

Response to Written Comments

on draft Waste Discharge Requirements Order No. R1-2017-0006 National Pollutant Discharge Elimination System (NPDES) for Redway Community Services District

Regional Water Quality Control Board, North Coast Region
March 8, 2017

Comment Letter Received

The deadline for submission of public comments regarding draft Waste Discharge Requirements Order No. R1-2017-0006, National Pollutant Discharge Elimination System Permit (Draft Permit) for Redway Community Services District (CSD) was December 22, 2016. Redway CSD provided timely comments which have been paraphrased and are followed by the Regional Water Board staff response. The term "Draft Permit" refers to the draft that was sent out for public comment. The term "Proposed Order" refers to the version of the permit that has been modified in response to comments and is being presented to the Regional Water Board for consideration.

Redway CSD Comments

***Comment 1:** Redway Community Services District (CSD) has requested to remove the 0.350 mgd flow limitation for the suspended transmission line that is included in the Draft Permit. The CSD states that the 4-inch SDR 17 Yelomine pipe can handle flows as high as 450 gpm which is the flow limit that exists when both pumps, at the end of the Chlorine Contact Chamber, are used to pump chlorinated effluent through the 4-inch diameter suspended transmission line.*

Response 1: The Regional Board has revised language in the Proposed Order to remove the flow limitation. Flows greater than 0.350 mgd may be transported through the suspended transmission line to prevent the discharge of treated effluent to the South Fork of the Eel River. The Proposed Order requires that the Permittee conduct a special engineering study, within a year of permit adoption date, to analyze the maximum effluent flows capable of being transported through the suspended transmission line, while maintaining its structural integrity.

Staff Initiated Changes

Staff initiated changes made to the Proposed Order include the addition of handling, storage, and disposal requirements for the sludge generated at the Facility. Permit coverage for the handling, storage, and disposal of sludge to land is contingent upon the submission and implementation of a Sludge Management Plan, in compliance with federal and state regulations, by no later than May 1, 2018. The Plan shall evaluate, identify, and recommend appropriate sludge handling, storage, and disposal practices and propose a schedule of implementation for the recommended practices. This new language can be found on pages 12, 16, and 18 of the proposed Order. The Permittee has reviewed and accepted these changes without any objections.