

Sent: Wednesday, October 08, 2014 9:34 AM  
To: Madigan, John@Waterboards  
Subject: Calistoga Cease and Desist Order

Categories: Important

To San Francisco Regional Water Quality Control Board, Attn. John Madigan  
RE: Dunaweal Wastewater Treatment Plant- Tentative Cease and Desist Order  
From: Charlotte Williams for Citizens for Green Community

Dear Sir,

Thank you for the opportunity to comment on the tentative Cease and Desist Order for the City of Calistoga's Dunaweal Wastewater Treatment Plant to be discussed at

As a resident of the greater Calistoga area and a member of Citizens for Green Community, I have followed the inadequacies of the Calistoga wastewater plant and the city management's subsequent inability to comply with State and Federal regulations, with interest. Their failure to implement a 2001 agreement between the city and the local spas, the illegal discharge of treated wastewater into the river during low flow periods in defiance of their permit, and the saturation of spray fields on the banks of the Napa River during similar periods with seepage directly into the Napa River.

Calistoga's treated waste water is well documented to contain high percentages of boron, antimony, ammonia, cyanide, copper, and mercury- primarily sourced from the geothermal spas in the region. Knowing this to be the case, in 2001 an agreement was reached between the City and the management of the local spas to monitor the waste water from these sources and to establish a payment scale that would reflect the extra cost of either removing the mineral load or of increasing the storage capacity and developing other uses for the treated water. The action called out in this agreement has never been put in place. Antimony, a heavy metal considered a health risk, is cited in your tentative Cease and Desist as being present at levels greater than allowed. This water is currently watering a sprayfield that leaches into the Napa River as well as the playing fields of the Calistoga Jr Sr High School- at times approaching saturation.

While I believe that the City of Calistoga operates in good faith, I also believe that they need an increased "sense of urgency" to take their responsibilities to the public in this area more seriously. I would strongly support a Cease and Desist Order and would urge requiring the following action

1. the immediate implementation of the 2001 Agreement
2. installation of equipment that can remove nuisance pollutants from the waste water prior to discharge
3. relocation of the wastewater ponds away from the banks of the Napa River

City leadership has put the cart in front of the horse here and has focused their efforts on increasing revenue from Transient Occupancy Taxes (TOT) - approving approx. 300 (?) new hotel and resort units in the last year. While this could long term provide funding for improved city services it also increases the pressure on a wastewater system that cannot support the current population. I (we?) believe that it is critical that a moratorium on any new hookups to the existing wastewater system be immediately implemented until such time as the system is brought up to State and Regional standards.

I fervently hope that Calistoga can find the will to take their responsibility to public safety and the environment seriously and clean up this mess. Your concerns are warranted.

Respectfully,

Charlotte Williams