

California Regional Water Quality Control Board  
North Coast Region

CLEANUP AND ABATEMENT ORDER NO. R1 2002-0017

FOR

THE SALVATION ARMY  
LYTTON SPRINGS FACILITY  
200 LYTTON SPRINGS ROAD  
HEALDSBURG, CA 95448

Sonoma County

The California Regional Water Quality Control Board, North Coast Region (hereinafter the Regional Water Board) finds that:

1. The Salvation Army operates a donated merchandise processing and distribution facility at 200 Lytton Springs Road, Healdsburg, California. The Lytton Springs site also houses a rehabilitation center for men, retail sales outlets, and staff residences. The facility property is located adjacent to Lytton Creek, a tributary of the Russian River.
2. The Salvation Army rehabilitation center and associated administrative and retail buildings generate approximately 9,500 gallons of domestic wastewater per day. Raw wastewater flows by gravity to two 10,000-gallon holding tanks before entering a wastewater stabilization pond with an unknown capacity.
3. On January 2, 2002, the Sonoma County Department of Code Enforcement forwarded an anonymous complaint to Regional Water Board staff regarding an alleged breach in a wastewater stabilization pond berm at the Salvation Army Lytton Springs facility. Regional Water Board staff immediately inspected the site with an engineering consultant working for the Salvation Army. Regional Water Board staff confirmed the breach and observed a discharge of wastewater to a drainage way adjacent to the wastewater pond. The drainageway continues across a pasture before being intercepted by a culvert that conveys storm water to Lytton Creek and thence to the Caltrans storm water system. The discharge from the wastewater pond to the drainageway was estimated at approximately 10 gallons per minute.
4. This release constitutes a direct discharge to waters of the state and poses an immediate threat to public health and may result in adverse impacts to the beneficial uses of the Russian River. These impacts will continue unless and until the discharge is eliminated. Regional Water Board staff have indicated to the representatives of the Salvation Army that the Salvation Army must immediately cease the unpermitted discharge from the wastewater stabilization pond and take immediate measures to prevent such a discharge in the future.
5. Due to the age and apparent instability of the wastewater stabilization pond as well as the lack of clear and permitted disposal options, the stabilization pond berm may be

vulnerable to additional breaches or overtopping. These potential releases, should they occur, will again threaten public health and may adversely affect the beneficial uses of the Russian River. The Salvation Army must ensure the structural integrity of the existing wastewater stabilization until such time as the pond no longer contains domestic waste products and no longer functions as a wastewater treatment pond.

6. On September 27, 2001, the Salvation Army submitted a report of waste discharge to the Regional Water Board describing the replacement of the existing wastewater treatment system at the Lytton Springs facility with a new system designed to treat 15,000 gallons per day of domestic wastewater. Currently the application is incomplete. Regional Water Board staff intends to propose waste discharge requirements for the facility expansion and an upgraded sewage treatment system.
7. As of the date of issuance of this Order, the Salvation Army has not ceased the unpermitted discharge and no cleanup or abatement activities have occurred.
8. The beneficial uses of the Russian River and its tributaries, as designated in the Water Quality Control Plan for the North Coast Region, include:
  - a. municipal and domestic supply
  - b. agricultural supply
  - c. industrial service supply
  - d. industrial process supply
  - e. water contact recreation
  - f. non-contact water recreation
  - g. groundwater recharge
  - h. navigation
  - i. hydropower generation
  - j. wildlife habitat
  - k. fish migration
  - l. fish spawning
  - m. commercial and sport fishing
  - n. warm freshwater habitat
  - o. cold freshwater habitat
  - p. estuarine habitat
  - q. aquaculture
9. The Salvation Army has caused or permitted waste to be discharged or deposited where it can be discharged to waters of the state and has created, or threatens to create a condition of pollution or nuisance.
10. This is an enforcement action by a regulatory agency, being taken for the protection of the environment, and is exempt from the provisions of the California Environmental Quality Act (Pub. Resources Code, Section 21000 et seq.) in accordance with California Code of Regulations, Title 14, Section 15321.

THEREFORE, IT IS HEREBY ORDERED that, pursuant to California Water Code Sections 13267(b) and 13304, The Salvation Army shall:

1. Cease the release of wastewater to surface waters. Actions to be considered shall include prompt repair of the pond levee, reductions in wastewater generation and/or transporting wastewater to an approved offsite treatment and disposal facility. Representatives of the Discharger shall visually inspect the pond and holding tanks on a daily basis. Reports of the inspections shall be submitted in accordance with 3. below.
2. Immediately begin actions to abate the threat of future discharges to surface waters resulting from the discharge of wastewater to the stabilization pond. By January 9, 2002, a report shall be submitted, for review and approval of the Executive Officer, describing the current capacity of the existing wastewater system as well as estimates of influent flow (wastewater, precipitation and infiltration/inflow). The report shall propose system upgrades or other control measures necessary to prevent future discharges to waters of the state. The report shall include a Time-Schedule for prompt implementation of all necessary system improvements proposed in the report.
3. Provide to the Regional Water Board weekly written status reports updating the progress of corrective measures. The report shall include results of daily visual inspections of the pond and holding tanks. Any release surface release from the pond or holding tanks shall be documented along with corrective measures taken. A final report shall be submitted to the Regional Water Board no later than one week following completion of abatement and stabilization activities referred to in 2.above.
4. Submit a wastewater and receiving water monitoring and sampling plan by January 9, 2002, to sample the pond wastes, and any discharges from the pond in order to determine the extent of the discharge to receiving walls.

Ordered by \_\_\_\_\_

Susan A. Warner  
Executive Officer

January 4, 2002