
**Response to Written Comments
Draft Waste Discharge Requirements
Order No. R1-2023-0004
National Pollutant Discharge Elimination System (NPDES)
For the
Redway Community Services District
Wastewater Treatment Facility
Regional Water Quality Control Board, North Coast Region
February 2, 2023**

Comments Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements for Order No. R1-2023-0004, National Pollutant Discharge Elimination System Permit (Draft Permit) for the Redway Community Services District (City or Permittee) Wastewater Treatment Facility (Facility) was January 3, 2023. Regional Water Board staff (Staff) received no written comments from the Permittee or public regarding the Draft Permit's notification period.

Regional Water Board staff virtually met with the Permittee on December 19, 2022 to discuss the Draft Permit. The Permittee did not identify any significant concerns with the Draft Permit during this meeting.

This Response to Comments document includes a summary of staff-initiated changes made to the Permit. Text added to the Proposed Permit is identified by underline and text to be deleted from the Proposed Permit is identified by strike-through in this document. The term "Draft Permit" refers to the version of the permit that was sent out for public comment. The term "Proposed Permit" refers to the version of the permit that has been modified in response to comments received and is being presented to the North Coast Regional Water Quality Control Board (Regional Water Board) for consideration.

Staff Initiated Changes:

The following sections describe changes made to the draft Order, initiated by Regional Water Board staff to update and provide clarification to the Proposed Permit. The modified sections are identified by their section numbers as indicated in the Proposed Order. Regional Water Board staff virtually met with the Permittee on January 12, 2023 to discuss the changes made to the Draft Permit and the Permittee did not have any objections to the proposed changes.

1. The draft Order's Table of Contents was corrected to address editorial errors.
2. Finding 2.6 was added to the Proposed Order to comply with Assembly Bill 2108 requirements that became effective on January 1, 2023 as follows:

2.6. Anticipated Water Quality Impacts in Disadvantaged or Tribal Communities

The Permittee, Redway Community Services District, operates a wastewater treatment facility within a disadvantaged community located along the South Fork Eel River in southern Humboldt County. The discharge is classified as "minor" under federal regulations, and during the term of the prior permit, Order No. R1-2017-0006, the Permittee did not discharge to the Eel River. In addition, among other updates, this renewed permit contains new requirements to implement bacteria and dissolved oxygen limitations and implement provisions for chronic toxicity. The Order does not contain a compliance schedule for meeting applicable water quality objectives; all requirements must be met upon Order adoption. Expanded monitoring and reporting requirements are included in the renewed Order to ensure discharges do not exceed water quality objectives. The Permittee is also currently seeking funding for significant upgrades and improvements to its wastewater treatment facility. The Regional Water Board publicly noticed the permit and provided opportunities for public comment. Public notice was provided to interested persons and public agencies in the region with jurisdiction over natural resources in the affected area, including the Humboldt County Health Department. The discharge regulated by this Order is not expected to result in a disproportionate impact to tribal or disadvantaged communities. The Regional Water Board has satisfied the outreach requirements set forth in Water Code section 189.7.

3. Section 10.6.2 of the Proposed Order's Monitoring and Reporting Program was modified to identify that State Water Board Order No. WQ-2022-0103-DWQ was adopted and will supersede the current Statewide Sanitary Sewer General Order, as follows:
 - 10.6.2. **Sanitary Sewer Overflows.** Notification and reporting of sanitary sewer overflows are conducted in accordance with the requirements of Order No. 2006-0003-DWQ (Statewide General WDRs for Sanitary Sewer Systems), which is not incorporated herein by reference, and any subsequent Orders or revisions thereto, including Order No. WQ 2022-0103-DWQ.
4. Section 6.2.5.1.1. of the proposed Order's Fact Sheet was modified to identify that State Water Board Order No. WQ-2022-0103-DWQ was adopted and will supersede the current Statewide Sanitary Sewer General Order, as follows:

- 6.2.5.1.1. Statewide General WDRs for Sanitary Sewer Systems. On May 2, 2006, the State Water Board adopted General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order No. 2006-0003-DWQ (General Order). The General Order requires public agencies that own or operate sanitary sewer systems with greater than one mile of pipes or sewer lines to enroll for coverage under the General Order. The General Order requires agencies to develop sanitary sewer management plans (SSMPs) and report all SSOs, among other requirements and prohibitions. The Permittee has enrolled under the General Order as required.

On February 20, 2008, the State Water Board adopted Order No. WQ 2008 0002-EXEC Adopting Amended Monitoring and Reporting Requirements for Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, to ensure adequate and timely notifications are made to the Regional Water Board and appropriate local, state, and federal authorities in case of sewage spills. On August 6, 2013, the State Water Board adopted Order No. WQ 2013-0058-EXEC Amending Monitoring and Reporting Program for Statewide General Waste Discharge Requirements for Sanitary Sewer Systems. Order No. WQ 2013-0058-EXEC addressed compliance and enforceability of the Monitoring and Reporting Program and superseded the amendments in Order No. WQ-2008-0002-EXEC. Notification and reporting of SSOs is conducted in accordance with the requirements of Order Nos. 2006-0003- DWQ and WQ 2013-0058-EXEC, and any revisions thereto for operation of its wastewater collection system.

On December 6, 2022, the State Water Board adopted State Water Board Order No. WQ 2022-0103-DWQ, Statewide Waste Discharge Requirements, General Order for Sanitary Sewer Systems. This Order becomes effective on June 5, 2023 and shall replace Order No. 2006-0003-DWQ.

5. The proposed Order's Monitoring and Reporting Program incorrectly identified the monitoring frequency for CTR Priority Pollutants at Monitoring Location EFF-001 as being required annually. This monitoring frequency should be listed as once per permit term. Table E-3 of the Proposed Order's Monitoring and Reporting Program and Section 7.2.1.4 of the Proposed Order's Fact Sheet have been corrected as follows:

Table-1. Effluent Monitoring – Monitoring Location EFF-001

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method ¹
Effluent Flow ²	mgd	Meter	Continuous	--

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method ¹
Dilution Rate	% of stream flow	Calculation	Daily	--
Chlorine, Total Residual	mg/L	Grab	Daily ³	Standard Methods
Biochemical Oxygen Demand 5 day @ 20°C (BOD ₅)	mg/L	24-hr Composite	Weekly ⁴	Standard Methods
Total Suspended Solids (TSS)	mg/L	24-hr Composite	Weekly ⁴	Standard Methods
pH	standard units	Grab	Weekly ^{4,5}	Standard Methods
Temperature	°C	Grab	Weekly ⁵	Standard Methods
Settleable Solids	mL/L	Grab	Weekly ⁴	Standard Methods
Hardness, Total (as CaCO ₃) ⁷	mg/L	Grab	Monthly ⁷	Standard Methods
Copper, Total Recoverable	µg/L	Grab	Monthly ¹³	Standard Methods
Chlorodibromomethane	µg/L	Grab	Monthly ⁸	Standard Methods
Dichlorobromomethane	µg/L	Grab	Monthly ¹³	Standard Methods
2,4,6-Trichlorophenol	µg/L	Grab	Monthly ¹³	Standard Methods
Alpha-Endosulfan	µg/L	Grab	Monthly ¹³	Standard Methods
Aluminum, Total Recoverable	µg/L	Grab	Monthly	Standard Methods
Total Coliform Bacteria	MPN/100 mL	Grab	Weekly ⁴	Standard Methods
<i>E. coli</i> Bacteria ⁶	MPN/100 mL	Grab	Weekly	Standard Methods

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method ¹
Ammonia Nitrogen, Total (as N)	mg/L	Grab	Monthly	Standard Methods
Nitrate Nitrogen, Total (as N)	mg/L	Grab	Monthly ⁸	Standard Methods
Nitrite Nitrogen, Total (as N)	mg/L	Grab	Monthly	Standard Methods
Organic Nitrogen	mg/L	Grab	Monthly	Standard Methods
Nitrogen, Total (as N)	mg/L	Calculation	Monthly	Standard Methods
Phosphorus, Total (as P)	mg/L	Grab	Monthly	Standard Methods
Total Dissolved Solids	mg/L	Grab	Monthly	Standard Methods
CTR Priority Pollutants ⁹	µg/L	24-hr Composite ¹⁰	<u>Annually Once per permit term</u>	Standard Methods ¹¹
Chronic Toxicity ¹²	Pass or Fail, and % Effect	24-hr Composite	Twice Annually	See Section 5 Below

Table Notes

- Pollutants shall be analyzed using the analytical methods described in 40 C.F.R. part 136 or by methods approved by the Regional Water Board or State Water Board, such as with the current edition of Standard Methods for Examination of Water and Wastewater (American Public Health Administration).
- The Permittee shall report the daily average and monthly average flows.
- Accelerated Monitoring (daily monitoring frequency). If two consecutive daily test results exceed an effluent limitation, the Permittee shall increase monitoring frequency to a minimum of twice per day for a week to evaluate whether an exceedance is persisting. If the exceedance is persisting, the Permittee shall take steps to identify the cause of the exceedance and take steps needed to return to compliance.
- Accelerated Monitoring (weekly monitoring frequency). If two consecutive weekly test results exceed an effluent limitation, the Permittee shall take two samples each of the two weeks following receipt of the second sample result. During the intervening period, the Permittee shall take steps to identify the cause of the exceedance and take steps to return to compliance.

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method ¹
<p>5. Monitoring for pH and temperature must coincide with monthly monitoring for ammonia.</p> <p>6. The Permittee may use any <i>E. coli</i> method specified in 40 CFR 136 for compliance monitoring.</p> <p>7. Effluent and receiving water hardness samples shall be collected concurrently with effluent CTR Priority Pollutant samples.</p> <p>8. Accelerated Monitoring (monthly monitoring frequency). If a test result exceeds an effluent limitation the Permittee shall take two more samples, one within 7 days and one within 14 days following receipt of the initial sample result. During the intervening period, the Permittee shall take steps to identify the cause of the exceedance and take steps needed to return to compliance.</p> <p>9. Those pollutants identified by the California Toxics Rule at 40 C.F.R. section 131.38. The Permittee is not required to sample and analyze for asbestos. Hardness shall be monitored concurrently with the priority pollutant sample.</p> <p>10. CTR pollutant samples shall be collected using 24-hour composite sampling, except for pollutants that are volatile.</p> <p>11. Analytical methods must achieve the lowest minimum level (ML) specified in Appendix 4 of the SIP and, in accordance with section 2.4 of the SIP, the Permittee shall report the ML and MDL for each sample result.</p> <p>12. Whole effluent chronic toxicity shall be monitored in accordance with the requirements of section 5 of this Monitoring and Reporting Program.</p> <p>13. After the first year of monitoring, at the request of the Permittee the Regional Water Board may, at its Executive Officer's discretion, and after receiving and analyzing the required water quality monitoring data, choose to reduce and/or eliminate certain monitoring requirements for constituents that routinely are found in concentrations below water quality objectives.</p>				

- 7.2.1.4. Consistent with Order No. R1-2017-0006, effluent monitoring requirements for CTR priority pollutants is required ~~annually~~ once per permit term to generate adequate data to perform an RPA.