Response to Written Comments
Draft Waste Discharge Requirements
Order No. R1-2026-0005
National Pollutant Discharge Elimination System (NPDES)
for the
City of Cloverdale
Wastewater Treatment Facility
Regional Water Quality Control Board, North Coast Region
December 3-4, 2026

Comments Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements, Order No. R1-2026-0005, National Pollutant Discharge Elimination System Order (Draft Permit) for the City of Cloverdale (Permittee) Wastewater Treatment Facility (Facility) was October 29, 2026. A draft permit, Order R1-2025-0002, was previously released for public comment on December 24, 2024, with this previous comment period closing January 24, 2025. The North Coast Regional Water Board staff (Regional Water Board) received 21 written comments from the Permittee during the first comment period.

The Proposed Permit was removed from the Agenda during this time due to legal challenges brought against the Test of Significant Toxicity. Once the legal issue was resolved, the Proposed Permit was released for another comment period. The Proposed Permit was noticed a second time from September 26, 2027, 2026, through October 28, 2026, and 12 written comments were received from the Permittee, all received timely.

This Response to Comments document includes a summary of changes made to the Order in response to comments submitted by the Permittee. Text added to the Proposed Order is identified by underline and text to be deleted from the Proposed Order is identified by strike-through in this document. The term “Draft Order” refers to the version of the order that was sent out for public comment. The term “Proposed Order” refers to the version of the order that has been modified in response to comments received and is being presented to the Regional Water Board for consideration.

City of Cloverdale Comments

Comment No. 1:

The Permittee requested the removal of Sections 3.9.1 through 3.9.1.2 from the Draft Order, arguing that these sections are irrelevant since discharge to the Russian River is prohibited under this Order (Discharge Prohibition 3.9). The Permittee further asserted that these prohibitions would only be appropriate after upgrades to advanced treatment are completed and a modified or reissued NPDES Order is adopted, as noted in Attachment E, Section 10.4.1.3.

Response to Comment No. 1:
Regional Water Board Staff agree that these limitations will not apply until the Permittee is approved for surface water discharge and the Permit is modified. However, these requirements shall remain in the Permit because the Permittee has requested to retain coverage under an NPDES Permit for the upcoming Permit term. Coverage under an NPDES Order must include requirements for surface water discharge based on the currently available information regarding the facility's treatment capacity and effluent quality. These requirements are subject to change upon modification of the Order and any new information provided by the Permittee.

If the Permittee wishes to remove these requirements, Staff recommend that the Permittee enroll under a Waste Discharge Requirement (WDR) Order and request rescission of its NPDES Permit.

No changes were made in response to this comment.

Comment No. 2:
The Permittee argued that the effluent limitations in Section 4.1 through 4.1.5.1.2 and Table 2 of the draft permit are not relevant since discharge to the Russian River is prohibited under this Order (Discharge Prohibition 3.9). They noted that these limitations would only be appropriate or applicable after upgrades to advanced treatment are completed, a Surface Water Discharge Report and full Report of Waste Discharge are submitted, a Reasonable Potential Analysis is conducted, effluent limitations are derived, and a modified or reissued NPDES Order is adopted.

Response to Comment No. 2:
Consistent with Response No. 1, Staff agree that these limitations will not apply until the Permittee is approved for surface water discharge and the Permit is modified. However, these requirements shall remain in the Permit because the Permittee has requested to retain coverage under an NPDES Permit for the upcoming term. Coverage under an NPDES Order must include requirements for surface water discharge based on the currently available information regarding the facility's treatment capacity and effluent quality. These requirements are subject to change upon modification of the Order and any new information provided by the Permittee.

If the Permittee wishes to remove these requirements, Staff recommend that the Permittee enroll under a Waste Discharge Requirement (WDR) Order and request rescission of its NPDES Permit.

No changes were made in response to this comment.

Comment No. 3:
The Permittee requested effluent limits from the previous Order be retained for TSS and pH, rather than new effluent limits contained in the Draft Order. The Permittee requested changes to the instantaneous minimum and maximum pH limitations to 6.0 and 9.0, respectively, and adjustments to the TSS average monthly and weekly limitations to 45 and 65 mg/L, respectively. For consistency with Attachment F, Sections 4.2.1.1, 4.2.4.1, 4.2.4.2, and the current Order, the Permittee requested these limitations be updated.

Response to Comment No. 3:
Staff agree with the Permittee's request to retain the existing effluent limits for pH and TSS contained in Order No. R1-2018-0034. As noted in Fact Sheet Section 4.2.4.1, the secondary treatment standards in 40 C.F.R. Part 133 establish minimum effluent quality levels for BOD5 and TSS. Standard limits are 30 mg/L (30-day average) and 45 mg/L (7-day average), with exceptions allowed under Sections 133.103 and 133.105. Facilities using trickling filters or waste stabilization ponds may qualify for "equivalent to secondary treatment" limits of 45 mg/L (30-day average) and 65 mg/L (7-day average). Additionally, Section 133.103(c) permits less stringent TSS limits for POTWs relying on waste stabilization ponds when regulatory levels cannot be met. The Permittee meets all conditions for equivalent-to-secondary limitations for TSS as prescribed by Section 133.101(g).

Staff agree with the Permittee's assertion that the minimum and maximum pH limitations should be 6.0 and 9.0, based on technology-based effluent limitations consistent with secondary treatment requirements established in 40 C.F.R. Part 133. Table 3 has been corrected to retain the TSS and pH effluent limitations from Order No. R1-2018-0034, as shown below.

Table 3. Effluent Limitations[1] – Discharge Point 002

Parameter	Units	Average Monthly	Average Weekly	Instantaneous Minimum	Instantaneous Maximum
Biochemical Oxygen Demand 5-day @ 20°C (BOD_5)	mg/L	30	45	--	--
pH	standard units	--	--	~~6.5~~6.0	~~8.5~~9.0
Total Suspended Solids (TSS)	mg/L	~~30~~45	~~45~~65	--	--

Comment No. 4:
The Permittee requested the removal of the coliform limitation of 1.1 MPN/100 ml. This limitation is not applicable as an effluent limitation and is instead applied as a groundwater limitation, as noted in Section 5.2.5. The inclusion of this limitation is inconsistent with the current Order.

Response to Comment No. 4:
Staff agree with the Permittee's assertion that this water quality objective is applied as a groundwater limitation, as noted in Section 5.2.5., consistent with the previous order and Basin Plan section 3.4.1.

Section 4.2.3.3 of the proposed order was modified as follows:

4.2.3. Disinfection. Disinfected effluent discharged from the Facility through Discharge Point 002 to the percolation ponds shall not contain coliform bacteria exceeding the following concentrations, as measured at Monitoring Location EFF-002:

4.2.3.1. The median concentration shall not exceed a Most Probable Number (MPN) of 23 per 100 milliliters (mL) in a calendar month[1]; and

4.2.3.2. No sample shall exceed an MPN of 240 total coliform bacteria per 100 milliliters

~~4.2.3.3. The median of the most probable number of coliform organisms over any 7-day period shall be less than 1.1 MPN/100 ml~~

Comment No. 5:
The Permittee requested that all of section 4.5.1 and its subsections be removed as to not cause confusion. Section 3.9 already prohibits discharge to the Russian River. There is no plan to upgrade the facility in this permit term.

Response to Comment No. 5:
Section 4.5.1 of the Draft Permit includes Filtration Requirements for tertiary treatment when discharging to the Russian River. Specifically, consistent with Order No. R1-2018-0034, this Draft Permit specifies that the turbidity of the filtered wastewater not exceed an average of 2 NTU during any 24-hour period; 5 NTU more than 5 percent of the time within a 24-hour period, and 10 NTU at any time, and is based on the definition of filtered wastewater found in title 22 section 60301.320 of the CCR. The title 22 definition is used as a reasonable performance standard to ensure adequate removal of turbidity upstream of the disinfection

[1] See section 7.11. of this Order regarding compliance with bacteriological limitations.

facilities. Properly designed and operated effluent filters will meet this standard. The point of compliance for the turbidity requirements is a point following filtration and before discharge to the chlorine disinfection system. **This requirement shall apply if and when the Permittee determines the need to discharge to the Russian River or to develop a reclamation system.**

Consistent with Responses No. 1 and No. 2, Staff agree that these limitations will not apply until the Permittee is approved for surface water discharge and the Permit is modified. However, these requirements shall remain in the Permit because the Permittee has requested to retain coverage under an NPDES Permit for the upcoming term. Coverage under an NPDES Order must include requirements for surface water discharge based on the currently available information regarding the facility's treatment capacity and effluent quality. These requirements are subject to change upon modification of the Order and any new information provided by the Permittee.

Comment No. 6

The Permittee requested the addition of clarification that surface water limitations will only be applicable after advanced treatment upgrades are made. The Permittee asserted that these limitations are not relevant until such upgrades are completed and a modified or reissued NPDES Order is adopted, as noted in Attachment E, Section 10.4.1.3.

Response to Comment No. 6:
As stated in section 5.1 of the Draft Order "Receiving water limitations are based on water quality objectives contained in the Basin Plan, and are a required part of this Order. Receiving water conditions not in conformance with the limitation are not necessarily a violation of this Order. Compliance with receiving water limitations shall be measured at monitoring locations described in the MRP (Attachment E). The Regional Water Board may require an investigation to determine cause and culpability prior to asserting that a violation has occurred."

Compliance with these limitations requires an investigation to assert a violation has occurred. Receiving water limitations were determined using the most current monitoring data, and they are necessary in case the Permittee were to discharge in violation of Discharge Prohibition 3.9. Receiving water limitations may be subject to change upon completed upgrades and a modification or reissuance of the Proposed Order, as noted in Attachment E, Section 10.4.1.3. Adding the requested language would be repetitive and would obscure the intent of the Order. Therefore, Staff do not believe a qualifying statement is necessary in section 5.1 of the Proposed Order and no changes have been made in response to this comment.

Comment No. 7:

The Permittee requested the insertion of the Facility Location Map from the City's Report of Waste Discharge, as found in the current Order (Figure B-1).

Response to Comment No. 7:
The Proposed Order was updated to include the Facility Map from the current order as part of Attachment B.

Comment No. 8:
The Permittee requested the removal of EFF-001 monitoring requirements or, at a minimum, the addition of clarification. These requirements are unnecessary until advanced treatment improvements are completed and a modified or reissued NPDES Order is adopted. Additionally, Acute Toxicity monitoring is not typically included in Orders adopted with the new Toxicity Provisions, as noted in Appendix E, Section 5.1.

Requested Change: EFF-001 monitoring requirements are not needed in this Order. These requirements should be removed, or at a minimum, clarification added.

Response to Comment No. 8:
As addressed in Comments 1 and 2 these requirements must remain in the Order if the Permittee wishes to continue NPDES coverage. Staff agree that EFF-001 monitoring requirements will not be applicable until advanced treatment improvements are completed and a modified or reissued NPDES Order is adopted. Clarifying language has been added in Attachment E, Section 4.1 as follows:

4.1. Monitoring Location EFF-001

Discharge Prohibition 3.9 requires that the Permittee upgrade the Facility to meet advanced treatment standards before discharging to the Russian River. When the necessary upgrades are complete, the Permittee shall submit a **Surface Water Discharge Report** for Executive Officer approval **at least 180 days before planned discharge**.

Comment No. 9:
The Permittee requested the removal of Section 5 of the MRP, Whole Effluent Toxicity, Species Sensitivity Screening requirements. Since the Permittee has no plans to upgrade to advanced treatment during the renewed Order term, the initiation of Species Sensitivity Screening using secondary treated wastewater is inappropriate.

Response to Comment No. 8 and 9:
As addressed in Comments 1, 2, and 7 these requirements must remain in the Proposed Order if the Permittee wishes to continue NPDES coverage. Staff agree that Whole Effluent Toxicity Testing Requirements and Species Sensitivity

Screening requirements will not be applicable until advanced treatment improvements are completed and a modified or reissued NPDES Order is adopted, thus clarifying language has been added in Attachment E, Section 5.1.4 as follows:

5.1.4. Species Sensitivity Screening. The Permittee shall submit a **Surface Water Discharge Report** for Executive Officer approval **at least 180 days before planned discharge.** Species sensitivity screening shall be conducted prior to discharge to surface waters and shall be included in the submittal of the Surface Water Discharge Report ~~during this Order's first required sample collection~~.

Comment No. 10:
The Permittee requested the removal of the Species Sensitivity Screening requirement or clarification that it is only applicable after advanced treatment improvements are completed and a modified or reissued NPDES Order is adopted. The Permittee does not plan to upgrade during the renewed Order term, making this requirement unnecessary.

Response to Comment No. 10:
Staff agree that this requirement is not necessary unless the permittee intends to discharge to surface water and a modified order is issued. Thus, Attachment E, Section 5.2.6 & Table E-11 has been modified as follows:

5.2.6. **Species Sensitivity Screening.** Species sensitivity screening shall be conducted **within 18 months of Regional Water Board approval to discharge to the Russian River.** ~~**Order's**~~

Table E-11. Reporting Requirements for Special Provisions Reports

Order Section	Special Provision Requirement	Reporting Requirements
MRP Whole Effluent Toxicity Testing Requirements 5.2.6	Species Sensitivity Screening	**Within 18 months** of Regional Water Board approval to discharge to the Russian River ~~this Order's~~

Comment No. 11:
The Permittee requested the removal of the TRE Work Plan requirement or clarification that it is only applicable after advanced treatment improvements are completed and a modified or reissued NPDES Order is adopted. Developing a generic TRE Work Plan at this time would be premature and unnecessary.

Response to Comment No. 11:
Attachment E, Section 5.4.1 & Table E-11 has been modified as follows:

5.4.1. **Generic TRE Work Plan.** The Permittee submitted a generic TRE Work Plan to the Regional Water Board in January 2011. The Permittee's generic TRE Work

Plan shall be reviewed ~~June 1, 2025~~ **no later than 60 days of Regional Water Board approval to discharge to the Russian River** and updated as necessary in order to remain current and applicable to the discharge and discharge facilities.

Table E-11. Reporting Requirements for Special Provisions Reports

Order Section	Special Provision Requirement	Reporting Requirements
MRP Effluent Monitoring Requirement 5.2.1	Generic TRE Work Plan review and update	Review ~~**by June 1, 2025**~~ **within 60 days of Regional Water Board approval to discharge to the Russian River**. Update as necessary

Comment No. 12:
The Permittee requested the removal of the CTR Priority Pollutants requirement and footnote 16. Since there will be no discharge to EFF-001 during the Order term, Footnote 16 is confusing, as CTR data from advanced treatment effluent is not relevant.

Response to Comment No. 12:
CTR data is necessary to complete Reasonable Potential Analysis and is necessary for a complete ROWD submittal as an NPDES discharger.

As stated in Response to Comment No. 1, if the Permittee further requests that these requirements be removed, then Regional Board Staff recommend the Permittee apply for Waste Discharge Requirements (WDRs) and request recission of NPDES coverage.

No changes were made in response to this comment.

Comment No. 13:
The Permittee requested that footnote 3 be corrected for consistency with EFF-002 monitoring. The revised text should state: “Each quarter, the Permittee shall report the daily average and monthly average flows,” consistent with the current Order.

Response to Comment No. 13:
The language the Permittee requested “Each quarter, the Permittee shall report the daily average and monthly average flows.”, is included in Draft Permit Table E-4 as Footnote 2. Table E-4, Footnote 3 was modified in response to comment No. 13 (below) and for consistency with Table E-5.

2. Each quarter, the Permittee shall report the daily average and monthly average flows.

3. Each quarter, ~~The~~ the Permittee shall ~~record~~ report the volume discharged to each percolation pond (Ponds 1-7).

Comment No. 14:
The Permittee requested the removal of PND monitoring requirements. The Facility lacks continuous flow metering equipment at individual ponds. The Permittee suggests modifying the requirements to report observations of which ponds are in use instead.

Response to Comment No. 14:
The PND monitoring requirements are necessary to better understand groundwater monitoring results. Staff acknowledge that the Permittee does not have the equipment to precisely monitor the flow to each pond. Clarifying language has been added to the Proposed Order to specify an observational flow measurement instead, as shown below:

Table E-5. Effluent Monitoring – Monitoring Locations PND-001 through PND-007

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method[1]
Effluent Flow[13]	~~MGD~~ --[2]	~~Meter~~ Observation	~~Continuous~~ Daily	--

Table Notes:

~~1. In accordance with the current edition of *Standard Methods for Examination of Water and Wastewater* (American Public Health Administration) or current test procedures specified in 40 C.F.R. part 136~~

1. Each quarter, the Permittee shall report the daily observed ponds in use, PND-001 through PND-007, ~~average and monthly average flows~~.
2. For each day of discharge the Permittee shall indicate 1 = discharge and 0 = no discharge at monitoring locations PND-001 through PND-007."

Factsheet section 7.6.2.4.

7.6.2.4. **Pond Monitoring.** Flow observation requirements at Monitoring Locations PND-001 through PND-007 have been newly established in this order to provide a more accurate assessment of groundwater monitoring data.

Comment No. 15 and 16:
The Permittee requested the removal of Chlorodibromomethane and Dichlorobromomethane monitoring requirements in receiving water and groundwater. Monitoring for these constituents may cease if, after two years of

monitoring, results show no detectable presence of the constituents in the receiving water or groundwater as per footnote 4 and 6 respectively.

Response to Comment No. 15 and 16:
Staff agree with the Permittee's assertion that Chlorodibromomethane and Dichlorobromomethane have not been detected at monitoring locations RSW-003 through RSW-006; GW-001; GW-007; GW-009; GW-010; GW-011; GW-012; GW-013; GW-014; GW-015; nor GW-016 within the previous permit term and that this monitoring is no longer necessary to complete reasonable potential analysis. Thus, Table E-7 and Table E-8 of the Proposed Order were modified as shown below:

Table E-7. Receiving Water Monitoring - Monitoring Locations RSW-003 through RSW-006

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method[1]
~~Chlorodibromomethane[6]~~	~~µg/L~~	~~Grab~~	~~Quarterly~~	~~GC (ML 0.5 µg/L)[4]~~
~~Dichlorobromomethane[6]~~	~~µg/L~~	~~Grab~~	~~Quarterly~~	~~GC (ML 0.5 µg/L)[4]~~

Table Notes:

1. In accordance with the current edition of Standard Methods for Examination of Water and Wastewater (American Public Health Administration) or current test procedures specified in 40 C.F.R. part 136.
2. Monitoring for effluent and receiving water hardness shall be conducted concurrently with effluent monitoring for copper at Monitoring Location EFF-002 and receiving water sampling for copper.
3. ICPMS = Inductively Coupled Plasma / Mass Spectrometry
   SPGFAA = Stabilized Platform Graphite Furnace Atomic Absorption
4. ~~GC = Gas Chromatography~~
5. ~~5.~~ 4. The Permittee shall propose an analytical method with the lowest practicable MDL in order to obtain sufficient data to make a determination on connectivity of the groundwater underlying the percolation ponds and the Russian River. As part of the decision, the Permittee may consider the availability of laboratories and associated costs.
6. ~~Monitoring may cease if, after two years of monitoring, results shows no detectable presence of the constituent in the receiving water.~~

8.3. Groundwater Monitoring Locations

The Permittee shall monitor groundwater at Monitoring Locations GW-001, GW-007, GW-009, GW-010, GW-011, GW-012, GW-013, GW-014, GW-015, and GW-016 as follows:

Table E-8. Groundwater Monitoring Locations

Parameter	Units	Sample Type	Minimum Sampling Frequency[1,7]	Required Analytical Test Method[2]
~~Chlorodibromomethane[4]~~	~~µg/L~~	~~Grab~~	~~Quarterly~~	~~GC (ML 0.5 µg/L)[5]~~
~~Dichlorobromomethane[4]~~	~~µg/L~~	~~Grab~~	~~Quarterly~~	~~GC (ML 0.5 µg/L)[5]~~

Table Notes:

1. Groundwater monitoring wells shall be constructed, and sampling conducted, to adequately capture seasonal variations in groundwater levels.
2. In accordance with the current edition of Standard Methods for Examination of Water and Wastewater (American Public Health Administration) or current test procedures specified in 40 C.F.R. part 136.
3. ICPMS = Inductively Coupled Plasma / Mass Spectrometry
   SPGFAA = Stabilized Platform Graphite Furnace Atomic Absorption

~~4. Monitoring may cease if, after two years of monitoring, results show no detectable presence of the constituent in groundwater.~~

~~5. GC = Gas Chromatography~~

~~6.~~4. For coliform samples that exceed a value of 1.1~~110~~ MPN/100ml, additional sampling should be taken and analyzed to eliminate the possibility of sampling error. The Permittee shall propose an analytical method with the lowest practicable MDL ~~in order to obtain sufficient data to make a determination on connectivity of the groundwater underlying the percolation ponds and the Russian River~~. As part of the decision, the Permittee may consider the availability of laboratories and associated costs.

~~7.~~5. The Permittee shall propose an analytical method with the lowest practicable MDL in order to obtain sufficient data to make a determination on connectivity of the groundwater underlying the percolation ponds and the Russian River. As part of the decision, the Permittee may consider the availability of laboratories and associated costs.

~~8.~~6. At GW-015, Permittee is only required to monitor “depth to groundwater".

~~9.~~7. Monitoring requirements at GW-007 are exempt during wet weather conditions, if the well is flooded or inaccessible.

Comment No. 17 and 18:

The Permittee requested correcting the due date for the Disaster Preparedness Assessment Report and Action Plan to March 1, 2027. This correction aligns with the due date noted in Table E-11.

Response to Comment No. 17 and 18:
Staff corrected the due date of Disaster Preparedness Assessment Report and Action Plan in Attachment E, Section 10.4.1.1 for consistency with the due date noted in Table E-11 as shown below.

10.4.1.1. **Disaster Preparedness Assessment Report and Action Plan**. Natural disasters, extreme weather events, sea level rise, and shifting precipitation patterns, some of which are projected to intensify due to climate change, have significant implications for wastewater treatment and operations. Some natural disasters are expected to become more frequent and extreme according to the current science on climate change. In order to ensure that Facility operations are not disrupted, compliance with conditions of this Order are achieved, and receiving waters are not adversely impacted by permitted and unpermitted discharges, the Permittee shall submit a Disaster Preparedness Assessment Report and Action Plan to the Regional Water Board by ~~November 1, 2026~~ **March 1, 2027**, for Executive Officer review and approval.

Comment No. 19:
The Permittee requested to change the due date for Groundwater Characterization to March 1, 2027. This correction ensures consistency with Attachment E, Section 10.4.1.2.

Response to Comment No. 19:
Staff corrected the inconsistency by changing the due date for Groundwater Characterization to March 1, 2027 as stated in Attachment E, Section 10.4.1.2. Thus, Table E-11 was modified as follows:

Table E-11. Reporting Requirements for Special Provisions Reports

Order Section	Special Provision Requirement	Reporting Requirements
MRP Reporting Requirement 10.4.1.1.	Disaster Preparedness Assessment Report and Action Plan	**March 1, 2027**
MRP Reporting Requirement 10.4.1.2.	Groundwater Characterization.	**March 1, 2027** ~~**November 1, 2026**~~

10.4.1.1. Disaster Preparedness Assessment Report and Action Plan. Natural disasters, extreme weather events, sea level rise, and shifting precipitation patterns, some of which are projected to intensify due to climate change,

have significant implications for wastewater treatment and operations. Some natural disasters are expected to become more frequent and extreme according to the current science on climate change. In order to ensure that Facility operations are not disrupted, compliance with conditions of this Order are achieved, and receiving waters are not adversely impacted by permitted and unpermitted discharges, the Permittee shall submit a Disaster Preparedness Assessment Report and Action Plan to the Regional Water Board by ~~**November 1, 2026**~~ **March 1, 2027**, for Executive Officer review and approval.

Comment No. 20:
The Permittee requested updating the Authorized Person to Kevin Thompson, as David J. Kelly is no longer with the City.

Response to Comment No. 20:
Staff corrected the Authorized Person to Kevin Thompson in Table F-1 was modified as follows:

Table F-1. Facility Information

Authorized Person to Sign and Submit Reports	Kevin Thompson ~~David J. Kelly~~, City Manager (707) 894-1710 Jay Robinson, Senior Wastewater Treatment Plant Operator, (707) 894-1719

Comment No. 21:
The Permittee requested correcting I&I to 128,500 gpd and updating I&I reduction information. This correction reflects the correct flow value reported in Form 2A of the Report of Waste Discharge.

Response to Comment No. 21:
Attachment F, Section 2.1.1 was corrected as follows:

Inflow and infiltration (I/I) were historically a problem for the Facility, resulting in significantly greater influent flows during storm events. It is estimated that ~~150,000~~ 128,500 gpd flow into the treatment system from I&I. The City completed a smoke and video testing study for I&I in 1997 and developed a program to correct the I&I problem. The Permittee cleans its sewer system every 5 years and preventively cleans sewers with a history of problems on an as needed basis. The Northern portion of the city was inspected using closed-circuit television (CCTV) in 1998 and ~~the Permittee is preparing to inspect the southern portion of the city when funding is available~~ the northern portion in 2021-2022. The Permittee inspects the condition of its gravity sewers on an 8-year cycle. The Permittee made significant upgrades to the older parts of the collection system to reduce I/I by sealing and grouting 101 manholes in 2005 and 2006 and by replacing 8,900 feet of sewer main, over 2,000 feet of sewer laterals, and 47 aging manholes between 2007 and 2009. Slip lining of sewer mains has been ongoing since 2000, with approximately

2000 feet planned for 2025. Approximately 25 manholes were grouted/epoxy coated sealed in 2022-2023. The peak daily flow through the Facility during the term of Order No. R1-2018-0034 was 7.1 mgd in February 2023, which is below the 8.25 mgd peak wet weather hydraulic capacity of the Facility. The Permittee has made significant effort to inspect, repair, and line the collection system to reduce I/I. The Permittee currently only has one lift station. Additional lift stations are anticipated to be integrated into the collection system with the development of new properties around the city.

Comment No. 22:
The Permittee requested the addition of discharge prohibition text stating: "The direct discharge of wastewater effluent from the Facility to the Russian River is prohibited, unless the Permittee upgrades the Facility to include advanced wastewater treatment, in accordance with the Surface Water Discharge Report approved by the Executive Officer."

Response to Comment No. 22:
Staff corrected the ordering and formatting for section numbers in Attachment F, Section 4.1.9 through 4.1.11 to correlate with language in Sections 3.9 through 3.11.

Staff Initiated Changes

Several non-substantive, editorial and typographical changes were incorporated into the Proposed Order.