
North Coast Regional Water Quality Control Board

**Response to Written Comments
Draft Amendment Order No. R1-2024-0030
for
Amendment of Order No. R1-2021-0002
for the
Russian River County Sanitation District
Russian River Wastewater Treatment Facility
Regional Water Quality Control Board, North Coast Region
December 5, 2024**

Comments Received

The deadline for submittal of public comments regarding draft Amendment Order No. R1-2024-0030, amending National Pollutant Discharge Elimination System (NPDES) Permit, Waste Discharge Requirements and Master Recycling Permit Order No. R1-2021-0002 (Permit) for the Russian River County Sanitation District and Sonoma Water (Permittees) was October 7, 2024. Regional Water Board staff (Staff) only received written comments from the Permittee during the Draft Amendment Order's notification period.

Regional Water Board staff discussed with the Permittees the Draft Amendment Order and proposed changes made in response to comments received on October 29, 2024. The Permittees did not identify any significant concerns with the proposed changes discussed during this meeting.

This Response to Comments document includes a summary of the comments received from the Permittees, followed by Regional Water Board staff response to each comment. Text added to the Proposed Amendment Order is identified by underline and text to be deleted from the Proposed Amendment Order is identified by strike-through in this document. The term "Draft Amendment Order" refers to the version of the Amendment Order that was sent out for public comment. The term "Proposed Amendment Order" refers to the version of the Amendment Order 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.

A. Sonoma Water Comment Letter

Comment No. A1: Sonoma Water identifies that while they do not oppose many of the edits, they believe that the proposed modifications to the Permit should occur within the

normal 5-year permit reissuance, and that the proposed changes included in the draft Amendment Order do not meet the allowable criteria for permit modification that are identified in 40 CFR § 122.62(a). This section of the Code of Federal Regulations discusses the allowable cause for modification of permits. As such, they request that the proposed amendments be made in the normal course of the 5-year permit reissuance.

Response to Comment No. A1: Regional Water Board staff submit that the proposed changes to the Permittee's NPDES permit are allowed under 40 CFR section 122.62(a)(2), Information. Specifically, staff received new information with Sonoma Water's Flood Control and Flow Reduction Mitigation Summary Report dated October 25, 2021, that identified that the Permittees' Collection System Operations and Maintenance plan does not represent all of their O&M practices and does need to be updated. Furthermore, during the December 2023 Board Meeting, Mr. Mike Thompson indicated that Sonoma Water has made short-term changes to the Facility operation, including making use of on-site storage, to prevent or reduce the potential for future sanitary system overflows. These identified changes constitute new information and are directly applicable to the content of the special study reports required by the Permit within section 6.3.6.2 and would have resulted in the inclusion of the proposed amendments if they were known at the time of Permit issuance.

Comment No. A2: Sonoma Water requests that in order to use the information obtained by the Engineering Evaluation, that the Collection System Operations and Maintenance Plan's due date of April 1, 2025 be updated to August 1, 2025, the due date for the Engineering Evaluation report.

Response to Comment No. A2:

Regional Water Board staff (Staff) agree that the due date for the updated Collection System Operations and Maintenance Plan may be changed to August 1, 2025 to allow full consideration and inclusion of any applicable information learned through the Engineering Evaluation Report. Revision No. 2 of the Proposed Amendment Order has been modified as follows:

2. A new section, Section 6.3.6.2.3., has been added to the Order to require the submission of an updated Collection System Operations and Maintenance Plan by no later than ~~April 1, 2025~~ August 1, 2025, to ensure the timely incorporation of short-term corrective actions identified by the Permittees. The Permittee's Collection System Management Plan would otherwise be due for an update in April 2026, as part of their required Sanitary Sewer Management Plan update. Section 6.3.6.2.3 has been added as follows:

6.3.6.2.3. By ~~April 1, 2025~~ August 1, 2025, the Permittees shall submit a revised Collection System Operations and Management Plan (O&M Plan) that incorporates flow reduction mitigation measures and operational changes identified since the last O&M Plan submittal. Additionally, the

O&M Plan shall identify how the Permittees will monitor and respond to conditions within the Russian River watershed that have been identified as having a strong relation to the occurrence of flooding in the Russian River within the District's service area.