

DEPARTMENT OF CORRECTIONS AND REHABILITATION

Mule Creek State Prison
P.O. Box 409099
4001 Highway 104
Ione, CA 95640



November 3, 2006

Pamela C. Creedon, Executive Officer
California Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

COMMENTS ON DRAFT CEASE AND DESIST ORDER DATED 18 OCTOBER 2006

Mule Creek State Prison (MCSP) has reviewed the draft Cease and Desist Order dated the 18 October 2006. Our comments\recommendations are as follows:

1. The discharger shall **immediately** comply with all aspects of WDRs Order No. 5-00-088. In no case shall the Discharger exceed a dry weather influent flow of 782,000 gpd (that generated in August 2006).

Comment\Recommendation:

The effluent flow meter failed calibration requirements by +/- 18% per Cooper Controls. Cooper Controls commenced installation of a new flow meter on October 27, 2006 to include modifications to the effluent weir. Estimated completion date: Jan 30, 2007. Recommend the influent flows be re-evaluated after completion of project, to include two (2) months of accurate flow data for evaluation. Request an extension to March 30, 2007.

3. By **30 December 2006**, the Discharger shall submit and immediately implement a *Spill Contingency Plan* containing the interim measures necessary for preventing unauthorized discharges to surface watercourses from the effluent storage pond.

Comment\Recommendation:

Effective September 28, 2006, MCSP reviewed and implemented a Spill Response Plan. The plan was included in the second response to the Notice of Violation (NOV) dated October 11, 2006. CDCR has hired a consulting engineering firm, Carollo Engineers, for response. Request an extension to January 30, 2007 in order to provide engineering review.

5. By **30 April 2007**, the Discharger shall submit a *Sprayfield Improvement Report and Management Plan* showing that it has made improvements and implemented measures to comply with all prohibition and specifications required by the WDRs.

Comment/Recommendation:

CDCR has hired a consulting engineering firm, Carollo Engineers, for response. As outlined in the second response to the NOV dated October 11, 2006, request an extension to June 30, 2007.

8. By **30 May 2007**, the Discharger shall submit a report showing that it has reduced flows at the laundry and meat plant by 30% in relation to flows measured in July 2006.

Comment/Recommendation:

Prison Industry Authority (PIA), a separate entity of the California Department of Corrections and Rehabilitation (CDCR), has ownership of the laundry/meat plant areas. CDCR has limited involvement in the operation and progression of projects under PIA jurisdiction. Due to the complexity of this project, request an extension to January 30, 2008.

9. By **30 August 2007**, the Discharger shall submit a report showing that it has reduced flows from the toilet and sinks in Buildings 1-15 by 30% in relation to flows measured in July 2006.

Comment/Recommendation:

Per CDCR, Facilities Management Division (FMD), and MCSP's response, dated October 10, 2006 to the NOV, a project has been approved for inclusion of electronically controlled flushometers on the celled toilets only. Request Cease and Desist Order to read as follows: By August 30, 2007, MCSP shall submit a report showing the actual amount of reduced flows in the institution as a result of this project.

10. By **30 January 2008**, the Discharger shall submit a report showing that it has reduced flows from the showers at Buildings 1-15 by 18% in relation to flows measured in July 2006.

Comment/Recommendation:

MCSP is presently developing a project proposal for the installation of electronic shower controls. As stated in the NOV response, dated October 10, 2006, completion date for the project will be based upon project approval and funding. Request Cease and Desist Order to read as follows: By January 30, 2008, MCSP shall submit a report showing the actual amount of reduced flows in the institution as a result of this project.

11. By **30 December 2006**, the Discharger shall submit a *Flow Meter Installation and Calibration Report*.

Comment\Recommendation:

Calibration of all flow meters shall be performed upon completion of the effluent flow meter replacement project. Request order to read as follows: Report shall be submitted by March 30, 2007.

12. By **30 December 2006**, the Discharger shall submit a report certifying that it has installed an alarm feature on the sludge drying facilities filtrate wet well.

Comment\Recommendation:

MCSP refers to this pump station as the Filter Belt Press Wet Well. An alarm feature shall be installed. Request an extension to January 30, 2007 for design and implementation.

17. By **30 June 2007**, the Discharger shall submit a *Dam Seepage Evaluation Report* which provides the results of an evaluation to determine whether the effluent is seeping from the base of the effluent storage reservoir.
By **1 October 2007**, the Discharger shall submit a *Dam Seepage Improvement and Containment Report*.

Comment\Recommendation:

CDCR has hired a consulting engineering firm, Carollo Engineers. Carollo has sub-contracted out the geo-technical work to the engineering firm Condor. Condor has reviewed the reports and has spoken to the Office of Dam Safety finding that a Dam of this type is designed for some leakage. Dam Safety has no problems with the Dam as it is. The seepage is needed to relieve internal pressures.

18. By **30 December 2007**, the Discharger shall submit a *Flow Reduction Evaluation Report* which shall describe the success in reducing flows over the previous year.

Comment\Recommendation:

Request this report be submitted upon completion of the toilet, shower, laundry, and meat plant water saving device projects, and to include two (2) months of accurate flow data for evaluation. Request an extension to March 30, 2008.

If you or your staff have any questions regarding the response, please contact me at (209) 274-5000.

ORIGINAL SIGNED BY

ROSANNE CAMPBELL
Warden (A)
Mule Creek State Prison