Message

From: Brittany Hale [brittany.hale@pgenv.com]
Sent: 7/17/2015 6:07:12 PM
To: Bernard, Lisa@Waterboards [Lisa.Bernard@waterboards.ca.gov]
CC: Dougherty, Mona@Waterboards [Mona.Dougherty@waterboards.ca.gov]; Leland, David@Waterboards [David.Leland@waterboards.ca.gov]; Lee, Shin-Roei@Waterboards [Shin-Roei.Lee@waterboards.ca.gov]; Mues, Pascal [Mues.Pascal@epa.gov]; Sablad, Elizabeth [Sablad.Elizabeth@epa.gov]; jim.parker@pgenv.com; Permit Control [permitcontrol@pgenv.com]
Subject: TO38 CA0024449 City of Eureka WWTP Tentative Draft
Attachments: CA0024449_City of Eureka_Elk River WWTP_Tentative Draft_(7-17-15).docm

Lisa,

Attached please find the Tentative Draft for the City of Eureka, Elk River Wastewater Treatment Plant (NPDES No. CA0024449). We developed the draft based on our discussions and emails; some to highlight:

1. The RPA and limits were established based on the more stringent of the SIP and Ocean Plan. Limits based on the SIP were calculated without providing dilution and mixing zone, and a reopener was included should the Permittee request dilution/mixing zone in accordance with the SIP. We retained the initial dilution of 30:1 while performing the Ocean Plan RPA and setting limits based on what has been used in the previous permits. Due to the concerns raised as part of the Permittee's effluent study, we have included a requirement for the Permittee to reassess the 30:1 dilution for use during the next permit renewal.
2. Receiving water monitoring in the Bay has been added with the requirement that the Permittee proposes the monitoring locations.
3. The exception to blending has been removed from the permit and the associated monitoring during blending events has been removed. As we discussed, we tried to bolster the rationale for removing the exception in the Fact Sheet based on our conversation with EPA HQ as we know the City will be paying particular attention to it.
4. We used the TST language from the City of Willits draft that you sent us on 7/9/2015.

We have highlighted throughout where you need to insert information (e.g., dates) and also included a few notes throughout the draft for your consideration.

If you have any questions regarding the draft, or if any revisions are necessary, please let me know.

Thank you,

Brittany Hale
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