

DEPARTMENT OF CORRECTIONS AND REHABILITATION  
CALIFORNIA MEN'S COLONY  
P.O. BOX 8101  
SAN LUIS OBISPO, CA 93409-8101



October 4, 2005

Roger W. Briggs  
Executive Officer  
California Regional Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

Dear Mr. Briggs :

The California Men's Colony (CMC) is requesting to have violations #2 and #11 be dismissed, as addressed in your Mandatory Minimum Penalty letter dated September 19, 2005. Violations #2 and #11 are chlorine residual values set under CMC's discharge permit heading Effluent Limitations No. 6. These values are not to exceed the compliance conditions set-forth in our discharge permit under footnote No. 1 which states:

"Monitoring and Reporting Program No. 01-001 states, "Compliance determinations for total chlorine residual shall be based on 99% compliance. To determine 99% compliance with the effluent limitation specified above for total chlorine residual, the following conditions shall be satisfied: (1) The total time during which the total chlorine residual values are above 0.1 mg/L (instantaneous maximum value) shall not exceed 7 hours and 26 minutes in any calendar month; (2) No individual excursion from 0.1 mg/L shall exceed 30 minutes; and (3) No individual excursion shall exceed 2 mg/L."

The CMC Wastewater Treatment Plant (WWTP) has a chlorine analyzer that monitors the discharge of effluent for total chlorine residual continuously. It takes approximately 3 minutes to complete a cycle between samples. The charts are for a 24 hour duration each, and are changed every day at midnight for this unit.

Chart "A" (See Attached) is an example of the daily chart being used. as noted, the 30 minute, ½ hour, time frame is obvious. The charts also ranges from 0 to 5 mg/L total chlorine residual, also making an obvious mark on the chart. There are no spikes on this chart.

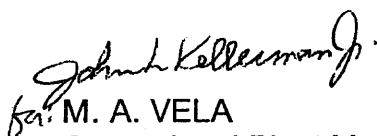
Chart "B" (See Attached) is from July 24, 2004. During the night between 2 A.M. and 3 A.M. there was a spike on the chart. As you can see, it was short in duration and would have had a residual of 0.3 mg/L. No other spikes were recorded or noted on this chart except one around 1245, it was 0.1 mg/L or less chlorine residual.

Chart "C" (See Attached) is from June 7, 2005. As you can see, there is hardly any deviation from the 0.0 mg/L line. The sample was collected around 0930, and the results in the lab were 0.18 mg/L total chlorine residual, thus under the 30 minute time requirement.

In addition to our chlorination/dechlorination system we have an Oxygen Reduction Potentiometer (ORP) probe in the effluent channel just before it leaves the plant to minimize chlorine violations. If the ORP senses a milli-volt reading above 240, it activates a second sodium bisulfite pump (de-chlorination chemical) as a redundant system. This system will increase or decrease the pump speed as necessary to bring the milli-volt reading to a normal level. Normally, We let the chlorine analyzer set the pace of the bisulfite pump (pulses per minute), adjusting the % of stroke according to the flow.

As indicated on the charts these residual valves did not exceed 30 minutes or exceed 2 mg/L per footnote No. 1.

If you have an questions on this matter please call Gerald Elwood, Chief Engineer at 805-547-7974



for: M. A. VELA  
Correctional Plant Manager II  
California Men's Colony

# Chart "A"

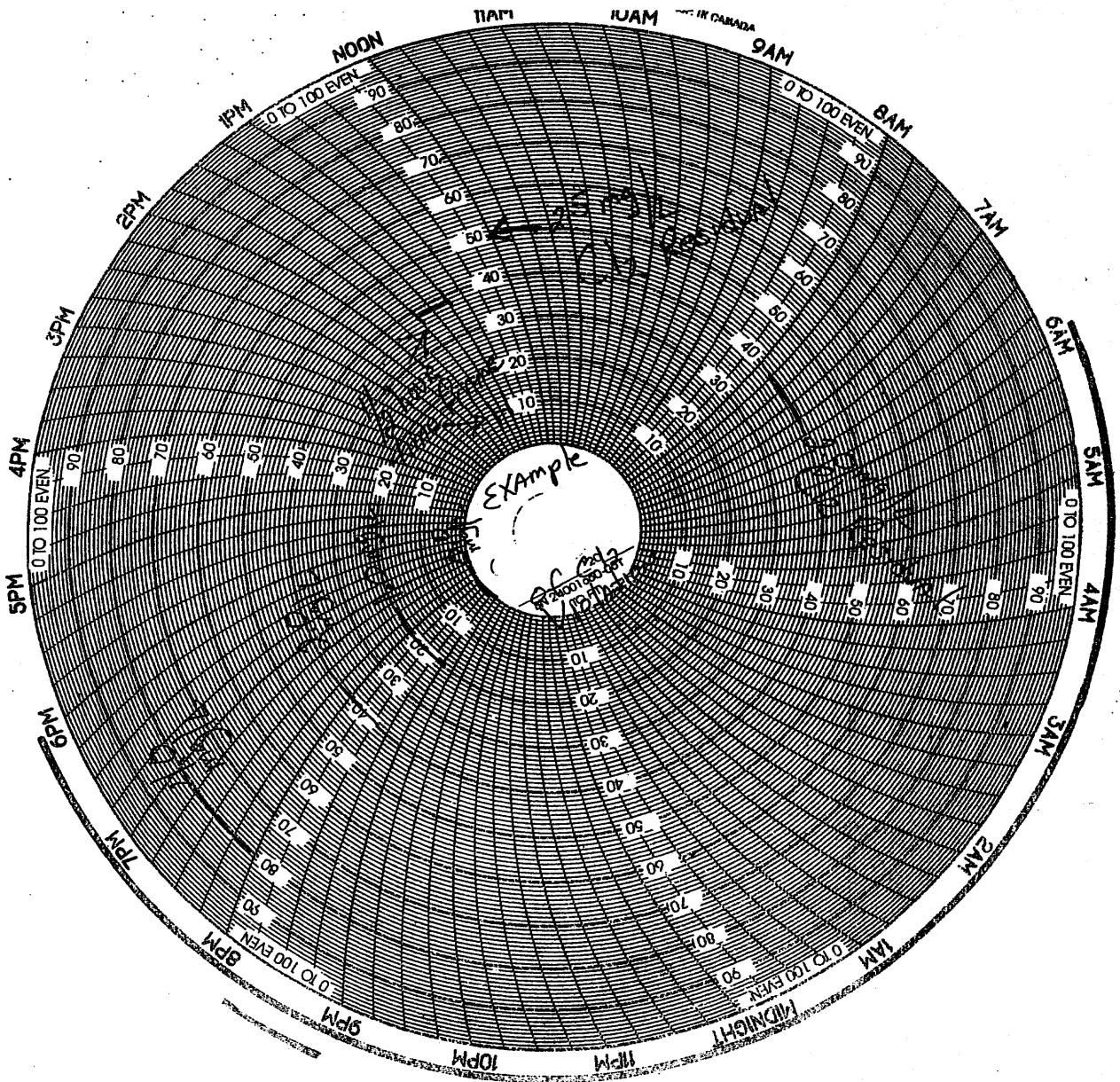




Chart "C"

