

**Response to Written Comments  
and  
Staff Initiated Changes  
Draft Waste Discharge Requirements  
Order No. R1-2019-0017  
Northcrest Mobile Home Park  
Wastewater Treatment Facility**

**Regional Water Quality Control Board, North Coast Region  
June 20, 2019**

**No Comment Letters Received**

The deadline for submittal of public comments regarding draft Waste Discharge Requirements, Order No. R1-2019-0017 (Draft Order) for the Northcrest Mobile Home Park (MHP) Wastewater Treatment Facility (Facility) was May 6, 2019. No comments were received during the public comment period. Prior to the close of the public comment period, North Coast Regional Water Quality Control Board (Regional Water Board) staff discussed the Draft Order with Macy Burnham, one of the owners of Northcrest MHP, LLC. The parties discussed the basis for Discharge Prohibition III.I. of the Draft Order. As a result of the discussion, Regional Water Board staff removed this Discharge Prohibition and the corresponding Compliance Determination requirement from the Proposed Order.

In this document, the staff initiated changes are described. Text to be added is identified by underline and text to be deleted is identified by ~~strike-through~~ in this document. The term “Draft Order” refers to the draft that was sent out for public comment. The term “Proposed Order” refers to the version of the Order that has been modified in response to comments and is being considered for adoption by the Regional Water Board.

**Staff Initiated Changes**

**Basis of Proposed Change**

The draft Order included a prohibition (Discharge Prohibition III.I) that limited the discharge through the wastewater treatment facility to less than or equal to 10,000 gallon per day. The establishment of a discharge prohibition is common in waste discharge requirements in the north coast region and its objective is to ensure that the volume of wastewater conveyed to the treatment and disposal system does not exceed the system’s treatment and disposal capacity. The prohibition also serves as a check to alert the Regional Water Board when a discharger expands its service area or adds connections to an extent that treatment effectiveness may be compromised and the volume and character of the discharge is different than that which was considered by the Regional Water Board during permit adoption. In accordance with general permit provisions, a discharger must submit a new report of waste discharge when there is a change in the volume, character, of location of a discharge.

In the course of discussion with the Discharger, Regional Water Board staff learned that the design flow of the Facility provided by the Discharger in the Report of Waste Discharge was an estimated range based on water meter readings of supply wells, estimates of irrigation water use, water supply system leaks, and other uses of water within the Northcrest MHP. Regional Water Board staff and the Discharger agreed that this flow estimate was too broad and imprecise to accurately characterize the volume of wastewater discharged to the mobile home park's wastewater treatment facility. In addition, the actual treatment and disposal capacity of the wastewater treatment facility is unknown at this time. Because the flow estimate provided by the Discharger is inaccurate and design capacity of the treatment and disposal facility is unknown, the discharge flow prohibition would be rendered ineffective. Consequently, Regional Water Board staff has removed Discharge Prohibition III.I from the Proposed Order and proposes a new requirement for the Discharger to submit a technical report prepared by a licensed engineer that more accurately estimates the wastewater flow generated by the mobile home park and provides an accurate assessment of the design capacity of the wastewater treatment and the effluent disposal systems.

Based on the discussion with the Discharger, there is a reasonable assurance that the Facility will continue to operate within the current range of inflows since there are no plans to add additional connections to the collection system or otherwise increase flows to the Facility. The adopted order may be revised in the future to replace the removed prohibition with a prohibition based on the assessment and technical report submitted by the Discharger.

The Proposed Order has been revised as follows:

#### Section III.I

- ~~I. — The average monthly dry weather flow of waste through the Facility shall not exceed 10,000 mgd. Compliance with this prohibition shall be determined as defined in section VIII.B of this Order.~~

#### Section VIII.B.

##### ~~**B. Monthly Average Dry Weather Flow**~~

~~Compliance with the monthly average dry weather flow prohibition in section III.I of this Order will be determined once each month by evaluating all flow data collected in the corresponding calendar month. The flow through the Facility, measured daily and averaged monthly, must be 10,000 gpd or less, during dry weather conditions, for the month in any calendar year with the lowest average monthly flow.~~

Regional Water Board Staff has added a new requirement to the Proposed Order requiring the Discharger to provide an accurate figure for the design capacity of the Facility within six months of permit adoption. The language shown below has been added to Section VII.O of the Proposed Order:

Section VII.O.2.

2. **Technical Report.** A professionally licensed engineer shall perform an assessment of the current design capacity of the Facility and an assessment of the current inflow to the Facility. The assessment of the design capacity shall consider the capacity of both the wastewater treatment and disposal systems. The Discharger shall submit an accurate figure for the design capacity of the Facility and inflow to the Facility to the Executive Officer within 6 months after permit adoption.