

Memorandum

Date: October 13, 2011

To: Mr. Kenneth Landau
Mr. David Coupe
Ms Wendy Wyels
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

From: Carol Oz, Staff Environmental Scientist
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Subject: Proposed Cease and Desist order and Administrative Civil Liability Order, City of Colfax
Wastewater Treatment Plant, Placer County

It is the California Department of Fish and Game's (DFG) understanding that the intent of this Order is to address all outstanding issues at the City of Colfax wastewater treatment plant. These include: (a) the need to continue making improvements to the collection system, (b) the need to provide temporary operational flexibility to allow the City to drain the storage reservoir so that it may be lined and therefore prevent wastewater seepage, and (c) the need to re-evaluate whether the facility is able to comply with the WDR requirement to hold all water generated during a 100-year annual precipitation event. This Order also continues an updated interim effluent limit for copper, an interim year-round flow limit, and interim mass loading effluent limits.

The DFG is providing the following comments regarding the Proposed Cease and Desist order and Administrative Civil Liability Order, City of Colfax Wastewater Treatment Plant. The City of Colfax Wastewater Treatment Plant is permitted by the Regional Water Quality Control Board via a National Pollution Discharge Elimination System (NPDES) permit to discharge treated effluent into a tributary to Smuther's Ravine Creek, thence the American River. The mission of the DFG is to manage California's diverse fish, wildlife, and plant resources, and the habitats upon which they depend, for their ecological values and for their use and enjoyment by the public. To that end, DFG has been involved with the City of Colfax WWTP to reconcile chronic pollution problems caused by violation of the NPDES. The stream system below the plant which flows to Smuther's Ravine Creek has been degraded for many years due to problems with the WWTP discharge. In 2003, DFG documented high concentration of chlorinated water discharging from the WWTP to the stream which caused death of benthic macroinvertebrates. In 2007, I investigated an ammonia release to the stream; again observations included no live benthic macroinvertebrates in the stream below the plant. If the WWTP cannot meet discharge requirements, the plant often ceases any discharge, which dries up the stream. The stream either has a chronically disrupted hydrological cycle or receives polluted discharge periodically. Thus, there is no dependable continuity of water quality or quantity which is necessary to support healthy aquatic life. In 2008, DFG met with the RWQCB, the City of Colfax WWTP, and property owners on the stream below the plant. Discussions at that meeting included DFG's recommendations for several options that would help improve the stream habitat.

DFG recommends that the NPDES and this current Order consider the impact of the WWTP effluent quantity and quality on the tributary to Smuther's Ravine and actively pursue the best interest of the stream resource. DFG observes that there is a history of extending compliance deadlines at this plant. The deadlines proposed

in the Order such as providing a flow reduction report by 2013, sewer rehabilitation report, compliance with copper effluent limitations, and storage capacity study, by 2014 allow continued degradation of the water quality and quantity in the tributary below the plant. Therefore, DFG strongly recommends that the RWQCB consider moving the deadlines forward in order to more timely gain plant compliance and protection and restoration of the damaged natural resources below the plant.

Please contact me at (916) 358-2918 if you have any questions.

cc: Isabel Baer, DFG
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