

---

## North Coast Regional Water Quality Control Board

April 23, 2013

Mr. Gregory Orsini  
P.O. Box 2037  
McKinleyville, CA 95519

Dear Mr. Orsini:

**Subject:** Notice of Violation and Transmittal of the March 2013 Compliance Evaluation Inspection Report for the McKinleyville Community Services District (CSD) Wastewater Treatment Facility

**File:** McKinleyville CSD Wastewater Treatment Facility  
WDID No. 1B82084OHUM, NPDES Permit No. CA024490

A compliance Evaluation Inspection (CEI) was conducted on March 12, 2013, at the McKinleyville CSD Wastewater Treatment Facility (WWTF) by a USEPA contractor on behalf of the North Coast Regional Water Quality Control Board (Regional Water Board). Regional Water Board staff also participated in the inspection. The CEI report prepared by the USEPA contractor, PG Environmental, is enclosed. In addition, the Facilities Inspection Report prepared by Regional Water Board staff through the CIWQS database is also enclosed.

The CEI report identified the following deficiencies:

1. NPDES permit, Order No. WQ-2011-0008-DWQ, Attachment E – Monitoring and Reporting Program, Provision I.C. requires that “Laboratories analyzing monitoring samples shall be certified by the Department of Health Services, in accordance with the provisions of Water Code section 13176, and must include quality assurance/quality control data with their reports.” Specific laboratory deficiencies include:
  - a. The on-site laboratory is not ELAP certified and has not developed a Quality Assurance/Quality Control (QA/QC) Program.
  - b. SOPs for analyses conducted in the on-site laboratory (i.e., temperature, pH, chlorine residual, and dissolved oxygen) have not been developed.

- c. Analytical records for pH and chlorine residual analyses do not include the time of analysis to demonstrate that samples are analyzed within 15 minutes of sample collection.
  - d. The temperature of the sample refrigerator in the on-site laboratory was not being monitored to document that samples are held at proper temperatures.
2. Table E-4 of the Monitoring and Reporting Program requires daily monitoring of pH and temperature at the end of the treatment process (M-001). A spot review of Facility monitoring records revealed that there was no monitoring data for pH and temperature for several days in October 2012.
3. Table E-9 of the MRP requires monthly upstream and downstream receiving water monitoring in the Mad River. Although not explicitly stated in the MRP, receiving water monitoring should be conducted during periods of discharge to the Mad River so that the data can be used to determine whether or not the discharge is impacting water quality in the receiving water. A spot review of monitoring records revealed that receiving water monitoring was conducted on November 7, 2012, prior to the start of discharge, which was initiated later in the month.
4. The operations and maintenance manual has not been updated since the WWTF was constructed in the mid-1980s and some procedures identified in the O&M manual are not followed. For example, the O&M manual states that sludge depth should be measured annually and removed periodically, but this procedure is not followed. In addition, Treatment Wetland 5 was added in approximately 2005, yet the manual has not been updated to account for this added treatment unit.

We also discussed the CSD's plans to upgrade the WWTF to address high ammonia and biosolids handling practices. You indicated that biosolids are not removed from the treatment train and have been allowed to accumulate in the four treatment ponds since the WWTF was constructed in the mid-1980s. You indicated that the build-up of sludge has not exceeded the design capacity for sludge accumulation of the two facultative ponds (Ponds 1A and 1B). We recommend that the CSD evaluate the potential effect of accumulated sludge could have on ammonia as you move forward with your upgrade plans.

This Notice of Violation serves as notice to correct the violations identified in items 1 through 4, above. Violations identified in items 1.c., 1.d., 2 and 3 should be implemented immediately. We recognize that violations identified in items 1.a., 1.b., and 4 require a period of time to address. By June 1, 2013, you are required to submit a report identifying a plan and time schedule to address the deficiencies identified in 1.a., 1.b., and 4 and confirming that the deficiencies identified in 1.c., 1.d., 2, and 3 have been corrected.

If you fail to submit the requested report by June 1, 2013, or correct the above violations as required by this Notice of Violation, the Regional Water Board shall take appropriate enforcement actions authorized by the Porter-Cologne Water Quality Act (Div. 7 of the

Water Code, commencing with section 13000), including the possible assessment of civil liabilities of \$1,000 per day of violation.

If you have any questions regarding this matter prior to July 1, 2013, you may contact Cathleen Goodwin at (707) 576-2687 or at [Cathleen.Goodwin@waterboards.ca.gov](mailto:Cathleen.Goodwin@waterboards.ca.gov). After July 1, 2013, you may contact Lisa Bernard at (707) 576-2677 or at [Lisa.Bernard@waterboards.ca.gov](mailto:Lisa.Bernard@waterboards.ca.gov).

Sincerely,

David Leland, P.E.  
Assistant Executive Officer (Acting)

130423\_McKinleyville\_CEI\_Transmittal\_NOV

cc: Craig Blett, PG Environmental [craig.blett@pgenv.com](mailto:craig.blett@pgenv.com)

Max Kuker, PG Environmental, [max.kuker@pgenv.com](mailto:max.kuker@pgenv.com)

Enclosures: March 12, 2013 Compliance Evaluation Inspection (CEI) Report for McKinleyville CSD

CIWQS Facilities Inspection Report for McKinleyville CSD