

Regional Water Quality Control Board  
North Coast Region

Executive Officer's Summary Report  
Wednesday, December 13, 2017  
Regional Water Board Office  
Santa Rosa, California

**ITEM:** 3

**SUBJECT:** Public Hearing on Order No. R1-2017-0046 to consider adoption of proposed Waste Discharge Requirements for the Willits Environmental Remediation Trust, Page Property, WDID No. 1B06008NMEN, National Pollutant Discharge Elimination System (NPDES) No. CA0025143 (*Cody Walker*)

**BOARD ACTION:** The Board will consider adoption of Waste Discharge Requirements Order No. R1-2017-0046. The Order will serve as a National Pollutant Discharge Elimination System (NPDES) permit for a period of five years.

**BACKGROUND:** This item is to consider adoption of waste discharge requirements which also serve as an NPDES Permit for the groundwater extraction and treatment system (Facility) at the Page Property located at 3920 Canyon Road in Willits, Mendocino County (Property).

In the 1940s the City of Willits acquired a 2.4-acre parcel of land east of the city and began municipal waste disposal operations. The Property is commonly referred to as the Page Property or the Old Willits Landfill. The operations included burning of waste to reduce the volume. In the 1950s, septage wastes were also disposed at the Property. In the late 1960s, liquid waste from chrome plating operations from the former Remco Hydraulics Facility in the City of Willits, and other wastes collected in the City were disposed at the Property. Industrial wastes from the former Remco Hydraulics Facility were disposed at the Property until early 1974. Soil and groundwater is contaminated predominantly with hexavalent chromium.

On April 26, 2012, the Regional Water Board adopted Order No. R1-2012-0026 which also serves as an NPDES Permit No. CA0025143 for the Willits Environmental Remediation Trust (WERT) and the City of Willits. The 2012 Order permits the extraction, treatment, and discharge of highly treated groundwater from the facility to land and to Darby Creek.

The Facility consists of a building to house the existing groundwater extraction and treatment system, and a fenced area that is used to spray irrigate the highly treated groundwater. Over 40 groundwater monitoring wells exist on-site and off-site to define the extent of contamination.

**DISCUSSION:** The proposed waste discharge requirements, which also serve as a NPDES permit, contain discharge prohibitions, effluent limitations, receiving water limits, and a

comprehensive monitoring program to evaluate the effectiveness of the groundwater extraction and treatment system.

The Permit prohibits the discharge of detectable levels of hexavalent chromium and other pollutants that may be collected as part of the extraction system. In accordance with the Basin Plan, the discharge of highly treated groundwater to Darby Creek is prohibited during the period of May 15 to September 30 of each year.

The WERT has been discharging the highly treated groundwater to a spray irrigation system, located on the Property. A discharge to Darby Creek is allowed in the Permit during the wet season; however, a discharge to the creek has never occurred. The NPDES Permit is being renewed at the request of the WERT in the event the highly treated groundwater cannot be solely disposed via the spray field.

**PUBLIC COMMENT:** A draft of this Order was available for public comment from September 5, 2017, to October 5, 2017. Comments were received from Jacobson James & Associates, Inc., on behalf of the WERT, who requested changes to the Draft Order. The requested changes were largely to correct nonsubstantive typographical errors and to clarify specific permit language. Regional Water Board staff agrees with and made the proposed changes in the Proposed Order. A detailed response to the written comments is presented in the attached Response to Comments document.

The Proposed Order is uncontested.

**RECOMMENDATION:** Adopt Order No. R1-2017-0046, as proposed.

**SUPPORTING DOCUMENTS:**

1. Proposed Order
2. Response to Comments
3. Comments
4. Public Notice