

From: "Peggy Risch/Stefan Schittko" <pegstef@snowcrest.net>
To: "Bryan Smith" <bsmith@waterboards.ca.gov>
Date: 6/1/2007 7:42:26 PM
Subject: Mount Shasta City/ NPDES permit

Bryan

I will not be sending any photos, I made an error about that-- although there are photos of the manhole at Rheam Ave. overflowing in previous years.

Thank you for your time. I look forward to hearing from you by phone 926-5614 or e-mail soon.

peggy risch

----- Original Message -----

From: Peggy Risch/Stefan Schittko

To: Bryan Smith

Sent: Friday, June 01, 2007 12:56 PM

Subject: NPDES permit

Hi Bryan

I left you a message to give me a call regarding Mount Shasta City's NPDES permit for Waste Discharge Requirements for the Waste Treatment Plant, but have not heard back yet. So I'm hoping you might be able to clarify a few things via e-mail soon, since the comment period deadline is next week, June 7th.

a) Permit Provision 2 a Interim Effluent Limitations describes inter pond piping requirement in order for the effluent discharge to be increased from .70mgd to .80mgd

Does this inter pond piping also include the proposed Stage II improvements demonstrated in the Diagram included in the permit: New Headworks, New treatment lagoons, and new pumps? OR is the inter pond piping only that which is referenced as Stage I in the diagram, which would exclude the Stage II improvements?

b) Special Provisions 5 d Collection System

Does not list any improvements required in the Collection System although the City has documented capacity issues, documented I & I, documented overflows, and a report by the City which outlines the necessary improvements. Is there a reason why these improvements have been omitted from the permit since the function of the waste treatment plant is not isolated from the functioning of the collection system?

c) Can you explain why the dry weather months (which have typically been referred to as August Sept and October in previous communications with the WB) are defined as June 15- Sept 15th in the NPDES permit? What is this determination of dry weather flow based on? ie river flows, documented precipitation patterns, etc? This year is extremely dry with the Sacramento River unable to support river rafting trips even in May because of inadequate flows. It would seem more prudent to have the effluent discharges to the Sacramento River based on actual flow data, not some time period that may not reflect actual flow conditions. As such, gaging at the effluent discharge point would be recommended.

d) Can you explain to me why Table 6A and 6B describes a daily maximum effluent discharge to the Sacramento River as a daily maximum average? Would it be more appropriate to describe a daily maximum effluent discharge, eliminating the word "average"?

e) Can you explain why the NPDES permit is recommending an increase to .80 mgd? It appears that the City needs to complete Stage I repairs to the Waste treatment plant in order to achieve this new discharge of .80 mgd in the NPDES permit, although comments previously made by the WB described the completion of these Stage I requirements as necessary for increasing the capacity to only .075 mgd. So why the change?

I can send you a copy of Jim Rohrbach's comments which state: "Stage 1 included headworks expansion, aerator upgrade, development of flow management plan, cleaning of lagoons one and two and modification to interlagoon piping. All of the expansion requirements of Stage 1 have been completed with the exception of the modification of the interlagoon piping. Until these modifications have been completed the maximum permitted daily dry weather flow must remain at 0.70mgd. A report was prepared by the Discharger's consultant, Pace Engineering, in October 2003 which presented a two stage expansion to take the plant from 0.70 mgd to 0.75 (stage one) and from 0.75 mgd to 0.90 mgd (Stage 2)." (emphasis added)

The need for increasing the City's waste water utility service is necessary to accomodate additional housing, however the Sacramento River also has economic and recreational value to those downstream which is dependent on the quality of the water, which is a benefit to the State as well. The NPDES permit has not provided any economic analysis that points to the benefits of the City's expansion of the Waste Treatment Plant to 0.80 mgd at the risk of potential environmental impacts to the downstream users by increasing the NPDES permit beyond what previous reports have outlined as 0.75 mgd based on the completion of Stage I repairs to the waste treatment plant. In a subsequent e-mail, I will send you photos of the visible discharges to the Sacramento River and their discoloring from the Waste Treatment Plant under its current 0.70 mgd effluent limit.

Thank you for your response so that I may further comment on the NPDES permit for the City of Mount Shasta. Please respond by e-mail or give me a call at 926-5614.

Sincerely
Peggy Risch