

Regional Water Quality Control Board
North Coast Region

Executive Officer's Summary Report
Thursday, February 2, 2017
Regional Water Board Office
Santa Rosa, California

ITEM: 6

SUBJECT: Public Hearing on Order No. R1-2017-0004 to consider adoption of proposed Waste Discharge Requirements for the Covelo Community Services District Wastewater Treatment Facility, WDID No. 1B83009OMEN, NPDES No. CA0023574 (*Imtiaz-Ali Kalyan*)

BOARD ACTION: The Board will consider adoption of Waste Discharge Requirements Order No. R1-2017-0004. The Order will serve as a National Pollutant Discharge Elimination System (NPDES) Order for a period of five years.

BACKGROUND: The Covelo Community Services District (Permittee) owns and operates a municipal wastewater treatment facility and associated wastewater collection and disposal facilities (Facility) for treating primarily domestic, commercial, and some industrial wastewater. The collection system service area includes the City of Covelo, which includes a population of approximately 750 people.

The Facility is designed to treat an average dry weather flow of 0.057 million gallons per day (mgd), average wet weather flow of 0.097 mgd, peak wet weather flow of 0.394 mgd, and average annual flow of 0.077 mgd. The treatment system consists of a headworks, two oxidation ponds, a treatment wetland, and an ozone disinfection system. Influent received from the gravity flow collection system is pumped to the headworks consisting of a horizontal grit channel and a spiral trash screen.

The Facility's two oxidation ponds (lined with high density polyethylene (HDPE)) are operated in a series and are used to reduce biochemical oxygen demand (BOD) and total suspended solids (TSS). The treatment wetlands are planted with alternating submerged and emergent vegetation and are operated to further remove BOD and TSS, as well as provide biological reduction of nitrogen compounds. During dry weather, the Permittee recirculates water through the treatment system to maintain an adequate water level in the treatment wetland. During the wet weather months, the Permittee discharges treated wastewater to a 5 million gallon percolation pond at Discharge Point 002. When influent flows exceed the treatment and storage capacity of the Facility, the Permittee may discharge treated wastewater to Grist Creek below the confluence with Town Creek at Discharge Point 001.

ISSUES: **Effluent Limitations and Monitoring and Reporting Requirements.** The Proposed Order continues to prescribe technology-based effluent limitations for BOD, TSS, and pH at Discharge Points 001 and 002. In addition, the Proposed Order retains WQBELs for chlorine and establishes new WQBELs for cyanide, based on reasonable potential, at Discharge Point 001.

Chronic Toxicity Requirements. The Proposed Order does not include numeric chronic toxicity limitations. The Permittee did not discharge to Grist Creek at Discharge Point 001 during the term of Order No. R1-2011-0001; therefore, chronic toxicity testing was not conducted. In addition, reasonable potential to exceed the Basin Plan's narrative toxicity objective for chronic toxicity cannot be determined and therefore chronic toxicity effluent limitations are not established in the Proposed Order. Nevertheless, this Proposed Order includes a reopener that allows the Regional Water Board to reopen the Order and include a numeric chronic toxicity limitation, a revised acute toxicity limitation, and/or a limitation for a specific toxicant identified in the Toxicity Reduction Evaluation. To ensure compliance with the Basin Plan's narrative toxicity objective, the Permittee is required to monitor chronic Whole Effluent Toxicity testing at Discharge Point 001. Furthermore, the Monitoring and Reporting Program (MRP) requires the Permittee to investigate the causes of, and identify and implement corrective actions to reduce or eliminate effluent toxicity.

Monitoring Requirements. The Proposed Order retains all monitoring and reporting requirements from the previous Order (No. R1-2011-0001) at EFF-001 in addition to new monitoring and reporting requirements for ozone residual, temperature, and cyanide. Furthermore, receiving water monitoring requirement for total dissolved solids (TDS) and specific conductance were added to the Proposed Order to ensure dischargers from the Facility are not having a detrimental impact on the beneficial uses of the underlying groundwater.

Public Comments. Regional Water Board staff received timely comments on the Draft Order from the Permittee and made some minor revisions to the Proposed Order in response to those comments. The most significant changes made to the Proposed Order in response to the Permittee's comments were (1) changing the units of measurement to ozone contact time at Monitoring Location EFF-001, (2) replacing monitoring requirements for sodium and chloride at EFF-002 with monitoring requirements for TDS, and (3) correcting the description of the backup disinfection method in the Fact Sheet. A full explanation of the comments and responses is documented in the attached Response to Written Comments document.

The revisions are acceptable to the Permittee, and adoption of the Proposed Order is uncontested.

RECOMMENDATION: Adopt Order No. R1-2017-0004, as proposed.

**SUPPORTING
DOCUMENTS:**

1. Proposed Order No. R1-2017-0002
2. Staff Response to Written Comments
3. Covelo Community Services District Comment Letter
4. Public Notice