

February 16, 2012

Sheila Soderberg
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA. 93401-7906

Re: NPDES Compliance Evaluation Inspection (CEI) reports

Dear Ms. Soderberg,

PG Environmental, LLC (PG) is pleased to deliver draft NPDES inspection reports for the facilities shown on the table at the end of this letter. The enclosed inspection reports are drafts and subject to revision at the Water Board's request.

Please note that the inspection reports use descriptors of S - satisfactory, M - marginal, U - unsatisfactory and N - not evaluated/not applicable for each program area and sub-element of the checklist. The application of a U generally denotes a potential permit violation and is accompanied by a corresponding permit citation.

The Regional Water Board is encouraged to review the findings and determine the appropriate follow-up action. However, in an effort to assist the Water Board with processing these reports, the facilities have been prioritized with regard to appropriate follow-up for each report (as depicted in the attached table). The ratings of 1 - High, 2 - Medium, and 3 - Low are based on the severity of identified deficiencies and type of follow-up that may be required.

Rating 1-High - Identified deficiencies threaten human health and environment, high priority for a follow-up inspection by Regional Board inspectors.

Rating 2-Medium - Paperwork and minor deficiencies, identified deficiencies could be dealt with by issuing an NOV letter requesting updated paperwork and/or photo documentation of changed conditions be submitted to the Regional Board within a specified period of time.

Rating 3-Low - Facility is generally in compliance, minor paperwork deficiencies or no observed deficiencies, no follow-up contact believed to be needed at this time.

PG is providing two sets of the hardcopy report with color photos for each facility and a

CD with an electronic version of each report. Additionally, PG will e-mail the electronic version for each report. Please contact me directly at 703-707-8258 Ext. 101 with questions and comments regarding these inspection reports or photo logs.

Sincerely,



Maxwell Kuker
PG Environmental, LLC
570 Herndon Parkway
Suite 500
Herndon, VA 20170
703-707-8258 Ext. 101 (office)
703-707-8259 (fax)

cc: Ken Greenberg, EPA Region IX (electronic copy)
Fatima Ty, EPA Region IX (electronic copy)
Philip S. Isorena, SWRCB (electronic copy)
Wes Ganter, PG Environmental, LLC (electronic copy)

Table 1. NPDES Wastewater Compliance Evaluations Conducted by PG Environmental, LLC for the Central Valley Regional Water Quality Control Board

Agency Name	Facility Name	Permit No.	Order No.	Inspection Date	Facility Rating	Comments
Cuyama Community Services District	Cuyama WWTP	CA0046089	R3-2007-0020	12/12/2011	Rating 1 - High Priority Follow-up	<p><u>Permit</u></p> <ul style="list-style-type: none"> The permit and Facility schematic do not accurately describe the Facility as the Discharger recently installed UV light disinfection. A ROWD has not been submitted within 180 days of date of expiration. <p><u>Records/Reports</u></p> <ul style="list-style-type: none"> Sample analysis was not performed for July 2011 due to a contract laboratory error. The Discharger reported the monitoring results for August 2011 in the July 2011 SMR. <p><u>Facility Site Review</u></p> <ul style="list-style-type: none"> Solids accumulation was observed at Discharge Point 001. <p><u>Flow Measurement</u></p> <ul style="list-style-type: none"> The Discharger had not calibrated the effluent flow measurement device for three years. <p><u>Self-Monitoring Program</u></p> <ul style="list-style-type: none"> Although Facility personnel conduct pH analysis at the on-site laboratory, the Discharger reports their contract laboratory pH analysis which appeared to be conducted approximately 24-48 hours after sample collection. The Discharger had not conducted receiving water monitoring during the permit term and was not aware of the requirements for receiving water monitoring. <p><u>Laboratory</u></p> <ul style="list-style-type: none"> The Discharger does not distinguish sample collection time versus sample analysis time for pH; therefore, the inspectors could not verify if the on-site pH is measured within 15 minutes of sample collection. Facility laboratory was not ELAP certified and had not developed written procedures for a QA/QC Program. Buffer solutions used to conduct calibration of pH measurement equipment were expired. The laboratory did not have the following records: SOPs, QA/QC

Agency Name	Facility Name	Permit No.	Order No.	Inspection Date	Facility Rating	Comments
						<p>document, or calibration and maintenance of equipment.</p> <p><u>Operation and Maintenance</u></p> <ul style="list-style-type: none"> • The Facility does not have a backup power supply. • The Discharger has a daily duties sheet, but does not maintain a daily operations log book. • The Discharger did not have a formal preventative maintenance program in place. • The Discharger does not have a formal system for tracking or scheduling equipment maintenance. • It did not appear that the operations staff had adequate training to operate and maintain the UV light disinfection system.
<p>Montecito Sanitary District</p>	<p>Wastewater Treatment Facility</p>	<p>CA00478994</p>	<p>R3-2006-0084</p>	<p>12/13/2011</p>	<p>Rating 2 - Medium Priority Follow-up</p>	<p><u>Facility Site Review/Storm Water</u></p> <ul style="list-style-type: none"> • The biosolids storage/loading area and storm water detention area is located upgradient of what appeared to be a storm water discharge location which was adjacent to the Facility's new laboratory building. Facility personnel stated that all storm water is maintained on site and flows back to the headworks. It was explained that they have issues with run on from the adjacent railroad. BMP's implemented along the perimeter in this location were in need of maintenance and an area of standing water was observed. <p><u>Self-Monitoring Program</u></p> <ul style="list-style-type: none"> • Influent sample collection and flow measurement locations are not representative of the Facility's influent as the in-plant return flows are commingled with raw influent prior to sample collection locations. <p><u>Laboratory</u></p> <ul style="list-style-type: none"> • The Discharger does not distinguish sample collection time versus sample analysis time for pH or total residual chlorine; therefore, the inspectors could not verify if the on-site pH and TRC are measured 15 minutes of sample collection. • Laboratory does not monitor the temperature of the influent composite sampler; therefore, the inspectors could not verify that adequate refrigeration was in use for influent BOD or TSS sample collection.

Agency Name	Facility Name	Permit No.	Order No.	Inspection Date	Facility Rating	Comments
Carpinteria Sanitary District	Wastewater Treatment Facility	CA0047364	R3-2011-0003	12/14/2011	Rating 2 - Medium Priority Follow-up	<p><u>Records/Reports</u></p> <ul style="list-style-type: none"> A transcription error was found in the Discharger's reporting spreadsheet for total residual chlorine grab sample monitoring and total chlorine usage data. The Discharger was unsure how far back the error may have affected their reporting. No permit limit exceedances were noted for the data reported or after the error was corrected. <p><u>Facility Site Review</u></p> <ul style="list-style-type: none"> Solids accumulation was observed at the secondary clarifier overflow weirs which appeared to be causing uneven flow distribution over the weirs. <p><u>Flow Measurement</u></p> <ul style="list-style-type: none"> Influent flow measurement does not provide representative flows as the Discharger does not adjust reported flow data to account for in-plant return flows. <p><u>Laboratory</u></p> <ul style="list-style-type: none"> Laboratory does not monitor the temperature of the influent composite sampler; therefore, the inspectors could not verify that adequate refrigeration was in use for influent BOD or TSS sample collection.
Summerland Sanitary District	Summerland WWTP	CA0048054	R3-2008-0009	12/15/2011	Rating 2 - Medium Priority Follow-up	<p><u>Records/Reports</u></p> <ul style="list-style-type: none"> Transcription errors were noted for the max and min pH being reported to CIWQS. Discharger has been reporting minimum values for maximum's and vice versa. <p><u>Flow Measurement</u></p> <ul style="list-style-type: none"> The Discharger had not calibrated the effluent flow measurement device in 2010. <p><u>Laboratory</u></p> <ul style="list-style-type: none"> The laboratory did not have the following records: written QA/QC program, calibration and maintenance records for laboratory equipment. The Discharger does not distinguish sample collection time versus sample analysis time for pH or total residual chlorine; therefore, the inspectors could not verify if these parameters are measured within 15 minutes of sample collection.

EPA Region IX and California Water Resources Control Board

NPDES Compliance Evaluation Inspection (CEI) Report

Name and Location of Facility Inspected Carpinteria Sanitary District Wastewater Treatment Facility 5351 Sixth Street Carpinteria, CA 93013		Entry Date 12/14/2011 Entry Time 8:05 AM	Permit Effective Date 3/25/2011
NPDES Permit Number CA0047364	Order Number R3-2011-0003	<input checked="" type="checkbox"/> Major <input type="checkbox"/> Minor	Permit Expiration Date 3/25/2016
Name(s) & Title(s) of On-Site Representative(s) Craig Murray (General Manager) Mark Bennett (Operations Manager) Mark Reynolds (Treatment Supervisor) Frank Gonzalez (Laboratory Director)		Contact Information Phone: (805) 684-7214 ext. 17 Fax: (805) 684-7213	Notified of Inspection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Name, Title & Address of Responsible Official Craig Murray (General Manager) 5300 Sixth Street Carpinteria, CA 93013		Contact Information Phone: (805) 684-7214 ext. 12 Fax: (805) 684-7213	Official Contacted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Inspector(s) Primary: Luz Slauter (PG Environmental, LLC) Other(s): Kortney Kirkeby (PG Environmental, LLC) Peter Von Langen (Central Coast Water Board)			Presented Credentials? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Weather Conditions at the Time of the Inspection: Sunny; no recent precipitation		Facility Receiving Water Name: Pacific Ocean	
Overview of Areas Evaluated During Inspection <i>S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated</i>			
Permit: S	Flow Measurement: S	Biosolids/Solid Waste Handling & Disposal: S	
Records/Reports: U	Self-Monitoring Program: U	Compliance Schedules: N	
Facility Site Review: M	Laboratory: S	Pretreatment (POTWs Only): N	
Effluent and Receiving Waters: S	Operations & Maintenance: S	Storm Water: N	
Prepared By: Luz Slauter (PG Environmental, LLC) on 1/13/2011			
Reviewed By: Max Kuker (PG Environmental, LLC) on 2/8/2012			

Facility Narrative

On December 14, 2011 a USEPA contractor inspected the Carpinteria Sanitary District Wastewater Treatment Facility in Carpinteria, CA. Discharges from the Facility are regulated by Central Coast Water Board Order No. R3-2011-0003 (NPDES Permit No. CA0047364). The primary purpose of the inspection was to determine the accuracy and reliability of the Discharger's self-monitoring and reporting program. The primary on-site Facility representatives were Craig Murray (General Manager), Mark Bennett (Operations Manager) and Mark Rogers (Treatment Supervisor).

The Carpinteria Sanitary District (CSD or Discharger) owns and operates the Carpinteria Wastewater Treatment Facility (Facility). The Discharger provides sewerage service for a population of approximately 17,000 in the City of Carpinteria and portions of Santa Barbara County (unincorporated Carpinteria Valley). According to the primary on-site Facility representatives, the Discharger maintains approximately 40 miles of sewer pipe and seven pump stations. There are no known industrial users in the service area.

The Facility provides secondary level treatment of wastewater. Treatment consists of screening, grit removal, primary sedimentation, aerated activated sludge, secondary clarification, chlorination, and dechlorination. Treated effluent is directed to the Pacific Ocean through Discharge Point 001. Sludge processing consists of aerobic digestion and dewatering via belt press or rotary screw press.

The inspectors visually evaluated the treatment train (in order from headworks to discharge) and site conditions in the presence of the primary on-site Facility representatives and determined that all mechanical treatment units were functioning properly with the exception of the secondary clarifiers. Specifically solids accumulation along the overflow weirs appeared to be causing uneven flow distribution. Refer to the 'Major Findings – Facility Site Review' section of this report for details.

The Facility's design capacity (design dry weather flow) is 2.5 million gallons per day (mgd). The reported average flow rate for October 2011 was 1.3 mgd. The instantaneous influent flow was 1.7 mgd (1,199 gallons per minute (gpm)) at 9:07 AM. The instantaneous effluent flow was 1.5 mgd (1,030 gpm) at 9:12 AM.

The Facility's operations and laboratory personnel conduct self-monitoring activities. Influent samples are collected immediately after screening and effluent samples for Discharge Point 001 are collected at the terminus of the chlorine contact chamber immediately after dechlorination. The sample collection for influent monitoring was found to not provide a representative sample due to in-plant return flows from the Facility not being accounted for. Refer to the 'Major Findings – Self Monitoring Program' section of this report for details. All samples are analyzed at an on-site laboratory and at a contract laboratory.

Self monitoring reports (SMRs) and Discharge Monitoring Reports (DMRs) for the period of August 2011 through October 2011 were reviewed as a component of this inspection. The review included a comparison of reported monitoring results versus requirements and limitations contained within the permit. No permit limit exceedances were identified. The evaluation also included a comparison of data points reported in SMRs submitted to the Central Coast Water Board against the laboratory bench sheets and contract laboratory reports documenting the actual analytical results. Transcription discrepancies were identified and are presented in the 'Records/Reports' section of this report.

The primary on-site Facility representatives were not aware that the Discharger had received written reports regarding previous inspections conducted. According to the Facility At-A-Glance report on CIWQS, the date of the last inspection conducted at the Facility was October 26, 2010 by a Central Coast Water Board representative. It should also be noted that an inspection report for this previous inspection was not obtained by the PG Environmental, LLC inspection team.

Major Findings

Facility Site Review

1. Central Coast Water Board Order No. R3-2011-0003, Attachment D – Standard Provisions, Section I.D requires that the Discharger “shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Discharger to achieve compliance with the conditions of this Order.” Algae build-up and solids accumulation was observed along the secondary clarifier overflow weirs which appeared to be causing uneven flow distribution (refer to Photos 2 and 3). Note that algae build-up and solids accumulation were observed in numerous locations in both clarifiers. According to the Facility’s Operations Manager, the secondary clarifier weirs are scheduled to be cleaned on a weekly basis and he stated the condition seen during the inspection was not typical and would be investigated and addressed immediately.

Self-Monitoring Program

1. Central Coast Water Board Order No. R3-2011-0003, Attachment E – Monitoring and Reporting Program, Section III.A.1 requires that for the influent monitoring location.... “sampling stations shall be established at each point of inflow to the treatment plant, and shall be isolated from and/or corrected for any in-plant return flows in order to obtain representative samples of the influent.” Influent samples were found to be collected and flow to be measured downstream of the point where the Facility’s in-plant return flows and storm water collected from Lift Station No. 3 are combined with raw influent piping. The primary on-site Facility representatives stated that this permit requirement was discussed during the Discharger’s permit renewal process. The Discharger installed their influent flow Magmeter approximately five years ago and expressed concern because they do not currently have methods to differentiate raw influent samples versus in-plant return flow samples, and that they do not have monitoring equipment that could be installed to account for the in-plant return flows. It should be noted that the current method of influent sample collection has the potential to effect compliance determination when calculating effluent BOD and TSS percent removals.

It should also be noted that as per the Facility’s primary on-site Facility representatives, the Discharger had expressed concern that this isolated influent sampling station requirement had been included in their permit since they installed the Facility’s influent Magmeter approximately five years ago. Further, the Facility’s primary on-site Facility representatives stated it would be a costly effort to move the influent flow measurement location and/or relocate the in-plant return flow lines. However, the Facility’s primary on-site Facility representatives stated that they would investigate a way to account for the belt press and screw press return flows.

2. Central Coast Water Board Order No. R3-2011-0003, Attachment D – Standard Provisions, Provision III.B requires that monitoring must be conducted according to test procedures under 40 CFR Part 136. 40 CFR 136.3, Table II requires samples to be preserved at less than or equal to six degrees Celsius. The influent composite sampler was not equipped with a

thermometer; therefore, the inspectors were not able to verify if previously collected samples were preserved in accordance with 40 CFR 136. The Facility's Laboratory Director was not aware of this requirement for the influent composite sampler and stated that he would address this issue immediately.

Attachments:

CEI Photo Log
CEI Exhibit Log

PERMIT:

OVERALL RATING: S

INSPECTED ITEM	EVAL
1. Current copy of Facility's NPDES permit available on site.	S
2. Correct name and mailing address of permittee identified on NPDES permit.	S
3. Facility is as described in permit.	S
4. a. Notification given to Regional Water Board of process/production modifications, collection system expansions, etc. that impacted quality/quantity of discharge or changes to the Facility or increased discharge. b. Permit modification received, if required, prior to changes.	S N
5. Recent permit modifications, amendments or compliance orders on file.	S
6. Number of discharge outfalls the same as listed in the permit.	S
7. Name of receiving waters listed correctly in the permit.	S
8. Permit status (i.e., Current, Expired, or Extended)	Current
9. Permit renewal application submitted to the Regional Water Board at least 180 days prior to the expiration date.	N
10. Other:	N

Notes:

This section was rated "satisfactory" because all checklist items reviewed were rated satisfactory.

RECORDS/REPORTS:

OVERALL RATING: M

INSPECTED ITEM	EVAL
<p>1. NPDES records maintained for the time period required (5 years):</p> <p>The following records and reports were requested and observed:</p> <ul style="list-style-type: none"> - Current permit, monitoring and reporting program, and standard provisions - Latest three months of DMRs and SMRs (August 2011 through October 2011) - 2010 Annual Report (dated January 16, 2011) - 2010 Annual Biosolids Report - Flow meter calibration records - Flow measurement records - Maintenance records - 2010 Outfall Inspection Report (dated September 11, 2010) - Spill and bypass records - Operation log books - Auxiliary power check log records - On-site laboratory certification and latest WP-195 QA report (dated June 16, 2011) - Contract laboratory records and chain-of-custodies 	<p>Yes</p>
<p>2. a. Did the Facility document any spills or bypasses during the period reviewed?</p> <p>b. Spills and bypasses reported and documented as required by the permit (i.e., as soon as possible, but no later than 24 hours from the time the permittee first became aware of the circumstances).</p> <p>c. Follow-up written documentation given as required by the permit (within 5 days in most cases).</p> <p>Central Coast Water Board Order No. R3-2011-0003 regulates the Facility and the associated collection system.</p> <p>Records of three spills were reviewed. The three spills appeared to be minor, cleaned-up properly, and reported to the Central Coast Water Board as required by the Permit.</p>	<p>Yes</p> <p>Yes</p> <p>S</p>

RECORDS/REPORTS:

OVERALL RATING: M

INSPECTED ITEM	EVAL
<p>3. Discharge monitoring report (DMR) and/or self monitoring report (SMR) evaluation:</p> <ul style="list-style-type: none"> a. The responsible person or designee signs and certifies the DMRs and/or SMRs. b. The Facility monitors more frequently than required by the permit. c. All data collected are summarized on the DMRs and/or SMRs. d. Data reported on DMRs and/or SMRs is consistent w/ analytical results. e. Coliform concentrations calculated as required by the permit (e.g., median, geometric mean). f. Numerical values for minimum detection limits are reported on DMRs and/or SMRs when laboratory reports "Not Detected" or "0" (for example, MDL= 3, Report: "<3" on DMR). g. "Less than values" properly carried through loading calculations. h. Flow measurement period used for loading calculations brackets the sampling period. i. Influent and/or effluent loading rates properly calculated; if required. j. Number Exceeding (N.E.) properly reported on all DMRs and annual reports. 	<p>S No S M S S S S N</p>
<p><i>3d. The inspectors found a transcription error in the Discharger's data reporting spreadsheet for the period of review (August through October 2011). The Discharger is required to monitor total residual chlorine (TRC) continuously and is also required to report a daily chlorine usage.</i></p>	
<p><i>Laboratory personnel conduct a daily grab sample analysis which is programmed in the spreadsheet to be used to calculate the daily chlorine usage data that is reported in the SMRs and DMRs. The inspectors discovered that the spreadsheet was not calculating the daily chlorine usage using the daily grab TRC and was instead calculating based on the average daily continuously monitored TRC data.</i></p>	
<p><i>The primary on-site Facility representatives did acknowledge the spreadsheet error and the programmed calculation was corrected immediately. Although no effluent limitaiton exceedances were noted due to this spreadsheet discrepancy, the calculated values were observed to be slightly higher than data previously reported (e.g. average loading of 0.20 lb/d versus 0.25 lb/d).</i></p>	
<p><i>The inspectors recommended that the Discharger confer with the Central Coast Water Board and the State Water Resources Control Board on how to correctly report the transcription error and determine if the Discharger would need to submit corrected SMR and DMR data. The Facility's Operations Manager was unsure of the time frame the error may have affected the data and stated he would conduct and investigation to determine a timeframe for the data needing to be corrected.</i></p>	

RECORDS/REPORTS:

OVERALL RATING: M

INSPECTED ITEM	EVAL
4. Reports completed in the time frame and frequency as required by the permit (not all reports required for all facilities): <ul style="list-style-type: none"> a. DMRs and/or SMRs b. Biosolids Monitoring Reports c. Biosolids Management Reports d. CSO/ I&I Reports e. Compliance Schedule Reports f. Pretreatment Reports g. Other: <i>4d. The collection system and associated records were not reviewed during the inspection.</i>	S S N N N N N
5. Sampling and analytical records (for water and biosolids) include: <ul style="list-style-type: none"> a. Dates, times, and location of sampling b. Names of individuals performing sampling c. Analytical methods d. Results of analyses e. Dates of analyses f. Time of analyses, as necessary to verify holding times g. Analysts' names or initials h. Instantaneous flow at grab sample stations, if required 	S S S S S S S N
6. Plant records include: <ul style="list-style-type: none"> a. Daily plant operational records or log book b. Equipment maintenance records and schedules c. CSO/lift station check records or log book d. Records of auxiliary power checks e. Spill Prevention Control and Countermeasure (SPCC) plan f. Pollution Prevention Plan (P3) g. Storm Water Pollution Prevention Plan (SWPPP) h. Influent and/or effluent flow measurement records maintained for the past three years i. Other: 	S S N S N N N S N
7. All records and reports required by the permit appear to be organized and available for inspection.	S
8. Other:	N
Notes: <i>This section was rated "marginal" due to checklist item 3d.</i>	

FACILITY SITE REVIEW:

OVERALL RATING: M

INSPECTED ITEM	EVAL
<p>1. All treatment units and supporting equipment are in service and mechanically functioning properly.</p> <p>The Facility's treatment train consists of the following:</p> <ul style="list-style-type: none"> - One mechanically cleaned bar screen (in use) and one manually cleaned bar screen (standby) - One primary clarifier - Two aeration basins (both in use) - Two secondary clarifiers (both in use) - One chlorine contact tank (hypochlorite disinfection and sodium bisulfite dechlorination) <p>The Facility's solids handling process consists of the following:</p> <ul style="list-style-type: none"> - One aerobic digester - One screw press (operated alternately with belt press; in standby) - One belt press (in use) <p>Solids accumulation along the secondary clarifier overflow weirs appeared to be causing uneven flow distribution. Refer to the 'Major Findings - Facility Site Review' section of this report for details.</p>	<p>U</p>
<p>2. Hydraulic and organic loadings are consistent with the fact sheet and plant design criteria.</p> <p>a. Are there signs of overloading to the Facility and collection system, including I&I and septage loading?</p>	<p>S</p> <p>S</p>
<p>3. Peak flows remain within the established plant capacity.</p> <p>a. If flows have exceeded capacity, has the Regional Water Board been notified?</p>	<p>S</p> <p>N</p>
<p>4. Lift stations are properly monitored, maintained, have a back-up power source and are not subject to chronic spills and/or overflows.</p> <p>Lift stations in the collection system were not reviewed as a component of this inspection.</p>	<p>N</p>
<p>5. Odors are adequately controlled, resulting in limited complaints.</p>	<p>S</p>
<p>6. Residual chlorine monitoring is well documented and sampling/monitoring is representative of the discharge.</p> <p>a. If a UV system is used, the dosage intensity, tubes, and alarms are adequate, maintained and documented.</p>	<p>S</p> <p>N</p>

FACILITY SITE REVIEW:

OVERALL RATING: M

INSPECTED ITEM	EVAL
7. Housekeeping procedures are adequate to prevent release of pollutants to the environment: a. Adequate dikes and secondary containment b. Spill containment and clean-up c. Signs of spillage to soil, groundwater, or surface water d. Storm water and leachate management from storage piles e. Leaking pipes, pumps, etc. f. Drum and chemical storage areas g. Minimization of pollutants entering storm water outfalls h. Other open dumps or debris piles i. Other:	S S S S S S S S N
8. Signs of tank deterioration and/or settlement.	S
9. Safety concerns are present that may interfere with proper operation, maintenance, and/or monitoring.	S
10. Material Safety Data Sheets (MSDS) are available for stored chemicals.	S
11. Equipment available for spill clean-up and containment.	S
12. Other:	N
Notes: <i>This section was rated "marginal" because the inspector did not believe that checklist item 1. was significant enough to down grade the overall rating to unsatisfactory.</i>	

EFFLUENT AND RECEIVING WATERS:

OVERALL RATING: S

INSPECTED ITEM	EVAL
<p>1. Recent DMR and/or SMR history (last 3 months) (outfall number(s) 001):</p> <ul style="list-style-type: none"> a. Violations of discharge limits b. Spills/bypasses c. Fish kills or other receiving water impacts d. WET testing results are in accordance with the permit e. If effluent limit violations have been identified, what actions has the Facility taken to eliminate or reduce their recurrence? <p>1a. Determination of effluent limit exceedances was made based upon a review of data contained within the monthly SMRs. No effluent limit exceedances were identified.</p>	<p>S S S S N</p>
<p>2. DMR and/or SMR spot check August, September, October 2011 conducted for the Months of:</p> <ul style="list-style-type: none"> a. Internal lab sheets and contract lab results properly transferred to DMRs b. Monthly average, weekly, maximum, etc., values correctly calculated per the permit c. Influent and effluent loadings reported d. DMR and/or SMR is accurate and complete for each outfall <p>2a. The inspectors identified a transcription error in the Discharger's SMR reporting spreadsheet with regards to total residual chlorine. This checklist item is accounted for in the 'Records/Reports' section of this report.</p>	<p>M S S S</p>
<p>3. Appearance of effluent during inspection:</p> <ul style="list-style-type: none"> a. The effluent(s) was viewed during the inspection b. Excessive foam, scum, or sheens present c. Cloudy and/or color d. Excessive solids e. Other: <p>The final effluent was viewed at the terminus of the chlorine contact basin (refer to Photo 4).</p>	<p>Yes S S S N</p>
<p>4. Appearance of receiving water(s) during inspection:</p> <ul style="list-style-type: none"> a. The receiving water(s) was viewed during the inspection b. Distinctly visible foam or sheens on receiving water c. Biosolids accumulation or deposits of solids below discharge point(s) d. Distinctly visible plume from discharge(s) to receiving water e. Discharge creates objectionable odor at or near receiving water(s) f. Other: <p>The Facility discharges 1,000 feet offshore; therefore, the receiving water in the vicinity of the discharge point was not viewed.</p>	<p>No N N N N N</p>
<p>5. Other:</p>	<p>N</p>
<p>Notes: This section was rated "satisfactory" because checklist item 2a. was accounted for in the 'Records/Reports' section of this report.</p>	

FLOW MEASUREMENT:

OVERALL RATING: S

INSPECTED ITEM	EVAL
<p>1. Flow Measurement devices and methods:</p> <p>Influent Measurement: Primary Device: <u>Magmeter</u> Secondary Device: <u>N/A</u></p> <p>Effluent Measurement: Primary Device: <u>Rectangular Weir</u> Secondary Device: <u>Ultrasonic transducer</u> Other method of estimating flow: <u>N/A</u></p> <p><i>It should be noted that the Facility is equipped with two effluent flow meters (both rectangular weirs equipped with ultrasonic transducers; one located at the terminus of the chlorine contact channel and the other located at the beginning of the chlorine contact channel). Effluent flow can be diverted through a chlorine contact pipe from the beginning of the chlorine contact channel to Discharge Point 001 when the chlorine contact channel is taken out of service for maintenance.</i></p>	<p>S N S S N</p>
<p>2. Flow measurement devices designed to meet permit requirements (“continuous measured,” “continuous record,” etc.).</p>	<p>S</p>
<p>3. Flow measurement location is representative of the actual discharge (considering return and bypass lines, etc.).</p> <p><i>Influent flow is measured at a point that includes in-plant return flows. This checklist item is accounted for in the 'Self-Monitoring Program' section of this report.</i></p>	<p>U</p>
<p>4. Flumes:</p> <ul style="list-style-type: none"> a. Approach channel straight for at least 10 times the maximum head height in flume b. Flow enters flume evenly distributed across the channel and free of turbulence, boils, or other disturbances c. The flume is clean and free of debris or deposits d. All flume dimensions appear accurate, level, and plumb e. Flume head is being measured properly f. Flume is appropriately sized to measure the existing range of flows g. No obstructions downstream causing inaccurate flow measurement due to excessive “submergence” in flume h. Proper flow tables being used 	<p>N N N N N N N N</p>

FLOW MEASUREMENT:

OVERALL RATING: S

INSPECTED ITEM	EVAL
5. Weirs: a. Approach channel straight for at least 10 times the maximum head height b. Flow in the approach channel is evenly distributed and free of turbulence, boils, or other disturbances c. No solids accumulation in the bottom of the approach channel d. Weir crest is located at least two times the maximum head height off the floor of the flow channel e. The weir plate is level, plumb and without distortions f. Weir is beveled on downstream side if plate is >1/8 inch thick g. No leakage around the weir plate h. Measuring point located at least 3 times the maximum head height behind (upstream of) the weir i. There is free-fall and access for air below the nappe of the weir (i.e., water doesn't cling to the weir plate) j. Weir sized properly to measure the existing range of flows k. Proper flow tables being used for weir type and size Note checklist items are rated for the weir at the terminus of the chlorine contact channel.	S S S S S N S S S S N
6. Secondary flow device properly installed and maintained, and operating without interference from foam, turbulence, webs, etc.	S
7. Date of last flow meter calibrations: Influent: 2/1/2011 Performed by: <u>Southwest Services (Arcadia, CA)</u> Effluent: 2/1/2011 Performed by: <u>Southwest Services (Arcadia, CA)</u> Note influent flow meter (Magmeter) date corresponds to flow verification activities conducted by the Discharger's contract technician. Note the effluent flow meter calibration date includes both effluent flow meters.	S S
8. Calibration checks by plant personnel routinely performed.	S
9. Calibration records (external and internal checks) maintained.	S
10. Other:	N
Notes: This section was rated "satisfactory" because checklist item 3. was accounted for in the 'Self Monitoring Program' section of this report.	

SELF-MONITORING PROGRAM:

OVERALL RATING: U

INSPECTED ITEM	EVAL
<p>1. Sampling locations, type, methods, and frequencies conform to the NPDES permit for all required samples (including influent, effluent, biosolids, receiving stream, etc.). Details concerning the Discharger's self-monitoring activities can be found in the 'Facility Narrative' section of this report.</p> <p>Influent sampling and flow measurement are conducted at a point which includes in-plant return flows. Refer to the 'Major Findings - Self-Monitoring Program' section of this report for details.</p>	U
<p>2. Sampling locations and methods provide representative samples.</p> <p>a. Grab samples are collected during peak flow conditions rather than low-stress conditions</p> <p>b. Composite sampling procedures comply with the permit (time vs. flow weighted)</p> <p>c. Other:</p>	S S N
<p>3. Automatic samplers and other sampling equipment are properly cleaned.</p>	S
<p>4. Samples are preserved using methods listed in 40 CFR, Part 136 (e.g., chilled, acidified). The on-site laboratory does not monitor the temperature of the influent composite sampler; therefore, the inspectors could not verify that samples are preserved in accordance with 40 CFR 136. Refer to the 'Major Findings - Self-Monitoring Program' section of this report for details.</p>	U
<p>5. Sample containers are as listed in 40 CFR, Part 136.</p>	S
<p>6. Chain-of-custody is maintained and documented.</p>	S
<p>7. Samples are collected using approved protocols:</p> <p>a. Coliform samples are collected directly into sterilized containers</p> <p>b. BOD samples are collected prior to disinfection or reseeded</p> <p>c. Oil and grease samples are collected directly into glass containers</p> <p>d. Other:</p>	S S S N
<p>8. Other:</p>	N
<p>Notes: This section was rated "unsatisfactory" due to checklist items 1. and 4.</p>	

LABORATORY:

OVERALL RATING: **S**

INSPECTED ITEM	EVAL
1. On-site laboratory is ELAP-certified? a. List parameters analyzed at the on-site laboratory that are used for DMR reporting: <u>pH, settleable solids, total residual chlorine, BOD, total and fecal coliform, TSS, turbidity, temperature, and dissolved oxygen</u> b. List additional parameters analyzed for internal monitoring and process control: <u>Total solids</u> ELAP Certification No. 1763, certification expires on May 31, 2012.	Yes
2. EPA-approved analytical methods are used by the on-site laboratory?	S
3. Adequate equipment and procedures used for on-site analyses: a. BOD and CBOD b. TSS c. pH d. Dissolved Oxygen e. Residual Chlorine f. Temperature g. Other:	S S S S S S N
4. On-site laboratory records include: a. Laboratory SOPs b. Calibration and maintenance of equipment c. Equipment operating instructions and manuals	S S S
5. Adequate spare parts and supplies for on-site analyses.	S
6. Results of latest external DMR QA study are available and are acceptable. Date of last report: 6/16/2011 The results of the most recent WP-195 (in lieu of DMR QA) report were reviewed and a rating of "acceptable" was noted for each parameter.	S
7. Satisfactory refrigeration in use.	S
8. Certified contract laboratory(s) being used:	S

LABORATORY:

OVERALL RATING: S

INSPECTED ITEM		EVAL
Laboratory Name: Fruit Growers Laboratory (FGL)	Laboratory Name: Aquatic Bioassay & Consulting Laboratories, Inc.	
Visited? No	Visited? No	
Address: 853 Corporation Street Santa Paula, CA 93060	Address: 29 North Olive Street Ventura, CA 93001	
Phone: (805) 392-2000	Phone: (805) 643-5621	
Parameters: Metals, phenolics, oil and grease, and priority pollutants	Parameters: Toxicity	
9. EPA-approved analytical procedures are identified on contract lab report.		S
10. Holding times being met by on-site and/or contract laboratory.		
a. pH measured in situ or within 15 minutes of sample collection.		S
b. Residual chlorine measured in situ or within 15 minutes of sample collection.		S
11. Other:		N
Notes: <i>This section was rated "satisfactory" because all checklist items reviewed were rated satisfactory.</i>		

OPERATIONS AND MAINTENANCE:

OVERALL RATING: S

INSPECTED ITEM	EVAL
1. Preliminary treatment units (bar screens, comminuters, grit channels, etc.) properly maintained with wastes properly disposed.	S
2. Adequate oxygen maintained in aerated treatment systems.	S
3. No operational problems caused by hydraulic "short-circuiting" in treatment units. Solids accumulation was observed at the secondary clarifier overflow weirs which appeared to be causing uneven flow distribution. This checklist item is accounted for in the 'Facility Site Review' section of this report.	U
4. Biosolids wasting/return rates adequate to maintain system equilibrium.	S
5. Operation and Maintenance (O&M) Manuals and supporting information organized and maintained for use: a. Plant O&M Manual b. Equipment manuals c. Plant engineering drawings d. Collection system drawings available or in development e. Maintenance records/costs	S S N N S
6. Routine and preventative maintenance items are scheduled and performed on time.	S
7. The amount of maintenance activities and parts in back-log is acceptable. The backlog of preventative and routine maintenance activities appeared reasonable.	S
8. Operational problems contributing to plant upset, excessive odors, effluent violations, etc.	S
9. Level of operator certification as required by the permit and staffing level as specified in O&M Manual. The Facility is typically staffed 8.5 hours per day (7 AM to 3:30 PM) Monday through Friday. One operator and one collection system representative complete rounds at the Facility on Saturday and Sunday (approximately 2-3 hours per day) and are on-call the remainder of the weekend. Facility operations are controlled and monitored via SCADA system. Operators have access to the SCADA system at the control center area. The operations team consists of the following: - Three Grade III - Two Grade II - Two Grade I	S
10. Auxiliary power available as required by the permit and operates the necessary treatment units. Power for the Facility is typically supplied by the local utility. In the event that power cannot be supplied by the local utility, a 1,000 kW emergency generator is available and has the capability to run all essential processes.	S
11. Alarm systems for power and equipment failure.	S

OPERATIONS AND MAINTENANCE:

OVERALL RATING: S

INSPECTED ITEM	EVAL
12. Treatment control procedures are established for emergencies.	S
13. Hydraulic surges are handled without excessive solids wash-out or bypasses.	S
14. Spare pumps and parts readily available.	S
15. Facility appears to be well operated and maintained. <i>Refer to checklist item 3.</i>	U
16. Other:	N

Notes:

This section was rated "satisfactory" because checklist items 3. and 15. were accounted for in the 'Facility Site Review' section of this report.

BIOSOLIDS/SOLID WASTE HANDLING AND DISPOSAL:

OVERALL RATING: S

INSPECTED ITEM	EVAL
1. Biosolids/solid waste disposal/reuse method(s) (e.g., land application, landfill, etc.): <i>Grit and screenings are hauled to a local landfill and biosolids are processed on site and hauled to a composting facility.</i>	S
2. Biosolids/solid waste disposal/reuse location(s): <i>Engel & Grey, Inc. (Santa Maria, CA)</i>	S
3. The above processes are in accordance with the permit.	S
4. Storage at Facility: a. Adequately sized for periods of inclement weather b. Controls leachate, runoff, and public access	S S
5. Recent analytical results for metals (biosolids) are within permit limits.	N
6. Biosolids land application records include: a. Farm maps and land owner agreements b. Soil nutrient analyses done within the last year for active sites c. Records showing loading rate to each site d. Pathogen/Vector reduction records (pH or temperature logs, etc.)	N N N N
7. Other:	N
Notes: <i>This section was rated "satisfactory" because all checklist items reviewed were rated satisfactory.</i>	

**Carpinteria Sanitary District Wastewater Treatment Plant
(NPDES No. CA0047364) Photo Log**

Inspected by: Luz Slauter and Kortney Kirkeby (PG Environmental, LLC) and
Peter Von Langen (Central Coast Water Board)



Photo 1: Facility entrance.

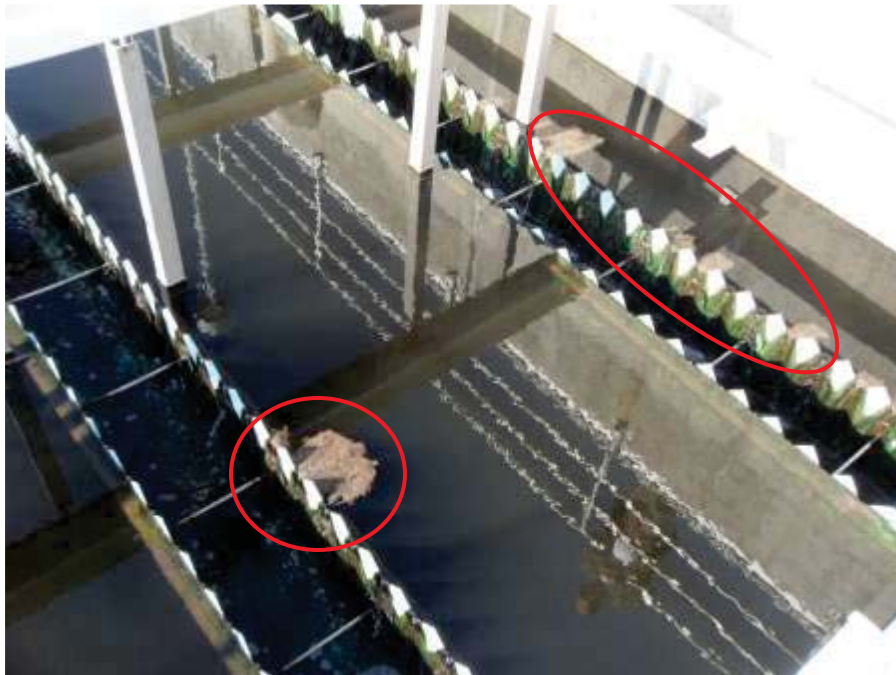


Photo 2: Example of algae build-up and solids accumulation along secondary clarifier overflow weirs.

**Carpinteria Sanitary District Wastewater Treatment Plant
(NPDES No. CA0047364) Photo Log**

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Photo 3: Close-up of algae build-up and solids accumulation shown in Photo 2. Solids accumulation appeared to cause uneven flow distribution over the weirs.



Photo 4: View of final effluent flowing over rectangular weir at the terminus of the chlorine contact basin.