**Response to Written Comments**

**Draft Waste Discharge Requirements**

**Order No. R1-2020-0003**

**Time Schedule Order (TSO))**

**for the Loleta Community Services District Wastewater Treatment Facility**

**Regional Water Quality Control Board, North Coast Region**

**April 16, 2020**

## Comment Letter Received

The deadline for submittal of public comments regarding draft TSO No. R1-2020-0003, (Draft TSO) for the Loleta Community Services District (Permittee) Wastewater Treatment Facility (Facility) was December 5, 2019. The Permittee provided timely comments. No other comments were received during the public comment period.

Regional Water Board staff met with the Permittee on March 3, 2020 to discuss the Permittee's comments. Responses to comments contained in this document are consistent with the discussion that occurred during the March 3, 2020 meeting.

In this document, the Permittee's comments are summarized, followed by the Regional Water Board staff response. The term "Draft TSO" refers to the version of the permit that was sent out for public comment. The term "Proposed TSO" refers to the version of the permit that has been modified in response to comments.

## Permittee Comments

### Comment 1: Interim Effluent Limitations

An interim average monthly effluent limit (AMEL) of 750 milligrams per liter (mg/L) total dissolved solids (TDS) is requested, which would put the facility into compliance approximately 95% of the time based on historical effluent data collected between March 2015 and October 2019 (45 samples).

**Justification:**

New total dissolved solids (TDS) effluent limits introduced in draft NPDES permit R1-2020-0002 (received November 6, 2019) present a significant challenge for LCSD. Effluent limits for TDS were not included in discussions with the North Coast Regional Water Quality Control Board (RWQCB) during recent planning studies, which included preliminary engineering design of a new wastewater treatment facility (WWTF) for LCSD. The existing LCSD WWTF, as well as the proposed new LCSD WWTF, do not include treatment technologies for removal or reduction of TDS.

Historical effluent TDS data from the facility (self-monitoring reporting data collected between March 2015 and October 2019) indicate that the facility will be in violation of the new effluent TDS limit of 500 mg/L approximately 62 percent of the time. We understand that the new TDS limit is for the protection of the

municipal and domestic drinking water supply (MUN) beneficial use of the Eel River; however, because LCSD is not prepared to address this limit immediately, we are requesting that interim effluent limits be established to allow LCSD time to develop a plan for compliance.

***Response 1*****:** *Staff has revised the TSO to include interim effluent limitations for TDS and to allow more time for the Permittee to achieve compliance with the final effluent limitations for TDS.*

*The Permittee has sampled for TDS 68 times during the term of Order No. R1-2014-0013 (2014 Permit). The Permittee exceeded the 500 mg/L threshold 41 times out of those 68 samples. Because the Permittee does not have the treatment technology at the current Facility to treat for TDS, the Permittee will be required to implement source control measures to reduce the concentration of TDS in the influent and achieve compliance with TDS final effluent limitations.*

*Based on the data collected during the term of 2014 Permit, interim effluent limitations for TDS will be established in the TSO. The interim effluent limitation for TDS was derived based on Facility performance using available effluent monitoring data at Monitoring Location EFF-001, the point of discharge to the Eel River. This performance based interim effluent limitation was calculated using statistical methodology described in the U.S. EPA Technical Support Document for Water Quality-based Toxics Control (TSD) and a statistical tool, RPCalc, developed by State Water Resources Control Board staff to assist State and Regional Water Board staff in the development of interim effluent limitations. The 95$^{th}$ percentile concentration of TDS was calculated at the 95 percent confidence level to determine the interim Average Monthly Effluent Limitation of 878 mg/L*

*The requested interim effluent limitation of 750 mg/L was not included in the TSO because it would expose the Permittee to potential MMP violations based on the historical data collected. Instead, the resulting 95$^{th}$ percentile concentration for TDS of 878 mg/L has been established as an interim effluent limitation consistent with EPA guidance. This interim effluent limitation has been added to the Proposed TSO along with the requirement for the completion of a special study to examine other sources of TDS and to develop and implement a plan for reducing TDS concentrations entering the Facility and for achieving compliance with TDS final effluent limitations.*

**Comment 2: Compliance Schedule**

The LCSD wastewater facilities improvements projects have undergone a number of changes since the planning study began in 2015. Initially, the project included rehabilitation of the sanitary sewer collection system (SSCS), construction of a new WWTF, construction of a new recycled water irrigation system, and rehabilitation of the outfall discharge pipe. In 2016 the project was split into two separate projects in an attempt to expedite rehabilitation of the SSCS so that wastewater flow reduction due to inflow and infiltration (I/I) reduction could be realized prior to final sizing and design of the new WWTF to reduce the size and cost of the new WWTF (SSCS Clean Water State Revolving Fund [CWSRF] project pin number 37433; WWTF CWSRF project pin number 42939).

The draft TSO includes tasks carried over from the original project plan, which incorporated both components of the project (SSCS and WWTF). We are requesting that the TSO be broken down into separate tasks for phased design and construction of the two projects. The following descriptions provide additional detail and justification for requested changes to the TSO compliance schedule included in Table 1 on Page 5.

**Change Request:**
Task A has been broken down into two separate tasks for completion of design plans and specifications for the two individual projects (SSCS and WWTF).

> **Justification:**
> If the SSCS project is constructed in 2020 as planned, I/I flow reductions can be monitored over the winter of 2020/2021, and reduced influent flow rates can be incorporated into the design of the new WWTF so that the new facility is not oversized based on high I/I influent flows. This change will ensure that the new WWTF is sized appropriately and will reduce associated construction and operational costs.

**Change Request:**
Task A, request that the SSCS project compliance be extended two months to May 1, 2020.

> **Justification:**
> Funding for the SSCS project is anticipated to be received from the State Water Resources Control Board (SWRCB) in January or February 2020. Additional time has been requested to ensure there is sufficient time to complete the design after receiving funding.

**Change Request:**
Task A, WWTF project, request that the compliance date be extended 16 months to July 1, 2021.

> **Justification:**
> Influent flow data monitoring to determine I/I reduction levels may be completed by the end of winter 2020/2021 (approximately May 2021). This date has been extended past May 2021 to allow sufficient time for influent flow data collection and design modifications resulting therefrom.

**Change Request:**
Task D compliance date request to be extended nine months to October 2021.

> **Justification:**
> Completion of Task A, WWTF Project in July 2021 requires additional time for preparation of the Title 22 Engineering Report that will include all final design elements of the new recycled water system. Three months following completion of plans and specifications will provide sufficient time to prepare the Title 22 Engineering Report.

**Change Request:**
Task E of the draft TSO Task Description refers to the "2019 Permit"; we believe this should read "2020 Permit" if referring to the NPDES permit (Order R1-2020-0002).

**Justification:**
We believe this is in error.

**Change Request:**
Task E compliance date request to be extended one year to June 1, 2022.

**Justification:**
To provide additional time for approval of the Title 22 Engineering Report following completion of Task D in October 2021, for installation of groundwater monitoring wells.

**Change Request:**
Task F has been broken down into two separate tasks for completion of construction of the two individual projects (SSCS and WWTF).

**Justification:**
Justification for breaking compliance dates down for two individual projects is provided previously.

**Change Request:**
Task F, SSCS Project, task description changed to remove mention of compliance with effluent limits in new NPDES permit (R1-2020-0002).

**Justification:**
Completion of the SSCS project will serve to reduce influent I/I flow rates but will not directly address water quality problems. Compliance with final effluent limitations in the new 2020 permit will follow completion of the WWTF Project.

**Change Request:**

Task F, WWTF Project, compliance date request to be extended 22 months to October 31, 2023.

**Justification:**
Following completion of Task A, WWTF Project, on July 1, 2021, approximately 28 months are anticipated for completion of construction on the new WWTF and associated project components. Extending the final completion date to October 31, 2023 will provide sufficient time for completion of construction. The various components of the WWTF Project require phased construction and commissioning; for example, the new WWTF must be constructed and commissioned prior to discharging to the recycled water irrigation system, the recycled water system must be completed and operational prior to rehabilitation of the outfall pipe, the recycled water irrigation system may only be used during

the summer discharge prohibition period for the Eel River (May 15-September 30).

The following anticipated schedule for completion of construction of the various components of the WWTF Project provides additional detail for the requested time extension:

July 2021 Complete bid package for construction (approximately 6 months).

December 2021 Complete bid selection and secure contractor for construction (6 months).

July 2022 Complete site work on new WWTF (18 months).

October 2022 Complete site work on recycled water irrigation system (3 months).

January 2023 Complete startup on new WWTF (3 months).

May 15, 2023 Start recycled water irrigation system operation (must follow completion and commissioning of new WWTF).

October 2023 Complete rehabilitation of outfall pipe (must follow commissioning of recycled water irrigation system, and during the summer when no discharge to outfall pipe is occurring).

October 2023 Complete construction on all components of WWTF Project.

**Table 1 Draft and Proposed Time Schedule Order (TSO) Tasks and Dates[1]**

| Task[2] | Task Description | | Compliance Date | |
|---|---|---|---|---|
| | Draft[2] | Proposed[2] | Draft[2] | Proposed[3] |
| A | Submit complete design plans and specifications for construction of the Preferred Alternative | <u>Submit complete design plans and specifications for construction of the Preferred SSCS Project Alternative</u> | March 1, 2020 | <u>May 1, 2020</u> |
| | | Submit complete design plans and specifications for construction of the Preferred WWTF Project Alternative | | <u>July 1, 2021</u> |
| D | Submit a Title 22 Engineering Report to the Division of Drinking Water with a copy to the Regional Water Board, | NCR[4] | January 1, 2021 | <u>October 1, 2021</u> |

| | | | | |
|---|---|---|---|---|
| | for Division of Drinking Water Approval, that meets the requirements of California Code of Regulations, title 22, section 60301 through 60357 and the requirements in Attachment G of the 2019 Permit. | | | |
| E | Submit proof of sufficient groundwater monitoring wells installed around the Recycled Water Use Site to show compliance with groundwater limitations listed in the 2019 Permit. | Submit proof of sufficient groundwater monitoring wells installed around the Recycled Water Use Site to show compliance with groundwater limitations listed in the 2020 Permit. | June 1, 2021 | July 1, 2022 |
| F | Complete Construction of the Preferred Alternative and achieve compliance with all Regional Water Board waste discharge requirements including Discharge Prohibitions and Final Effluent Limitations for copper, carbon tetrachloride, chlorodibromomethane, dichlorobromomethane and nitrate. | Complete Construction of the Preferred SSCS Project Alternative. | December 31, 2021 | NCR |
| | | Complete Construction of the Preferred WWTF Project Alternative and achieve compliance with all Regional Water Board waste discharge requirements including Discharge Prohibitions and Final Effluent Limitations for copper, carbon tetrachloride, chlorodibromomethane, dichlorobromomethane and nitrate. | | October 31, 2023 |
| 1. Draft TSO tasks and dates from draft TSO R1-2020-0003, received November 6, 2019. Proposed TSO tasks and dates being requested with this letter.<br>2. As shown in draft TSO R1-2020-0003.<br>3. Proposed with this letter.<br>4. NCR: no change requested. | | | | |

***Response 2:*** *Due to the changes to the project delivery timing and funding, the requested compliance schedule changes have been made to the Proposed TSO.*