CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD

INSPECTION REPORT

30 June 2023

DISCHARGER:	Grizzly Lake Community Services District
FACILITY:	Delleker Wastewater Treatment Plant
CONTACTS:	Pat Guillory, General Manager
INSPECTION DATE:	9 May 2023
INSPECTED BY:	Mike Nilsen, Central Valley Water Board
ACCOMPANIED BY:	Daniel Sylvia, Operator Eric Holmes, Operator
CIWQS INSPECTION ID:	52190658
CIWQS PLACE ID:	219530
WDR ORDER NUMBER:	R5-2019-0052 (NPDES CA0081744)
PURPOSE:	Follow-up inspection

Background

On 19 April 2023, Central Valley Regional Water Quality Control Board staff (Central Valley Water Board) conducted a compliance evaluation inspection of the Grizzly Lake Community Services District's (Discharger) Delleker Wastewater Treatment Plant (Facility). The purpose of the inspection was to evaluate compliance with Waste Discharge Requirements (WDRs) Order R5-2019-0052 (NPDES CA0081744).

Central Valley Water Board transmitted the inspection report and Notice of Violation on 31 May 2023. During the inspection, multiple violations of the WDRs and comments were noted by Central Valley Water Board staff (Staff).

After the inspection, Staff and the Discharger discussed unauthorized discharge to surface water during the discharge to surface water prohibition period of 1 May through 31 October. The Discharger requested an exception to WDRs Discharge Prohibition III.F, partly due to the lack of available capacity in treatment ponds, and the Central Valley Water Board responded to the request in a letter dated 1 May 2023. The response letter communicated that an exception to the discharge prohibition was not

granted and further, if the Discharger chose to discharge to surface water during the discharge to surface water prohibition period, additional monitoring and progress reports would be required.

On 9 May 2023, I completed an unannounced follow-up inspection at the Facility to observe the conditions at the Facility since the 19 April 2023 inspection and observe Facility operations and maintenance activities.

Inspection photographs are provided in Attachment A.

Inspection Observations

I arrived on site at approximately 1030 on 9 May 2023 and met with Pat Guillory (General Manager) in the Discharger's office. Pat notified operators Daniel Sylvia and Eric Holmes that I was on site and they met in the office. I explained the reason for the unannounced inspection was to observe Facility operations and follow up on conditions noted in the inspection report from the 19 April 2023 inspection. I also discussed monitoring requirements in the permit and referenced the 1 May 2023 letter sent by the Central Valley Water Board for additional monitoring when discharging during the discharge prohibition period (after May 1). I also discussed the weekly progress update sent by the Discharger the day before, May 8, which noted that the Discharger stopped discharging on Friday, May 5.

I visited the Facility with both operators. The weather at the time of the inspection was partly sunny and there was not any snow on the ground at the Facility or in the nearby city of Portola. Previous to the inspection there was a small storm, but the amount of precipitation appeared small enough to not affect Facility operations.

I observed the influent vault and observed the influent flow had receded since the 19 April 2023 inspection to a flow rate that was low enough to be accurately measured by the flow measurement device. Operators showed me that permanent freeboard measurement gauges were present in Ponds 1 and 3, which were not present during the previous inspection and were likely fully submerged. Freeboard measurement appeared to be about 2.5 feet in both Pond 3 and Pond 1.

Operators then showed me that flow to the chlorine contact basin from Pond 5 was shut off, and no effluent was leaving the Facility. Chlorinated wastewater remained in the chlorine contact basin but was left there until discharge would be started up again. The operators also demonstrated that due to more favorable weather conditions and the berms drying out since last inspection, they were able to rehabilitate areas of the berm that needed maintenance.

Operators then noted a large crack in the chlorine contact chamber that was submerged during the previous inspection. They noted that this is the likely cause of the chlorine contact basin seeming to be "sinking" into the surrounding land.

The operators noted that visible seepage still remained next to the Pond 5 southern berm and near the chlorine contact chamber. I collected samples of the water from both locations for total coliform and specific conductivity to be compared to the wastewater in Pond 5. Specific conductivity samples were analyzed in the field with a hand-held meter and total coliform samples would be taken to a laboratory to analyze. Additionally, I collected samples of the river for specific conductivity approximately three-quarters of a mile downstream of the discharge location.

I then provided sample bottles for the operators to collect total and dissolved metals samples at RSW-001. Operators have been struggling with labs to obtain proper filters to collect dissolved metals data in the river, so I provided bottles to collect appropriate data according to the WDRs.

The operators also discussed the likely need to continue discharging wastewater past May 1 in violation of the discharge prohibition in their NPDES permit. I informed the operators that if they needed to continue doing so, they need to follow the requirements of the Central Valley Water Board letter dated 1 May 2023, including additional samples and weekly progress updates.

I concluded the inspection and left the site at approximately 1200.

Water Quality Data Analysis

Samples of the water near Pond 5 collected during the inspection were dropped off at Pace Analytical[1] later in the day. Later, fecal coliform was added to the analysis. The results of the field collected samples and laboratory analysis collected on 9 May 2023 are provided in Table 1:

Table 1. Water Quality Sampling Results

Parameter	Plan Q	Chlorine Contact Basin	Pond 5	Receiving Water (Downstream)
Total Coliform (MPN/100mL)	>1600	>1600	Not sampled	Not sampled
Fecal Coliform (MPN/100mL)	<1.8	2.0	Not sampled	Not sampled
Specific Conductivity (µS/cm)	401	483	323	138

[1] Samples were analyzed by Pace Analytical, a California Environmental Laboratory Accreditation Program (ELAP)-certified laboratory.

The results indicate a similarity between specific conductivity from both seepage locations and the wastewater in Pond 5. Although both seepage locations resulted in elevated total coliform results, neither resulted in elevated fecal coliform.

Summary

1. Staff completed a follow-up inspection to observe the conditions at the Facility since the 19 April 2023 inspection and observe Facility operations and maintenance activities. Since the 19 April 2023 inspection, certain conditions at the Facility have appeared to improve or been addressed, specifically for the violations listed below in reference to the 19 April 2023 Inspection Report and 31 May 2023 Notice of Violation (NOV):

    a. Treatment ponds are currently being operated with more than 2 feet of freeboard. Although some treatment ponds have permanent staff gauges, not all ponds had permanent staff gauges present. Additionally, operators were repairing the berms around ponds. (NOV, Item 6, subsection ix)

    b. Influent flow measurement appears to be accurate since flow has receded to a level within the instrument's capability. This appears to be related to the reduced pond surface water elevation. (NOV, Item 10, Monitoring section III.A)

    All other violations and staff comments noted in the 19 April 2023 Inspection Report and NOV have not been addressed.

2. Staff gathered samples of water on the ground adjacent to Pond 5. Water quality results indicate a similarity between specific conductivity from both sample locations and the wastewater in Pond 5. Although both sample locations resulted in elevated total coliform results, neither resulted in elevated fecal coliform.

3. During the 19 April 2023 inspection, Staff noted that wastewater appeared to be seeping through berms and released onto the ground adjacent to Pond 5. This was observed again during this inspection and samples further reinforce that the berms around Pond 5 appear to be seeping partially treated undisinfected wastewater.

4. Staff informed the operators that if they needed to continue discharging wastewater to surface water past May 1, they need to follow the requirements of the Central Valley Water Board letter dated 1 May 2023, including additional samples and weekly progress updates.

Inspector

Michael Nilsen

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Water Boards

Mike Nilsen, PE
Water Resource Control Engineer

Reviewer

Stacy S. Gotham

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Water Boards

Stacy Gotham, PE
Senior Water Resource Control Engineer