
North Coast Regional Water Quality Control Board

April 24, 2013

Mr. J.C. England
111 E. Commercial Street
Willits, CA 95490

Dear Mr. England:

Subject: Notice of Violation and Transmittal of the March 2013 Compliance Evaluation Inspection Report for the City of Willits Wastewater Treatment Facility

File: Willits Wastewater Treatment Facility
WDID No.1B800780MEN, NPDES Permit No. CA0023060

A Compliance Evaluation Inspection (CEI) was conducted on March 4, 2013, at the Willits Wastewater Treatment Facility (WWTF) by a USEPA contractor on behalf of the North Coast Regional Water Quality Control Board (Regional Water Board). The CEI report prepared by the USEPA contractor, PG Environmental, is enclosed.

The CEI report identified the following deficiencies:

1. NPDES permit, Order No. RB1-2010-0017, Attachment E – Monitoring and Reporting Program (MRP), Provision I.C. requires that “Laboratories analyzing monitoring samples shall be certified by the Department of Health Services, in accordance with the provisions of Water Code section 13176, and must include quality assurance/quality control data with their reports.” Specific laboratory deficiencies include:
 - a. The on-site laboratory’s ELAP certification expired approximately one year ago. The City has not completed a DMR QA or WP study since the expiration. Lab staff were not able to produce a copy of the most recent proficiency study results.
 - b. Analytical records for pH analyses do not include the time of analysis to demonstrate that samples are analyzed within 15 minutes of sample collection.
 - c. Thermometers were not present in the influent and effluent composite samplers to verify that preservation temperatures were less than or equal to 6 degrees Celcius in the samplers. Further, no method of refrigeration was being utilized to properly preserve samples.
2. The 2012 Annual SMR and the 2012 Annual Biosolids Report had not been submitted and were overdue as of the date of the inspection (March 4, 2013). As of the date of this letter these Annual reports are still overdue. Section X.D.3 of the MRP states that the Annual Report is due on March 1 of each year.

3. Standard Provision IV.A of Attachment D to Order No. R1-2010-0017 requires the Discharger to retain records of all monitoring information, including calibration and maintenance records...". Flow meter calibration records were not available for review. The Plant Supervisor stated that routine calibrations do take place; however, documentation and/or certification is not provided by the contractor (MCC).
4. Both the influent and effluent composite samplers were found to be time-paced rather than flow-based. The Plant Supervisor stated that samples are collected every 30 minutes. General Monitoring Provision I.A of the MRP requires composite samples to be composited in proportion to flow.
5. Foaming was observed at Discharge Point 003 following the enhanced treatment wetlands. Although foam was not observed in the creek, this is a threatened violation of Receiving Water Limitation V.A.6.

This Notice of Violation serves as notice to correct the violations identified in items 1 through 5, above. Violations identified in items 1.b, 1.c., 2 and 4 should be implemented immediately. By June 1, 2013, you are required to submit a report identifying a plan and time schedule to address the deficiencies identified in 1.a., 3, and 5 and confirming that the deficiencies identified in 1.b., 1.c., 2, and 4 have been corrected.

If you fail to submit the requested report by June 1, 2013, or correct the above violations as required by this Notice of Violation, the Regional Water Board shall take appropriate enforcement actions authorized by the Porter-Cologne Water Quality Act (Div. 7 of the Water Code, commencing with section 13000), including the possible assessment of civil liabilities of \$1,000 per day of violation.

If you have any questions regarding this matter prior to July 1, 2013, you may contact Cathleen Goodwin at (707) 576-2687 or at Cathleen.Goodwin@waterboards.ca.gov. After July 1, 2013, you may contact Lisa Bernard at (707) 576-2677 or at Lisa.Bernard@waterboards.ca.gov.

Sincerely,

David Leland, P.E.
Assistant Executive Officer (Acting)

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cc: Jake Albright, PG Environmental jake.albright@pgenv.com
Max Kuker, PG Environmental, max.kuker@pgenv.com
Jack Silver Attorney at Law, lhm28843@sbcglobal.net

Enclosures: March 4, 2013 Compliance Evaluation Inspection (CEI) Report for City of Willits Wastewater Treatment Facility