

**Regional Water Quality Control Board  
North Coast Region  
Executive Officer's Summary Report  
June 9, 2022**

**ITEM: 4**

**SUBJECT:** Public Hearing on Order No. R1-2022-0015 (Proposed Order) to consider adoption of Waste Discharge Requirements for the City of Point Arena Wastewater Treatment Facility, WDID No. 1B80045OMEN (Ben Zabinsky)

**BOARD ACTION:** The Board will consider adoption of Waste Discharge Requirements (WDRs) Order No. R1-2022-0015.

**BACKGROUND:** The City of Point Arena (Permittee) owns and operates the City of Point Arena Wastewater Treatment Facility (Facility), a domestic wastewater treatment plant that serves the community of Point Arena in Mendocino County. Point Arena's median household income (MHI) of \$31,719 is less than 60 percent of the California MHI, which qualifies the area as a severely disadvantaged community per the State Water Resources Control Board Division of Financial Assistance (DFA) criteria.

The Facility has an average dry weather design treatment capacity of 0.057 million gallons per day (mgd) and a peak hour wet weather treatment capacity of 0.86 mgd. The wastewater treatment system consists of a gravity collection system, a lift station, a primary aerated facultative treatment pond, a secondary facultative treatment pond, and chlorine disinfection. Treated wastewater is discharged to four 17,000 square-foot or 0.40-acre percolation ponds.

A large portion of the wet weather inflow to the Facility is the result of inflow and infiltration (I&I) of rainwater into the collection system and ultimately into the Facility during wet weather events. To address operational challenges associated with receiving excessive I&I into the Facility, the Permittee is focusing on reducing I&I by addressing known sources of collection system I&I and is currently conducting a study to prioritize rehabilitation work on the collection system. The Permittee is currently seeking financial assistance in the form of grants and/or low-interest loans from DFA to help fund the collection system rehabilitation work. Additionally, the Permittee plans to install back-up generators at two lift stations prior to the upcoming wet season to address the risk of sewer overflows.

Since 2003, the Facility has been regulated by Order No. R1-2003-0001 (Previous Order). Proposed Order No. R1-2022-0015 will replace the Previous Order.

**DISCUSSION:** The Proposed Order continues to prescribe technology-based effluent limitations for biochemical oxygen demand (BOD) and total coliform bacteria and prescribes a new effluent limitation for pH. Effluent limitations for Suspended Solids and Settleable Solids have been removed.

The Proposed Order includes special provisions which require studies and reports to ensure compliance with the operations, source control, and biosolids disposal requirements, such as a requirement to submit a Disaster Preparedness Assessment Report and Action Plan. Another special study provision is the Special Study to Evaluate the Potential to Impact Groundwater (Special Study). This provision requires the City to submit a work plan within 18 months of adoption of the Order that includes work tasks to complete the Special Study and a final report to present the results. The Special Study is necessary to ensure that the discharge from the Facility does not result in degradation of groundwater, exceedances of water quality standards, or impacts to the beneficial uses of groundwater within the Garcia River Hydrologic Area consistent with the Statement of Policy with Respect to Maintaining High Quality Waters of California.

Other noteworthy changes to the Proposed Order from the Previous Order include the following:

1. Addition of Discharge Prohibitions consistent with new standard permitting language for WDRs.
2. The daily maximum Effluent Limitation for Biochemical Oxygen Demand has been removed and the average monthly limitation has been increased from 50 mg/L to 90 mg/L. The higher limitation reflects the performance capability of facultative treatment ponds.
3. An instantaneous maximum Effluent Limitation for pH of 8.5 and an instantaneous minimum of 6.5 has been added to ensure effluent meets water quality objectives in Basin Plan Table 3-1.
4. The maximum daily Effluent Limitation for Total Coliform Organisms has been changed from 230 MPN/100 mL to 240 MPN/100 mL. Increasing this limitation brings the effluent limitations into conformance with the disinfection standards for secondary-23 recycled water set forth in the California Code of Regulations, title 22 Recycled Water Criteria.
5. The Discharge Specification for freeboard in the percolation ponds has been increased from one foot to two feet and a new Discharge Specification regarding treatment and storage capacity during the winter months has been added.
6. Receiving water limitations include a new Basin Plan groundwater toxicity objective to implement the 2016 amendments to the Basin Plan.
7. Noteworthy changes to the Monitoring and Reporting requirements include the following:
  - a. Monitoring of the Thrift Well is no longer included since discharges to the irrigation field on the Thrift Property have ceased.

- b. Addition of monthly monitoring of nitrate and total nitrogen in influent wastewater and nitrate, total nitrogen, and Total Dissolved Solids (TDS) in effluent for at least 12 months to support the Special Study.
- c. Removal of monitoring of chlorine residual, nonfilterable residue, and settleable matter in the treated effluent. Monitoring these parameters is unnecessary for discharges to land where Total Coliform Organisms, Total Suspended Solids, and TDS are already being monitored.
- d. Addition of monitoring of pH, chloride, nitrate, total nitrogen, TDS, Total Suspended Solids, and Title 22 pollutants in the treated effluent. These parameters have been added to monitor compliance with effluent and groundwater limitations and to ensure treatment systems are functioning properly.
- e. Addition of sanitary sewer system reporting requirements that will document the City's continued work to assess the collection system and to correct deficiencies and reduce inflow and infiltration into the collection system.
- f. Addition of annual volumetric reporting requirements to implement requirements of the State Water Board Recycled Water Policy.
- g. Addition of spill notification requirements for spills and unauthorized discharges other than sanitary sewer overflows, which are reported in accordance with the Statewide General WDRs for Sanitary Sewer Systems, as amended by State Water Resources Control Board Order No. WQ 2013-0058-EXEC.

A copy of the Draft Order was posted on the Regional Water Board website and was available for public comment from February 16, 2022, through March 18, 2022, for the 30-day comment period. Regional Water Board staff (staff) did not receive any comments on the Draft Order during the public comment period.

After the end of the public comment period, staff identified several items in the Draft Order that required correction. The changes were all editorial in nature or removed language not relevant to the Proposed Order that was mistakenly included. Regional Water Board staff communicated with the City of Point Arena after the public review period regarding the content of the Proposed Order.

Staff anticipates that the Proposed Order will be uncontested.

**RECOMMENDATION:** Adopt Order No. R1-2022-0015, as proposed.

**SUPPORTING DOCUMENTS:**

- 1. Proposed Order R1-2022-0015
- 2. Notice of Public Hearing