Message

From: Goodwin, Cathleen@Waterboards [Cathleen.Goodwin@waterboards.ca.gov]
Sent: 4/22/2020 10:42:28 PM
To: Chuck Durham [Chuck.Durham@pgenv.com]; David Adams [dadams@ci.eureka.ca.gov]
CC: Chand, Gurgagn@Waterboards [gurgagn.chand@waterboards.ca.gov]; Cheung, Steve@Waterboards [Steve.Cheung@Waterboards.ca.gov]; Sirese Jacobson [sirese.jacobson@pgenv.com]; Whitson, Amelia [Whitson.Amelia@epa.gov]; Kozelka, Peter [Kozelka.Peter@epa.gov]
Subject: RE: Eureka PCI under EPA contract R9-16-02 //Task Order-68HE0918F0417

Thank you, Chuck. I'll talk to you in the morning.

From: Chuck Durham <Chuck.Durham@pgenv.com>
Sent: Wednesday, April 22, 2020 3:22 PM
To: Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>; David Adams <dadams@ci.eureka.ca.gov>
Cc: Chand, Gurgagn@Waterboards <Gurgagn.Chand@Waterboards.ca.gov>; Cheung, Steve@Waterboards <Steve.Cheung@Waterboards.ca.gov>; Sirese Jacobson <Sirese.Jacobson@pgenv.com>; Amelia Whitson <Whitson.Amelia@epa.gov>; Peter Kozelka <Kozelka.Peter@epamail.epa.gov>
Subject: RE: Eureka PCI under EPA contract R9-16-02 //Task Order-68HE0918F0417

EXTERNAL:

Hi Cathy,

Yes, Sirese and I will lead the interview but feel free to interject at any time.

The way the remote inspections have worked to date, at the close of the interview, we will determine which files are to be reviewed (for Eureka I recommend that PG review 2 of the 3 SIUs files and you review the 3rd; State Waterboard personnel may choose to review one of the files simply as an exercise and compare findings with ours, this also an option and good exercise for other RB staff with less pretreatment experience than you). Therefore, you may want to review the annual report and determine which file you have a preference to review. Other than that, just reviewing the annual report and response to the last PCA should be sufficient to prepare for tomorrow's call.

At the close of the interview, we'll set a date for the exit interview (sometime within a week or two, schedule dependent) and I will send out a meeting invite for that discussion (typically 30 min – 1 hour).

Let me know if you have any additional questions.

-Chuck

Chuck Durham
PG Environmental
(615) 888-2928 (Office)
(615) 202-2382 (mobile)

From: Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>
Sent: Wednesday, April 22, 2020 3:43 PM
To: Chuck Durham <Chuck.Durham@pgenv.com>; David Adams <dadams@ci.eureka.ca.gov>
Cc: Chand, Gurgagn@Waterboards <Gurgagn.Chand@Waterboards.ca.gov>; Cheung, Steve@Waterboards <Steve.Cheung@Waterboards.ca.gov>; Sirese Jacobson <Sirese.Jacobson@pgenv.com>; Whitson, Amelia

<Whitson.Amelia@epa.gov>; Peter Kozelka <Kozelka.Peter@epamail.epa.gov>
Subject: RE: Eureka PCI under EPA contract R9-16-02 //Task Order-68HE0918F0417

Hi Chuck:

I am looking over Eureka's 2019 PT annual report and last PCI report this afternoon. I also have your checklist.

I assume that you will lead the interview discussion tomorrow. Is there anything in particular that I need to be prepared to do? I will keep meticulous notes knowing that I will be preparing the report.

Thanks,
Cathy

From: Chuck Durham <Chuck.Durham@pgenv.com>
Sent: Monday, April 6, 2020 4:33 PM
To: David Adams <dadams@ci.eureka.ca.gov>
Cc: Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>; Chand, Gurgagn@Waterboards <Gurgagn.Chand@Waterboards.ca.gov>; Cheung, Steve@Waterboards <Steve.Cheung@Waterboards.ca.gov>; Sirese Jacobson <Sirese.Jacobson@pgenv.com>; Amelia Whitson <Whitson.Amelia@epa.gov>; Peter Kozelka <Kozelka.Peter@epamail.epa.gov>
Subject: RE: Eureka PCI under EPA contract R9-16-02 //Task Order-68HE0918F0417

EXTERNAL:

Hi David,

This email confirms the Pretreatment Compliance Inspection (PCI) of City of Eureka pretreatment program, to be performed under R9-16-02 //Task Order-68HE0918F0417, which we discussed by telephone last week. The PCI is scheduled for Thursday, April 23, 2020 at 10:00am PDT. The PCI interview and document review will be performed remotely. If possible, we would like to conduct the interview portion of the file review via Microsoft Teams (a video conferencing platform), or alternatively by phone. The remote PCI will begin with the interview, followed by PG's review of selected Significant Industrial User (SIU) files. Upon reviewing the annual report and consultation with Regional Board and State Water Board staff, PG will select specific SIU files for review. PG can provide a link to a OneDrive location so that files can be uploaded, if needed, or if you have a Sharepoint site you prefer to use that will work as well.

Enclosed is the PCI checklist our staff will be using for the interview. It is recommended that you review the PCI checklist prior to the inspection.

Below are some of the documents we typically review during the PCI:

Sewer Use Ordinance
Local Limits
Enforcement Response Plan
NPDES permit/WDR
Most recent Pretreatment Program Annual Report – <u>if you can provide this via email in advance, that would be ideal</u>
Response to your most recent PCI – <u>if you can provide this via email in advance, that would be ideal</u>
Most recent significant noncompliance publication, if applicable
Significant industrial user files

In addition to the POTW files listed in the confirmation email above, the following files (for the past three years) will need to be uploaded for the SIU file reviews:

- SIU permit
- SIU permit application
- SIU fact sheet (if applicable)
- Control Authority compliance sampling (including analytical lab reports and chain-of-custody [COC])
- Control Authority compliance inspections
- SIU self-monitoring reports (including analytical lab reports and COC)
- Enforcement documentation
- Slug discharge control plan (if applicable)

Please note that the PCI will not be considered complete until the onsite industrial user site visits can be conducted. These onsite industrial user site visits will be postponed until the prohibition on travel is lifted.

Just as an fyi, those participating in the inspection include PG Environmental staff (myself and Sirese Jacobson), Cathy Goodwin from the Regional Board, and possibly Gurgagn Chand and Steve Cheung from the State Water Board. If you have any questions or concerns about your PCI, please feel free to contact me at the number below.

I will be sending out an invite shortly with call-in information and a link to join via Microsoft Teams.

Thank you for accommodating this alternative approach to the inspection.

Respectfully,

Chuck Durham
PG Environmental
(615) 888-2928 (Office)
(615) 202-2382 (mobile)

From: David Adams <dadams@ci.eureka.ca.gov>
Sent: Thursday, April 2, 2020 7:03 PM
To: Chuck Durham <Chuck.Durham@pgenv.com>
Cc: Goodwin, Cathleen@Waterboards <Cathleen.Goodwin@waterboards.ca.gov>
Subject: Re: Eureka PCI

[EXTERNAL Sender Outside PG]

Hello Chuck,
I have been out of the office but have received your request. I will try to send a copy of the annual report tomorrow. Am currently working out details of a remote workstation but tentatively could set a time for Thursday 23rd at 10:00am.

Regards,

David Adams
Source Control Inspector II
City of Eureka
(707) 441-4362

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------
From: Chuck Durham <Chuck.Durham@pgenv.com>
Date: 4/1/20 4:10 PM (GMT-08:00)
To: David Adams <dadams@ci.eureka.ca.gov>
Cc: "Goodwin, Cathleen@Waterboards" <Cathleen.Goodwin@waterboards.ca.gov>
Subject: Eureka PCI

Hi David,

This email serves as a follow-up to the voicemail I left late the afternoon. The North Coast Regional Water Quality Control Board (Regional Board) has requested contractor support through Region 9 to conduct a pretreatment compliance inspection of the City of Eureka pretreatment program. Due to concerns regarding the coronavirus (COVID-10) outbreak, on-site evaluation is not possible at this time. As decided upon in discussion with EPA Region 9 and the SWRCB, the following approach is currently being taken to complete these tasks:

- If possible, we would like to conduct the interview portion of the file review via Microsoft Teams. We can provide you a link and call-in number to join the meeting. You can choose to be visible by camera on your computer, turn camera off, or simply just call in. Either will work sufficiently. You can also forward the invite to anyone else you may wish to take part in the interview.
- PG will provide you with a list of documents necessary for us to complete the file review component remotely and provide you with a link to which you may upload scanned files. The only document we really need prior to the PCI is the latest annual report so that we can decide which industries we want to evaluate as part of the file review.
- the on-site industrial user site visits will be postponed until such time that all travel bans and shelter-in-place restrictions are lifted.

If possible, we would like to schedule the PCI for the week of April 20-24. If you have a preference on the day or time, please let me know and I'll send out a confirmation email. I don't anticipate needing more than two hours for the interview call. We can also schedule a time for a Closing Interview to review our findings during that first call.

If you have any questions about this process, I'm happy to discuss them with you in more detail over the phone. You can reach me at either of the numbers below. If you are unavailable any of the dates proposed, please provide me with alternate dates for consideration. Thank you.

Respectfully,

Chuck Durham
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(615) 202-2382 (Mobile)
chuck.durham@pgenv.com

Visit our website at www.pgenv.com

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