
North Coast Regional Water Quality Control Board

Regional Water Quality Control Board North Coast Region Executive Officer's Summary Report February 2, 2023

ITEM: 4

SUBJECT: Public Hearing on Order No. R1-2023-0004 to consider adoption of proposed Waste Discharge Requirements for the Redway Community Services District (Redway CSD) Wastewater Treatment Facility, WDID No. 1B83147OHUM, NPDES No. CA0022781 (Matthew Herman)

BOARD ACTION: The Board will consider adoption of Waste Discharge Requirements Order No. R1-2023-0004. The Order will serve as a National Pollutant Discharge Elimination System (NPDES) permit for a period of five years.

BACKGROUND: The Redway CSD (Permittee) owns and operates the Redway Wastewater Treatment Facility (Facility) and associated wastewater collection system that serves a population of 1,340 residential, commercial, and industrial users in the community of Redway, California. There are no industrial users within the service area. The Facility accepts wastewater from two institutional users located outside of the service area: the Eel River Conservation Camp and a YMCA Camp. The Facility is located at 1150 Evergreen Road, Suite 2, Redway, Humboldt County, California.

The Facility is currently regulated under Waste Discharge Requirements Order No. R1-2017-0006, which serves as a NPDES permit for waste discharges to surface waters.

The Facility discharges secondary treated wastewater and has an average dry weather design treatment capacity of 0.186 million gallons per day (mgd) and a peak daily wet weather treatment capacity of 0.580 mgd. The treatment system consists of a 300,000-gallon oxidation ditch, secondary clarifier, chlorine disinfection using calcium hypochlorite tablets, and dechlorination using sodium bisulfite. The Facility discharges treated wastewater to either the South Fork Eel River at Discharge Point 001, or to three percolation ponds at Discharge Point 002.

DISCUSSION: Order No. R1-2023-0004 (Proposed Permit), replaces Order No. R1-2017-0006 (Previous Permit). The Proposed Permit continues to prescribe technology-based effluent limitations for biochemical oxygen demand (BOD) and total suspended solids (TSS), and effluent limitations for settleable solids, total residual

chlorine, total coliform bacteria, pH, dichlorobromomethane, and ammonia. The Proposed Permit also retains land discharge specifications for the discharge of treated wastewater to the percolation ponds at Discharge Point 002.

The Proposed Permit further retains the special provisions which require studies and reports to ensure compliance with the operations, toxicity, source control, and biosolids disposal requirements. Additionally, a special study requirement for the preparation and submittal of a Disaster Preparedness Assessment Report and Action Plan has been included in the Proposed permit. Other noteworthy changes to the Proposed Permit include the following:

1. **Ammonia Impact Ratio.** The effluent limitation for ammonia nitrogen has been replaced with an ammonia impact ratio limitation to better account for receiving water conditions that determine ammonia toxicity at the time of a discharge. (Order Section 4.1.1)
2. **Revised Basin Plan receiving water limitations.** To implement the 2016 amendments to the Water Quality Control Plan for the North Coast Region (Basin Plan), updated dissolved oxygen limitations have been added to the Proposed Permit. (Order Section 5.1.1)
3. **Bacteria Provisions.** New receiving water limitations for *E. coli* bacteria have been added to the Proposed Permit to implement provisions of the new bacteria provisions that were adopted by the State Water Board on August 7, 2018 and amended into the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California. (Order Section 5.1.20)
4. **Toxicity Provisions.** Updated chronic toxicity requirements have been included in the Proposed Permit to implement the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California (Toxicity Provisions), adopted on December 1, 2021. (Order Section 4.4.1)
5. **Nitrate Effluent Limitation.** The previous effluent limitation for Total Nitrogen has been replaced with an effluent limitation for Nitrate. Because the Total Nitrogen limit was based on the primary MCL for Nitrate and monitoring results from the current permit term showed that Nitrate made up most of the Total Nitrogen present in the discharge, it was determined that a Nitrate limit would be more appropriate. (Order Section 4.1.1)
6. **Monitoring and Reporting Requirements.** Noteworthy changes to the monitoring and reporting program (MRP) include the following:
 - a. An increase to the frequency of chronic toxicity monitoring, from annually to quarterly, to reflect the requirements of the new Toxicity Provisions. Additionally, acute toxicity monitoring is no longer required as monitoring results from the term

of Order R1-2017-0006 indicate that reasonable potential for acute aquatic toxicity is not present. (MRP Section 4.1.1)

- b. A general language update to the Whole Effluent Toxicity Testing requirements section to reflect the new Toxicity Provisions. (MRP Section 5)
- c. The MRP includes new monitoring requirements for *E. coli* in both the effluent and receiving water to demonstrate compliance with the new REC-1 bacteria objectives for *E. coli*. (MRP Sections 4.1.1 and 8.1.1)
- d. The MRP includes new monitoring requirements for both the effluent and receiving water to determine if the discharge has reasonable potential to cause or contribute to an exceedance of receiving water quality criteria for aluminum. These monitoring requirements include effluent and receiving water monitoring for aluminum and receiving water monitoring for dissolved organic carbon. (MRP Sections 4.1.1 and 8.1.1)
- e. The MRP includes new monitoring requirements for Total Dissolved Solids (TDS) to collect data needed to determine if reasonable potential exists for the discharge to exceed water quality objectives for TDS. (MRP section 4.1.1)

A copy of the Draft Permit was posted on the Regional Water Board website and was available for public comment from December 2, 2022 through January 3, 2023. Additionally, Regional Water Board staff held a virtual meeting with the Permittee on December 19, 2022 to discuss the Draft Permit. The Permittee did not identify any significant concerns with the Proposed Permit and no public comments were received.

Staff initiated changes were made to the Proposed Permit to address editorial errors in the Permit's table of contents, to identify that a revised Statewide Sanitary System General Order has been adopted, and to add Finding 2.6 to the Order. Finding 2.6 identifies the implementation of Assembly Bill 2108, requiring the Regional Water Board staff to conduct equitable, culturally relevant outreach when considering proposed discharges of waste that may have disproportionate impacts on water quality in disadvantaged communities or tribal communities

Staff anticipates that the Proposed Permit will be uncontested.

RECOMMENDATION: Adopt Order No. R1-2023-0004 as proposed.

SUPPORTING DOCUMENTS:

- 1. Proposed Order No. R1-2023-0004
- 2. Response to Comments Document
- 3. Notice of Public Hearing