

December 30, 2008

Email to SLCWD Board

Dear SLCWD Board,

After reviewing the various reports concerning this year's water quality control board complaint about DSPUD's algae growth and discharge violations, I submitted the attached comment.

My concerns, as you will read in the comments, is that the violations may be operational and do not require expensive upgrades to fix. My concerns are also that DSPUD is not doing all it can to keep the South Yuba clean.

Last month I asked Tom Skjelstad and Jim King why the plant seemed to work fine some months and not others. They used the "stock" excuses that cold influent temperature, erratic flows and I&I were to blame. I then pointed out that the plant seemed to work fine (no violations) during January, February, March and April, which are the worst months for the "stock" excuses, but fails (has violations) during the warmer, non-I&I, and relatively consistent (but low) flow months of June, July, October, November and December. I asked if the real problem may be low-flow conditions, and maybe something can be done operationally to fix low-flow processing. I received no reply.

I feel that there may be a lot of relatively inexpensive fixes that have not been examined properly. I also question why the engineering firm that designed the plant, knowing the ammonium and nitrate discharge limits, and also knowing the temperature, erratic flow and I&I issues, is not being held responsible for making the plant work as spec'd.

Some fixes may be as simple as insulation or enclosures to protect the processing tanks from the weather, or better control loops for "feeding" the inflow to equalize the input load ("feeding" appears to be more "ad-hoc" and manually done rather than automated). The equalization tank seems undersized at 0.2mg, as the average flow is around 0.2mgd. A tank this size would equalize any day/night variations, but would not be as effective for any weekend/weekday variations where several days storage would be needed. A second equalization tank would also allow one to measure inflow loading in one tank and properly "feed" it in the second. Feeding the tanks with oxygen to aid the aerobic "bugs" may also be useful if it isn't currently being done.

My overall feeling is that DSPUD is using the threat of expensive upgrades to either get dilution credits (bad for the South Yuba), or push for big development to pay for the upgrades. Before buying into the "expensive upgrades" argument, I feel it is imperative that DSPUD explain why their plant works the best under what they consider the worst conditions, and demonstrate that all possible fixes, rather than upgrades, be explored.

The bottom line is that the plant is close to working-- SLCWD should insist that DSPUD fix it, not replace it or further pollute the South Yuba by claiming "dilution", and certainly not approve any expansion until the plant works properly.

Joe Gray

Attachement: [Letter to Regional Water Control Board](#)

