

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: 4

SUBJECT: Public Hearing on Order No. R1-2017-0047 Modifying Waste Discharge Requirements/NPDES Permit, Order No. R1-2016-0015 for the City of Healdsburg Wastewater Treatment, Recycling, and Disposal Facility, WDID No. 1B820460SON, NPDES No. CA0025135 (*Cathleen Goodwin*)

BOARD ACTION: The Board will consider adoption of Order No. R1-2017-0047 modifying Waste Discharge Requirements Order No. R1-2016-0015. The Order as proposed will remove copper effluent limitations from National Pollutant Discharge Elimination System (NPDES) permit, Waste Discharge Requirements Order No. R1-2016-0015.

BACKGROUND: Based on the State Water Board's Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries for California (SIP, 2000 and SIP amendment, 2005) and U.S. EPA technical guidance, a permittee can conduct a site-specific study to account for a difference between the toxicity of a metal in laboratory dilution water and its toxicity in the receiving water at the site. The difference is translated into a Water Effect Ratio (WER). The WER can then be used to adjust the aquatic life criteria from the California Toxics Rule (CTR) to derive site-specific aquatic life criteria. To streamline the permitting process, the State Water Board in 2005 amended the SIP to allow the WER to be established in individual NPDES permits, rather than in a Basin Planning process as previously required.

The City of Healdsburg (Permittee) conducted a site-specific WER study to determine the site-specific toxicity of copper in the receiving water at Discharge Point 001, which enters Basalt Pond, a tributary to the Russian River. The study was conducted in accordance with applicable U.S. EPA guidance, including *Streamlined Water Effect Ratio Procedure for Discharges of Copper* (EPA-822-R-01-005) and *Interim Guidance on Determination and Use of Water Effect Ratios for Metals* (EPA-823-B-94-001). The study concluded that a site-specific WER of 6.39 for total recoverable copper is appropriate at Discharge Point 001. This means the site-specific objectives, although about 6 times higher than the CTR criteria, are protective of the beneficial uses of the receiving waters.

Applying the new WERs, effluent copper concentrations at the Healdsburg Wastewater Treatment Facility Discharge Point 001 do not demonstrate reasonable potential to exceed the most stringent water quality criteria for copper. Had this information been available at

the time that Order No. R1-2016-0015 was adopted, no effluent limitations for copper would have been included in Order No. R1-2016-0015.

ISSUES: Order R1-2017-0047 proposes to modify Order No. R1-2016-0015 by removing the effluent limitations for total recoverable copper at Discharge Point 001. The protection afforded under the modified permit condition will result in a level of protection for beneficial uses equal to the previous conditions of Order No. R1-2016-0015.

The draft Order was noticed for public comment between September 11, 2017, and October 11, 2017. The City of Healdsburg submitted an email to Regional Water Board staff on October 10, 2017, stating that City staff appreciate Regional Water Board staffs' work to prepare this permit modification and that the City has no additional comments. No other comments were received. This Order is uncontested.

RECOMMENDATION: Adopt Order No. R1-2017-0047, as proposed.

**SUPPORTING
DOCUMENTS:**

1. Proposed Order No. R1-2017-0047
2. Order No. R1-2016-0015 (Modified in accordance with Order No. R1-2017-0047 on December 13, 2017)
3. Public Notice