

Regional Water Quality Control Board  
North Coast Region

Executive Officer's Summary Report  
April 16, 2020  
Regional Water Board Office  
Santa Rosa, California

**ITEM: 3**

**SUBJECT:** Public Hearing on adoption of Order No. R1-2020-0002, proposed Waste Discharge Requirements and Master Recycling Permit for the Loleta Community Services District Wastewater Treatment Facility, WDID No. 1B80081OHUM, NPDES No. CA0023671 (Justin McSmith)

**BOARD ACTION:** The Board will consider adoption of Waste Discharge Requirements and Master Recycling Permit Order No. R1-2020-0002 (Proposed Permit). The Proposed Permit will serve as a National Pollutant Discharge Elimination System (NPDES) permit for a period of five years.

**BACKGROUND:** The Loleta Community Services District (CSD) (Permittee) owns the Loleta CSD Wastewater Treatment Facility (Facility), a publicly owned treatment works. The Facility is currently designed to provide secondary wastewater treatment for an average dry weather flow of 0.081 million gallons per day (mgd) and an average wet weather flow of 0.143 mgd. The Facility consists of a gravity collection system, an aeration basin, clarifier, chlorine contact chamber, and chlorine and sulfur dioxide flow-proportioning equipment. Treated effluent is currently discharged year-round at Discharge Point 001 to a wetland tributary of the Eel River. The Facility is currently regulated under Waste Discharge Requirements Order No. R1-2014-0013 (2014 Permit) for discharges of secondary treated wastewater to the Eel River. The 2014 Permit also served as an NPDES permit.

During the term of the 2014 Permit, the Permittee completed a Facilities Plan to investigate possible treatment plant upgrades to achieve improved Facility performance, compliance with effluent limitations and other permit requirements, and identify and evaluate a new discharge location to provide recycled water to a use site during the summertime discharge prohibition period (May 15 to September 30). The Permittee concluded that the Preferred Facility Project would need to include an influent pump station, a rotary drum screen, extended aeration, and an ultraviolet light (UV) disinfection system, as well as system wide remediation work on the collection system. As described in the Proposed Upgrade Project, treated effluent will continue to be discharged at Discharge Point 001 between October 1 and May 14, but be discharged as recycled water at Discharge Point 002 between May 15 and September 30, once the Proposed Upgrade Project is completed. Discharge Point 002 is proposed to be a recycled water use site next to the Facility that will use recycled water for non-dairy producing cattle.

**DISCUSSION:** The Proposed Permit replaces the 2014 Permit and includes new total dissolved solids (TDS) effluent limitations, UV specifications, and recycled water specifications and requirements for the land application of recycled wastewater during

the summertime discharge prohibition period. In addition, other new requirements include mercury monitoring for compliance with the Statewide Mercury Provisions, *E. coli* monitoring for compliance with the Statewide Bacteria Provisions and submission of a Disaster Preparedness Assessment Report and Action Plan.

In addition to the Proposed Permit, Time Schedule Order No. R1-2020-0002 (TSO) is proposed to be issued under Executive Officer signature concurrent with the adoption of the Proposed Permit. The TSO continues the compliance schedule and interim effluent limitations for copper, carbon tetrachloride, chlorodibromomethane, dichlorobromomethane, and nitrate from the 2015 Cease and Desist Order (No. R1-2015-0008), which is proposed to be rescinded at today's board meeting (see Item #4). In addition, the TSO establishes an interim effluent limitation for TDS to provide the Permittee with time to investigate source control and other options for achieving compliance with the proposed final limitations. The TSO also provides an updated compliance schedule and task descriptions to bring the Permittee into compliance with the new TDS effluent limitations and the summertime discharge prohibition.

A copy of the Proposed Permit was posted on the Regional Water Board website and was available for public comment from November 5, 2019 through December 5, 2019. The Discharger submitted timely comments on the Proposed Permit.

The following revisions were made to the Proposed Permit in response to comments from the Permittee:

- Establishment of tiered effluent monitoring for heptachlor and carbon tetrachloride. This tiered monitoring will provide monitoring flexibility if the Permittee is able to show compliance with the final effluent limitations over 12 consecutive months.
- Clarification on the receiving water monitoring locations for the Proposed Permit. The Permittee shall sample upstream and downstream of where the Ropers Slough tributary enters the main stem of the Eel River.
- Clarification on the definitions of tribal beneficial uses contained in the State Water Board Mercury Provisions and in the Regional Water Board's Basin Plan.

A full explanation of the comments and responses is provided in the attached Response to Comments document. Staff anticipates that the Proposed Permit will be uncontested.

**RECOMMENDATIONS:** Adopt Order No. R1-2020-0002, as proposed.

**SUPPORTING DOCUMENTS:**

1. Proposed Order No. R1-2020-0002
2. Comments Provided on Draft Order No. R1-2020-0002
3. Staff Response to Written Comments
4. Public Notice