
North Coast Regional Water Quality Control Board

April 24, 2013

Mr. Erik Lust
736 F Street
Arcata, CA 95521

Dear Mr. Lust:

Subject: Notice of Violation and Transmittal of the March 2013 Compliance Evaluation Inspection Report for the City of Arcata Wastewater Treatment Facility

File: Arcata Wastewater Treatment Facility
WDID No.1B82114OHUM, NPDES Permit No. CA0022713

A Compliance Evaluation Inspection (CEI) was conducted on March 14, 2013, at the Arcata Wastewater Treatment Facility (WWTF) by a USEPA contractor on behalf of the North Coast Regional Water Quality Control Board (Regional Water Board). The CEI report prepared by the USEPA contractor, PG Environmental, is enclosed.

The CEI report identified the following deficiencies:

1. NPDES permit, Order No. R1-2012-0031, 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 laboratory does not follow QA/QC procedures or written SOPs and has not recently conducted proficiency testing for in-house analyses (i.e., temperature, pH, chlorine residual, and dissolved oxygen).
 - b. 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.
 - c. The 15 minute hold time for pH was exceeded on numerous occasions during the period of review (November 2012 through February 2013).

2. Nitrate and ammonia were monitored in December 2012 as required by section IV.A.1 (Table 4) of the MRP, but the monitoring results were not reported in the December 2012 eSMR, as required by section X of the MRP. This deficiency can be corrected by requesting the December 2012 eSMR to be withdrawn so that you can resubmit it with the missing data.
3. Records reviewed revealed that effluent flow is not being recorded continuously as required by sections IV.A.1 (Table E-4) and IV. B.1 (Table E-5) of the MRP.
4. Standard Provision IV.A of Attachment D to Order No. R1-2012-0031 requires that records of all monitoring information be retained, including calibration and maintenance records. You indicated that flow meters have not been calibrated recently and flow meter calibration records could not be located for review.

This Notice of Violation serves as notice to correct the violations identified in items 1 through 4, above. By June 1, 2013, you are required to submit a written report identifying how these issues have been resolved, or a plan and time schedule to resolve issues that require additional time.

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. After July 1, 2013, you may contact Lisa Bernard at (707) 576-2677 or at Lisa.Bernard@waterboards.ca.gov.

Sincerely,

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

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cc: Craig Blett, PG Environmental craig.blett@pgenv.com
Max Kuker, PG Environmental, max.kuker@pgenv.com

Enclosure: March 13, 2013 Compliance Evaluation Inspection (CEI) Report for City of Arcata Wastewater Treatment Facility