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**To:** <skranhold@waterboards.ca.gov>  
**Date:** 10/25/2006 4:54:01 PM  
**Subject:** Comments on Draft C & D for Mule Creek State Prison

October 25, 2006

Scott Kranhold,

Thank you for the opportunity to comment on this document. My questions and observations are as follows.

1. In general, there are repeated statements that discharges to Mule Creek are retained on site and that Mule Creek is not flowing. While Mule Creek upstream of the facility is essentially dry this time of year, the stream bed contains significant amounts of water from the Highway 104 bridge downstream for well over a mile. At times of irrigation flow has been observed in Mule Creek exiting the facility. It is presumed that runoff from the prison is the main contributing factor to water observed in Mule Creek.
2. Bacti counts in the sample this office collected 21 September 2006 of tailwater runoff and the sample collected 10 October 2006 by Carlton Engineering from Mule Creek at the Highway 104 bridge suggest to me that disinfection may not be adequate, even with the use of polymer to improve solids retention. Mule Creek monitoring reports historically show only occasional bacti count excursions above the limits established by the WDRs. This may be worth a closer look.
3. Draft Cease & Desist, pg 3, para 16, line 7 - Missing text, "...wastewater was spilled into Mule Creek because a sprayfield pump was on overnight, resulting in runoff..."
4. pg 4, para 20, last sentence - Typo, "It is not known..."
5. pg 4, para 22 - My copy of Order No. 5-00-088 indicates Daily Max total coliform count to be 230, not 240 as shown in this draft. All other values look consistent. Was this revised?
5. pg 5, para 24 - Is it worth noting that bacteriological counts in the tailwater runoff I observed entering Mule Creek exceed WDRs? See attachments.
6. pg 7, para 33 - This office had requested and was promised by MCSP staff copies of the reports ordered by the NOV, but none have yet been received. Can we obtain copies from your office? Does the Wastewater Inflow and Reduction Evaluation Report evaluate increased discharges to ARSA or discharge to the City of Lone as required by the NOV? Does the report discuss reduction of prison population? Does it discuss placing any prohibitions on increased use within the service area, including Preston and the CDF Academy? The logistics of trucking the daily wastewater volume generated during dry weather, let alone wet weather flows, may not be feasible to safely accomplish. It is strongly recommended that input from the Amador County Transportation Commission, CHP and CalTrans be sought before agreeing to this as an interim solution.

7. pg 8, para 35 - WWTF = facility?

8. pg 13, para 19 & 20 - Should these milestones be in 2008 rather than 2009?

9. pg 14, para 20 - Typo, "reference the groundwater monitoring data collected for the facility..." Note the letter "i".

10. pg 14, para 21 - Should first quarter reports be due on April 15 rather than February 15?

11. Attachment B, pg 1 - Center column heading text overlap. Should footnote 4 state "beginning third quarter 2007" as does bold text in first paragraph, above? Is there a particular reason to avoid sampling groundwater during the first quarter of each year as stated in footnote 5? Brief review of three other facilities with WDRs which include groundwater monitoring did not have such an exclusion. Can MBAS be added to constituents tested for in ground and surface waters? This was found in Mule Creek downstream sample collected October 10, 2006.

12. pg 2, para 10 - Will monitoring requirements be adjusted, if warranted, based on the industrial waste stream constituents? We have on file a 17 December 1990 letter from Michael Higgins of the Regional Board referencing acetone, toluene, and methylene chloride in regard to a sludge disposal plan submitted 1 August 1990. It may be beneficial to review the information submitted with that plan.

13. This department requests copies of quarterly groundwater monitoring reports.

Again, thank you for the opportunity to comment,

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