

EDMUND G. BROWN JR.
GOVERNORMATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

North Coast Regional Water Quality Control Board

July 12, 2012

Mr. Tim Ericksen
City of Ukiah
300 Seminary Avenue
Ukiah, CA 95482-5400

Dear Mr. Ericksen:

Subject: Request for Emergency Irrigation Discharge of Tertiary Effluent

File: City of Ukiah Wastewater Treatment Facility, WDID No. 1B84029OMEN

We received your July 3, 2012 letter requesting approval of a temporary, emergency discharge of disinfected tertiary effluent to land at agronomic rates from the City of Ukiah Wastewater Treatment Facility (WWTF). Your letter states that an emergency discharge is necessary to address difficulties with disposal that developed over the last two years due to late spring rains that made it impossible for the City to empty a percolation pond each summer for maintenance necessary to maintain percolation rates. We understand that pond levels are still rising with only $\frac{1}{4}$ foot of freeboard remaining in the storage ponds and that an uncontrolled discharge of secondary effluent could occur if the City does not take steps to dispose of some of the ponded water in a controlled manner. The City proposes to treat the stored secondary effluent through its tertiary filters to provide the highest possible quality of water for land disposal and believes this is the best strategy to alleviate the critical storage conditions in a manner that protects water quality. The City anticipates that implementation of this temporary disposal plan will allow the City to empty at least one of the percolation ponds before winter in order to perform maintenance needed to increase percolation rates.

The City proposes to set up a temporary irrigation system on City-owned property immediately to the south of the WWTF that would be used through October 15, 2012. The City's plan describes practices that will be implemented to prevent runoff, minimize the potential for pollutants percolating to groundwater, and protect human health. Management practices identified in the City's Use Area Management Plan (Attachment 3 to the July 3, 2012 letter) include 100 foot setbacks to all waterways (Russian River and creek), irrigation between the hours of 7:30 am and 9:00 pm each day, daily

inspections of the irrigation area, repairing breaks prior to beginning irrigation each day, routinely adjusting sprinkler heads to achieve 80% coverage of the irrigation area, applying water at rates that prevent runoff and ponding of water for more than 48 hours, metering the amount of water irrigated, refraining from use of fertilizer, providing signage (in English and Spanish) identifying the recycled water use, restricting public access, and ceasing irrigation if runoff is observed or if windblown spray carries recycled water off the site. There are no potable water wells within 100 feet of the proposed temporary irrigation area. The City proposes to report monthly the acreage irrigated, quantity of recycled water used, and copies of daily inspection reports.

Your letter also confirms that the City is working on a permanent long-term solution to its disposal problem that includes construction of a reclamation system.

Regional Water Board staff understands that the City is in a critical situation and must take action in order to prevent serious violations of its permit that would result if an uncontrolled discharge of secondary effluent from the percolation ponds to the Russian River were to occur and to prevent potential damage to the percolation ponds. The City has not completed all of the necessary actions to permit reclamation at this time, thus the City's decision to implement this plan would be an unauthorized discharge. However, this type of violation is not a high priority for enforcement to the Regional Water Board, and staff does not anticipate assessing penalties, provided that the City conducts the temporary irrigation in accordance with the plan identified in its July 3, 2012 letter and continues to demonstrate progress toward completing its reclamation system.

If you have any questions, you may contact Cathleen Goodwin at (707) 576-2687 or by email at Cathleen.Goodwin@waterboards.ca.gov .

Sincerely,

Original signed by Luis Rivera for

Matthias St. John
Executive Officer