CITY OF COLFAX COMMENTS – TENTATIVE DISCHARGE PERMIT

1	Cover page, Table 2. Discharge Location	Discharge Point Latitude and Longitude Suggest to add ± 30" after latitude and longitude	
2	Page 1, Table 4	In the table heading, add "Existing" prior to Facility Information	
3	Page 1, Table 4	Undefined Facility Design Flow Replace the "Facility Design Flow" with • *Inflow Annual Dry Weather Flow (ADWF) 0.2 mgd* • *Discharge Flow 0.5 mgd*	
4	Page 1, A. line 7	Change to "….permit renewal to *plant inflow up to 0.2 mgd and discharge up to 0.65 mgd* of treated…."	
5	Page 3, H, line 9	Add *Lake Clementine* after source to	
6	Page 4, Table 5	Add "…*tributary to Bunch Creek*, tributary to the North Fork of the American River."	
7	Page 6, M, line 4	Clarify "pathogens"	
8	Page 9, Effluent Limitations	The CTR samples prior to October 2005 were taken at the seepage plant effluent. The MEC from the Reasonable Potential Analysis used in developing the effluent limits in this permit was based on the seepage plant effluent quality. That does not represent the effluent concentration from the interim tertiary treatment plant. The effluent quality data, particularly ammonia concentrations from the interim plant was included in the Anti-degradation and Infeasibility Report (AD&I Report) submitted to the Board on February 23, 2007. These numbers should be used as the basis for developing interim plant effluent limits.	

9	Page 9, Table 6.	Copper – • Please clarify the Maximum Daily copper limit - Page F-49 shows the interim copper limit is 17.73 µg/L. But this table is showing 5.5 µg/L. • Provide basis of the Average Monthly copper limit included in this table. • Limits in Table 6 and Table 8 shall be consistent.	
10	Page 9, Table 6	Ammonia and Nitrate – • Interim tertiary treatment system does not have nutrient removal capability. Effluent from the interim tertiary treatment system cannot meet both ammonia and nitrate limits. • Nitrate limit should be removed from Table 6. • Ammonia limit in Table 6 and Table 8 should be consistent. • Ammonia limit in Table 8 shall be re-established based on the CTR results from the interim tertiary plant in AD&I Report.	
11	Page 10, j.	Revise j. to **Average Daily Discharge Flow**. Average Daily Discharge Flow shall not exceed 0.65 mgd.	
12.	Page 11, Table 7	Copper – • Provide basis of the copper limits included in this table. • The new plant performance on copper removal is unknown. Copper will be closely monitored after the new plant is in operation.	
13	Page 12, j	Revise j. to **Average Daily Discharge Flow**. Average Daily Discharge Flow shall not exceed 0.5 mgd.	
14	Page 13, Table 8	Ammonia limit – The limit should be re-established based on the CTR results from the interim tertiary plant in AD&I Report.	

15	Page 14, V.A. line 3.	The receiving water limitations do not apply to Smuthers Ravine. Smuthers Ravine is far downstream of the designated plant downstream sampling point. The City has no control on the tributary section in between the plant discharge point and the downstream sampling point. Any domestic stock, wide life and human activities could impact the water quality. The City cannot be held responsibility to maintain the water quality beyond the discharge point. Will end of pipe samples be accepted as indication Smuthers Ravine is not being impacted?	
16	Page 14, A. 8.	pH – Historically, the upstream water pH is consistently below 6.5. Please advise how the stream pH can be maintained in between 6.5 to 8.5 with less than 0.5 change in plant effluent.	
17	Page 16, B.2	Please explain paragraph. How do you achieve a daily median based on four times per year testing?	
18	Page 27, iv.	The Freeboard requirement is redundant. The requirement is stated, or repeated in v. Suggest deleting iv.	
19	Page 29, 6. a.	These provisions only apply to the new plant. The interim plant is not designed to comply with those provisions.	
20	Page 29, 6. a.	The new plant will have the ability to operate with coagulation/flocculation mode if needed	
21	Page 31, VII. C.	The average dry weather influent flow (ADWF) is not necessarily equal to the equalized treated effluent discharge flow. The City's WWTP will treat stored raw sewage and partially treated water during the dry months. Therefore, dry weather effluent discharge flow will be higher than the ADWF coming into the treatment plant. Suggest providing definitions of ADWF and Effluent Limitation.	

22	Page C-1	Clarify that this is the interim plant process schematic. And please incorporate the markups on the attached schematic.	
23	Attachment C	Suggest inserting the new plant process schematic (which is significantly different from the interim plant's).	
24	Page D-2, c. d. and e.	Operation of UV disinfection system will be based on the manufacture provided equipment specific O&M requirements as approval by California DHS.	
25	Page D-8, C.2	Please provide forms, or add when forms are made and provided to City by the RWCB	
26	Attachment E	It is not clear which plant (interim or the new plant) this Monitoring and Reporting Program applies to. The interim plant and the new plant will have significantly different treatment processes. Therefore, a "plant-specific" monitoring and reporting program shall be developed for either interim plant or the new plant. Suggest to develop a specific monitoring and reporting program for the interim plant and a specific program for the new plant	
27	Page E-4	Please define what intermittent discharge is because under normal operations, the system is shut down twice weekly for maintenance	
28	Page E-2, Table E-1	Monitoring Location Name – P-001 and P-002 Change to aerated storage pond	
29	Page E-2, Table E-1	R-002 Delete. End of pipe is the location.	
30	Page E-8, VIII. A. 1.	Delete "Smuthers Ravine" None of the monitoring locations are located on the Smuthers Ravine which is far downstream of the treatment plant outfall.	

31	Attachment F	Clarify which plant this Fact Sheet applies to, the interim plant or the new plant.	
32	Page F-3, Table F-1	Provide definition of Threat to Water Quality -2; Provide definition of Complexity – B	
33	Page F-3, Table F-1	Add "*Existing*" to the Facility Information	
34	Page F-4, C. line 4	Change "replaced" to "*upgraded*"	
35	Page F-4, C. line 5	Change "with" to "*to*"	
36	Page F-5 &6, Item II.A. 2.	Please review and replace II. A. 2 with these updated facts per attached information.	
37	Page F-7 last line (strike out version)	Solids that settle in the chorine contact chamber <u>are diverted to Pond 3</u>	
38	Page F-8, paragraph 3, line 6	Add "*pressure*" prior to sand Delete "*that are more typically used in agricultural operations."*	
39	Page F-8, paragraph 5, line 7	Out-dated information Delete "Solicitation of bids is ….the New WWTP". Replace with *"the City received bids on April 26, 2007."*	
40	Page F-9 through F-12	We've scanned reviewed D. 2 through 24. We question why there is a compliance summary included in the proposed permit. The permit applies to the future operation of the plant. If the summary is a mandated component of the permit, then why are alleged violations after 2003 included? The city received by hand a draft list of alleged violations on December 7, 2006 but has never received further notice of violation in order to respond. The city believes most of the alleged violations dated after implementation of the interim plant are not violations. Correction of the records will be provided once official notice is received.	

41	Page F-14, c. line 5	Delete ", that there is a potential …. a cold water designation." This is not a fact. There is no access for anadromous fish to reach the North Fork.	
42	Page F-19, b.	Flow – Delete what is written and replace with attached. *For clarity, there is a need* to clarify flows*, equalized daily flows,* and difference between current plant and new plant items.	
43	Page F-20, Table F-4	Why are these pH limits used in the permit? The permit has pH limits of 6.5 to 8.5.	
44	Page F-21 B.2.a Line 16 (strike out version)	"From Order No. 5-01-190" appears to be typo—should be "from Order No. 5-01-180"	
45	Page F-26 h. line 2	The Discharger uses sodium bisulfite, not sulfur dioxide	
46	Page F-26 h. line 17	The Facility discharges through an "energy attenuating structure"	
47	Page F-27 Second to last line from bottom (strike out version)	"summer of 2008" should read January 1, 2009	
48	Page F-34 last line of paragraph 3 (strike out version)	"were estimated at $298,000"—add by RWQCB staff	
49	Page F-66 7.a. second paragraph (strike out version)	Bids for the new plant construction were received and opened on April 26 with a 90-day bid hold pending final funding approval	
50	Page G-2 footnote 9 (strike out version)	(e.g., 17, 700 mg/L) should read (e.g, 17.7 mg/L)	