
North Coast Regional Water Quality Control Board

March 10, 2017

Calvin Chaille
Redway Community Services District
P.O. Box 40
Redway, CA 95560

Dear Mr. Chaille:

Subject: **Notice of Violation** of Order No. R1-2011-0046 Waste Discharge Requirements for Redway Community Services District, Redway Wastewater Treatment Facility, Humboldt County (NPDES No. CA0022781)

File: Redway Community Services District, Redway Wastewater Treatment Facility, WDID No. 1B83147OHUM

Redway Community Services District (Permittee) is hereby given notice that it has violated Provision 5.c.vii of Order No. R1-2011-0046 (2011 Order) by failing to divert surface runoff to prevent drainage from the sludge treatment and storage sites at the above referenced Facility. Additionally, the Permittee violated Provision 5.c. ix of the Current Order by failing to take appropriate measures to prevent sludge and waste material applied on forested land from being conveyed from the storage site, and deposited into waters of the State.

The Permittee must implement corrective actions to remediate the alleged violations of the 2011 Order and eliminate the threat of discharge to waters of the state (see *Section IV. Required Actions* of this letter for details).

I. Background

The Permittee owns and operates a municipal wastewater treatment plant and associated wastewater collection and disposal facilities (Facility) that serves the community of Redway. The Facility is designed to treat an average dry weather flow of 0.186 million gallons per day (mgd), and a peak wet weather flow of 0.580 mgd. Wastewater generated within the Permittee service area is conveyed to the Dogwood lift station from where it is

pumped through an 8-inch pressure main down Dogwood lane, under the South Fork Eel River, and to the Facility.

The treatment system consists of an oxidation ditch, a secondary clarifier, a sludge thickener, which is no longer in operation, and a chlorine contact chamber for disinfection. The Facility discharges treated wastewater to three percolation ponds that are located in an upland area adjacent to the Facility and across a deep ravine. Treated wastewater is conveyed to the percolation ponds via a suspended transmission line, which limits the effluent flow that may be discharged to the ponds. Solids removed from the secondary clarifier are either returned to the oxidation ditch or dewatered in four sludge drying beds. The dewatered solids are disposed of in a wooded area, owned by the Permittee, north of the Facility.

The Facility is currently regulated under the 2011 Order, which expired on August 31, 2016, but is in effect until the new order becomes effective. On March 8, 2017, the Regional Water Board adopted revised waste discharge requirements for the Facility under Order No. R1-2017-0006 that become effective on May 1, 2017. Provision VI.C.2.b of the new Order, adopted March 8, 2017, includes a compliance schedule for the development of a Sludge Management Plan (See Section VI. Required Actions below for deadlines).

II. Applicable Requirements

The 2011 Order, adopted June 22, 2011, requires that the Permittee comply with the following Sludge Disposal and Handling provisions:

Provision VI.C.5.c.vii: "Solids and sludge treatment and storage sites shall have facilities adequate to divert surface water runoff from adjacent areas, to protect the boundaries of the site from erosion, and to prevent conditions that would cause drainage from the treatment and storage site to escape from the site. Adequate protection is defined as protection from a design storm with a 100-year recurrence interval and 24-hour duration."

Provision VI.C.5.c.ix: "The discharge of sewage sludge and solids shall not cause waste material to be in a position where it is, or can be, conveyed from the treatment and storage sites and deposited in the waters of the state."

III. Alleged Violations.

The Permittee violated Provision VI.C.5.c.vii of the 2011 Order by failing to adequately divert surface water runoff from adjacent areas from draining through the sludge disposal area, and Provision VI.C.5.c.ix of the 2011 Order by failing to prevent sludge applied on forested land from being washed away and conveyed from the storage site, and deposited into waters of the state.

In April 2008, the District submitted a Wastewater Biosolids Management Plan (Plan), which recommended the implementation of sludge handling, storage, and disposal methods at the Facility. According to the Plan, dewatered sludge from the drying beds is to be buried into a pre-excavated trench measuring 40ft long, 5ft deep, and 3ft wide. The sludge is required to be filled to a maximum depth of 4ft and then covered with 1ft of soil cover.

During a December 14, 2016, inspection, Regional Water Board staff observed four mounds of sludge piled approximately 10 inches above the ground surface. The mounds were wet from the rain. The area around the sludge mounds had ponded water that was visibly discolored by sludge material (see Attachment A: Photos 1-5). At an adjacent sludge disposal area, staff observed runoff flowing downhill from the sludge disposal site in the general direction of the Eel River which is approximately 2200 southwest of the sludge application area. The runoff was carrying eroded sediment with it (see Attachment A: Photos: 6).

IV. Required Action

In accordance with Provision VI.C.2.b of the newly adopted Order, the Permittee is required to submit a preliminary work plan by **August 1, 2017**, to reevaluate existing sludge management practices in order to comply with applicable portions of 40 CFR 57, 258, and 503, and General Waste Discharge Requirements for Small Domestic Water Treatment Systems (Order WQ 2014-DWQ). The preliminary work plan shall include a schedule of initial tasks the District will implement to bring sludge handling, storage, and disposal practices into compliance with federal and State regulations. Additionally, the Permittee shall prepare and submit a final work plan that contains the recommended long-term sludge management practices, and a time schedule leading to implementation of the selected alternative practices. The Permittee shall submit the final workplan for review and approval to the Regional Water Board Executive Officer by **May 1, 2018**.

V. Future Enforcement Action

Please note that correcting the conditions of non-compliance with the 2011 Order and Monitoring and Reporting Program (MRP) does not preclude enforcement action for the violations alleged in this notice. The Regional Water Board reserves its rights to fully enforce the law against any violation and threatened violation by taking enforcement actions such as a cease and desist order, time schedule order, administrative civil liabilities, and referral to the State Attorney General's office. Administrative civil liabilities may be assessed beginning with the date that a violation first occurred. The liabilities can be up to \$10 per gallon and/or \$1,000 to \$10,000 per day per violation, pursuant to Water Code sections 13385 and/or 13268.

Should you have any questions regarding this matter, please contact Imtiaz-Ali Kalyan of my staff at (707) 576-2805, or Imtiaz-Ali.Kalyan@waterboards.ca.gov.

Sincerely,

Claudia Villacorta
Point Source and Groundwater Protection Division Chief

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Certified Return Receipt Requested

Supporting Photographs from the December 14, 2016, inspection



Photograph 1. Redway CSD – 12/14/16: Evidence of ponding water below sludge mounds on forested property northwest of the treatment plant. Photograph by Cathleen Goodwin, Regional Water Board staff



Photograph 2. Redway CSD – 12/14/16: Evidence of ponding water below sludge mounds on forested property northwest of the treatment plant. Photograph by Cathleen Goodwin, Regional Water Board staff



Photograph 3. Redway CSD – 12/14/16: Evidence of ponding water below sludge mounds on forested property northwest of the treatment plant. Photograph by Cathleen Goodwin, Regional Water Board staff



Photograph 4. Redway CSD – 12/14/16: Discoloration of water on the forested property northwest of the treatment plant. Photograph by Cathleen Goodwin, Regional Water Board staff



Photograph 5. Redway CSD – 12/14/16: Discoloration of water on the forested property northwest of the treatment plant. Photograph by Cathleen Goodwin, Regional Water Board staff



Photograph 6. Redway CSD – 12/14/16: Evidence of sediment laden runoff occurring from sludge disposal area on the forested property northwest of the treatment plant. Photograph by Cathleen Goodwin, Regional Water Board staff