Response to Written Comments
Draft Waste Discharge Requirements
Order No. R1-2021-0021
National Pollutant Discharge Elimination System (NPDES)
For the
City of Willits Wastewater Treatment Facility
Regional Water Quality Control Board, North Coast Region
December 2, 2021

Comments Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements for Order No. R1-2021-0021, National Pollutant Discharge Elimination System Permit (Draft Permit) for the City of Willits (City or Permittee), City of Willits Wastewater treatment Facility (facility) was October 15, 2021. Regional Water Board staff (staff) received written comments from the City of Willits.

Regional Water Board staff (Staff) virtually met with the Permittee on October 14, 2021 to discuss the Permittee's comments. Responses to comments contained in this document are consistent with the discussion that occurred during the October 14, 2021 meeting.

This Response to Comments document includes a summary of Permittee's comments, Staff responses, and staff-initiated changes. 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.

City of Willits (City)

Comment No. 1: *The City identifies that sections 4.3.3.2, 6.3.1.8, and other sections throughout the permit identify that the Facility falls under Title 22 and not Title 23 Secondary. The City requests that the Regional Water Board amend the language to reflect the correct Title.*

Response to Comment 1: The Regional Water Board wished to clarify that the Facility's recycled water is Disinfected Secondary-23 Recycled Water, as defined in Title 22, Section 60301.225 of the California Code of Regulations. References to Title 22 within the Draft Permit are correct.

No changes have been made to the permit in response to this comment.

Comment No. 2: *The City identified that the Draft Permit's effluent limitation for total coliform, requiring that the median value of total coliform to not exceed a Most Probable Number of 23 per 100 milliliters (MPN/100 mL) in a calendar week is different from their current NPDES permit. The current Permit requires that the median value of total coliform bacteria to not exceed 23 MPN/100 mL in a calendar month. Because the City is only required weekly sampling of total Coliform, the City feels that the existing requirement of 23 MPN/100 mL in a calendar month would be more appropriate.*

Response to Comment 2: Staff agree with the City that the proposed effluent limitation for total coliform is incorrect for the permit. Upon investigation, Staff determined that the effluent limitation contained in both the Draft Permit and the current Permit do not match the total coliform requirements for Disinfected Secondary 23 Recycled Water. Staff have updated the Proposed Permit to reflect the disinfection requirements for Disinfected Secondary 23 Recycled Water. Sections 4.1.1.3. and 4.3.2.3. of the Proposed Permit has been modified as follows:

4.1.1.3. **Disinfection**. Disinfected effluent shall not contain total coliform bacteria exceeding the following concentrations, as measured at Monitoring Location INT-002:

4.1.1.3.1. The median value of total coliform bacteria shall not exceed a Most Probable Number (MPN) of 23 per 100 milliliters (mL)~~, in a calendar week~~ using the results of the last seven days for which analysis have been completed; and

4 .1.1.3.2. The maximum daily value of total coliform bacteria shall not exceed an MPN of 240 per 100 mL in more than one sample in any 30 day period.

4.3.2.3. **Disinfection:** Disinfected effluent shall not contain total coliform bacteria exceeding the following concentrations, as measured at Monitoring Location INT-002:

4.3.2.3.1. The median value of total coliform bacteria shall not exceed a Most Probable Number (MPN) of 23 per 100 milliliters (mL)~~, in a calendar week~~ using the results of the last seven days for which analysis have been completed; and

4.3.2.3.2. The maximum daily value of total coliform bacteria shall not exceed an MPN of 240 per 100 mL in more than one sample in any 30 day period.

Comment No. 3: *The City is requesting that language be included within the Proposed Permit to allow their use of the existing flow measurement equipment (weir and transducer) that was previously used to determine receiving water flows as a backup to the USGS monitoring Station. The City identifies that the USGS station has periodically*

gone down and this would allow them an alternative source of data collection during periods when data would otherwise be unavailable.

Response to Comment 3: Regional Water Board staff concludes that it is unnecessary to identify a backup receiving water flow monitoring method in the Proposed Permit. While a data gap may occur, the City should make notification of this type of event to Regional Water Board staff and may consider the use of the previously used weir and transducer as a substitution, but should consider all available resources as this system was identified as being unreliable during low flow conditions. Additionally, Regional Water Board staff have reviewed the flow monitoring data from USGS Gauge No. 11472180, and the reoccurring data gaps occur during the period of May 15 through September 30 each year, corresponding to the effective dates for the surface water discharge prohibition.

No changes have been made to the permit in response to this comment.

Comment No. 4: *The City is requesting that the monitoring hours used to determine daily flow in Section 3.9.1. of the Draft Permit be changed from 12:01 am and 12:00 midnight, to 9:01 am and 9:00 am. This change would better reflect the time that flow meter data is collected at the facility.*

Response to Comment 4: Regional Water Board staff have determined that this is a reasonable request. Section 3.9.1. of the Proposed permit has been modified as follows:

3.9.1. The discharge of treated wastewater shall be adjusted at least once daily to avoid exceeding, to the extent practicable, ten percent of the most recent daily flow measurement of Outlet Creek at USGS Gauge No. 11472180. Daily flow shall be based on flow meter comparisons reasonably read between the hours of ~~12:01~~ 9:01 am and ~~12:00 midnight~~ 9:00 am; and,

Comment No. 5: *The City is concerned that sampling for E. coli at monitoring location EFF-003 (after the water passes through the enhancement wetlands) will exceed the stated limit. The City identifies that they have no way to control E. coli contamination that may naturally occur within the enhancement wetlands, and suggests that the wetland should be considered the receiving waters and the sample point should just be set to monitoring location INT-002 in this case.*

Response to Comment 5: Effluent monitoring for *E. coli* bacteria at monitoring location EFF-003 is appropriate because this location is representative of the Facility's discharge to receiving waters. Regional Water Board staff understand that natural sources of bacteria may be present in the City's enhancement wetland area and that these sources may result in elevated concentrations of *E. coli* within the City's effluent discharge. The City may choose to collect additional data, such as *E. coli* monitoring

from monitoring location INT-002, to demonstrate that *E. coli* bacteria is not present in the discharge from their disinfection system.

It should also be noted that the Proposed Permit does not include an effluent limitation for *E. coli* bacteria. However, the Proposed Permit does include a receiving water limitation for *E. coli* in section 5.1.20. It should be noted that section 5 of the Proposed Permit, Receiving Water Limitations, states that receiving water conditions not in conformance with the receiving water limitations are not necessarily a violation of the Order and that the Regional Water Board may require an investigation to determine cause and culpability prior to asserting that a violation occurred.

No changes have been made to the permit in response to this comment.

Comment No. 6: *The City is concerned that the inclusion of an effluent limitation for zinc in the Draft Permit appears to be based on a single annual sample. The City does not know if that single sample is representative of the actual concentration of zinc that may occur, or a one-time spike.*

Response to Comment 6: An effluent limitation for zinc is provided in the Proposed Permit because the reasonable potential analysis for zinc resulted in a Trigger 2 result, as discussed in Sections 4.3.4.2 and 4.3.4.3 of the Fact Sheet for the Proposed Permit. Trigger 2 is applicable when the background level (receiving water concentration) of a pollutant is greater than the most stringent water quality objective and that pollutant is also detected in the effluent water. A Trigger 2 result requires that an effluent limitation be included in the Proposed Permit.

The most stringent water quality objective for zinc is 51.6 µg/L and is a hardness-dependent criterion for the protection of freshwater aquatic life per the California Toxic Rule. The March 20, 2019 receiving waters sample (monitoring point REC-001) indicated a zinc concentration of 65 µg/L, exceeding the above identified most stringent water quality objective. All annual monitoring samples reported during the previous permit term resulted in reportable concentrations of zinc in the effluent, although none of these sample results exceeded the most stringent water quality objective.

No changes have been made to the permit in response to this comment.

Comment No. 7: *The City would like to formally request a one-week extension to complete their review the Draft Permit.*

Response to Comment 7: Additional comments were not received from the City. No changes have been made to the permit in response to this comment.