

RESORT IMPROVEMENT DISTRICT NO.1
SHELTER COVE SEWER & OTHER FACILITIES MAINTENANCE DISTRICT
HUMBOLDT COUNTY, CALIFORNIA

March 28, 2015

Charles Reed
Water Resource Control Engineer
North Coast Regional Water Quality Control Board
5550 Skylane Blvd
Santa Rosa, CA 95403

Dear Mr. Reed as well as members of the North Coast Regional Water Board,

I, Christopher Christianson, Wastewater Superintendent of the Shelter Cove, Humboldt County Resort Improvement District No. 1 am writing this letter to object to a few aspects of the 2015 draft NPDES permit renewal. Specifically, I feel that 24-hour composite sampling would present unnecessary hardship for the District and its employees, as well as possibly produce false results for the tested constituents.

Under the draft NPDES permit for 2015, 24-hour composites would be required for BOD, TSS, and oil and grease constituents on the effluent discharge (point 001), for BOD and TSS on the recycled water discharge (point 002), as well as BOD and TSS of the wastewater plant influent. Considering that Shelter Cove is a minor discharger, a low population community, and that the wastewater plant flows are highly contingent on the plant's primary lift station, I feel that the daytime, 8-hour composite sampling for these constituents, as currently practiced, would be more than sufficient to detect all ranges with accuracy. The majority of wastewater flow occurs during this 8-hour compositing period. A certified operator can oversee this sampling. (The RID wastewater plant is not staffed 24 hours.) The expense of operating equipment (automatic sampling devices) for these constituents would be prohibitive to the District, on top of the already increased sampling required under this draft permit. Plus, an automatic sampler could possibly produce contaminated, erroneous composites, due to the nature of the wastewater plant flows and the activity of the central lift station.

In conclusion, I would like to formally request an amendment to the 2015 draft NPDES permit for the Shelter Cove RID. I would like to have the sample types for BOD, TSS, and oil and grease altered from 24-hour composites back to the current 8-hour composites for influent, effluent, and recycled water testing, please. Thank you very much for your time and consideration.

Sincerely,



Christopher Christianson
Wastewater Superintendent
Humboldt County Resort improvement District No.1
9126 Shelter Cove Rd
Whitethorn, CA 95589
(707) 986-1411
cchristianson@sheltercove-ca.gov