Message

From: Max Kuker [max.kuker@pgenv.com]
Sent: 3/29/2013 9:01:18 PM
To: Dougherty, Mona@Waterboards [MDougherty@waterboards.ca.gov]
CC: Wesley Ganter [wes.ganter@pgenv.com]; NPDES_Wastewater@waterboards.ca.gov; pisorena@waterboards.ca.gov; Document Control [documentcontrol@pgenv.com]; Max Kuker [max.kuker@pgenv.com]; Greenberg, Ken [Greenberg.Ken@epa.gov]; Jake Albright [jake.albright@pgenv.com]; James Ashby [james.ashby@pgenv.com]; Garcia-Bakarich, Luis [Garcia-Bakarich.Luis@epa.gov]; KUO, LYNN [Kuo.Lynn@epa.gov]
Subject: PG Environmental Regional Water Board 1 CEI Reports (Email 1 of 1)
Attachments: CA0024449 - Eureka- WWTF - 3-15-13.pdf; CA0023060 - City of Willits WWTF - 3-4-13.pdf; CA0024490 - Mckinleyville- WMF- 3-12-13.pdf; RB1 - Cover Letter - 3-29-2013.docx; RB1 - Cover Letter - 3-29-2013.pdf

Dear Ms. Dougherty,

PG Environmental, LLC (PG) is delivering draft NPDES compliance evaluation inspection reports for the facilities shown in the following table. Please contact me directly at 703-707-8258 Ext. 101 with questions and comments regarding these inspection reports or photo logs. The enclosed inspection reports and photo logs are drafts and subject to revision at the Water Board's request.

Thanks,
Max

Agency Name	Facility Name	Permit No.	Order No.	Inspection Date	Facility Rating	Comments
EUREKA, CITY OF	EUREKA CITY ELK RIVER WWTF	CA0024449	R1-2009-0033	3/15/2013	Rating 2 - Medium Priority Follow-up	**Flow Measurement** 1. The Discharger is required to monitor and report effluent flow. The Facility does not have an effluent flow meter and reports influent flow as effluent flow. **Stormwater** 1. The Facility has storm drains which discharge to Humboldt Bay. While the Discharger does implement a stormwater management plan, they do not have coverage under the Industrial Stormwater Permit, do not sample stormwater, or do not have a Storm Water Pollution Prevent Plan that meets the requirement of the general permit.
MCKINLEYVILLE CSD	MCKINLEYVILLE CSD WWTF	CA0024490	2011-0008-DWQ	3/12/2013	Rating 2 - Medium Priority Follow-up	**Laboratory** 1. The Lab was not ELAP certified, did not have a QA/QC program, and was not using SOPs for on-site analyses. **Biosolids/Solid Waste Handling &**

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						Disposal 1. The Discharger has never removed any solids from the facultative ponds or oxidation ponds since the Facility was constructed in mid-1980s.
WILLITS, CITY OF	WILLITS WWTF	CA0023060	R1-2010-0017	3/4/2013	Rating 1 - High Priority Follow-up	**General** 1. The Discharger has recently reached substantial completion of several major plant upgrades. The Plant Supervisor stated that February 2013 was the first month that all new processes were online, and monitoring under permit provisions for the new treatment train was fully implemented. February 2013 monitoring data had not yet been submitted to the North Coast Water Board and was not reviewed as part of this inspection. The Discharger switched from chlorine disinfection to UV disinfection on January 8, 2012. **Records/Reports** 1. 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). The 2011 annual reports were not maintained on site, and were not able to be reviewed at the time of the inspection. **Effluent and Receiving Waters** 1. Foaming was observed at Discharge Point 003 following the enhanced treatment wetlands. **Flow Measurement** 1. 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).

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						Self-Monitoring Program 1. The influent sampling point at the Facility was not located as described in the Permit. Specifically, the sampling location was located in the aerated grit chamber which is after treatment via screening. The Plant Supervisor stated that the current sampling location had been implemented within the last few months; however, the previous location was not representative of all flows entering the Facility. Previously, influent sampling was conducted at the influent Parshall flume which does not include flows entering the plant through the septage receiving station (as required by the permit). 2. The Discharger utilizes portable composite samplers for influent and effluent composite sampling. Thermometers were not present in the influent and effluent composite samplers to verify preservation temperatures were less than or equal to 6 degrees Celsius in the samplers. Further, no method of refrigeration was being utilized to properly preserve samples. 3. Sample times for effluent pH monitoring are not recorded to verify the 15 minute holding time. 4. Weekly monitoring for effluent pH is not reported in the monthly eSMRs as required by the permit. The Discharger only reports instantaneous maximum and minimum values in the monthly eSMRs. It should be noted that the Discharger monitors effluent pH daily. 5. Both the influent and effluent composite samplers were found to be time-paced rather than

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						flow-based. The Plant Supervisor stated that samples are collected every 30 minutes. **Operations and Maintenance** 1. The Discharger does not maintain an operations log book or checklists/rounds sheets for daily operations and maintenance tasks. The primary on-site Facility representatives stated that they would purchase a log book and increase record keeping as soon as possible. Currently maintenance and operations tasks are performed primarily through institutional knowledge. 2. The Discharger does not maintain run logs for the on-site backup diesel generator. The Plant Supervisor stated that the generator is tested routinely and automatically, triggered by the SCADA system. He further stated that run records may be able to be extracted from the SCADA database, but was unable to provide them at the time of the inspection. 3. An O&M Manual for the new treatment processes was not available for review. The Plant Supervisor stated that the Discharger's engineering firm currently has a draft version and is working on a finalized edition. **Laboratory** 1. The Plant Supervisor stated that the on-site Facility laboratory's ELAP certification had expired approximately a year before the inspection. The Discharger had not completed a DMR QA or WP Study since the expiration. Documentation of the most recent proficiency study results were not able to be produced at the time of the

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						inspection. Laboratory staff present during the inspection stated that a copy of Standard Methods is kept on site for procedure and quality control reference. The copy of Standard Methods was observed in the laboratory by the inspector.

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