with you prior to the Board hearing for adoption of the Order. We will follow up with you to schedule the meeting.

Sincerely,

Jonathan "Nate" Stong, P.E.  
City Engineer

Attachment A – Comments on Tentative Permit

cc: Beth Thayer, Central Valley Regional Water Quality Control Board  
Steve Herrera, Herrera Engineering Consultants, Inc.  
Michael Bryan, Robertson-Bryan, Inc.

ATTACHMENT A

CITY OF PLACERVILLE COMMENTS  
ON  
TENTATIVE  
WASTE DISCHARGE REQUIREMENTS  
FOR THE  
HANGTOWN CREEK WATER RECLAMATION FACILITY  
CITY OF PLACERVILLE, EL DORADO COUNTY

Submitted December 4, 2013

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**TENTATIVE ORDER**

**Attachment A - Definitions**

p. A-1, Definitions. Throughout the permit the acronym “RL” is used to as part of reporting requirements and compliance determinations. However, “RL” is not defined in the permit. The presumed definition is “Reporting Level,” which is the term used in the SIP. The City requests “RL” be defined as “Reporting Level” where first presented in the permit. Also, the City requests a definition of Reporting Level be provided in Attachment A.

**Attachment E – Monitoring and Reporting Program (MRP)**

p. E-4, Table E-2. Influent Monitoring. There is a typographical error. “Biochemical” is misspelled.

p. E-4, Table E-3. Effluent Monitoring - Chlorine, Total Residual. Remove footnote 1 under “Required Analytical Test Method” for this constituent. 24-hour flow proportional composite sampling does not apply to this constituent.

p. E-5, Table E-3. Effluent Monitoring – Footnote 9. The City requests that the following sentence be added to the footnote to indicate that continuous monitoring to demonstrate a positive dechlorination agent residual in the effluent is also appropriate to demonstrate compliance with the chlorine residual effluent limits (per Compliance Determination VII. G.).

“As an alternative, continuous monitoring to demonstrate a positive dechlorination agent residual is also an acceptable method of demonstrating compliance with the total chlorine residual effluent limit (in lieu of continuous chlorine residual monitoring).”

p. E-7, B.8.b. Chronic Toxicity Testing. The Special Provision referenced should be:

“...Special Provision at section VI.C.2.a.ii of the Order.”

## ATTACHMENT A

p. E-10, Table E-7. Ultraviolet Light Disinfection System Monitoring Requirements. This table specifies flow monitoring at UVS-001, which per definition in the MRP, is located downstream of the UV system where a representative sample can be taken. The flow at this location is equivalent to the discharge flow at EFF-001, which is currently continuously monitored. The City requests either:

- 1) The flow monitoring requirement in Table E-7 be removed; or
- 2) The flow monitoring location be changed from UVS-001 to EFF-001; or
- 3) A footnote be added to UVS-001 in Table E-7 that states, “flow monitoring at EFF-001 may be used to satisfy the UVS-001 flow monitoring requirement.”

p. E-11, Table E-8. Monitoring Periods and Reporting Schedule.

- As written, the SMR due date specified in this table for sampling frequencies of Continuous, 1/Day, 1/Week, 2/Week, and 5/Week is “45 days after the end of the monitoring period.” The City requests that the SMR Due Date for each be changed to “Submit with Monthly SMR.” Otherwise, to comply with the specified due date, the City would have to make multiple submittals every 1, 2, and 5 days.
- The City requests that a row be added to the table for a Sampling Frequency of 3/Week to relate to the sampling frequency for BOD, TSS and Total Coliform Organisms. The SMR Due Date should also be “Submit with Monthly SMR.”

### Attachment F - Fact Sheet

p. F-4, A. Description of Wastewater and Biosolids Treatment and Controls. There is a typographical error in the second paragraph. The upgrades included secondary (rather than tertiary) clarifiers. The description of the treatment units should be corrected to read:

“...an effluent cooling system, a biological nutrient removal system (a Modified Ludzak-Ettinger process capable of nitrification and denitrification), secondary clarifiers, and UV disinfection, ~~and tertiary clarifiers.~~”

p. F-5, Table F-2. Historic Effluent Limitations and Monitoring Data. The flow limitation in this table needs a footnote to define 2.3 MGD as the Average Dry Weather Flow effluent limitation. This flow limitation is incorrectly shown in a column titled Maximum Daily effluent limitation.

p. F-20, ECA for Acute Cadmium, Lead and Acute Silver, last full paragraph. There is a typographical error in the paragraph beginning, “In this case...” The number 0.1.3 µg/L should be changed to 1.3 µg/L.

p. F-31, Persistent Chlorinated Hydrocarbon Pesticides, RPA Results. As shown in Table F-10, 2,4-D should be added to the individual pesticides listed in this paragraph that were not detected in the effluent between January 2010 and March 2013.

## ATTACHMENT A

p. F-52, b. Chronic Aquatic Toxicity. There is a typographical error in the paragraph. The fourth sentence should be corrected to read:

“No toxicity was detected in the accelerated monitoring samples and the source of the transient toxicity observed in the January ~~2009~~ 2013 sample is unknown.”

p. F-59, Table F-15. Summary of Final Effluent Limitations.

- The flow limitation in this table needs a footnote to define 2.3 MGD as the Average Dry Weather Flow effluent limitation. This flow limitation is incorrectly shown in a column titled Maximum Daily effluent limitation.
- “DC,” which refers to design capacity, should be replaced with PB (based on demonstrated performance capabilities for the facility) as the Basis for the pH limitation.

p. F-72, B.8. re. Turbidity Specifications. The final sentence of this paragraph should be modified as follows to properly identify all filter monitoring locations:

Therefore, monitoring for turbidity is required at Monitoring Locations FIL-001, FIL-002, and FIL-003, and effluent monitoring ~~requirements have~~ for turbidity has not been retained in this Order.

p. F-73, c. i. Monitoring Location RSW-002. The word “flow” should be deleted from this sentence, because receiving water flow monitoring at this location has not been retained from the previous Order. Effluent and RSW-001 flow monitoring have been retained, and RSW-002 flow will be reported as the sum of flow at these two locations.

### **Attachment G – Summary of Reasonable Potential**

p. G-1, Electrical Conductivity. The average annual MEC should be revised to read 406 µmhos/cm as shown in Table F-11 on page F-32.

p. G-2, Total Dissolved Solids. The average annual MEC should be revised to read 242 mg/L as shown in Table F-11 on page F-32.

### **DRAFT CEASE AND DESIST ORDER AMENDMENT**

p. 2, Item 8. Clarification is needed regarding why total coliform, nitrate plus nitrite and turbidity are being removed from the CDO. The second sentence should be revised to read as follows:

“This Order also amends CDO R5-2008-0054-01 to remove reference to pollutants (copper, total coliform organisms, nitrate plus nitrite, and turbidity) for which the Discharger has demonstrated compliance and/or there is no longer reasonable potential.”