



# City of Livingston

1416 C Street  
Livingston, CA 95334

## NOTICE OF VIOLATION CITY OF LIVINGSTON WRITTEN RESPONSE

**Given the critical nature of laboratory results, both for reporting permit compliance and evaluating plant loadings, data accuracy must be assured.**

**The City of Livingston is developing a QA/QC program that includes Standard Operating Procedures (SOPs) Sample Location Methods, and Schedule for QA/QC Requirements.**

- (1.) Test Description**
- (2.) Test Date and Time**
- (3.) Time and Date sample was sent to lab. Chain of custody control.**
- (4.) Person who took sample.**
- (5.) All operators are knowledgeable in sampling techniques, and will train OIT's and new employees.**
- (6.) The Treatment Plant will be using a white board to log all sampling that is required for each month, beginning Oct. 2014. This information will also be recorded in a log book for a permanent record.**
- (7.) Final Effluent to Pond #7 & #8, depending which pond is being used at the test time, will be tested for COD, Nitrate as Nitrate and TKN Nitrogen in Oct, 2014.**

**Monitoring Wells #6 & #7 have been on the testing schedule since July, 2014.**

**This will put the City of Livingston in compliance under Order Number 89-066.**

**This written response should satisfy the NOV of 5 Sept. 2014.**

*Gerald Davidson 9-25-14*

**Gerald Davidson  
Chief Plant Operator**

**Date**

**COPY**

**CITY OF LIVINGSTON**  
**TENTATIVE WDR REQUIREMENTS**

The following comments on the draft WDR are of concern to the City and it is my opinion that there are findings that are unnecessary.

- Finding #16, page 3:
  - The sludge holding pad is stated to be in a 100 year flood plain, however, it is known that Pond #'s 1, 2 and 3 are out of the 100 year flood plain. The Sludge pad elevation is 4 inches higher than that of Pond #1. We used monitoring well # 2 for the set point elevation which is 100.43 feet. We also took elevation from the sludge pad and compared it to the natural ground elevation. The east side of the ground elevation was 3.2 feet and the west side was 4 feet lower than the sludge pad.. This clearly shows that the sludge pad is not in the 100 year flood plain.
- Finding #16, page 4:
  - In talking with Dave Stringfield of Carollo Engineering, who designed the treatment system, the pad was designed to be above the 100 year flood plain.
  - The sludge pad consists of soil cement of a depth of 12 inches which was confirmed by actual excavation next to the sludge pad.
  - It is my belief that the ground water is well protected; otherwise, there would be indication in the monitoring well samples.
  - Old abandoned burn dumps:
    - In 1969 the burn dump was no longer being used, however, I can't find how it was sealed or encapsulated. The City has no records going back 45 years.
- Finding #17, page 4:
  - In the contract document dated, June 1989 by Dewante & Stowell Engineering, Wastewater Treatment Plant Expansion – page 02226-4 and page 02226-5, the bottom and inside slopes of the sludge lagoon shall be treated with a soil cement of at least 6 inches, (please see attached). The shows that both sludge lagoons are sealed according to the contract document.
  - This should eliminate any technical report per your request.
- Finding #22, page 5:
  - We were not able to find any information regarding what the elevation is for the 100 year flood plain. According to FEMA maps they used Zone A as the 100 year flood plain.

- Pond #1 is not in Zone A and the sludge storage pad is 4 inches higher than Pond #1.
- This clearly shows that the sludge storage pad is not in the 100 year flood plain.
- Finding #44, page 11:
  - Water Recycling Regulatory Considerations
    - The wastewater is located in an agriculture area, however, the area surrounding the treatment plant is planted in raw eatable crops. These crops are an almond orchard and grapes (used for wine), making recycling not feasible for irrigation at this time.
    - Water Conservation measures – All water from the wastewater treatment plant goes to evaporate and percolation ponds. They recharge the ground water. Due to the severe drought conditions we have very little water in the ponds.
    - Regionalization. – This is not feasible at this time due to the distance between these small communities.
- Finding #45, page 11:
  - The adjacent farm land has raw eatable crops and it is not feasible.
- Finding #50, page 13:
  - The discharge of scum to unlined scum ponds – this was addressed in Finding #17, page 4 as follows; in the contract document dated, June 1989 by Dewante & Stowell Engineering, Wastewater Treatment Plant Expansion – page 02226-4 and page 02226-5, the bottom and inside slopes of the sludge lagoon shall be treated with a soil cement of at least 6 inches. (Please see attached.) This shows that both sludge lagoons are sealed according to the contract document.
  - This should eliminate any technical report per your request.
- Finding #50, page 13
  - Unknown construction of sludge storage pad built on an old abandoned burn site. This was addressed in Finding #16, page 4, old abandoned burn dump: in 1969 the burn dump was no longer being used, however, I can't find out how it was sealed or encapsulated. The City has no records going back 45 years.
  - This should satisfy the requirement of Title 27 Section 20090(b) for both the scum ponds and the sludge pad.
- Task #4, page 21 – Item 5, page 23
  - This has been addressed in the above findings and I believe that the sludge storage pad is not in the 100 year flood plain and the scum ponds are lined with 6 inches of soil cement.
  - This should satisfy the requirement of Title 27 Section 20090(b) for both the scum ponds and the sludge pad.

- Task #4, page 23 – Item 7

- There is no place at this time to use Wastewater as irrigation because of raw eatable crops in the surrounding area.

Gerald Davidson 10-2-14

Gerald Davidson  
Chief Plant Operator

Date

conditions, no additional fill material shall be placed until the last layer compacted has been checked and found to be compacted to the specified densities.

The finished levee surfaces shall be made reasonably smooth and free from irregular surface changes, and to the dimensions shown on the plans.

### 3.04 BACKFILL AGAINST STRUCTURES

Material for filling and backfilling around structures shall be free from sod, large lumps, boulders, or rocks, roots, concrete, brush or other objectionable materials, and shall be obtained from required excavations insofar as practicable. Should the material available from excavation be insufficient or unsuitable for the required use, the Contractor shall furnish and place suitable material. Do not place backfill against newly constructed concrete structures for a period of 14 days unless authorized by the Engineer. Hand-held compactors shall be used for backfill against concrete walls.

### 3.05 EMBANKMENT SURFACING

Aggregate base shall be placed as specified in Paragraph 3.01, Section 02513.

### 3.06 EROSION PROTECTION

Broken concrete pieces shall be placed on riprap on the interior slopes of the pond embankments in the locations shown on the plans. Riprap shall be free of organic materials, applied to a minimum thickness of 9 inches. All riprap shall be placed so as to provide a minimum of voids and to form a footing trench keyed into the embankment slope as shown on the plans. Material may be placed by dumping and may be spread by bulldozers or other suitable equipment. Local surface irregularities on the riprap shall not vary from the planned slopes by more than one-half the thickness called for.

### 3.07 SPECIAL IMPERVIOUS MATERIAL

The bottom and inside slopes of the sludge lagoons shall be treated with a soil cement mixture. The surface to be treated shall be scarified to a depth of six inches and cement shall be applied uniformly to the loose material at a rate of one sack per 12 square feet of surface area.

Following application of the cement, water shall be applied by sprinkling uniformly to bring the mixture to the optimum moisture content, as determined by the Engineer. Then the

entire surface shall be thoroughly mixed to a depth of 12 inches by harrowing, discing, or other approved means. It is estimated that three passes of a disc will be required to achieve adequate mixing.

After mixing is approved by Engineer, the entire surface shall be lightly rolled and sprinkled with water again, as directed by Engineer. Curing will begin immediately and extend for one week. Curing will be by means of clean straw kept moist or other approved means.

### 3.08 CLEANUP

After completing all earthwork on embankments, the Contractor shall leave the site in a neat and clean condition, doing such grading as is required by the plans, or if not called for on the plans to restore the site to its original shape and configuration. Any existing features, improvements, structures, and other facilities damaged or affected by the work shall be replaced, repaired, or restored to their original condition or better.

END OF SECTION