

**Response to Written Comments
Draft Waste Discharge Requirements
Order No. R1-2024-0010
for the
City of Dorris
Wastewater Treatment Facility
Regional Water Quality Control Board, North Coast Region
June 13, 2023**

The deadline for submittal of public comments regarding draft Waste Discharge Requirements Order No. R1-2024-0010, for the City of Dorris (Discharger) Wastewater Treatment Facility (Facility) was February 15, 2024. Regional Water Board Staff (staff) received no formal written comments from the public regarding the Draft Permit's notification period.

This Response to Comments document includes a summary of informal Discharger comments and staff-initiated changes made to the Permit. Text added to the Proposed Permit is identified by underline and text to be deleted from the Proposed Permit is identified by strike-through in this document. The term "Draft Permit" refers to the version of the permit that was sent out for public comment. The term "Proposed Permit" refers to the version of the permit that has been modified in response to comments received and is being presented to the North Coast Regional Water Quality Control Board (Regional Water Board) for consideration.

During conversations with the Discharger, the Discharger requested reduced sampling/monitoring frequency based on the Discharger's status as a small, severely disadvantaged community. Based on these conversations, the following changes were made:

1. In Table 4 of Section IV, a footnote was added to the Average Monthly Effluent Limitation allowing for a future change to the averaging period for effluent limitations depending on sampling frequency requirements in Table D-3.

Table 4. Effluent Limitations

Parameter	Units	Average Monthly Effluent Limitation ¹	Maximum Daily Effluent Limitation	Instantaneous Minimum Effluent Limitation	Instantaneous Maximum Effluent Limitation
Biochemical Oxygen Demand (5-day @ 20°C)	mg/L	50	80	--	--
Total Suspended Solids	mg/L	50	80	--	--
Settleable Solids	ml/L	0.1	0.2	--	--
pH	Standard units	--	--	6.5	8.5

¹ After the first three years of monitoring and at the request of the Permittee, the Regional Water Board may, at the Executive Officer's discretion, and after receiving and analyzing the required water quality monitoring data, approve a reduction of the sampling frequency of certain monitoring requirements for constituents that routinely are found in concentrations below water quality objectives, and are not expected to result in exceedances of receiving water objectives or have an adverse impact on beneficial uses. Averaging periods for effluent limitations may also change to correspond to the sampling frequency located in Attachment D: Monitoring and Reporting Program, Table D-3.

- In Table D-2 of Attachment D (Monitoring and Reporting Program), minimum sampling frequency was changed from monthly to quarterly for BOD and TSS.

Table D-2. Influent Flow – Monitoring Location INF-001

Parameter	Units	Sample Type	Minimum Sampling Frequency
Flow (Daily, Monthly Average)	mgd	Flow Sensor	Continuous
Biochemical Oxygen Demand (5-day @ 20°C)	mg/L	Grab	Monthly Quarterly
Total Suspended Solids	mg/L	Grab	Monthly Quarterly

- In Table D-3 of Attachment D (Monitoring and Reporting Program), a footnote was added to minimum sampling frequency for BOD, TSS, and pH.

Table D-3. Effluent Monitoring – Monitoring Location EFF-001

Parameter	Units	Sample Type	Minimum Sampling Frequency
Flow (Daily, Monthly Average)	mgd	Flow Sensor	Continuous
Biochemical Oxygen Demand (5-day @ 20°C)	mg/L	Grab	Monthly ²
Total Suspended Solids	mg/L	Grab	Monthly ²
pH	Standard Units	Grab	Weekly ²
Nitrogen, Nitrate (as N)	mg/L	Grab	Monthly
Nitrogen, Total (as N)	mg/L	Grab	Monthly

² After the first three years of monitoring and at the request of the Permittee, the Regional Water Board may, at the Executive Officer's discretion, and after receiving and analyzing the required water quality monitoring data, approve a reduction of the sampling frequency of certain monitoring requirements for constituents that routinely are found in concentrations below water quality objectives.

- In Table D-5 of Attachment D (Monitoring and Reporting Program), minimum sampling frequency for Depth of Poned Effluent was changed from weekly to monthly.

Table D-5. Percolation Pond Monitoring – Monitoring Location PERC-001

Parameter	Units	Sample Type	Minimum Sampling Frequency
Depth of Poned Effluent	0.01 feet	Measured	Weekly <u>Monthly</u>

- In Table D-6 of Attachment D (Monitoring and Reporting Program), minimum sampling frequency for Depth to Groundwater was changed from monthly to quarterly.

Table D-6. Groundwater Monitoring – Analytes and Frequency

Parameter	Units	Sample Type	Minimum Sampling Frequency
Depth to Groundwater	0.01 feet	Measured	Monthly Quarterly
Total Coliform Organisms	MPN/100mL	Grab	Annually
Fecal Coliform Organisms	MPN/100mL	Grab	Annually
Nitrogen, Total (as N)	mg/L	Grab	Annually
Nitrogen, Nitrate (as N)	mg/L	Grab	Annually
Total Dissolved Solids	mg/L	Grab	Annually

Staff Initiated Changes

The following sections describe changes made to the draft Order, initiated by Regional Water Board staff to update and provide clarification to the Proposed Permit. The modified sections are identified by their section numbers as indicated in the Proposed Order. These proposed changes are either required by law or do not materially impact the Permittee. The Permittee was notified of changes on 05/02/2024.

1. Formatting changes were made throughout the document to bulleted lists and section headers.
2. Attachments were renamed as Attachments A – D in the Proposed Permit. Attachments formerly appeared as bullets in a list format in the Draft Permit.
3. Language was adjusted in section Q: Adequate Capacity to better match regulatory language on which the section is based.

Q. Adequate Capacity

~~If the Discharger's wastewater treatment plant will reach capacity within 4 years, the Discharger shall notify the Regional Water Board. If the Regional Water Board finds that capacity will be exceeded within four years, the Regional Water Board will notify the Discharger that the Regional Water Board will consider adopting a time schedule Order pursuant to Section 13300 of the Water Code, or other enforcement order unless the A copy of such notification shall be sent to the appropriate local elected officials, local permitting agencies, and the press. Factors to be evaluated in assessing reserve capacity shall include, at a minimum, (1) comparison of the wet weather design flow with the highest daily flow, and (2) comparison of the average dry weather design flow with the lowest 30 day flow. The Discharger can shall demonstrate that adequate steps are being taken to address the capacity problem. The Regional Water Board notification will require~~

the Discharger to shall submit a technical report to the Regional Water Board showing how flow volumes will be prevented from exceeding capacity, or how capacity will be increased, within 120 days of after providing notification to the Regional Water Board, or within 120 days after receipt of the Regional Water Board's notification that it finds that the Facility will reach capacity within four 4 years. The Regional Water Board will provide a copy of the A copy of such notification shall be to appropriate local elected officials, local permitting agencies, and the press. Factors to be evaluated in assessing reserve capacity shall include, at a minimum, (1) comparison of the wet weather design flow with the highest daily flow, and (2) comparison of the average dry weather design flow with the lowest 30-day flow. The time for filing the required technical report may be extended by the Regional Water Board. An extension of 30 days may be granted by the Executive Officer, and longer extensions may be granted by the Regional Water Board itself (Cal. Code of Regs., tit. 23, § 2232).

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