

**Central Valley Regional Water Quality Control Board
Board Meeting – 23/24 June 2016**

**Response to Written Comments for
Quincy Community Services District
Quincy Wastewater Treatment Plant
NPDES Permit Renewal (CA0078981)**

The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements (NPDES Permit No. CA0078981) renewal for the Quincy Community Services District (Discharger), Quincy Wastewater Treatment Plant (Facility), Plumas County.

The tentative NPDES Permit (tentative Permit) and tentative Time Schedule Order (tentative TSO) were issued for a 30-day public comment period on 18 April 2016 with comments due by 18 May 2016. The Central Valley Water Board received public comments regarding the tentative orders by the due date on 12 May 2016 from the Discharger and East Quincy Community Services District (EQCSD). The submitted comments are summarized below, followed by Central Valley Water Board staff responses.

Comment: Discharger and EQCSD

The Discharger and EQCSD submitted similar comment letters. The letters did not provide specific comments about the tentative Permit or tentative TSO but expressed general concerns about uncertainty of obtaining a mixing zone and dilution credits in the future, funding acquisition for Facility upgrades and anticipated financial impacts to ratepayers, and stringency of effluent limits in comparison to other dischargers.

The letters point to concerns about the estimated costs to upgrade the Facility. Both district boards have concerns about the cost burden of the upgrades on the small community, whose population has not changed since 1970 and whose economy is weak. While the Discharger is pursuing grant funding through Clean Water State Revolving Fund and United States Department of Agriculture Rural Development, funding approval is not a guarantee and wastewater rates could potentially increase by 55% over the next six years. They have reached out to the upper Feather River watershed Integrated Regional Water Management Group for financial help but the timeframe for their next grant funding cycle is uncertain. The letters also point to a perceived unfairness to this Facility versus other dischargers in the area with regard to tighter effluent limits.

Response. Central Valley Water Board staff understands the concerns expressed by the Discharger and EQCSD and recognizes the financial impact on the ratepayers to comply with the permit. The compliance issues are not new to the proposed NPDES permit renewal. The effluent limitations for ammonia, copper, and lead proposed in the tentative NPDES permit are similar to the limits required in the current permit for which the Discharger has been under compliance schedules to meet. The proposed time schedule order (TSO) extends the compliance schedules an additional 5 years allowing the Discharger additional time to come into compliance. As an alternative to constructing facility upgrades, the proposed TSO provides the Discharger the opportunity to first determine if a mixing zone is feasible. If a mixing zone study demonstrates that dilution credits and mixing zones comply with the requirements of the State Implementation Policy (SIP) the NPDES permit could be amended to modify the effluent limitations for ammonia, copper, and lead using dilution credits. The tentative NPDES permit acknowledges the Discharger's desire to seek dilution credits and

includes a specific reopener provision for a mixing zone if the appropriate information is submitted by the Discharger.

The comment letters also discuss a concern that the Quincy Community Services District is being treated unfairly. The letters also point to other dischargers in Plumas County that have less stringent effluent limitations. Central Valley Water Board staff do not concur that the Discharger is being treated unfairly. The proposed NPDES permit has been developed consistent with other NPDES permits, which must consider site-specific conditions of the discharge and the receiving water. In addition, the SIP requires for a mixing zone study to be conducted prior to dilution credits being granted. While the Delleker Wastewater Treatment Plant and City of Portola Wastewater Treatment Plant, the two facilities near Quincy, do have less stringent effluent limitations than proposed in the Quincy tentative permit, site-specific conditions were taken into account. In these specific cases, the dischargers have conducted the necessary mixing zone studies and have been granted mixing zones and dilution credits. As discussed above, mixing zones may also be feasible for Quincy. A permit reopener is proposed in the tentative Permit and Board staff will work with the Discharger to pursue the necessary studies that will allow the permit to be reopened.