Message

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Sent: 3/19/2013 5:49:45 PM
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Subject: RB1 CEIs - Post-Inspection Summary

Cathy, Charles, Kason;

Thank you for your contributions to the North Coast Water Board inspections last week. Please find below a quick summary of my observations from the Compliance Evaluation Inspections PG Environmental, LLC conducted last week. The inspections were conducted on behalf of EPA and at the request of the North Coast Water Board. The observations may include information on the condition of the facilities, record keeping, monitoring, and operation and maintenance. I will begin drafting the reports now that I am back in the office. After the draft reports are completed, they will undergo our internal Quality Assurance process and will subsequently be forwarded to the North Coast Water Board for further review. **Please note that all findings are preliminary and are subject to addition, deletion, and/or modification.**

McKinleyville Community Services District

Records/Reports

- The Facility was not recording the time of analysis for residual chlorine in order to verify that the analysis was conducted within fifteen minutes of sample collection. The lab technician stated that he performs the analysis immediately following sample collection.
- The cover letter file uploaded to the November 2012 eSMR record was the same cover letter uploaded to the October 2012 eSMR record. A November 2012 cover letter was not found with the November 2012 eSMR record. This finding was made following the completion of the inspection and was not discussed with the Discharger during the closeout conference on the day of the inspection.

Effluent and Receiving Waters

- The Facility exceeded the single sample coliform limit during the month of November 2012. The Discharger stated that the high coliform reading was inconsistent with normal results and many have been a result of a sampling or analysis error.
- The Facility did not meet the acute toxicity test species required reproductive rate for the months of November and December 2012. The Discharger has ongoing communications with the North Coast Water Board and has not come to resolution regarding the source of the toxicity. The Discharger is developing a capital improvement plan to upgrade treatment processes. The design of the upgrades has begun and is expected to be completed by April 2014. The construction of the upgrades has not yet been programed or funded.
- The Discharger is required to monitor pH and temperature of its discharge. The Discharger did not monitoring pH and temperature during some periods of October 2012 when discharging to the percolation ponds. The Discharger stated that pH and temperature is monitored when discharging to the Mad River but not the percolation ponds.

Laboratory

- The Facility uses a refrigerator to preserve samples in the laboratory prior to analysis or delivery to an outside contract laboratory. No temperature monitoring devise was in use at the time of the inspection in order to verify that samples were being preserved in accordance with 40 CFR 136.
- The Facility's on-site laboratory is used to conduct certain analyses for permit compliance monitoring. The on-site laboratory is not ELAP certified, nor did the Discharger maintain or utilize a laboratory quality control program.

- The Facility's laboratory personnel didn't maintain or use SOPs when conducting analyses for permit compliance monitoring.
- The Facility did not have a certified thermometer for use in calibrating laboratory equipment or conducting temperature monitoring of the effluent.

Operation and Maintenance

- The Facility did not maintain an updated operations and maintenance manual. For example the manual recommended solids handing procedures did not reflect current practice and the manual had not been updated to reflect the addition of the wetlands treatment in Facility designated Pond 5.

Biosolids/Solid Waste Handling & Disposal

- The Facility does not have any procedures for handling, processing, or disposing of biosolids. Biosolids have been allowed to accumulate in the treatment ponds since the Facility was constructed in the mid-1980's. In addition, grit removed at the headworks is dumped into the treatment ponds.

<u>City of Fortuna</u>

Facility Review

- The influent composite sample tube had a build-up of material on the interior wall. The Discharger stated that the tube is periodically inspected and replaced when it appears dirty. There is no set schedule to replace the tube.
- The influent mag meter vault and mag meter was covered in debris and was in need of some general cleaning. The Discharger and operator representatives stated that the mag meter has not been inspected for a period of years.

Effluent and Receiving Waters

- The Discharger is required to maintain a residual chlorine concentration of 1.5 mg/L prior to dechlorination. A low residual chlorine value was recorded in February 2013. The Discharger has recently calibrated the metering system used to regulate chlorine dosages which he stated has addressed this and a number of previous low chlorine readings.
- The Discharger did not report receiving water observations to the CWIQS reporting system during the period of review.
- The Discharger did not report the analytical results for dichlorobromomethane or chlorodibromomethane in February 2013. The analytical results were on file at the Facility.

Operation and Maintenance

- The Facility processes biosolids and green waste into compost. Due to management decisions to delay disposal of the compost, the Facility has reached compost and processed biosolids storage capacity. This limits the Facility's ability to waste solids from the treatment process and has causes observable issues including a significant build-up of foam and solids on the aeration tanks and solids accumulation in the secondary clarifiers. The Discharger stated that compost removal from the Facility is expected to begin soon, allowing additional storage room for storing processed solids.

<u>City of Arcata</u>

Records/Reports

- The Facility was not recording the time of analysis for residual chlorine in order to verify that the analysis was conducted within fifteen minutes of sample. Residual chlorine is analyzed directly adjacent to the sample location near the chlorine contact tank.
- The Discharger is required to report ammonia and nitrate quarterly. The Discharger did not report these pollutants during the period of review (one quarter). Analytical results were observed in the Dischargers monitoring records.

Effluent and Receiving Waters

- The Discharger reported several effluent excursions during December 2012 including chlorine residual, 2,3,7,8 TCDD, TSS, and settleable solids. All were reported in CWIQS. The Discharger stated that a large wet weather even contributed to the excursions.

Flow Measurement

- The Discharger was not able to demonstrate that influent and effluent flow meters had been calibrated nor were records maintained from any past calibration work. The Discharger has hired a new calibration technician who has been assigned responsibility of meter calibration

Laboratory

- 40 CFR 136 requires pH to be analyzed immediately but at least within fifteen minutes of sample collection. On several occasions during the period of review, the fifteen minute hold time was exceeded. The laboratory SOP for pH analysis states that the sample is to be analyzed within fifteen minutes of collection.
- The Discharger used a portable cooler packed with ice to preserve and transport monitoring samples to a contract laboratory. The samples are placed in the cooler at the same time the ice is introduced causing concern that the internal temperature may not be at or below the required preservation temperature. Additionally, there is no thermometer in use in the cooler to verify that preservation temperatures are maintained.
- The laboratory is not ELAP certified but does have SOPs and a Quality Assurance Plan. The laboratory technician stated that he was not familiar with the Quality Assurance Plan when show a copy.

Operation and Maintenance

- The Facility operation and maintenance manual had not been updated to reflect current Facility operations. The manual is currently being updated but the update has not been completed.

City of Eureka

Records/Reports

- The Facility was not recording the time of analysis for pH in order to verify that the analysis was conducted within fifteen minutes of sample.

Flow Measurement

- The Facility is required to monitor and report effluent flow volume. The Facility does not monitor effluent flow. The Discharger reports influent flow as effluent flow. The Discharge stated that effluent flow has never been monitored and that the original Facility design did not include effluent flow monitoring.
- The Discharger is required to measure and report blended flow (flow which does not receive secondary treatment and is blended with fully treated flow). The Discharger uses approximate methods to measure and report blended flow.

Biosolids/Solid Waste Handling & Disposal

- The Facility does not have a process to dry biosolids. It relies on a contractor to bring in temporary equipment to dry biosolids before hauling them away for disposal. One of two solids holding ponds was observed to be full.

Storm Water

- The Facility discharges stormwater to Elk River from the Facility. The Discharger maintains a Storm Water Pollution Prevention Plan but does not maintain coverage under the Statewide General Storm Water Permit for Industrial Activities, nor does the Discharger sample stormwater or prepares and submits an annual storm water report.

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