

December 10, 2010

Diana Messina
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

Subject: Tentative Order Permit No. CA0084697, United Auburn Indian Community, Placer County

Dear Ms. Messina,

On behalf of the United Auburn Indian Community (Tribe), we hereby submit the following comments in regards to the subject Tentative Order.

Section I, Table 4: Facility Information

The facility contact has changed. The current information is as follows:

Greg Baker, United Auburn Indian Community Tribal Administrator,
Phone: (916) 240-4232 or (530) 883-2385

The type of facility is not a “Publicly Owned Treatment Works (POTW)”. It is a private facility owned solely by the Tribe.

The proposed facility design flow shown does not account for a phased expansion. Please refer our comments to *Section II, Item B: Facility Description*.

Section II, Item B: Facility Description

Pursuant to a letter submitted on behalf of the Tribe by Analytical Environmental Services (AES) on April 17, 2009, we intend to expand the casino and the WWTP in phases, starting with a smaller initial expansion that does not include the performing arts center and involves a reduced number of gaming, hotel rooms, and restaurants. The proposed flow of 0.875 MGD identified in the tentative Order would constitute buildout. The first phase currently under construction would expand the WWTP to a discharge capacity of 0.7 MGD. Accordingly, we request that all references to the flow limitation be revised to permit the Discharger to request a flow increase in increments (0.7 MGD and 0.875 MGD) corresponding to the degree of WWTP expansion completed.

The Facility Description contained in the Order accurately describes the first phase WWTP expansion except that only one belt filter press will be installed. We suggest changing that part of the description (last sentence in first paragraph) to read “...sludge is pumped directly from the process overflow tank to the belt filter press unit process, and then trucked off-site to a local landfill.”

The flow schematic contained in the Tentative Order (Attachment C-Flow Schematic) should be identified as the flow schematic pertaining to the buildout flow of 0.875 MGD. A second flow schematic for the Phase 1 expansion is included as Attachment A to this letter.

Section III, Item B.7: Reclaimed Water Prohibitions

This section includes the following prohibition:

“The application of recycled water within 50 feet of a domestic well, and impoundment of recycled water within 100 feet of a domestic well, unless approved by the California Department of Public Health (DPH); formerly the Department of Health Services), is prohibited.”

Since the WWTP and areas proposed for the application of recycled water are located on land that is held in trust by the Federal government for the Tribe, DPH does not have jurisdiction and would not be involved in granting any approvals. The U.S. Environmental Protection Agency (USEPA) has this oversight on Tribal trust land. Therefore, DPH should be changed to USEPA here and elsewhere in the Tentative Order.

Section V, Item A.1: Bacteria

As shown in Attachment B, background fecal coliform concentrations in Orchard Creek typically far exceed the receiving water limitations stated in this section. A likely background source of this pollutant is the large number of livestock that graze adjacent to the creek both upstream and downstream of the point of discharge. Please clarify how compliance with this requirement will be determined, given the high background concentrations and the potential for other fecal coliform sources to enter the creek both upstream and downstream of the discharge.

Section IV, Item C.9: Reclamation Specifications

As mentioned above, DPH should be changed to USEPA.

Section VI, Item C.4.b.: UV Disinfection System Operation Specifications

This section includes the following requirement:

“The Discharger shall operate the UV disinfection system to provide a minimum UV dose per bank of 100 millijoules per square centimeter (mJ/cm²) at peak daily flow, unless otherwise approved by DPH, and shall maintain an adequate dose for disinfection while discharging to Orchard Creek, unless otherwise approved by DPH.”

The requirement implies that the UV disinfection system is intended to disinfect effluent to meet Title 22 disinfected tertiary recycled water standards. This is not the case. The UV system is designed to meet disinfection requirements for discharge to Orchard Creek.

The recycled water storage tank, as described on page 33 of the Report of Waste Discharge, serves as a chlorine contact basin and is baffled with upstream sodium hypochlorite injection to provide a minimum modal contact time of 450 mg*min/l in accordance with disinfected tertiary recycled water requirements.

We therefore request that that the paragraph quoted above be revised to read as follows:

“The Discharger shall operate the recycled water chlorine disinfection system to provide a minimum modal contact time of 450 mg*min/l. The UV disinfection system shall be operated to maintain an adequate dose for disinfection while discharging to Orchard Creek.”

Section VI, Item C.4.c: Reclaimed Water

The references to DPH on pages 28, 29, and 30 should be changed to USEPA.

Section VI, Item C.5: Special Provisions for Municipal Facilities (POTWs Only)

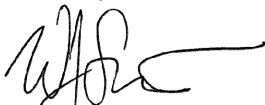
As this facility is not a POTW (see above comments on Section I), we recommend deleting this section in its entirety and replacing with “Not Applicable”.

Section VI, Item C.6: Other Special Provisions

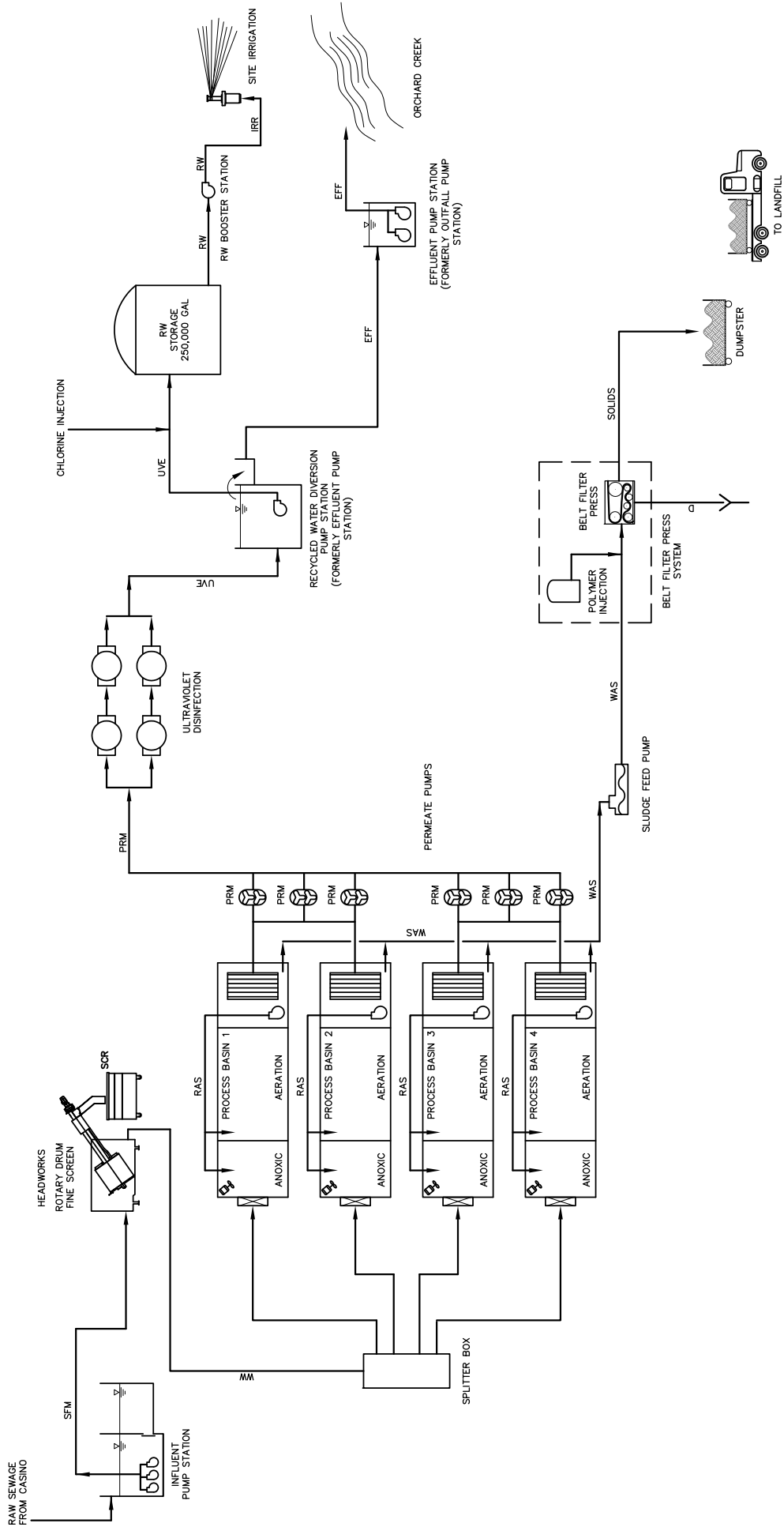
Please revise this section as necessary to account for phased WWTP expansion, as discussed previously in this letter.

We appreciate the opportunity to provide comments on the Tentative Order. If there are any questions regarding our comments, please contact us at 916-364-1490 or at bslenter@hydroscience.com.

Sincerely,



Bill Slenter, P.E.
Principal



Attachment A
 Process Schematic
 Phase 1 Thunder Valley Casino
 WWTP (0.70 MGD)
 Placer County, California

Attachment B - Receiving Water Fecal Coliform Data

Date	R1	R2
	Fecal Coliform MPN/100ml	Fecal Coliform MPN/100ml
4/5/2005	>1600	1600
4/12/2005	900	900
4/19/2005	>1600	900
4/26/2005	>1600	1600
5/3/2005	900	>1600
5/10/2005	>1600	>1600
5/17/2005	>1600	>1600
5/24/2005	1600	900
5/31/2005	>1600	1600
6/7/2005	1600	500
6/14/2005	900	220
6/21/2005	300	350
6/28/2005	900	900
7/5/2005	500	900
7/12/2005	>1600	900
7/19/2005	500	900
7/26/2005	>1600	1600
8/2/2005	900	1600
8/10/2005	500	300
8/16/2005	170	500
8/22/2005	140	500
8/30/2005	140	220
9/6/2005	70	50
9/13/2005	70	>1600
9/20/2005	50	80
9/27/2005	220	140
10/4/2005	1600	170
10/11/2005	50	80
10/18/2005	30	23
10/25/2005	30	30
11/1/2005	280	300
11/8/2005	170	300
11/15/2005	30	27
11/22/2005	70	170
11/29/2005	300	500
12/6/2005	30	22
12/13/2005	11	17
12/20/2005	1600	1600
12/27/2005	900	500
1/3/2006	900	300
1/9/2006	210	>1600
1/17/2006	50	110
1/24/2006	40	30
1/31/2006	1600	54
2/7/2006	170	80
2/14/2006	50	70
2/21/2006	23	33
2/26/2006	70	39
3/7/2006	500	300

Attachment B - Receiving Water Fecal Coliform Data

Date	R1	R2
	Fecal Coliform MPN/100ml	Fecal Coliform MPN/100ml
3/13/2006	130	220
3/20/2006	130	80
3/27/2006	240	500
4/2/2006	240	1600
4/9/2006	210	500
4/17/2006	1600	>1600
4/25/2006	79	76
5/1/2006	170	1600
5/9/2006	350	920
5/17/2006	350	540
5/23/2006	920	540
5/30/2006	920	>1600
6/6/2006	920	540
6/13/2006	240	350
6/20/2006	170	79
6/27/2006	>1600	>1600
7/4/2006	920	130
7/11/2006	130	170
7/18/2006	49	79
7/24/2006	70	130
8/1/2006	220	79
8/8/2006	79	110
8/15/2006	79	31
8/22/2006	240	49
8/29/2006	350	350
9/5/2006	79	140
9/12/2006	350	240
9/19/2006	920	1600
9/26/2006	31	49
10/3/2006	79	220
10/10/2006	46	170
10/17/2006	920	920
10/24/2006	540	350
10/31/2006	920	540
11/7/2006	280	350
11/14/2006	130	130
11/21/2006	79	350
11/28/2006	33	110
12/5/2006	110	22
12/11/2006	920	920
12/19/2006	350	33
12/26/2006	110	170
1/2/2007	33	70
1/9/2007	23	7.8
1/16/2007	49	17
1/23/2007	44	49
1/30/2007	27	14
2/6/2007	240	240
2/13/2007	350	350

Attachment B - Receiving Water Fecal Coliform Data

Date	R1	R2
	Fecal Coliform MPN/100ml	Fecal Coliform MPN/100ml
2/20/2007	920	170
2/27/2007		
3/6/2007	1600	540
3/13/2007	920	>1600
3/20/2007	79	170
3/27/2007	>1600	>1600
4/3/2007	>1600	1600
4/10/2007	40	350
4/17/2007	1600	350
4/23/2007	920	350
5/1/2007	170	170
5/8/2007	1600	23
5/15/2007	140	350
5/22/2007	220	130
5/29/2007	>1600	920
6/5/2007	70	240
6/12/2007	540	540
6/19/2007	32	130
6/26/2007	79	79
7/3/2007	240	49
7/10/2007	920	1600
7/17/2007	920	540
7/23/2007	350	110
7/31/2007	220	63
8/7/2007	130	170
8/15/2007	130	31
8/21/2007	170	140
8/28/2007	46	17
9/4/2007	140	23
9/11/2007	540	280
9/18/2007	79	49
9/24/2007	31	23
10/1/2007	79	32
10/9/2007	33	23
10/16/2007	94	130
10/23/2007	23	94
10/30/2007	33	12
11/6/2007	920	>1600
11/13/2007	350	920
11/20/2007	49	49
11/27/2007	46	31
12/6/2007	>1600	350
12/12/2007	94	130
12/18/2007	920	1600
12/26/2007	33	110
1/2/2008	*	*
1/8/2008	540	130
1/17/2008	79	140
1/22/2008	33	79

* Power failure at CLS

Attachment B - Receiving Water Fecal Coliform Data

Date	R1	R2
	Fecal Coliform MPN/100ml	Fecal Coliform MPN/100ml
1/30/2008	33	33
2/4/2008	17	170
2/12/2008	49	33
2/19/2009	23	13
2/26/2008	49	23
3/4/2008	23	33
3/11/2008	13	5
3/18/2008	33	79
3/25/2008	27	33
4/1/2008	280	350
4/9/2008	170	130
4/15/2008	79	540
4/21/2008	540	920
4/29/2008	1600	>1600
5/6/2008	1600	49
5/13/2008	>1600	>1600
5/20/2008	430	1600
5/28/2008	1600	>1600
6/3/2008	1600	540
6/11/2008	540	920
6/16/2008	46	63
6/25/2008	920	>1600
7/1/2008	>1600	540
7/8/2008	1600	1600
7/15/2008	1600	1600
7/21/2008	920	1600
7/29/2008	140	33
8/5/2008	23	49
8/12/2008	79	33
8/20/2008	70	23
8/26/2008	70	70
9/2/2008	240	110
9/10/2008	170	280
9/16/2008	1600	920
9/25/2008	>1600	94
9/30/2008	21	49
10/8/2008	170	140
10/14/2008	140	79
10/21/2008	31	46
10/27/2008	46	63
11/6/2008	46	34
11/11/2008	22	13
11/18/2008	27	14
11/25/2008	33	79
12/2/2008	8	8
12/9/2008	49	70
12/16/2008	920	1600
12/23/2008	72	220
12/31/2008	13	17