

**Regional Water Quality Control Board  
North Coast Region  
Executive Officer's Summary Report  
June 15, 2023**

**ITEM: #5**

**SUBJECT:** Public Hearing on Order No. R1-2023-0006 to consider adoption of proposed Waste Discharge Requirements for the Covelo Community Services District (Covelo CSD) Wastewater Treatment Facility, WDID No. 1B830090MEN, NPDES No. CA0023574 (Sabrina Cegielski)

**BOARD ACTION:** The Board will consider adoption of Waste Discharge Requirements Order No. R1-2023-0006. The Order will serve as a National Pollutant Discharge Elimination System (NPDES) permit for a period of five years.

**BACKGROUND:** The Covelo CSD (Permittee) owns and operates the Covelo Wastewater Treatment Facility (Facility) and associated wastewater collection system that serves a population of 350 residential and commercial users in the community of Covelo, California. There are no industrial users within the service area. The Facility is located at 75997 Covelo Road, Covelo, Mendocino County, California.

The Facility is currently regulated under Waste Discharge Requirements Order No. R1-2017-0004, 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 0.057 million gallons per day (mgd) and a peak daily wet weather treatment capacity of 0.394 mgd. The treatment system consists of a headworks, two oxidation ponds, a treatment wetland, and ozone disinfection system. Discharge to Discharge Point 001 (Grist Creek) occurs on an as needed basis. If the Facility does not discharge, flow is recirculated (bypassing the disinfection unit) back to oxidation pond one. During periods of discharge, flow is directed from the treatment wetlands to the ozone disinfection unit. Following disinfection, the discharger can direct effluent to discharge to land at Discharge Point 002 (percolation ponds) at any time of the year.

**DISCUSSION:** Order No. R1-2023-0006 (Proposed Permit), replaces Order No. R1-2017-0004 (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, 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. **Assembly Bill 2108.** 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. The finding briefly summarizes updates to the Draft Order and explains that public notice was provided to interested persons and public agencies. (Draft Order section 2.6)
2. **Daily Maximum Effluent Limitations for BOD5 and TSS.** Daily maximum effluent limitations for BOD5 and TSS are not retained as these limitations may not provide the most representative measure of compliance given the long retention time of the Facility. Monthly average and weekly average limitations for BOD5 and TSS are retained in the Draft Order. (Draft Order section 4.1.1)
3. **Manganese Effluent Limitation.** WQBEL for Manganese was added based on the primary MCL for Manganese. Monitoring results from the current permit term showed that manganese was detected in the effluent discharge at levels that exceeded the primary MCL. (Draft Order section 4.1.1)
4. **Iron Effluent Limitation.** WQBEL for Iron was added based on the primary MCL for Iron. Monitoring results from the current permit term showed that Iron was detected in the effluent discharge at levels that exceeded the primary MCL. (Draft Order section 4.1.1)
5. **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 (pH and temperature) that determine ammonia toxicity at the time of a discharge. (Order Section 4.1.1)
6. **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)

7. **Bacteria Provisions.** New receiving water limitations for *E. coli* bacteria have been added to the Proposed Permit to implement 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)
  
8. **Disaster preparedness assessment report and action plan.** A requirement to prepare a disaster preparedness assessment report has been added to require the Permittee to assess the Facility's vulnerability to natural disasters and extreme weather and other conditions that may be exacerbated by climate change. (Draft Order section 6.3.2.1)
  
9. **Groundwater Pathogen Special Study.** Due to high total coliform levels at monitoring location EFF-002 (percolation ponds) a requirement to complete a pathogen study has been added. The study requires the Permittee to determine cause(s) of high coliform levels in groundwater. Once the source(s) is identified, the Permittee is required to implement and record corrective actions (Draft Order section 6.3.2.2)
  
10. **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)
  
11. **Monitoring and Reporting Requirements.** Noteworthy changes to the monitoring and reporting program (MRP) include the following:
  - a. An increase in 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 current permit term 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 February 9, 2023 through March 13, 2023. On March 13, 2023 the Permittee submitted three written comments that identified minor corrections to the Proposed Permit.

Staff initiated changes were also made to the Proposed Permit to address editorial errors in the Permit's table of contents.

Staff anticipates that the Proposed Permit will be uncontested.

**RECOMMENDATION:** Adopt Order No. R1-2023-0006 as proposed.

**SUPPORTING DOCUMENTS:**

- 1. Proposed Order No. R1-2023-0006
- 2. Response to Comments Document
- 3. Notice of Public Hearing