

# CITY OF BLUE LAKE

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## TRANSMITTED VIA EMAIL

April 19, 2012

Mr. Roy O'Connor  
North Coast Regional Water Quality Control Board  
5550 Skylane Blvd, Suite A  
Santa Rosa, CA 95403

**Subject: Comments on Draft WDR Permit Renewal, City of Blue Lake  
WWTF, Blue Lake, California; WDID No. 1B811290HUM, Order No.  
R1-2012-0050**

Dear Mr. O'Connor:

The City of Blue Lake (City) is submitting the following comments with regard to the draft Waste Discharge Requirement (WDR) permit for our Wastewater Treatment Facility (WWTF) located in Blue Lake, California. These comments specifically address the draft of Order No. R1-2012-0050 and include reference to specific draft permit sections and page numbers where applicable. The City seeks a WDR permit that works and does not put the facility out of compliance upon issuance. Accordingly, the City requests RWQCB staff cooperation in resolving the important issues set forth below.

### ***Comments on Draft WDR Permit for the City of Blue Lake's WWTF***

- 1. Comment: Final Effluent Limitations – Discharge Point 001**
  - a. WDR Permit (p.4)**

Section IV.A. of the permit includes the final effluent limitations for Discharge Point 001, as listed in Table 4. This section includes reference to total nitrogen limitations for discharges to land and sets the effluent limitations for total nitrogen for the discharge based on limits presented in

other WDR permits in the region.

To date, the City has not collected any total nitrogen data from Discharge Point-001. We request that this effluent limitation be removed from this permit cycle, and we will monitor total nitrogen as prescribed in table C-2 of the Draft Monitoring and Reporting Program. Our primary reason for this request is that because the City does not have any total nitrogen data for our WWTF, we do not know whether we will be out of compliance upon issuance of the new permit. Under the monitoring program, we will establish a baseline for total nitrogen data. Additionally, the City spent the past two years under threat of litigation by River Watch, which was recently settled. The City is concerned that if we exceed the total nitrogen limit, we will be exposed to additional litigation.

**2. Comment: Special Studies, Technical reports and Additional Monitoring Requirements**

**a. WDR Permit (p.11)**

Section VIII. Q. General Provisions, Special Studies of the permit includes a requirement for a hydrogeologic Investigation work plan and subsequent summary report. The work plan is due within 12 months of permit adoption, and the associated summary report is due within 12 months of work plan approval. The City is in agreement with the schedule for the work plan submittal; however requests that the submittal of the hydrogeologic investigation summary report be submitted within 24 months of the work plan approval. The City needs to collect data in accordance with the work plan for one year to determine if there is seasonal variation.

**3. Comment: Facility Information**

**a. Fact Sheet (p. D-1)**

Section I.B. General Facility Information in the fact sheet states, “Three of these industrial connections – the Mad River Brewery, the Blue Lake Rancheria, and Blue Lake Power – are considered significant users.” The City requests that Calgon Carbon Corporation be added as a significant user, and the reference to “three of these industrial connections...” be modified to reflect this by stating “four of these industrial connections - the Mad River Brewery, the Blue Lake Rancheria, Calgon Carbon Corporation, and Blue Lake Power – are considered significant users.”

**b. Fact Sheet (p. D-1)**

Section I.C. Existing Wastewater Treatment and Reclamation Facility in the fact sheet states that “Three of the industrial connections, the Mad River Brewery, the Blue Lake Rancheria, and Blue Lake Power are considered significant users.” The City requests that Calgon Carbon Corporation be added as a significant user, and the reference to

“three of the industrial connections...” be modified to reflect this by stating “four of the industrial connections, the Mad River Brewery, the Blue Lake Rancheria, Calgon Carbon Corporation, and Blue Lake Power, are considered significant users.”

**c. Fact Sheet (p. D-2)**

Section I.C., Existing Wastewater Treatment and Reclamation Facility in the fact sheet states that “This pond contains two surface aerators.” Approximately nine months ago, the City added an additional aerator to Pond 1. The City requests that the number of aerators be modified to reflect this by stating, “This pond contains three surface aerators.”

Thank you for this opportunity to provide comments on the draft WDR permit for the City of Blue Lake’s WWTF. If you have any questions regarding the comments, please call me at 707-668-5655.

Sincerely,

John Berchtold (via email)  
City Manager

c: Mike Foget, SHN