

California Regional Water Quality Control Board
North Coast Region

ORDER NO. R1-2012-0032

RESCINDING CEASE AND DESIST ORDER NO. 98-33

AND

REQUIRING THE U.S. COAST GUARD PETALUMA TRAINING CENTER
WASTEWATER TREATMENT FACILITY TO CEASE AND DESIST FROM
DISCHARGING OR THREATENING TO DISCHARGE EFFLUENT IN VIOLATION OF
WASTE DISCHARGE REQUIREMENTS

ORDER NO. R1-2012-0033

WDID No. 1B72033OSON

Sonoma County

The Regional Water Quality Control Board, North Coast Region (hereinafter Regional Water Board), finds that:

1. The U.S. Coast Guard Petaluma Training Center (hereinafter Discharger) owns and operates a municipal wastewater treatment facility (Facility) located in the Two Rock area of Petaluma, California adjacent to Stemple Creek, a tributary of the Pacific Ocean through the Estero de San Antonio. The current Facility provides secondary treatment and consists of a gravity collection system, 7.2-acre oxidation pond system, and chlorine contact basin, as well as recycled water storage and irrigation facilities. The dry weather design flow of the oxidation pond treatment system is 0.18 million gallons per (mgd) (average dry weather flow).
2. The Facility has been regulated by Waste Discharge Requirements Order No. 85-162, (WDID No. 1B72033OSON), adopted by the Regional Water Board on December 5, 1985. Order No. 85-162 permits the discharge of disinfected secondary effluent via spray irrigation to pasture land adjacent to the treatment facility and prohibits the discharge of waste to Stemple Creek or its tributaries.
3. Waste Discharge/Reclamation Requirements Order No. R1-2012-0033 (WDID No. 1B72033OSON) is scheduled to be adopted by the Regional Water Board concurrently with this Cease and Desist Order (CDO). Upon adoption, Order No. R1-2012-0033 will supersede Order No. 85-162. Order No. R1-2012-0033 permits the agronomic application of disinfected secondary effluent via spray irrigation to pasture land adjacent to the treatment facility and of disinfected tertiary effluent to landscaped areas on the Training Center property and prohibits the discharge of waste to Stemple Creek or its tributaries.
4. The Regional Water Board adopted a Water Quality Control Plan for the North Coast Region (hereinafter Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan.

The Basin Plan at page 2-1 states that the beneficial uses of any specifically identified water body generally apply to its tributary streams. The Basin Plan identifies beneficial uses for the Estero Americano Hydrologic Area, to which Stemple Creek is tributary.

5. Violations of Order No. 85-162 were addressed in CDO No. 98-33 and consisted of the discharge of disinfected secondary effluent to Stemple Creek during the period of January 18, 1998 to February 11, 1998, in violation of waste discharge requirements. The discharge resulted from spray irrigation runoff due to saturated spray field conditions. The irrigation was necessary to prevent the effluent storage ponds at the Facility from overflowing. CDO No. 98-33 states "It appears that a major factor that contributed to the violation was excessive infiltration/inflow into the Petaluma Training Center's wastewater collection system which resulted in accelerated filling of the treated wastewater storage ponds. The estimated volume of treated wastewater discharged during this time period was 10.4 million gallons. Such discharges threaten to continue unless corrective actions are taken."
6. CDO No. 98-33 required the Discharger to submit to the Regional Water Board, a report detailing efforts to determine the cause of the violation, a corrective action plan to be implemented to prevent future violations, and a detailed time schedule for implementation of the corrective actions.
7. The Discharger submitted several documents in response to CDO No. 98-33, including a one page "Timeline Summary" on March 26, 1998, and letters dated April 27, 1998, July 10, 1998, August 17, 1999, and February 4, 1999. These documents identified infiltration and inflow into the collection system as the cause of the violation and identified plans to seal leaking manholes, raise low manholes, plug sources of inflow to the collection system, replace over 6,500 lineal feet of sewer line, repair berms around the sewer ponds, and raise berms along Stemple Creek to minimize the potential for wastewater (treated or untreated) from the Facility from reaching Stemple Creek in the future.
8. Although the Discharger made corrections to its collection system, the Discharger has needed to irrigate saturated irrigation fields with disinfected secondary effluent during periods of sustained wet weather, in particular during the months of December 2005; January through March 2006; January and February 2008; February 2009; January through March 2010; December 2010; and March 2011. The Discharger has determined that inadequate storage, combined with infiltration and inflow (I&I) are the cause of these violations. Peak wet weather flows reach approximately 3 mgd during periods of sustained rainfall. In recent years, the Discharger has managed its wastewater treatment system in the months leading up to the wet-weather season to minimize the amount of stored effluent and has cautiously irrigated during dry days between storms to the extent possible.
9. The Discharger is violating, or threatening to violate, the following terms in its Permit, Order No. R1-2012-0033:

III. Discharge Prohibitions

- A. The direct or indirect discharge from recycled water use areas to surface waters is prohibited except in minor amounts such as that associated with Best Management Practices (BMPs) for good irrigation practices.
- C. Creation of pollution, contamination, or nuisance, as defined by section 13050 of the California Water code is prohibited.

V. Discharge Specifications

- D. **Discharge.** No waste constituent shall be released or discharged, or placed where it will be released or discharged in a concentration or in a mass that causes violation of the Basin Plan's water quality objectives for groundwater.
- E. **Operation and Maintenance.** The Discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related equipment and appurtenances) that are installed to achieve compliance with the conditions of this Order and to maximize treatment of wastewater and optimize the quality of the discharge.
- G. **Winter Months.** The Facility shall have sufficient treatment, storage, and disposal capacity to accommodate allowable wastewater flow, design seasonal precipitation, and ancillary infiltration and inflow during the winter months.

VII.B. Reclamation Requirements

- 6. Application of recycled water to the agricultural and urban reuse areas shall be at reasonable agronomic rates and shall consider soil, climate, and nutrient demand of the crop. Application rates shall ensure that a nuisance is not created. Degradation of groundwater, considering soil, climate, and nutrient demand, shall be minimized, consistent with applicable provisions of the Recycled Water Policy.
 - 8. Recycled water shall not be applied on water-saturated or frozen ground or during periods of precipitation such that runoff is induced.
 - 9. Recycled water shall not be allowed to escape the recycled water use areas in the form of surface runoff.
10. The Discharger submitted a Report of Waste Discharge (ROWD) on May 20, 2011 that identifies plans to upgrade the wastewater treatment facility to handle increased capacity and provide more reliable treatment, and to provide increased storage facilities for its treated effluent. Order No. R1-2012-0033 is being adopted to permit the new wastewater treatment facility and the higher flows that will eventually result from population increases at the Training Center. The new

wastewater treatment Facility will have design flows of 0.197 mgd (average dry weather flow). The ROWD also identifies additional work that the Discharger has conducted to identify additional sources of I&I and plans to address those sources over time. The new wastewater treatment facility has a design peak weather flow of 3.036 mgd to account for the existing I&I. Until the treatment plant upgrade project described in the ROWD is complete, the Discharger will have difficulty complying with the more stringent requirements of Order No. R1-2012-0033.

11. The ROWD describes plans to construct the facility upgrade over two construction seasons to address the need to keep the existing wastewater treatment facility operational during construction and the fact that the existing wastewater treatment ponds will be converted to effluent storage ponds upon completion of the upgraded wastewater treatment facility. The compliance schedule in Requirement 1 of this Order reflects this plan.
12. Pursuant to Water Code section 13389 and title 14, California Code of Regulations, section 15321, this is an enforcement action for violations and threatened violations of waste discharge requirements and as such is exempt from the requirements of the California Environmental Quality Act (Public Resources Code sections 21000-21177).
13. On April 26, 2012, after due notice to the Discharger and all other affected persons, the Regional Water Board conducted a public hearing, received evidence, and heard and considered all comments pertaining to this cease and desist order.
14. Any person affected by this action of the Regional Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Water Code section 13320 and Title 23, California Code of Regulations, section 2050. The petition must be received by the State Water Board within 30 days of the date of this Order. Copies of the law and regulations applicable to filing petitions will be provided upon request. In addition to filing a petition with the State Water Board, any person affected by this Order may request the Regional Water Board to reconsider the Order. To be timely, such request must be made within 30 days of the date of this Order. Note that even if reconsideration by the Regional water Board is sought, filing a petition with the State Water Board within the 30-day period is necessary to preserve the petitioner's legal rights. If you choose to request reconsideration of this Order or file a petition with the State Water Board, you must comply with the Order while your request for reconsideration and/or petition is being considered.

IT IS HEREBY ORDERED PURSUANT TO CALIFORNIA WATER CODE SECTIONS 13243, 13300, and 13301 that Cease and Desist Order No. 98-33 is rescinded.

IT IS FURTHER ORDERED, that pursuant to Water Code sections 13300 and 13301, the U.S. Coast Petaluma Training Center Wastewater Treatment Facility shall cease discharging waste contrary to the prohibitions, discharge specifications and reclamation

requirements contained in Finding 9, above, and comply with the following requirements:

1. The Discharger shall comply with the following compliance schedule:

Task	Task Description	Compliance Date
1	Submit final specifications and design drawings for construction of the proposed wastewater treatment facility upgrade project to the Regional Water Board Executive Officer	November 1, 2012
2	Commence construction of the wastewater treatment facility upgrade project	May 1, 2013
3	Submit a written report regarding progress toward completion of the wastewater treatment facility upgrade	March 1, 2014
4	Complete construction of the wastewater treatment facility upgrade project	December 1, 2014
5	Initiate operation of the upgraded wastewater treatment, storage, and reclamation facilities to complete performance tests and engineering analysis	February 1, 2015
6	Complete testing of the completed wastewater treatment facility and submit to the Regional Water Board Executive Officer, a written report with the final performance test results and an engineering analysis of the upgraded facility, certifying hydraulic flows and that the new facilities operate properly	April 1, 2015
7	Full operation of the upgraded wastewater treatment, storage, and reclamation facilities in compliance with final permit requirements	June 1, 2015
8	Submit As-Built Drawings	June 1, 2015

2. During the time period described in Requirement 1 above, the Discharger shall operate and maintain, as efficiently as possible, all facilities and systems necessary to comply with all prohibitions, effluent limitations and requirements identified in Order No. R1-2012-0033 or any revisions thereto.
3. During the time period described in Requirement 1 above, the Discharger shall comply with the following interim effluent limitations at Discharge Point 001 (Discharge to Effluent Storage Ponds) as required by Order No. R1-2012-0033:

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Biochemical Oxygen Demand (5-day @ 20°C)	mg/L	50	--	80	--	--
Total Suspended Solids	mg/L	50	--	80	--	--
pH	std units	--	--	--	6.0	9.0
Settleable Solids	m/L	---	--	1.0	--	--
Total Coliform Organisms	MPN/100 mL	23 (median)	--	240	--	--

4. If, for any reason, the Discharger is unable to perform any activity or submit any documentation in compliance with the deadlines set forth in Requirements 1, above, the Discharger may request, in writing, that the Regional Water Board Executive Officer grant an extension of the time. The extension request shall include justification for the delay and be submitted at least 30 days prior to the deadline that the Discharger is requesting to extend. An extension may be granted by the Regional Water Board Executive Officer in writing for good cause.

5. If the Executive Officer of the Regional Water Board finds that the Discharger fails to comply with the provisions of this Order, the Executive Officer may take all actions authorized by law, including referring the matter to the Attorney General for judicial enforcement or issuing a complaint for administrative civil liability pursuant to Water Code sections 13350 and 13385. The Regional Water Board reserves the right to take any enforcement actions authorized by law.

CERTIFICATION

I, Catherine Kuhlman, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, North Coast Region, on April 26, 2012.

Catherine Kuhlman
 Executive Officer