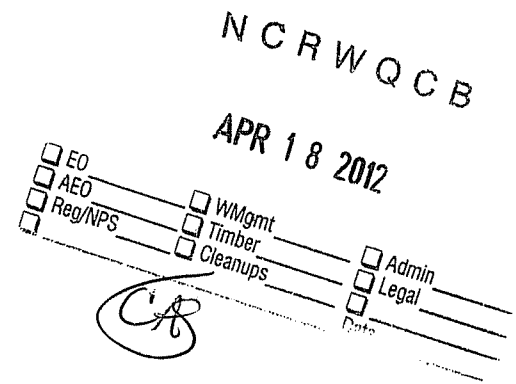




April 16, 2012

Catherine Kuhlman, Executive Officer
 North Coast Regional Water Quality Control Board
 5550 Skylane Boulevard, Suite A
 Santa Rosa, CA 95403



Re: Comment Letter
 City of Cloverdale Wastewater Treatment Plant Draft NPDES Permit
 Order Number R1-2012-0048
 NPDES Number CA0022977
 WDID Number 1B84032OSON

Dear Ms. Kuhlman:

This letter contains the City's comments and questions on the draft copy of the proposed Waste Discharge Requirements (WDRs) for the City of Cloverdale's Wastewater Treatment Plant. A copy of the draft proposed WDR was provided to the City by Cathleen Goodwin on March 14, 2012. The City's comments and questions on the draft WDRs are as follows:

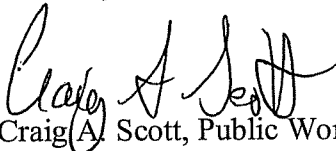
1. Page 4, Table 4. The City would like to remain classified as not a major facility regarding its design flow. The definition of a major discharger, on the USEPA website, as "any NPDES facility . . . with design flows of greater than one million gallons per day . . ." appears to indicate the City's system, rated as a 1 million gallons per day facility, is not a major discharger. Please confirm.
2. Page 9, Table 6, the Effluent Limitations for TSS have changed from AMEL 50 mg/L and AWEL 45 mg/L to AMEL 45 mg/L and AWEL 65 mg/L. What is the reason for this change?
3. Page 13, please confirm that a median concentration of coliform organisms in any of the City's groundwater monitoring wells exceeding 1.1 MNP per 100 milliliters or 1 colony per 100 milliliters does not in itself constitute a violation of V.B.5, Groundwater Limitations.
4. Page 21, please provide details in the MRP of the constituents and sampling for the influent pollutant priority scan required under VI.C.b.iii(a), Industrial Waste Survey.
5. Page 25, 6.a, Storm Water, requires the City to obtain coverage under SWQB Order No. 97-03-DWQ, NPDES General Permit No. CAS000001. However, on Page F-62 it states that "all storm water within the Facility's NPDES permitted process areas are captured by the aeration and percolation ponds and only storm water from the operations building and

parking lot discharges to a surface drainage that is tributary to the Russian River." Therefore, the storm water permit for the plant itself should not be required.

6. Page E-14, A.2, Surface Water Monitoring, requires monitoring of Russian River locations RSW-001 and RSW-002 (upstream and downstream of the Russian River discharge point) during discharge to the percolation ponds. This is in addition to Russian River monitoring at SS-1 and SS-2 (upstream and downstream of the percolation ponds) required under Groundwater on page E-15. The existing permit already requires Russian River monitoring at SS-1 and SS-2. The additional Russian River sampling at locations RSW-001 and RWS-002 during discharge to the percolation ponds seems redundant and unnecessary.
7. Page E-5, Footnote 6 says "effluent sampling for copper and lead." Please delete reference to lead. There is not requirement for effluent sampling for lead.
8. There are numerous incorrect footnote superscript number references throughout the tables in Attachment E. Please review all and correct references numbers.
9. Page F-41, Table F-8, lists the MDEL for Dichlorobromomethane incorrectly as 0.11 µg/L. Please correct the figure to 1.1 µg/L.

Thank you for the opportunity to comment on this important document. The City appreciates the time and effort made by Cathy Goodwin and other Regional Board staff working with the City and its consultant for this effort. Please do not hesitate to contact me if you have any questions.

Sincerely,



Craig A. Scott, Public Works Director/City Engineer
City of Cloverdale

Cc:
Cathleen Goodwin
Nina Regor
Jay Robinson
Paul Wade