



December 16, 2011

**Certified Mail**

California Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, #1400  
Oakland, CA 94612

Attention: Ms. Tong Yin, Ph.D., P.E.

Re: Self-Monitoring Program Reports  
Novato Wastewater Treatment Plant

Enclosed please find the **November 2011** Monthly Self Monitoring Report for the Novato Wastewater Treatment Plant, and the Reclamation area. This report was prepared by Bob Adamson, Acting Laboratory Supervisor and John Bailey, Project Manager Veolia Water.

"I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Bailey', written over a horizontal line.

John Bailey  
Project Manager  
Veolia Water West - Novato CA

- ☐ NPDES violations noted this month
- ☐ Wastewater was diverted to Reclamation for irrigation this month.
- ☐ Wastewater treatment violations noted this month - see attached Evaluation of Violations Report.
- ☒ Reclamation facility violations noted this month - see attached Evaluation of Violations Report.
- ☒ Overflows occurred this month- see attached Overflow Report



NOVEMBER 2011

NOVATO SANITARY DISTRICT  
VEOLIA WATER WEST OPERATING SERVICES

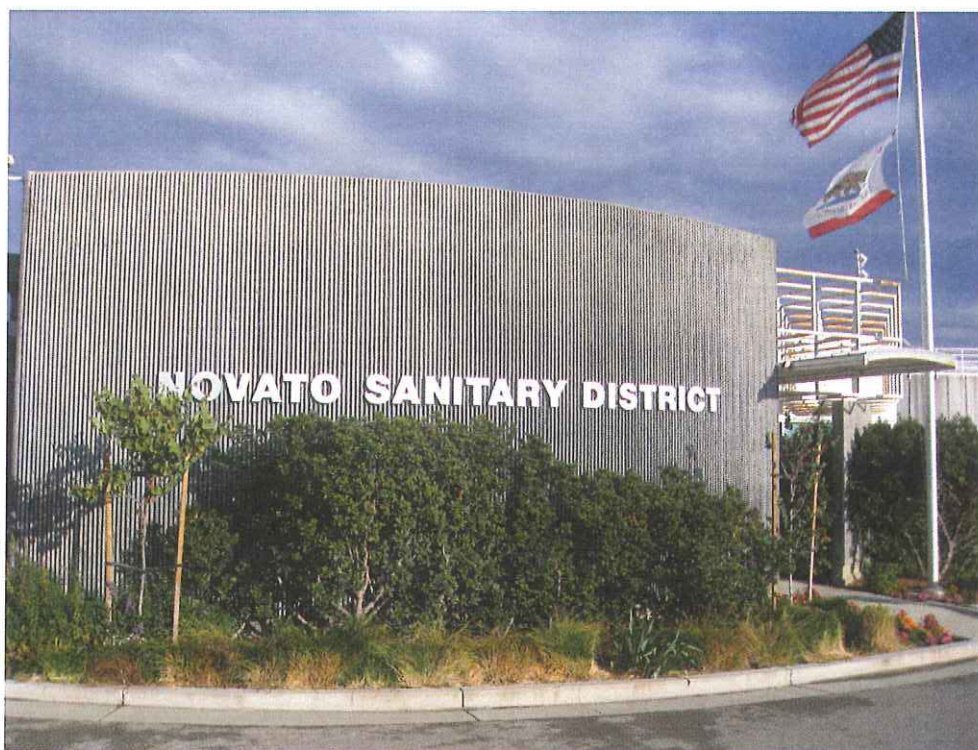
SELF MONITORING PROGRAM

for

THE NOVATO SANITARY DISTRICT

and

RECLAMATION AREA





# NOVATO SANITARY DISTRICT SELF-MONITORING PROGRAM

## Novato Plant

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For: November 2011

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### NOTES

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#### ANALYTICAL NOTE:

- All BOD analysis is by Standard Methods 5210 B.
- All TSS analysis is by Standard Methods 2540 D.
- The District continued the Chronic Toxicity, Toxicity Identification Evaluation (TIE) and accelerated monitoring. The November toxicity result was 30.3 TUC. On December 7<sup>th</sup> a meeting with Aqua Science was held to discuss findings to date and a path forward. Preliminary work indicates two possible types of toxicity. High mortality of test organisms and reproductive interference. We are continuing to work with Aqua Science to resolve the cause of toxicity.
- The *Chronic Toxicity Summary Table* under *Report Notes* below has been updated with November data. An erroneous Tuc result submitted in October has also been corrected.

The bullet item that follows was extracted from the September 2011 SMR and provides additional TIE background.

- The District initiated a TIE on February 16, 2011, due to the February 2, 2011 chronic toxicity EC<sub>25</sub> (%) result of 8.6 TUC. The Water Board staff has received reports of the Phase I TIE report with the results of the initial findings under a separate correspondence dated March 23, 2011. Part of the first phase of the TRE plan is to investigate the District's internal process streams. Chronic toxicity tests were performed on March 28, 2011 and April 18, 2011 as part of the internal processes investigation. The April chronic toxicity test resulted in a 43.5 TUC value. Water Board was notified and a TIE on the April samples was initiated on May 10, 2011. Another TIE was initiated on June 23, 2011. *Aqua Science* laboratory completed a site visit on August 11, 2011 to view facilities to determine if sampling equipment or protocol may have affected the observed toxicity results. A summary of the events and the results are included in the Interim Phase I report and are included in the *Appendices* of this SMR. The District will resume compliance chronic testing in October along with the TIE testing.
- A "J" symbol reflects estimated analytical result value detected below the Reporting Limit (R.L.) and above the Method Detection Limit (MDL). The "J" flag is equivalent to the DNQ Estimated Concentration flag.
- Value results of "< 1.0" are reported as "1.0 MPN/100 mL to complete the calculation of the geometric mean.

**Novato Sanitary District  
Self-Monitoring Report –September Reclamation 2011**

- An enterococcus sample taken on November 10<sup>th</sup> was read two hours early and therefore has been deemed invalid. The sample result was <1 and the inclusion/exclusion has no bearing on compliance. The required number of (3) valid samples were collected and reported for the week.

**REPORT NOTE:**

- Values are reported to significant figures, as required by permit limits.
- All laboratory values with “J” or “DNQ” values are “estimated concentration” values. The electronic system does not accommodate written parameters; this notification is to satisfy requirement E-11, 4b. of the District’s NPDES permit of identifying all “J” or “DNQ” values as “estimated concentration” values.

- Below is a summary of Chronic Toxicity activities for the last 11 reports.

Tabular Summary of Effluent Test Results (most sensitive endpoint) Chronic Toxicity Testing

Test Date	Jun-10	Oct-10	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11	Oct-11	Nov-11
EC25	>100	>100	10.8	>100	>100	11.6	58	2.3	4.9	3.3
NOEC	<6.25	100	12.5	100	100	6.25	50	<6.25	12.5	<6.25
Tuc (100/EC25)	<1.0	<1.0	9.3	<1.0	<1.0	8.6	1.7	43.5	*20.4	30.3

\*The October summary erroneously reported 8.0 Tuc for October 2011.

**OPERATION NOTE:**

Treatment plant was in Bay Discharge mode throughout the month of November. Irrigation ceased on November 8<sup>th</sup>.

**VIOLATIONS FOR NOVEMBER 2011**

**NPDES - None**

**WDR pH - E-008 (Reclamation Storage Pond #2): pH 9.5 November 4, 2011**

A wide fluctuation in pH is normal for pond operations. This is a naturally occurring condition due primarily to photosynthesis and the oxygen / carbon dioxide cycle.

**No discharge from this location occurs.**

<p style="text-align: center;"><b>Novato Sanitary District</b> <b>Self-Monitoring Report –September Reclamation 2011</b></p>
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**COLLECTION SYSTEM OVERFLOWS FOR OCTOBER 2011**

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The Novato Sanitary District Collection System had one overflow for November 2011:

Monday, November 21, 2011, 1169 Midway Ct, Novato CA, 2 gallon SSO,  
Event ID 773423, Certification ID 914213

**EVALUATION OF THE OVERFLOW FOR NOVEMBER 2011**

1169 Midway Ct: A root blockage in the District main caused a discharge of approximately 2 gallons to the curb and gutter. District staff relieved the blockage and cleaned the curb and gutter recovering 100 percent (2 gallons) of the overflow. Staff televised the main line identifying significant root intrusion at 3 places within the first 15 feet downstream from the overflow manhole, the remainder of the main is in good condition. A repair request has been submitted to replace the first 15 feet of this main line. This line segment was last cleaned on 5/17/2011 and is on a 24 month schedule. The type of nozzle used to clean this line segment has been changed and the cleaning frequency changed from 24 months to 12 months until repairs can be made. There were no storm drains, drainage ditches or waterways affected by this discharge.