

Response to Written Comments

on draft Waste Discharge Requirements Order No. R1-2017-0004, National Pollutant Discharge Elimination System (NPDES) for Covelo Community Services District

Regional Water Quality Control Board, North Coast Region
February 2, 2017

Comment Letter Received

The deadline for submission of public comments regarding draft Waste Discharge Requirements Order No. R1-2017-0004, National Pollutant Discharge Elimination System Permit (Draft Permit) for Covelo Community Services District (CSD) was November 14, 2016. Covelo CSD provided timely comments which have been paraphrased and followed by the Regional Water Board staff response. The term “Draft Order” refers to the draft 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 and is being presented to the Regional Water Board for consideration.

Covelo CSD Comments

***Comment 1:** Covelo Community Services District (CSD) requests that 0.432 mgd be listed as peak instantaneous flow treatment capacity in lieu of 0.394 MGD. The current limit of 0.394 mgd has been carried over from the previous permit and reflects the treatment capacity reported by the District in their 2016 Report of Waste Discharge.*

Response 1: Treatment capacity limitations contained in Table 1 of the Proposed Order are based on the design specifications submitted to the Regional Board for the District’s Wastewater Treatment Plant and have been carried over from the previous Order. Although the Regional Water Board may consider increasing the peak instantaneous flow treatment capacity, based on the Facility’s design specifications, as with any permitted increase in mass emissions of pollutants, the action must first be supported by an anti-degradation analysis conducted by the District and approved by the Regional Water Board in accordance with the *State Water Board’s Statement of Policy with Respect to [Maintaining High Quality Water in California](#)* - Resolution No. 68-16.

No change has been made to the Proposed Order in response to this comment.

***Comment 2:** Attachment C, Figure C-1. The CSD states that Monitoring Well (MW) 4 is located inside the fence enclosure.*

Response 2: The CSD has provided an updated map that has been added to the Proposed Order.

***Comment 3:** Attachment C, page C-2. The CSD states that the current facility flow schematic used in the draft order was carried over from the previous Order and is inaccurate. A revised “facility flow diagram” has been submitted by the CSD to the Regional Water Board*

Response 3: The revised “facility flow diagram” submitted by the CSD has been incorporated into the Proposed Order.

Comment 4: Attachment E, Table E-2, provides a description of Covelo CSD's different monitoring locations. The CSD points out a discrepancy between the description of groundwater monitoring locations in the table, and their locations in the facility site map shown in attachment C, Figure C-1.

Response 4: Attachment E, Table E-2 within the Proposed Order has been updated to provide a more accurate description of Covelo CSD's groundwater monitoring well locations within the site map shown in Attachment C, Figure C-1.

Comment 5: Attachment E, Table E-2, provides a description for septage monitoring at SEP-001 as follows. "SEP-001: Septage receiving station after complete mixing of septage wastes and prior to discharge to the grit channel." The CSD states that septage cannot be monitored at location SEP-001 as the description states due to physical barriers including the absence of a proper sampling point.

Response 5: The CSD has no plans for accepting septage at present. The CSD may accept septage with prior approval from the Regional Water Board Executive Officer of a proposed Septage Management Plan in accordance with the septage handling specifications provided in the provisions section. IV. C.3.c.ii. The CSD may propose an appropriate monitoring location with the Septage Management Plan.

Comment 6: Attachment E, Table E-4, provides effluent monitoring requirements for effluent to be discharged to Grist Creek at Monitoring Location EFF-001. For Ozone Contact Time, the "units" of measure within the table is minutes. The CSD has stated that the unit for Ozone Contact Time should be representative of "concentration x time."

Response 6: Staff agrees. Ozone Contact Time is the product of the ozone concentration in the wastewater multiplied by the time the wastewater is in contact with that ozone. The unit of measure for Ozone Contact Time in Table E-4 has been updated to reflect this change.

Comment 7: Attachment E, Table E-5, provides land discharge monitoring requirements at EFF-002 for discharge to percolation ponds. The CSD objects to sampling requirements for sodium and chloride due to "the naturally occurring presence of sodium silicate in the area." Furthermore, the CSD is concerned that if and when chlorine is used as a disinfectant, some form of resultant chloride salt would be deposited into the soil.

Response 7: Monitoring requirements have been changed to require monitoring for Total Dissolved Solids (TDS) in place of monitoring for sodium and chloride. Staff included monitoring requirements for sodium and chloride in Table E-5 due to concerns that salts may be present in the treated effluent percolating through the soil column and contaminating the underlying groundwater. The beneficial uses of the underlying groundwater include municipal and domestic supply, industrial service supply, industrial process supply, agriculture supply, and freshwater replenishment to surface waters. Monitoring for salts at EFF-002 (in the form of either TDS or sodium and chloride) is necessary to demonstrate compliance with effluent limitations and to determine whether

or not the discharge poses reasonable potential for salt concentrations to exceed any numeric or narrative water quality objectives. Soil survey data (through the Natural Resources Conservation Service (NRCS)) shows nearly 60% of soil in area of the WWTP consists of Gielow sandy loam.

Comment 8: *Attachment E, IX. Other Monitoring Requirements. With respect to Disinfection Process Monitoring, the draft order requires the District to provide continuous and reliable monitoring of flow, initial ozone dose, disinfection contact time, and ozone residual at monitoring location OCC-001. The CSD states that with the current setup of the ozone disinfection system, obtaining a reading on the initial ozone dose concentration would be impossible to acquire.*

Response 8: The CSD recently installed a line from the mixer outlet to the dissolved analyzer that permits monitoring for initial ozone dose. Staff did not change the disinfection process monitoring requirement since the CSD can now feasibly monitor the initial ozone dose at location OCC-001.

Comment 9: *Attachment F, II. Facility Description. The CSD provided a minor correction to the backup chlorination and dechlorination process. The CSD states calcium hypochlorite tables would be used at Wet Well No. 1 for providing the initial chlorine dose, and sodium sulfite tablets would be added at Wet Well No.2 for dechlorination.*

Response 9: Language in the Proposed Order has been updated to reflect this change.

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