From:	matt froneberger
To:	NorthCoast
Cc:	Goodwin, Cathleen@Waterboards; Kalyan, Imtiaz-Ali@Waterboards
Subject:	FW: Forestville Permit
Date:	Monday, November 27, 2017 4:34:15 PM

Below are comments for public record regarding the pending Draft Permit for the Forestville Water District Wastewater Treatment, Reclamation and Disposal Facility. REF# R1-2012-0012

Matthew D Froneberger
General Manager
Forestville Water District
707 887 1551
cpomatt@gmail.com
www.forestvillewd.com

From: matt froneberger [mailto:cpomatt@gmail.com]
Sent: Monday, November 27, 2017 4:30 PM
To: 'Goodwin, Cathleen@Waterboards' <Cathleen.Goodwin@waterboards.ca.gov>; Kalyan, Imtiaz-Ali@Waterboards <Imtiaz-Ali.Kalyan@Waterboards.ca.gov>
Cc: David Long <long@brce.com>; Forestville Water District <fwd@sonic.net>; Steven Bandettini <bandets@sonic.net>; Malcolm T. Manwell <Manwell@perrylaw.net>; Martin L. Hirsch <Hirsch@perrylaw.net>
Subject: RE: Forestville Permit

Cathy / Imtiaz:

At this time, the District only has general comments regarding the pending Draft Permit.

The District does not agree with the NCRWQCB has elected to continue to increase mandates on this (and other) local Districts, especially those that result in increased costs that must be passed on to the citizenry of Forestville. Unfortunately, based on past experiences here and at other jurisdictions, we feel that it is fruitless to spend time and much needed resources exhaustively reviewing and contesting new items contained in the draft as we do not feel that it is likely or even possible our input would alter in any meaningful way said Draft Permit. Each of the new items that have been proposed for adoption come with an associated cost, and as stated before, our resource pool is limited and those resources are needed just to maintain and operate the District. Where does it end? Each successive Permit contains even greater restrictions with no sign of slowing. Is there an end-point that the NCRWQCB is headed toward? Furthermore, Permits are unique, in that the requirements for one jurisdiction can vary by small or very large degrees based on what appears to be little or no good reason, especially when comparing those that have the same receiving waters.

The District continues to take exception with the organization of the Permit itself. The style incorporated by the NCRWQCB is cumbersome at best and intentionally confusing at worst. The Permit is rife with cross references that require constant review elsewhere in the Permit. On page #13 of ORDER NO. R1-2012-0012 there are references to over twenty other places within and

without the permit. A clear, concise Permit that is straightforward and easily read and understood would be of great help to those of us that are required to follow the rules. A helpful component would be to integrate a single timeline that addresses all items that are due to be completed during the Permit lifecycle, or a single section that outlines all discharge prohibitions as well as limitations for all constituents.

As a result of the District's Compliance Schedule Request, we expect that the NCRWQCB will issue a CDO to establish interim limits and timelines for compliance of the items covered. The Request addresses many of the difficulties and objections that were discovered in the Draft Permit.

Lastly, The District takes exception of the apparent 'double standard' that is applied to compliance. As required in ORDER NO. R1-2012-0012 the District completed its due diligence and submitted the required documentation for re-issuance of its Permit. The ROWD was completed and submitted in June of 2016 for consideration and adoption prior to or as near as possible to the sun-setting of the current permit. This is especially important with regard to final copper effluent limit compliance. The District, at great expense, completed an exhaustive copper WER study and submitted said report for incorporation to the pending Draft Permit. Unfortunately, because the new permit has not been issued that includes those findings, the District has the potential for exposure, albeit slight, to violations of discharge requirements as well as potential third-party action. The District is appreciative that the NCRWQCB is addressing this item through other means, but is understandably concerned moving forward.

All this being said, the District is committed to comply with any and all requirements that are placed upon it, and look forward to a continuing good relationship with the NCRWQCB and their staff.

I would appreciate any responses to these comments from either of you or from your office and will be happy to answer any questions that you may pose.

Regards,

Matthew D Froneberger
General Manager
Forestville Water District
707 887 1551
cpomatt@gmail.com
www.forestvillewd.com

From: Goodwin, Cathleen@Waterboards [mailto:Cathleen.Goodwin@waterboards.ca.gov]
Sent: Monday, November 27, 2017 1:20 PM
To: Matt Froneberger (cpomatt@gmail.com) <cpomatt@gmail.com>
Subject: Forestville Permit

Hi Matt:

Today is the last day of the public comment period for the draft Forestville permit. Will you be submitting comments?

Cathy