

**Regional Water Quality Control Board
North Coast Region
Executive Officer's Summary Report
August 4, 2022**

ITEM: 3

SUBJECT: Public Hearing on Order No. R1-2022-0001 to consider adoption of proposed Waste Discharge Requirements and Master Recycling Permit for the Mendocino City Community Services District Wastewater Treatment Plant, WDID No. 1B83129OMEN, NPDES No. CA0022870 (Matthew Herman)

BOARD ACTION: The Board will consider adoption of Waste Discharge Requirements Order No. R1-2022-0001. The Order will serve as a National Pollutant Discharge Elimination System (NPDES) permit for a period of five years.

BACKGROUND: The Mendocino City Community Services District (Permittee) owns and operates the Mendocino City Community Services District Wastewater Treatment Plant (Facility) and associated wastewater collection, treatment, and disposal facilities that serve a population of approximately 4,000, including 1,000 full-time residents and many visitors and tourists to Mendocino City, Russian Gulch State Park, and Headlands State Park. The Facility is located on 10500 Kelly Street in Mendocino, Mendocino County, California.

The Facility has an average dry weather design treatment capacity of 0.3 million gallons per day (mgd) and a peak daily wet weather treatment capacity of 1.0 mgd. The Facility consists of comminution, extended aeration activated sludge, secondary clarification, and tertiary filtration. Effluent is chlorinated, dechlorinated, and flows by gravity to a flow equalization pond. Treated effluent temporarily stored in the equalization pond is discharged through a diffuser at Discharge Point 001 to the Pacific Ocean. The outfall structure is an 8-inch diameter pipe, 996 feet in length, which provides a minimum initial dilution of 100:1.

During the dry weather season (generally May through October) and other periods, as needed, tertiary treated effluent is distributed to a water recycling system at Discharge Point 002, which consists of a 55,000-gallon storage tank, accompanying appurtenances, and a pop-up sprinkler system located on the Mendocino High School athletic fields. Disinfected tertiary recycled water is pumped to the high school storage tank in a "batch" fashion, and each tank of recycled water transferred to the storage tank must be used for field irrigation before the tank is refilled from the treatment plant.

DISCUSSION: Order No. R1-2022-0001 (Proposed Permit), replaces Order No. R1-2015-0039 (Previous Permit). The Proposed Permit continues to prescribe technology-based effluent limitations for biochemical oxygen demand (BOD) and total suspended solids (TSS), and effluent limitations for total coliform bacteria, oil and grease, settleable

solids, turbidity, pH, total residual chlorine, and TCDD¹ equivalents based on the California Ocean Plan for discharges to the Pacific Ocean. The Proposed Permit also retains requirements for the production and use of recycled water.

The Proposed Permit further retains the special provisions which require studies and reports to ensure compliance with the operations, recycled water, toxicity, source control, and biosolids disposal requirements. Additionally, a special study requirement for the preparation and submittal of a Disaster Preparedness Assessment Report and Action Plan has been included in the Proposed Permit. Other noteworthy changes to the Proposed Permit include the following:

1. **Disinfection Process Requirements.** The requirement from the Previous Permit that a minimum chlorine residual of 1.5 mg/L be maintained at the end of the chlorine contact basin (before dechlorination) is not included in the Proposed Permit. This requirement has been replaced with a requirement that total residual chlorine concentration be maintained at a concentration that ensures the discharge meets the total coliform effluent limitation. This minor modification provides the Permittee the flexibility to add the appropriate amount of disinfectant chemicals to the effluent while still achieving the objective of ensuring adequate disinfection to meet effluent limitations. (Order section 4.4.2.1)
2. **Bacteria Provisions.** New receiving water limitations for enterococci and fecal coliform bacteria are included in the Proposed Permit to implement provisions of new bacteria provisions that were adopted by the State Water Board on August 7, 2018 and amended into the California Ocean Plan. (Order Section 5.1.20)
3. **Effluent Discharge Evaluation.** A new Special Study Provision is included in the Proposed Permit requiring an evaluation of the effluent discharge to either confirm the current dilution ratio or to propose an alternative dilution ratio. (Order section 6.3.2.3 and Fact Sheet section 6.2.2.3)
4. **Compliance Determination Language.** New language for determining compliance with enterococci and fecal coliform bacteria receiving water limitations as well as six month median and single sample maximum effluent limitations are included in the Proposed Permit. (Order Sections 7.8.2, 7.8.3, 7.8.4, 7.8.5, 7.12, and 7.13)
5. **Monitoring and Reporting Requirements.** Noteworthy changes to the monitoring and reporting program (MRP) include the following:
 - a. New permit language has been added to the MRP that requires the Permittee to participate in the State Water Board's DMR-QA Program. (MRP section 1.6)

¹ TCDD-equivalents shall mean the sum of the concentrations of chlorinated dibenzodioxins (2,3,7,8-CDDs) and chlorinated dibenzofurans (2,3,7,8-CDFs) multiplied by their respective toxicity factors.

- b. The MRP includes a new annual volumetric reporting requirement to implement the requirements of the State Water Board Recycled Water Policy. (MRP section 10.4.3)
- c. The addition of a Sanitary Sewer System Reporting section to the Annual Report requirements has been added to the MRP. (MRP section 10.4.2.9)

A copy of the Draft Permit was posted on the Regional Water Board website and was available for public comment from February 25 through March 28, 2022. A timely comment letter was received from the Permittee. No other comments were received. The attached Response to Comments document includes a full explanation of the Permittee's comments and Staff's response to the Permittee's comments; several permit modifications were made to the Proposed Permit in response to the Permittee's comments. The Response to Comments document also summarizes several staff-initiated changes that were made to address the recommended provisions included in the State Water Board Division of Drinking Water's June 21, 2022, Title 22 Engineering Report Conditional Acceptance Letter (Conditional Acceptance Letter). The Conditional Acceptance Letter was issued after the Draft Order was released for public comment and was revised on June 23, 2022, to correct the listed recycled water system identification number.

Staff notified the Permittee of the changes made to the Proposed Permit during a virtual meeting on June 22, 2022. The Permittee indicated that Staff's response to the Permittee's comments and changes made to the Proposed Permit are acceptable to the Permittee. Staff anticipates that the Proposed Permit will be uncontested.

RECOMMENDATION: Adopt Order No. R1-2022-0001, as proposed.

SUPPORTING DOCUMENTS:

1. Proposed Order R1-2022-0001
2. Notice of Public Hearing
3. Response to Comments
4. A copy of the Mendocino City CSD Comment letter (dated March 28, 2022) is available upon request by emailing Matthew.Herman@Waterboards.ca.gov
5. State Water Board Division of Drinking Water's Title 22 Engineering Report Conditional Acceptance Letter (dated June 23, 2022) is available upon request by emailing Matthew.Herman@Waterboards.ca.gov