



Reference: 011197.214

March 6, 2018

Mr. Justin McSmith
Water Resource Control Engineer
NPDES Wastewater and Storm Water Unit
North Coast Regional Water Quality Control Board
550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

Subject: Comments on Draft Order R1-2018-0013, for WDID 1B85026RHUM, NPDES Permit No. CA0024571

Dear Mr. McSmith:

SHN Engineers & Geologists is submitting the following comments on behalf of DG Fairhaven, LLC (DGF) regarding the draft North Coast Regional Water Quality Control Board (Regional Board) Order R1-2018-0013 for National Pollutant Discharge Elimination System (NPDES) permit CA0024571 (facility Waste Discharge Identification No. 1B85026RHUM).

1. Page 1. Facility design flow and maximum anticipated discharge flow rate reported as the same value (0.145 MGD).

DGF would like to request that the Regional Board retain the maximum anticipated discharge flow rate of 0.350 MGD from the previous order (R1-2012-0027). The maximum anticipated discharge flow rate has been reduced from 0.350 MGD to 0.145 MGD from the previous Regional Board Order (R1-2012-0027). The report of waste discharge (ROWD) submitted on June 30, 2016, reports that the maximum daily flow observed was 0.634 MGD, the maximum 30-day flow observed was 0.135 MGD, and the long-term average flow observed was 0.109 MGD (SHN, 2016). The maximum instantaneous flow rate of 0.634 MGD was mistakenly reported as the maximum daily flow rate. The maximum daily flow rate during the reporting period included in the 2016 ROWD was actually 0.186 MGD.

2. Page 5, Table 4. Total recoverable copper mass effluent limits for discharge point EFF-001 for maximum daily and instantaneous maximum values have been calculated using the highest 6-month median flow rate.

DGF would like to request that the Regional Board consider calculating mass effluent limitations for total recoverable copper at EFF-001 using the maximum daily flow rate for the maximum daily discharge limit, and the instantaneous maximum flow rate for the instantaneous maximum discharge limit. Calculation of these values for compliance reporting is based on the daily maximum and instantaneous maximum flow rates. Section III.C.4.k of the 2015 Ocean Plan is unclear as to the flow rate to be used in determining mass emission effluent limitations, stating only that the observed flow rate is to be used in each case. In this case, the observed daily maximum flow rate would be 0.186 MGD, and the observed instantaneous maximum flow rate would be 0.634 MGD, which would result in total recoverable copper mass emission limitations of 1.9 pounds per day

Mr. Justin McSmith

Comments on Draft Order R1-2018-0013, for WDID 1B85026RHUM, NPDES Permit No. CA0024571

March 6, 2018

Page 2

(lb/d) and 17 lb/d, respectively. It should be noted that the instantaneous flow rate and mass emission rate is reported as daily values, which reflect relatively high values of flow and mass emission, when they are in fact instantaneous values that would not actually result in an emission rate of 17 pounds in any given day.

3. Page 6, Table 4, footnote 6. Should refer to section VII.G regarding calculation of mass results instead of VII.H which pertains to chronic toxicity.
4. Page 11, Section VI.C.2.a. Please clarify the date by which the climate change readiness study plan is to be submitted to the Regional Board. The Order indicates that the climate change readiness study plan should be submitted to the Regional Board by August 1, 2022, whereas the cover letter indicates the study plan is to be submitted by June 1, 2022.
5. Page 11, Section VI.C.2.a. Please clarify whether the climate change readiness study plan (due either June 1, or August 1, 2022) is to include a plan to complete items listed in the second paragraph of Section VI.C.2.a, or if all items listed in the second paragraph of Section VI.C.2.a are to be completed by the due date.
6. Page 14, Section VI.C.6.a. Please clarify why potential stormwater runoff to the facility is to be included in the annual wastewater permit report. The facility currently maintains an approved notice of non-applicability (NONA) with respect to the Industrial General Permit, and there is no evidence that we are aware of that indicates stormwater runoff to the facility is an issue. See also: Fact Sheet page F-33, Section VI.B.6a.
7. Page E-3, Section II, Table E-2. The monitoring location EFF-010 description of low-volume waste should no longer include screw and bearing cooling process water. See also: Page 1, Table 2.
8. Page E-3, Section III.A.1, Table E-3. Total recoverable zinc, flow weighted 24-hour composite sampling added.

DGF would like to request that the Regional Board consider removing the added composite sampling requirement for zinc from EFF-001. DGF has historically low zinc concentrations at EFF-001 (less than 1 mg/L) with a single elevated sample collected on October 22, 2013 (1.89 mg/L). It is believed that the elevated concentration of zinc in this sample was an anomaly, possibly due to a lack of flushing of the sample pipe during sample collection. This may have resulted in collection of a sample with elevated zinc that leached from galvanized piping into the sample water. This sample was two orders of magnitude greater than any other monthly sample collected at EFF-001 in the 4.5 years since that time.

9. Page E-6, Section III.C.1, Table E-5, footnote 5. Refers to MRP Section III.B regarding priority pollutant identification. Please clarify; Section III.B does not include any language about priority pollutant identification. See also: Section VIII.A regarding cooling tower maintenance chemical records.
10. Page E-6, Section IV.A.1. Refers to Table E-5 regarding WET at Discharge Point 001; however, Table E-5 is for monitoring location EFF-020. Table E-3 includes Discharge Point 001 toxicity monitoring information.

Mr. Justin McSmith

Comments on Draft Order R1-2018-0013, for WDID 1B85026RHUM, NPDES Permit No. CA0024571

March 6, 2018

Page 3

11. Page E-11, Section IV.B.2, first paragraph. Refers to Section V.A.8 twice, regarding accelerated monitoring for toxicity testing; Section IV.A.8 includes accelerated monitoring requirements.
12. Page E-12, VIII.A. Refers to Section III of the MRP regarding priority pollutant monitoring for cooling tower maintenance chemicals. The only mention of this in Section III is as noted above in Comment 9.
13. Page E-12, Section VIII.B. Biological Survey. Please provide more detail about what is required for the biological survey. See also: page A-2, definition of *Degrade*.

Requirements for these surveys remain unclear with regard to the following:

- Length and number of transects required for monitoring
 - What constitutes a reference site
 - The minimum number of species of demersal fish, benthic invertebrate, or attached algae that must be included in the evaluation
 - Whether consideration will be made for sites with low visibility regarding the time schedule for completion
14. Page F-3, Section I, Table F-1. Facility design flow and maximum anticipated discharge flow rate reported as the same value (0.145 MGD). See Comment 1.
 15. Page F-6, Section II.C, Table F-4. Discharge Point 020, total recoverable zinc monitoring data reported as 10.1 mg/L for both highest 30-day average discharge and highest daily discharge. Our data indicate the highest single value for Monitoring Point 020 was 0.113 mg/L on April 16, 2015. Please specify where the value of 10.1 mg/L comes from, or whether this value was possibly reported in error.

Mike Foget (SHN) will be speaking at the May 17 public hearing about removing the additional zinc sample testing requirement for monitoring point EFF-001 as discussed above in Comment 8.

Bob Marino (DGF) will be speaking at the May 17 public hearing about the maximum anticipated facility discharge flow rate as discussed above in Comment 1, and removing the added annual reporting requirement for stormwater runoff to the site as discussed above in Comment 6.

Chuck Swanson (SHN) will be speaking at the May 17 public hearing about using the observed daily maximum flow rate and the instantaneous maximum flow rate for calculation of water quality based effluent limitations for copper mass emissions as discussed above in Comment 2.

References Cited

SHN Engineers & Geologists. (2016). *Report of Waste Discharge, Fairhaven Power Facility, Samoa, California*. Eureka, CA:SHN.

Mr. Justin McSmith

Comments on Draft Order R1-2018-0013, for WDID 1B85026RHUM, NPDES Permit No. CA0024571

March 6, 2018

Page 4

We look forward to your responses to our comments. If you have any questions, please call me at 707-441-8855.

Sincerely,

SHN Engineers & Geologists



Mike Foget, PE
Project Engineer

MKF/CRS:lms

c.: Mr. Bob Marino, DG Fairhaven Power LLC

