

**Response to Written Comments
Draft Waste Discharge Requirements
Order No. R1-2024-0005
for the
Willow Creek Community Services District
Wastewater Treatment Facility
Regional Water Quality Control Board, North Coast Region
February 8, 2024**

Comments Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements Order No. R1-2024-0005, for the Willow Creek Community Services District (Discharger) Wastewater Treatment Facility (Facility) was December 15, 2023. Regional Water Board Staff (staff) received no written comments from the Permittee or public regarding the Draft Permit's notification period.

This Response to Comments document includes a summary of staff-initiated changes made to the Permit. Text added to the Proposed Permit is identified by underline and text to be deleted from the Proposed Permit is identified by strike-through in this document. The term "Draft Permit" refers to the version of the permit that was sent out for public comment. The term "Proposed Permit" refers to the version of the permit that has been modified in response to comments received and is being presented to the North Coast Regional Water Quality Control Board (Regional Water Board) for consideration.

Staff Initiated Changes

The following sections describe changes made to the draft Order, initiated by Regional Water Board staff to update and provide clarification to the Proposed Permit. The modified sections are identified by their section numbers as indicated in the Proposed Order.. The proposed changes are either required by law or do not materially impact the Permittee.

1. Page numbers were corrected in the header section throughout the document.
2. Table 1 (Discharger Information) was updated to include both the California Integrated Water Quality System (CIWQS) place identification number and the Electronic Content Management (ECM) indexing number.

Table 1. Discharger Information

Discharger	Willow Creek Community Services District
Name of Facility	Willow Creek Community Services District Wastewater Treatment Facility
Facility Address	450 Country Club Road
	Willow Creek, CA 95573
CIWQS Place ID	<u>812326</u>
ECM Primary Indexing Number	<u>CW-812326</u>

3. The coordinates in Table 2 were changed from degrees, minutes, and seconds format to decimal degrees format.
4. The date of the board meeting for proposed adoption of the permit was changed throughout the document from the range of February 8-9 to February 8 to reflect the updated single-day board agenda.
5. The deadline for a Disaster Preparedness Assessment Report and Action Plan was changed to June 1, 2027 from June 1, 2026.

VIII. GENERAL PROVISIONS: S. Disaster Preparedness Assessment Report and Action Plan

Natural disasters, extreme weather events, sea level rise, and shifting precipitation patterns, some of which are projected to intensify due to climate change, have significant implications for wastewater treatment and operations. Some natural disasters are expected to become more frequent and extreme according to the current science on climate change. In order to ensure that Facility operations are not disrupted, compliance with conditions of this Order are achieved, and receiving waters are not adversely impacted by permitted and unpermitted discharges, the Discharger shall submit a Disaster Preparedness Assessment Report and Action Plan to the Regional Water Board by ~~June 1, 2026~~ June 1, 2027, for Executive Officer review and approval.

6. Editorial changes were made to correctly reflect the Average Monthly Effluent Limitations versus the Average Weekly Effluent Limitations that were defined in the Compliance Determination subsection of the General Provisions.

VIII. GENERAL PROVISIONS: T. Compliance Determination: C. Average Monthly Effluent Limitation (AMEL)

1. The arithmetic mean of all samples collected in a calendar ~~week~~ month, calculated as the sum of all samples in a calendar ~~week~~ month divided by the number of samples. If only one sample is collected in a calendar ~~week~~ month, that sample result will constitute the ~~weekly~~ monthly average and daily

maximum results for the purpose of determining compliance with effluent limitations.

2. If the average of daily discharges over a calendar week exceeds the AMEL for a given parameter, this will represent a single violation, though the Discharger will be considered out of compliance for each day of that ~~week~~ month for that parameter (~~e.g., resulting in 7 days of non-compliance in a 7-day week~~) (e.g., resulting in 31 days of non-compliance in a 31-day month).

If only a single sample is taken during the calendar ~~week~~ month and the analytical results for that sample exceeds the AMEL, the Discharger will be considered out of compliance for that calendar ~~week~~ month. The Discharger will only be considered out of compliance for days when the discharge occurs. For any one calendar ~~week~~ month during which no sample (daily discharge) is taken, no compliance determination can be made for that calendar ~~week~~ month.

7. The introductory paragraph of the Monitoring and Reporting Program was updated to reflect the current version of the permit:

This MRP is issued pursuant to California Water Code (Water Code) section 13267 which authorizes the Regional Water Quality Control Board (Regional Water Board) to require technical and monitoring reports. The technical and monitoring reports required by this Order are necessary to ensure compliance with Order No. ~~R1-2023-0002~~ R1-2024-0005 and to protect human health and waters of the state. The costs of the technical or monitoring reports required by this Order bear a reasonable relationship to the need for these reports and the benefit to be gained by these reports.