

Farhad, Mohammad@Waterboards

From: Pedro Reyes <pedro.reyes@cdcr.ca.gov>
Sent: Thursday, June 11, 2015 10:09 AM
To: CentralValleySacramento
Cc: Farhad, Mohammad@Waterboards; Stanley, Jeff@CDCR; Cordano, Fred@CDCR; Vasconcellos, Edward@CDCR; Bettencourt, Miles (Terry)@CDCR; Madia, Teri@CDCR
Subject: Request To Remove Item #9(c) from CAO R5-2015-0704
Attachments: CAO -- R5-2015-0704, Request To Remove Item #9(c).pdf

Date of Title of Submittal	June 11, 2015 – CAO R5-2015-0704 – Request To Remove Item #9 (c)
Regulatory Program	NPDES
Unit	Compliance and Enforcement
Regulated Party (Discharger)	California Department of Corrections and Rehabilitation
Facility Name	Deuel Vocational Institution
County	San Joaquin

Pedro B. Reyes
California Department of Corrections & Rehabilitation
Departmental Construction & Maintenance Supervisor
Facilities Planning, Construction, and Management
Facilities Asset Management Branch
Phone: (916) 255-0516
Fax: (916) 255-3022

FACILITY PLANNING, CONSTRUCTION AND MANAGEMENT

P.O. Box 942883
Sacramento, CA 94283-0001



June 10, 2015

Mr. Andrew Altevogt, Assistant Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Sacramento, CA 95670

Dear Mr. Altevogt:

The California Department of Corrections and Rehabilitation, Facility Planning, Construction and Management (FPCM) is requesting that a requirement of the Clean and Abatement Order (CAO) R5-2015-0704, Item #9 (c) be removed from the CAO. Item #9 (c) requires a plant redundancy process and/or features review for the Reverse Osmosis (RO) Plant to ensure compliance with the Waste Discharge Requirements (WDR).

FPCM hired a consultant to conduct an evaluation/study of the Deuel Vocational Institution (DVI) RO Plant which includes plant operations, plant redundancy, development of an operational manual, operator training, and operational improvement in order to comply with the directives of Citation #01-10-15C-002 issued by the State Water Resources Control Board, Division of Drinking Water. Since this study is already required by the aforementioned citation, FPCM does not want to duplicate the same efforts. Upon completion of the evaluation/study, FPCM will submit a copy of the findings, if requested.

Should you require additional information, please contact Pedro Reyes, Regional Manager, at (916) 255-0516, or myself at (916) 255-2583.

A handwritten signature in blue ink, appearing to read "Fred Cordano".

FRED CORDANO
Associate Director
Facilities Asset Management Branch
Facility Planning, Construction and Management Division

cc: Jerome Price, Warden, DVI
Edward Vasconcellos, Associate Warden-Business Services, DVI
Pedro Reyes, Regional Manager, FAMB
Terry Bettencourt, Correctional Plant Manager II, DVI
Jeff Stanley, Regional Manager, FAMB

Central Valley Regional Water Quality Control Board

16 July 2015

J. Price, Warden
Deuel Vocational Institution
California Department of Corrections
P.O. Box 400
Tracy, CA 95378-0004

RESPONSE TO CAO R5-2015-0704 ITEM #9 REMOVAL REQUEST, CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, OPERATION OF WASTEWATER TREATMENT FACILITY, DEUEL VOCATIONAL INSTITUTION, SAN JOAQUIN COUNTY

The California Department of Corrections and Rehabilitation (Discharger) discharges treated wastewater from its Deuel Vocational Institution Wastewater Treatment Facility (Facility) to Deuel Drain and is regulated by Waste Discharge Requirements (WDRs) Order R5-2014-0014 (NPDES CA0078093). On 30 March 2015, the Central Valley Regional Water Quality Control Board (Board) issued Cleanup and Abatement Order (CAO) R5-2015-0704 due to an excessive number of exceedances of the chronic toxicity trigger, which is attributed to elevated influent electrical conductivity to the Facility. Additionally, violations of nitrate plus nitrite effluent concentrations are attributed to damaged membrane bioreactor (MBR) modules as a result of inadequate maintenance.

CAO R5-2015-0704 item #9 requires the Discharger to submit a *Third Party Evaluation of the Operation and Maintenance of the Facility*. Item #9 requires the Discharger to examine its Facility and make recommendations to adequately operate and maintain the wastewater treatment Facility. On 10 June 2015, the Discharger submitted a request to Board staff to remove item #9 from CAO R5-2015-0704. The Discharger stated that it has hired a consultant to conduct an evaluation/study of the Reverse Osmosis Plant (RO Plant). Hence, the Discharger does not want to duplicate the same efforts.

Board staff would like to clarify that Item #9 required by CAO R5-2015-0704 is **not the same evaluation** required under Citation #01-10-15C-002, issued by the State Water Resources Control Board's Division of Drinking Water. Item #9 of CAO R5-2015-0704 requires the Discharger to submit a third party evaluation of the operation and maintenance of the wastewater treatment Facility and it should include recommendations on how to adequately operate and maintain the wastewater treatment Facility. Therefore, the Discharger's request to remove item #9 from CAO R5-2015-0704 is rejected. By **1 June 2016**, please submit a *Third Party Evaluation of the Operation and Maintenance of the Wastewater Treatment Facility*.

If you have any questions, please contact Mohammad Farhad at (916) 464-1181 or mfarhad@waterboards.ca.gov.



KARI HOLMES, P.E.

Senior Water Resource Control Engineer
NPDES Compliance and Enforcement Unit

cc: Joseph Beasley, Associate Warden, Deuel Vocational Institution, Tracy
Terry Bettencourt, Correctional Plant Manager, Deuel Vocational Institution, Tracy
Jamie Rodriguez, Chief Engineer, Deuel Vocational Institution, Tracy
Pedro Reyes, California Department of Corrections and Rehabilitation, Rancho Cordova
Jeff Stanley, California Department of Corrections and Rehabilitation, Rancho Cordova
Terri Madia, California Department of Corrections and Rehabilitation, Rancho Cordova
Fred Cordano, California Department of Corrections and Rehabilitation, Rancho Cordova
Todd Poston, California Department of Corrections and Rehabilitation, Rancho Cordova
Edward Vasconcellos, Deuel Vocational Institution, Tracy
Mark Hardcastle, Regional Manager, Facilities Management, CDCR, Rancho Cordova
Donald Struckman, Staff Counsel, California Department of Corrections and Rehabilitation, Rancho Cordova
Vanessa Young, Staff Counsel, State Water Resources Control Board, Office of Enforcement, Sacramento