Message

From: Goodwin, Cathleen@Waterboards [Cathleen.Goodwin@waterboards.ca.gov]
Sent: 5/8/2020 4:40:43 PM
To: Mues, Pascal [Mues.Pascal@epa.gov]
CC: Whitson, Amelia [Whitson.Amelia@epa.gov]
Subject: RE: Draft Comments regarding City of Eureka Ammonia Modeling Proposal
Attachments: 200505_RB comments on Evaluation of NH3 Toxicity - comments from Pascal_CAG.docx

Hi Pascal:

I was so excited when I received your quick response, but I understand not to expect this kind of turnaround. ☺

I have been swamped as usual, but found time yesterday to go through your comments and discuss them with Heaven. Your comments (both inserted in the text and in the comment boxes) are very helpful. I would not want to create confusion or push-back from the modeling consultant, and I am so grateful to have your expert eye and expertise to guide me through this.

There are a couple of things I wouldn't mind discussing with you briefly if you have around a half hour to talk today or Monday. If you do, let me know what time is good for you and I will schedule a Teams call. I will be working until about 2 today and all day Monday.

Two specific things I would want to talk tie to the first comment box that you added into my comments where you asked what my intention is with the use of the words "required ammonia criteria".

I was intentionally broad in using those word so that I wouldn't lock into something too narrow. The City had asked us if it is possible to use the model to show that there is no reasonable potential for ammonia (thus no permit limits or mixing zone specified in permit). What do you think of that? Is that even reasonable or allowed by regulation? Can we expect to use the modelling results to demonstrate a lack of RP (thus no limits)? Or would it be necessary that the outcome of this model to be the establishment of a dilution factor that is determined by the model?

If there is an option, we should ask City to be specific about what they intend. If there is an option, I propose to add language (as I have done in the attached draft) stating that the City needs to articulate the intended use of the model.

Amelia and Pascal: Is it possible to allow use of the model results to demonstrate a lack of RP? Or can it only be used to establish a mixing zone? My thought is that we might be held by regulation and BBJ to establish a mixing zone and dilution credit as we do with ocean dischargers. But I want to thoroughly explore this with you and Pascal.

I am so grateful to have both of you assisting me through these complex permitting issues.

Take Care

From: Mues, Pascal <Mues.Pascal@epa.gov>
Sent: Wednesday, May 6, 2020 7:05 PM
To: Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>
Subject: RE: Draft Comments regarding City of Eureka Ammonia Modeling Proposal

EXTERNAL:

Cathy – I fortunately was able to make time to review your letter this afternoon. Just please don't hold me to this kind of turnaround time in the future ☺

In general, nice work. I had about a dozen various suggestions for how the language that could be clarified and/or made easier for the applicant to implement. Some of my longer sidebar comments might get annoying to read in that tiny font; I was trying to explain my thinking in detail so I hope you don't take the comment length as some kind of reflection on the quality of your work.

I mostly attempted to point out where you might get confusion or push-back from the modeling consultant and how to rephrase things to get out in front of such questions. Over half are issues that a permit writer simply wouldn't know about without having done models before, such as terminology that has a specific meaning in the modeling context ("modeling error" / model error) which is different from what you were using it to mean. I'm happy to have a quick call Thursday or Friday if you find any of my suggestions unclear.

Thanks for continuing to push this forward, it's so rare to get the chance to ask for improvements to a modeling submission *before* the permit reissuance clock starts ticking. Fingers crossed that we can improve the environmental outcomes to the same degree!

-Pascal

Pascal Mues, Environmental Engineer
NPDES Permits office, U.S. EPA Region 9, WTR-2-3
75 Hawthorne Street, San Francisco, CA 94105
Phone: (415)-972-3768 | mues.pascal@epa.gov

From: Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>
Sent: Tuesday, May 5, 2020 8:34 PM
To: Mues, Pascal <Mues.Pascal@epa.gov>
Cc: Moore, Heaven@Waterboards <Heaven.Moore@Waterboards.ca.gov>; Whitson, Amelia <Whitson.Amelia@epa.gov>
Subject: Draft Comments regarding City of Eureka Ammonia Modeling Proposal

Hi Pascal:

I sure appreciated the discussion we had last month regarding the City of Eureka Ammonia Modeling proposal. I finally have the comments organized. I have attached them for your review and comment back to me if you have time. We had hoped to get these to the City by the end of April, but alas, I was juggling too many balls to meet that hoped for deadline. I am hoping to get comments out to the City by later this week or early next week.

If I have missed anything important in my comments, or misstated anything, please point those kinds of things out to me.

I know that you are very busy. Please let me know if you have time to look this over and the timing.

It is a pleasure working with you on this.

Cathy

Cathleen Goodwin
Water Resources Control Engineer
North Coast Regional Water Quality Control Board

5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

Desk Phone No.: (707) 576-2687
Fax Phone No.: (707) 523-0135
Email: Cathleen.Goodwin@waterboards.ca.gov

The governor of California has issued a statewide shelter in place order due to the COVID-19 emergency. The Water Boards are continuing day-to-day work protecting public health, safety, and the environment. However, most staff are working remotely and we continue to check email and voicemail regularly. Thank you and stay healthy and safe.