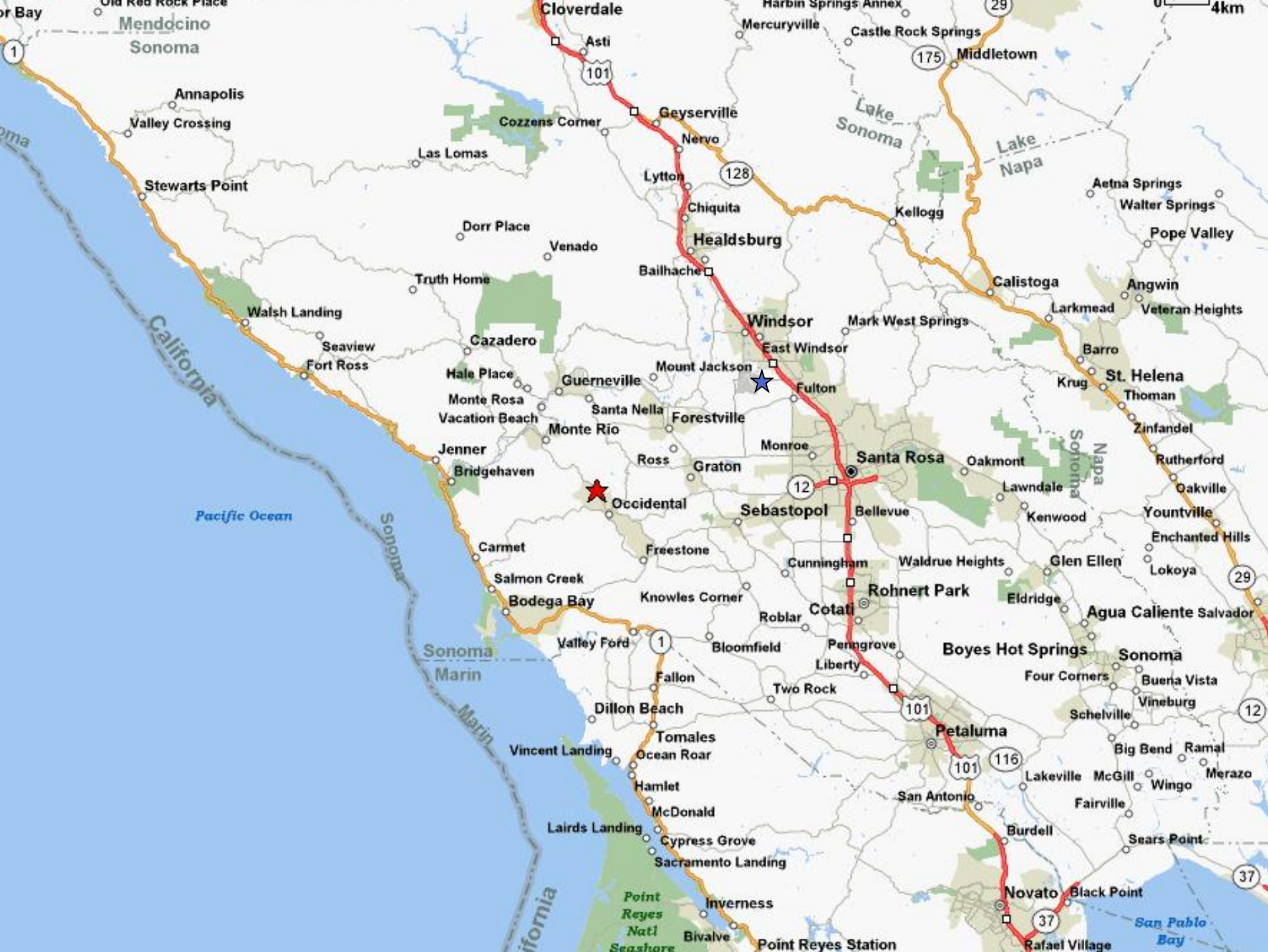


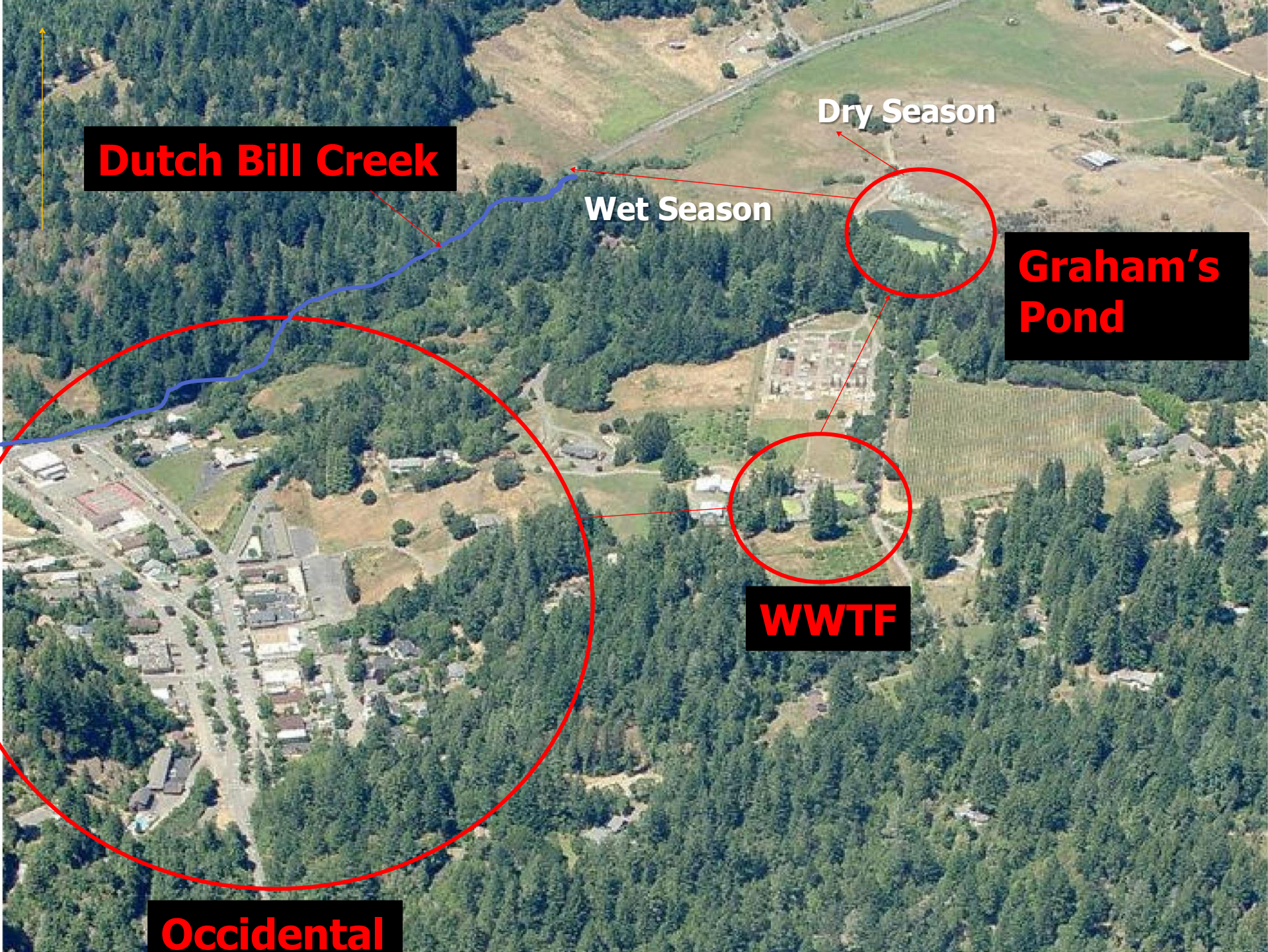
**Proposed Modification of
Cease and Desist Order
No. R1-2012-0102
for the
Occidental County Sanitation District
Wastewater Treatment Facility
Modification Order No. R1-2018-0007**

**Item 6
Cathleen Goodwin
North Coast Regional Water Quality Control Board
February 8, 2018**

Presentation

- ▶ **Overview of Wastewater Facility**
- ▶ **History of Permitting and Enforcement**
- ▶ **Proposed CDO Modification**
- ▶ **Hearing Purpose:**
 - ▶ **To consider adoption of a modified CDO**





Dutch Bill Creek

Dry Season

Wet Season

Graham's Pond

WWTF

Occidental







02/25/2009

NO TRESPASSING

Compliance Challenges

- ▶ **Antiquated facility**
- ▶ **Basin Plan seasonal discharge prohibition**
 - **Storage pond a water of the U.S.**
- ▶ **Basin Plan advanced wastewater treatment**
 - **Costly upgrades**
- ▶ **Small rate-payer base**
- ▶ **Remote community**
- ▶ **Hilly terrain**

Enforcement History

- ▶ Lengthy enforcement history – since 1993
- ▶ Under cease and desist orders since 1997
- ▶ Long-term capital improvement project (CIP)
 - Subsurface disposal system
 - Advanced wastewater treatment upgrades
 - Pipeline to Guerneville
- ▶ Interim compliance projects
 - pH and chlorine control
 - Sludge dredged from ponds
 - Baffles installed in aeration pond
 - Collection system replacement

Enforcement History

- ▶ **Five administrative civil liability actions for violations of permit requirements**

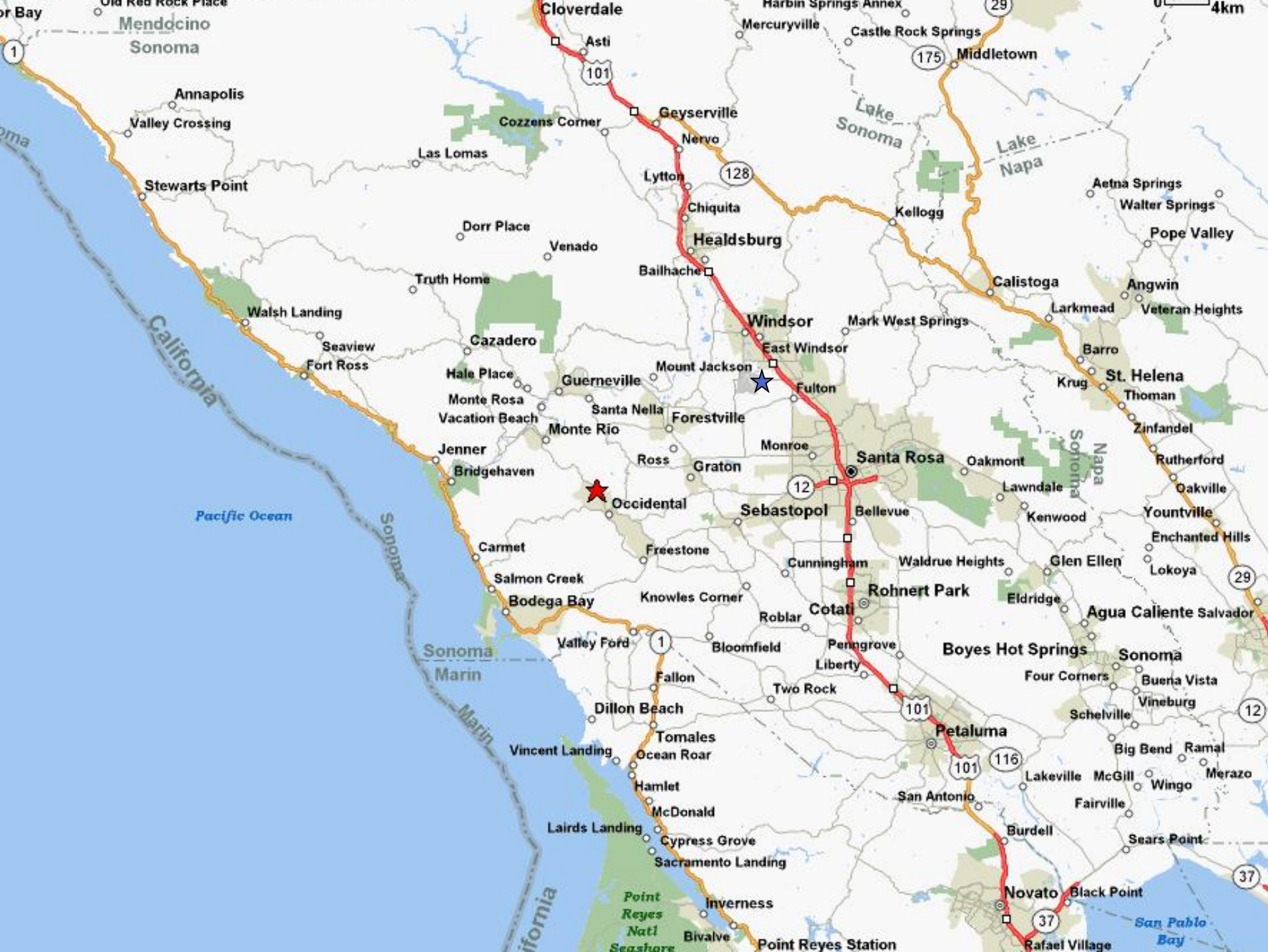
- ▶ **Total penalties assessed: \$518,000**
 - **Penalties paid: \$95,500**
 - **Compliance projects: \$373,000**
 - **Supplemental environmental projects: \$49,500**

Permitting and Enforcement History

- ▶ **2012 Permit (Order No. R1-2012-0101)**
 - ▶ Graham's Pond identified as a water of the US
 - ▶ New effluent limits for surface water discharge
 - ▶ Tertiary limits for BOD and TSS, ammonia, CTR pollutants
- ▶ **2012 CDO (Order No. R1-2012-0102)**
 - Compliance schedule to implement CIP
 - ▶ 5 years as required by Water Code
 - ▶ Allows for extension up to five additional years
 - Interim effluent limits
 - Protection from mandatory minimum penalties

Compliance with 2012 CDO

- ▶ **Permittee has evaluated/proposed projects**
 - **Water recycling project – no surface water discharge**
 - ▶ **Eliminated – public opposition**
 - **Truck raw wastewater to Guerneville WWTF**
 - ▶ **Eliminated – Guerneville rate payer opposition**
- ▶ **December 2017 – Request for extension**
 - **Truck raw wastewater to Airport WWTF**
 - ▶ **Selected project**
 - ▶ **CEQA completed – notice of determination adopted**
 - ▶ **100% design and bid documents complete**
 - ▶ **Commence construction of CIP by March 31, 2018**



Proposed CDO Modification

- ▶ **Extends date for compliance with final effluent limitations from January 31, 2018, to July 31, 2018**
- ▶ **Extends date for completion of CIP from January 31, 2018, to October 31, 2018**
- ▶ **Requires revised Pollution Prevention Plan**
 - **Plan for operational improvements that will remove pollutants that have accumulated in Dutch Bill Creek Watershed as a result of effluent discharges**

Proposed CDO Modification

- ▶ **Retains interim effluent limitations**
- ▶ **Retains protection from mandatory minimum penalties**

Staff Recommendations

- ▶ **Open hearing for public comments**
- ▶ **Only the modifications identified in proposed Order are open to public comment**
- ▶ **Adopt Modification Order No. R1-2018-0007**