California Regional Water Quality Control Board
North Coast Region

TIME SCHEDULE ORDER No. R1-2017-0045
TO PROVIDE TIME SCHEDULES TO COMPLY WITH
ORDER No. R1-2017-0007

CITY OF RIO DELL WASTEWATER TREATMENT PLANT
NPDES No. CA0022748

Humboldt County
WDID No. 1B83134OHUM

The California Regional Water Quality Control Board, North Coast Region (hereafter Regional Water Board), finds:

1. The City of Rio Dell (Permittee) is the owner and operator of the Rio Dell Wastewater Treatment Plant (Facility), a publically owned treatment works, which discharges secondary treated wastewater under Waste Discharge Requirements (WDRs) contained in Order No. R1-2011-0054 through October 31, 2017, and Order No. R1-2017-0007 beginning on November 1, 2017, (Permit), adopted by the Regional Water Board on August 17, 2017. The Permit also serves as a National Pollutant Discharge Elimination System (NPDES) permit (NPDES No. CA0022748). The Permit contains discharge prohibitions, effluent and receiving water limitations, and monitoring and reporting requirements.

2. The Facility serves a population of 3,100 residential, commercial, and institutional users in the City of Rio Dell.

3. The Facility is designed to treat an average dry weather flow of 0.4 million gallons per day (mgd), and a peak wet weather flow of 2.51 mgd. The treatment system consists of a headworks, Aero-Mod secondary treatment and solids stabilization system, chlorine disinfection, and dechlorination using sodium bisulfite. Solids removed from the wastewater are stored and thickened in two aerated digesters and subsequently dewatered with a belt filter press. The dewatered biosolids process through an indirect sludge dryer, which produces Class A biosolids that the Permittee gives away to residents as a soil amendment.

4. The Permit allows the Permittee to discharge disinfected secondary treated effluent after dechlorination to the Lower Eel River in accordance with the *Water Quality Control Plan for the North Coast Region* (hereinafter Basin Plan) which allows discharges of disinfected and dechlorinated secondary effluent between October 1 and May 14 at a discharge rate not to exceed one percent of the flow of the Lower Eel River as measured at United States Geological Survey (USGS) Gage No. 11477000 in the Lower Eel River near Scotia.

5. The Regional Water Board adopted the Basin Plan, which designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the Basin Plan. The Basin Plan identifies present and potential beneficial uses for the Russian River, to which Dutch Bill Creek and Graham's Pond are tributary.

6. The Permit implements provisions of the California Toxics Rule (CTR) and the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (State Implementation Policy or SIP) by requiring the Permittee to monitor its effluent for CTR constituents that may have reasonable potential to cause or contribute to an excursion above a water quality criterion or objective applicable to the receiving water. The Permit also requires monitoring for constituents with maximum contaminant levels (MCLs) for protection of drinking water established in the California Code of Regulations, Title 22, Division 4, Chapter 15.

7. During the term of the Permittee's previous NPDES permit, Order No. R1-2011-0054, the Permittee sampled for CTR priority pollutants and Title 22 drinking water pollutants on June 20, 2016. Sampling results revealed that chlorine disinfection by-products, specifically, dichlorobromomethane, chlorodibromomethane, total trihalomethanes, and Haloacetic Acids were present at concentrations that exceeded applicable CTR and Title 22 water quality objectives. The Permittee conducted additional sampling for these pollutants between January and April 2017. The sampling results confirmed that all four pollutants are present in the Permittee's discharge at concentrations that exceed applicable CTR and Title 22 water quality objectives.

8. The Permittee reported two sanitary sewer overflows from its collection system in the last three years, as follows:

a. On February 8, 2015, during a period of heavy rainfall, 4,680 gallons of raw sewage was discharged from a sewer manhole at Painter Street and to the Eel River.

b. On January 10, 2017, during a period of heavy rainfall, 82,000 gallons of raw sewage was discharged from the same sewer manhole at Painter Street and to the Eel River.

c. The Permittee identified the location of these spills as a weak point in the collection system because this point in the collection system receives the flow from two lift stations that pump at maximum capacity during periods of sustained and/or heavy rainfall, and the pipe cannot convey the amount of sewage combined with infiltration and inflow that flows through it during these times.

9. The Permittee is violating or threatening to violate, the following terms in Order Number R1-2017-0007:

IV. EFFLUENT LIMITATIONS AND DISCHARGE PROHIBITIONS

A. Effluent Limitation – Discharge Point 001

1. Final Effluent Limitations – Discharge Point 001

a. The discharge of treated wastewater shall maintain compliance with the following limitations at Discharge Point 001, with compliance measured at Monitoring Location EFF-001 as described in the Monitoring and Reporting Program (MRP) (Attachment E).

Table 1. Effluent Limitations – Discharge Point 001 (Monitoring Location EFF-001)

Parameter	Units	Effluent Limitations[1]				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Chlorodibromomethane	µg/L	0.40	--	0.80	--	--
Dichlorobromomethane	µg/L	0.56	--	1.1	--	--
Total Trihalomethanes	µg/L	80	--	--	--	--
Haloacetic Acids	µg/L	60	--	--	--	--

10. The Permittee is violating or threatening to violate, the following terms of Order No. 2006-003, Statewide General WDRs for Sanitary Sewer Systems (Sanitary Sewer Order):

a. Prohibition C.1. Any SSO that results in a discharge of untreated or partially treated wastewater to waters of the United States is prohibited.

b. Prohibition C.2. Any SSO that results in a discharge of untreated or partially treated wastewater that creates a nuisance as defined in California Water Code Section 13050(m) is prohibited.

c. Provision D.10. The Enrollee shall provide adequate capacity to convey base flows and peak flows, including flows related to wet weather events. Capacity shall meet or exceed the design criteria as defined in the Enrollee's System Evaluation and

Capacity Assurance Plan for all parts of the sanitary sewer system owned and operated by the Enrollee.

d. **Provision D.13.** The mandatory elements of the SSMP are specified below. However, if the Enrollee believes that any element of this section is not appropriate or applicable to the Enrollee's sanitary sewer system, the SSMP program does not need to address that element. The Enrollee must justify why that element is not applicable. [This provision identifies the mandatory elements of the SSMP as: Goal; Organization; Legal Authority; Operation and Maintenance Program; Design and Performance Provisions; Overflow Emergency Response Plan; FOG Control Program; System Evaluation and Capacity Assurance Plan; Monitoring, Measurement, and Program Modifications; SSMP Program Audits; and Communication Program.]

11. The Permittee will be unable to comply with the chlorine disinfection by-product effluent limitations identified in Finding 9, above, until the Permittee implements operational, Supervisory Control and Data Acquisition (SCADA) system programming, and structural changes at the Facility designed to reduce the production of chlorine disinfection by-products.

12. On July 19, 2017, the Permittee submitted a letter documenting current efforts to address chlorine disinfection by-products and requesting a compliance schedule to provide time for the Permittee to implement measures to achieve compliance with chlorine disinfection by-product effluent limitations identified in Finding 9, above. The Permittee has started to implement operational modifications, including adjustments to chlorine dosing and chlorine basin detention times, and increasing the cleaning frequency for the clarifiers and chlorine contact basin and is assessing the most effective manner for controlling algae. The Permittee needs additional time to achieve compliance with chlorine disinfection by-product effluent limitations because the Permittee has limited funds to address the problem all at once and needs time to systematically make corrections to the chlorine disinfection system. The July 19, 2017, letter describes a plan to begin with operational, algae control, and SCADA programming modifications to improve the performance of the existing facilities, followed by structural modifications to the clarifiers and chlorine contact tank to further address algae growth that acts with chlorine to form chlorine disinfection by-products. The Permittee proposes to conduct on-going monitoring to assess the effect of these changes. If the operational, programming, and structural modifications do not result in full compliance, the Permittee proposes to submit a future report describing additional actions it will evaluate in order to achieve full compliance with chlorine disinfection by-product effluent limitations. This time schedule order (Order) includes a compliance schedule for the Permittee to submit this report describing additional actions necessary, if needed.

13. During the development of WDR Order No. R1-2017-0007, Regional Water Board staff conducted an I/I analysis that resulted in a determination that the Permittee's collection system has significant levels of I/I. The analysis was conducted utilizing two approaches: (1) the definitions of excessive I/I in the federal regulations at 40 C.F.R sections 35.2005(b) and 133.103(d); and (2) methodology in a report titled *Recommended Standards for Wastewater Treatment Facilities, Policy for the Design, Review, and Approval of Plans and Specifications for Wastewater Collection and Treatment Facilities*, *2014 Edition, A Report of the Wastewater Committee of the Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers* (10 States Standards).

The I/I analysis utilized influent flow data collected between December 1, 2011, and June 30, 2016, and a population of 3,100 as reported in the ROWD. The Regional Water Board analyzed the Permittee's per capita flows for comparison with the definitions of "excessive I/I" in 40 C.F.R section 35.2005(b)(28) and 133.103(d) (i.e., greater than 275 gpd per capita per day). Influent flows exceeded 275 gpd per capita on 115 occasions, primarily in late November through early April each year, during periods corresponding to significant wet weather events.

Using Figure 1 of the 10 States Standards document, a peaking factor of 3.4 is the maximum rate of wastewater flow that is calculated for a population of 3,100. The analysis revealed 49 exceedances of the peaking factor, with exceedances ranging from 3.4 to 5.8.

14. The Regional Water Board file includes a January 18, 2011, Technical Memo from the Permittee's engineering consultant to State Water Board Division of Financial Assistance (DFA) staff that acknowledges that the Permittee has an I/I problem. The technical memo states, "The flow through the City's collection system includes a large amount of I/I during wet weather. Historically, peak flows to the City's WWTP exceed the flow limitations set by the SWRCB [State Water Board] for funding. The City is planning to perform a [Sanitary Sewer System Survey (SSES)] in order to address their I/I issues. However, due to time constraints the City will not be able to complete a SSES as part of this improvement project. Without a completed SSES, the treatment facilities in this improvement project will be designed to meet the flow requirements described in the SRF Policy statement above." The flow requirements are an average daily flow of 120 gallons per capita per day (gpcd) and a peak flow of 275 gpcd.

15. The Permittee developed an initial SSMP dated December 10, 2010, to meet the requirements of the Sanitary Sewer Order. The Permittee conducted an SSMP audit in January 2015 as required by the Sanitary Sewer Order, and completed a revision of its SSMP in December 2015. Section 8, System Evaluation and Capacity Assurance Plan, of the SSMP identifies the Permittee's goal of completing a Sanitary Sewer System Assessment (also known as a sewer system evaluation survey) by December 2017,

and following completion of the Sanitary Sewer System Assessment, to identify projects to increase the capacity of the sewer system.

16. During a May 2, 2017, telephone meeting, Regional Water Board staff discussed the Permittee's plans to conduct a Sanitary Sewer System Assessment and implement a plan to improve collection system performance. The Permittee plans to move forward with spot repairs in 2017, while pursuing financing in order to conduct a Sanitary Sewer System Assessment. The Permittee stated that it would not be able to complete the Sanitary Sewer System Assessment by the December 2017 identified in its SSMP. The Permittee is working with the State Water Board DFA to submit an application for a planning grant to complete the Sanitary Sewer System Assessment. This Order includes a compliance schedule for the Permittee to submit a plan and schedule for completing the Sanitary Sewer System Assessment and addressing I/I issues.

17. California Water Code section 13300 states:

"Whenever a regional board finds that a discharge of waste is taking place or threatening to take place that violates or will violate requirements prescribed by the regional board, or the state board, or that the waste collection, treatment, or disposal facilities of a discharger are approaching capacity, the board may require the discharger to submit for approval of the board, with such modifications as it may deem necessary, a detailed time schedule of specific actions the discharger shall take in order to correct or prevent a violation of requirements."

18. Water Code section 13267, subdivision (a) provides that the Regional Water Board may investigate the quality of any waters of the state within its region in connection with any action relating to the Basin Plan. Water Code section 13267, subdivision (b) provides that the Regional Water Board, in conducting an investigation, may require a discharger to furnish, under penalty of perjury, technical or monitoring program reports. The reports required by this Order, pursuant to Water Code section 13267, are necessary to ensure that the future threat to water quality created by activities at the Facility are properly assessed and controlled. Due to the importance of protecting water resources as explained herein, the costs associated with developing the required reports and work plans bear a reasonable relationship to the benefits that will be obtained from having the necessary information for the Regional Water Board to properly regulate and monitor the Facility.

19. Water Code section 13383, subdivision (a) provides the Regional Water Board may establish monitoring, inspection, entry reporting, and record keeping requirements, as authorized by section 13160, 13376, or 13377 for any person who discharges, or proposes to discharge to navigable waters. Subdivision (b) provides that the Regional Water Board may require any person subject to this section to establish and maintain monitoring equipment or methods, including, where appropriate, biological

monitoring methods, sample effluent as prescribed, and provide other information as may be reasonably required.

20. Pursuant to Water Code section 13385(j)(3), mandatory minimum penalties (MMPs) will not apply to future violations of final effluent limitations for chlorine disinfection by-products if:

a. A time schedule order is issued on or after July 1, 2000, and specifies the actions that the discharger is required to take in order to correct the violations that would otherwise be subject to MMPs;

b. The Regional Water Board finds that the discharger is not able to consistently comply with one or more of the effluent limitations established in the waste discharge requirements applicable to the waste discharge because the effluent limitation is a new or more stringent regulatory requirement that has become applicable to the waste discharge after the effective date of the waste discharge requirements and after July 1, 2000, new or modified control measures are necessary in order to comply with the effluent limitation, and the new or modified control measures cannot be designed, installed, and put into operation within 30 calendar days;

c. The Regional Water Board establishes a time schedule for bringing the waste discharge into compliance with the effluent limitations that is as short as possible, taking into account the technological, operational, and economic factors that affect the design, development, and implementation of the control measures that are necessary to comply with the effluent limitations, and where the time schedule exceeds one year, the time schedule includes interim requirements and actions and milestones leading to compliance; and

d. The discharger [permittee] has prepared and is implementing in a timely and proper manner, or is required by the regional board to prepare and implement, a pollution prevention plan pursuant to Water Code section 13263.3.

21. Because this Order establishes a compliance schedule to address anticipated future violations of final dichlorobromomethane, chlorodibromomethane, total trihalomethanes, and Haloacetic Acids effluent limitations, after making specific findings and setting interim effluent limitations, in accordance with the Water Code section 13385(j)(3) and the terms of this Order, no MMPs will be assessed for violations of the final dichlorobromomethane, chlorodibromomethane, total trihalomethanes, and Haloacetic Acids effluent limitations as stipulated in Finding 22 below. Specifically, the Regional Water Board finds that:

a. The time schedule order is being issued after July 1, 2000, and specifies the actions the Permittee is required to take to correct the violations of the final dichlorobromomethane, chlorodibromomethane, total trihalomethanes, and

Haloacetic Acids effluent limitations in section IV.A.1.a of Order No. R1-2017-0007, as set out in Finding 9, above.

b. The final effluent limitations for dichlorobromomethane, chlorodibromomethane, total trihalomethanes, and Haloacetic Acids established in Order No. R1-2017-0007 are more stringent than those required pursuant to Order No. R1-2011-0054. The Permittee will not be able to consistently comply with final effluent limitations for dichlorobromomethane, chlorodibromomethane, total trihalomethanes, and Haloacetic Acids because new or modified control measures will be needed for the Permittee to comply, and the new or modified control measures are dependent on the completion of actions that will take more than 30 calendar days to complete.

c. Requirement 1 of this Order establishes interim effluent limitations for dichlorobromomethane, chlorodibromomethane, total trihalomethanes, and Haloacetic Acids, and Requirement 2 of this Order establishes a compliance schedule for bringing the Facility into compliance with final effluent limitations for dichlorobromomethane, chlorodibromomethane, total trihalomethanes, and Haloacetic Acids established in the Permit that are as short as possible.

d. This Order requires the Permittee to prepare and implement a pollution prevention plan in order to reduce the impacts when the discharge exceeds the final effluent limitations for chlorine disinfection by-products during the compliance period.

22. Accordingly, the Regional Water Board finds that MMPs for violations of final dichlorobromomethane, chlorodibromomethane, total trihalomethanes, and Haloacetic Acids effluent limitations when discharging to the Lower Eel River at Monitoring Location EFF-001 as specified in Effluent Limitations section IV.A.1.a of Order No. R1-2017-0007 do not apply through October 31, 2022, so long as the Permittee complies with the interim effluent limitations contained in Requirement 1, and the compliance schedule contained in Requirement 2, of this Order. If an interim effluent limit contained in this Order is exceeded, then the Permittee is subject to MMPs for that particular exceedance as it will no longer meet the exception in Water Code section 13385 (j)(3).

23. Interim effluent limitations for dichlorobromomethane, chlorodibromomethane, total trihalomethanes, and Haloacetic Acids established in Requirement 1 of this Order were derived based on Facility performance using available effluent monitoring data at Monitoring Location EFF-001, the point of discharge to the Lower Eel River. The Permittee sampled for chlorine disinfection by-products 5 times during the term of Order No. R1-2011-0054: June 2016 and January through April 2017. The June 2016 sample was collected outside of the river discharge season and during a time period when the Permittee was not adequately managing its chlorine disinfection system to minimize the potential for formation of chlorine disinfection by-products. The

remaining four samples were collected during the discharge season and during a period that the Permittee was working to improve management of the chlorine disinfection system. Dichlorobromomethane results ranged from 10 µg/L to 15 µg/L; chlorodibromomethane results ranged from <1 µg/L to 1.6 µg/L total trihalomethanes results ranged from 64 µg/L to 196 µg/L, and Haloacetic Acids results ranged from 110 µg/L to 268 µg/L. Interim effluent limitations are based on the highest effluent concentration detected in the samples collected between January and April 2017.

24. The Regional Water Board has notified the Permittee, interested agencies and persons, of its intent to issue a Time Schedule Order in accordance with Water Code section 13167.5.

25. Issuance of this Order is exempt from the provisions of the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) ("CEQA") pursuant to CWC section 13389, since the adoption or modification of a NPDES permit for an existing source is statutorily exempt and this Order only serves to implement a NPDES permit. (Pacific Water Conditioning Ass'n, Inc. v. City Council of City of Riverside (1977) 73 Cal.App.3d 546, 555-556.).

IT IS HEREBY ORDERED, pursuant to California Water Code section 13300, 13267 and 13383, the Permittee shall comply with the following requirements to prevent violations of Order No. R1-2017-0007:

1. The Permittee shall comply with the following interim effluent limitations in the interim period established by this Order for the Permittee to achieve compliance with final effluent limitations set forth in Effluent Limitation IV.A.1.a of Order No. R1-2017-0007:

Parameter	**Units**	**Average Monthly Effluent Limitation**
Dichlorobromomethane	µg/L	13
Chlorodibromomethane	µg/L	1.6
Total Trihalomethanes	µg/L	110
Haloacetic Acids	µg/L	150

2. The Permittee shall implement the tasks in the following compliance schedule in order to achieve compliance with Effluent Limitation IV.A.1.a of Order No. R1-2017-0007 at the earliest possible date in accordance with the following schedule:

Task	**Task Description**	**Compliance Date**
A	Implement and document operational modifications to the chlorine disinfection process, including adjustments to the manner and amount of chlorine dosing,	**Beginning July 1, 2017 through**

Task	Task Description	Compliance Date
	shortening the chlorine basin detention time, and the frequency of chlorine contact basin and clarifier cleaning.	**September 1, 2020**
B	Evaluate options for algae control within the Facility by first testing current algae types and concentrations within the Facility, then assess and implement options for algae removal, including options identified in Tasks C and G, below.	**Beginning August 1, 2017 through July 2019**
C	Purchase and install 4 Sonic Solutions SS1000's to reduce the algae growth in the Facility clarifiers and chlorine contact basins. After a given amount of time to be recommended by the manufacturer of the SS1000's, analyze and test algae concentrations compared to pre-installation of the SS1000's to determine effectiveness.	**October 1, 2017**
D	Implement SCADA programming modifications to allow continuous recording of data from the chlorine and bisulfite analyzers.	**December 1, 2017**
E	Submit a pollution prevention plan for Regional Water Board Executive Officer approval that identifies measures that the Permittee will take to minimize the potential impacts when the discharge exceeds the final effluent limitations for the chlorine disinfection by-products, chlorine dichlorobromomethane, chlorodibromomethane, Total Trihalomethane, and Haloacetic Acids during the compliance period. The pollution prevention plan shall address all of the elements identified in Water Code section 13263.3(d)(3)(A-I). The Permittee shall implement the pollution prevention plan in accordance with the approved schedule.	**March 1, 2018**
F	Submit a progress report documenting efforts to reduce the formation of chlorine disinfection by-products, including, but not limited to, assessment of algae control methods, and implementation of operational, structural, algae control, and SCADA programming modifications. Each progress report shall describe the specific measures implemented to date, the effectiveness of these measures, any proposed modifications, and include the results of monitoring data collected to assess the effectiveness of measures.	**October 1, 2018 and October 1, 2019**

Task	Task Description	Compliance Date
G	After assessing the effectiveness of algae control using the SS1000's (Task C) and other algae control methods identified through the assessment identified in Task B, implement structural modifications, if necessary, including the addition of covers for the clarifiers and contact basins and replacement of contact basin baffle liners.	**October 1, 2019**
H	Monitor chlorine contact basin effluent quality to determine if operational, SCADA programming, and structural changes are sufficient to reduce the formation of chlorine disinfection by-products and achieve compliance with final effluent limitations for chlorine disinfection by-products. If the Permittee determines that monitoring is needed more frequently than required in Order No. R1-2017-0007, the Permittee shall submit a monitoring plan for approval by the Regional Water Board Executive Officer. Monitoring data shall be submitted with the Permittee's electronic monitoring reports and included in the report identified in Task I.	**Beginning July 1, 2017 through September 1, 2020**
I	Submit for Regional Water Board Executive Officer approval, a report documenting completion of the operational, structural, and SCADA programming modifications identified in Tasks A, B, C, D, and G and summarizing the monitoring data collected in accordance with Tasks C and H. The report shall provide standard operating procedures for the chlorine disinfection system (including chlorine dosing, detention time, cleaning and other procedures that the Permittee has determined to be effective for reducing the formation of chlorine disinfection by-products) and an assessment of whether the Permittee's efforts to date have resulted in compliance with effluent limitations for chlorine disinfection by-products.	**October 1, 2020**
J	If compliance is not achieved upon completion of Tasks A, B, C, D and G, the Permittee shall submit, for Regional Water Board Executive Officer approval, a report identifying additional measures that the Permittee will evaluate in order to reduce the production of and achieve compliance with final effluent limitations for chlorine disinfection by-products and a time schedule for completing proposed measures. Possible measures	**December 1, 2020**

Task	Task Description	Compliance Date
	include evaluation of other disinfection methods such as ultraviolet light disinfection or conducting a study to evaluate the potential for dilution credits and a mixing zone as a means to achieve compliance.	
K	Submit for Regional Water Board Executive Officer approval, documents necessary to substantiate compliance measures proposed pursuant to Task J, including, but not limited to implementation of any additional measures proposed in the report submitted pursuant to Task J. Such documents may include work plans, engineering reports, mixing zone compliance and anti-degradation study report, or other reports identified by the Permittee in the report submitted pursuant to Task J and approved by the Regional Water Board Executive Officer.	**In accordance with time schedule submitted and approved after submittal of Task I report**
L	Achieve compliance with final effluent limitations for dichlorobromomethane, chlorodibromomethane, total trihalomethanes, and Haloacetic Acids as required by WDR No. R1-2017-0007 (Effluent Limitation IV.A.1.a, Table 4).	**October 31, 2022**

3. The Permittee shall implement the tasks in the following compliance schedule in order to reduce excessive infiltration and inflow at the earliest possible date in accordance with the following schedule:

Task	Task Description	Compliance Date
A	Submit for Regional Water Board Executive Officer approval, a work plan that identifies specific tasks for conducting a sewer system evaluation survey (SSES) with the goal of reducing collection system overflows and inflow and infiltration into the collection system. The work plan should include, but not be limited to, a detailed description of tasks for assessing the collection system and obtaining financing and a time schedule for completing the SSES and submittal of a final SSES report.	**June 1, 2018**
B	Submit annual progress reports, documenting progress toward completing approved tasks and obtaining financing pursuant to the work plan submitted in Task A.	**March 1 of each year, beginning in 2019**
C	Submit for Regional Water Board Executive Officer approval, a final SSES Report. At a minimum the SSES Report shall:	**In accordance with time schedule submitted and**

Task	Task Description	Compliance Date
	1. Identify and prioritize collection system deficiencies, including cracks, breaks, improper manhole and lateral connections, unauthorized connections, undersized or underperforming pipeline sections, etc., utilizing smoke-testing, closed circuit television (CCTV) surveys, or other acceptable assessment methods. 2. Include photo-documentation of any observed cracks, breaks, malfunctions, and appropriate repairs. Photo-documentation shall include CCTV survey reports, including, pipe condition assessment/grading. Pipe grading shall be based on the National Association of Sewer Services Companies Pipeline Assessment and Certification Program (a national industry-standard sewer pipe condition assessment system or equivalent grading program). 3. Include a time schedule for implementation of needed short-term and long-term repairs to be implemented to address the prioritized collection system deficiencies identified in Task C.1, for approval by the Regional Water Board Executive Officer. The time schedule shall demonstrate a commitment to reduce exfiltration, infiltration, and inflow (I/I), and prevent sanitary sewer overflows (SSOs), in the shortest reasonable amount of time.	**approved after submittal of Task I report**
D	Implement the short-term and long-term repairs identified in Task C.3, above.	**In accordance with a time schedule approved by the Regional Water Board Executive Officer**

4. In the interim period until the Permittee can achieve full compliance with Order No. R1-2017-0007, the Permittee shall operate and maintain, as efficiently as possible, all facilities and systems necessary to comply with all prohibitions, effluent limitations and requirements identified in Order No. R1-2017-0007 or any future waste discharge requirements issued for the Facility.

5. If the Permittee is unable to perform any activity or submit any documentation in compliance with the deadlines set forth in Requirements above, the Permittee may request, in writing, an extension of the time. The extension request shall include justification for the delay and shall be submitted at least thirty days prior to the respective deadline to be considered complete and timely.

6. If the Regional Water Board Executive Officer finds that the Permittee fails to comply with the provisions of this Order, the Regional Water Board Executive Officer may take all actions authorized by law, including referring the matter to the Attorney General for judicial enforcement or issuing a complaint for administrative civil liability pursuant to Water Code sections 13268, 13350 and 13385. The Regional Water Board reserves the right to take any enforcement actions authorized by law.

7. Any person aggrieved by this action of the North Coast Water Board may petition the State Water Board to review the action in accordance with CWC section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

Ordered by: Matthias St.John Digitally signed by Matthias St.John Date: 2017.10.20 11:53:21 -07'00'
Water Boards
Matthias St. John
Executive Officer