Regional Water Quality Control Board North Coast Region

Change Sheet 1

Thursday, April 7, 2016 Eureka City Hall Eureka, California

ITEM: 4

SUBJECT: Public Hearing on Order No. R1-2016-0013 to consider adoption of proposed

Waste Discharge Requirements for the JH Ranch Wastewater Treatment

Facility, WDID No. 1A14143RSIS (Roy O'Connor)

Three changes have been made to the proposed Order by Regional Water Board staff following the public comment period. The first modification sets forth a requirement for submittal of a Facility Plan that describes the existing Facility and provides a mechanism for the Regional Water Board to be notified of planned changes at the Facility. The second modification updates the section number and corrects a typographic error in the requirement for a hydrogeologic study. The final modification corrects an incomplete sentence in Section V.C of the Monitoring and Reporting Program (MRP). Additions are shown in underlined text and deletions in strikeout text.

- 1. A new Order section VIII.Q.1 was added to require a Facility Plan, as follows:
 - "1. Facility Plan. The Discharger shall prepare a Facility Plan that identifies any needed modifications to ensure adequate treatment and disposal of existing and any anticipated future wastewater flows and concentrations. The Facility Plan shall be considered an evolving document and be updated before the initiation of any repairs, upgrades, and/or new construction at the Facility. The Facility Plan shall include, but not be limited to, the following components:
 - a. An updated Facility map, a description of the existing service area, including a description of buildings contributing waste flow to the Facility, and a description of future service areas if applicable;
 - b. Estimates of existing and planned hydraulic and organic loading rates (at average and peak flows) and a demonstration that the existing Facility is designed to treat existing and anticipated future loads and remain in compliance with this Order; Projections shall be made from actual wastewater flows and concentrations to the extent possible;
 - c. A description of the existing Facility conditions and areas needing corrective actions and time schedules:

- d. A detailed evaluation of short-term and long-term alternatives to ensure adequate treatment and disposal of existing and any anticipated future hydraulic and organic waste loads;
- e. Description of recommended repairs and/or upgrades to the existing Facility including the financing mechanisms for implementation of the Facility Plan; cost estimates for needed capital and operation and maintenance (including basis) shall be included.

The Discharger shall update the Facility Plan, as necessary, to conform to short-term and long-term changes in the Facility. The Facility Plan shall be submitted to the Executive Officer within 3 months after permit adoption. For discharges not covered under this Order, or other Regional Water Board or State Water Board Order, the Discharger shall submit a report of waste discharge in addition to the Facility Plan and any future updates."

- 2. Section VIII.Q.1 of the draft Order was renumbered and a typographical error was corrected, as follows:
 - **2.** <u>Hydrogeologic Study.</u> A hydrogeologic study is required to determine the fate and transport of pollutants in discharges of treated wastewater associated with the discharge location.

A workplan for a hydrogeologic investigation is required. The workplan proposal shall be designed to investigate:

- **a.** Current and projected depths of the disposal area;
- **b.** Site specific lithologic profile;
- **c.** Depth to groundwater, including seasonal variations;
- **d.** Seasonal groundwater gradients;
- **e.** Calculated capacity of areal soils to accommodate current and projected wastewater flows: and
- **f.** Concentration gradients of targeted wastewater constituents in groundwater measured at various points extending away from the disposal areas, towards French Creek, and concentrations of targeted wastewater constituents, if any, surfacing in French Creek.

Information developed in accordance with implementation of an approved investigation workplan shall be summarized in a subsequent report, which models the fate and transport of wastewater pollutant disposal. The workplan shall be submitted to the Executive Officer for approval within 6 months after permit adoption. The subsequent summary report of work shall be submitted within 24 months after workplan approval.

3. The final sentence of Section V.C of the draft MRP was completed, as follows:

C. Spill Notification

i. **Spills and Unauthorized Discharges.** Information regarding all spills and unauthorized discharges that may endanger health or the environment shall be provided orally to the Regional Water Board¹ within 24 hours from the time the Discharger becomes aware of the circumstances and a written report shall also be provided within five (5) days of the time the Discharger becomes aware of the circumstances of the spill or unauthorized discharge.

Regional Water Quality Control Board North Coast Region

Change Sheet No. 2

Thursday, April 7, 2016 Eureka City Hall Eureka, California

ITEM: 4

SUBJECT: Public Hearing on Order No. R1-2016-0013 to consider adoption of proposed

Waste Discharge Requirements for the JH Ranch Wastewater Treatment

Facility, WDID No. 1A14143RSIS (Roy O'Connor)

Changes were made to the proposed Order at the request of Regional Water Board members during the public hearing. The first modification revises General Provision VIII.N to provide a mechanism for the Regional Water Board to review and revise the Order periodically based on information obtaining during the term of the permit, in particular, information obtained from the Facility Plan and the Hydrogeologic Study. Additional modifications were made to General Provision VIII.Q to 1) specify that the Hydrogeologic Study must include monitoring of wastewater constituents in French Creek upstream and downstream from the Facility; 2) accelerate due dates set forth for the Hydrogeologic Study; and 3) correct punctuation problems created by the modifications. Additions are shown in underlined text and deletions in strikeout text.

1. Section VIII.N. Revision of Requirements was modified as follows:

The Regional Water Board will review this Order periodically and may revise requirements when necessary. As additional information on water quality is developed and obtained, the Regional Water Board may take appropriate action on this Order, including, but not limited to, reopening the Order for modification, or requiring a report of waste discharge. The Executive Officer may also modify the monitoring and reporting program.

- 2. Section VIII.Q. of the proposed Order was modified as follows:
 - 2. Hydrogeologic Study. A hydrogeologic study is required to determine the fate and transport of pollutants in discharges of treated wastewater associated with the discharge location. Regional Water Board staff requires additional information and testing for the treated effluent disposal location and methodology. Further information is necessary to ensure that disposal methods will not result in detectable wastewater constituents in French Creek, will not result in violation of groundwater quality standards, and to determine the ability of the disposal areas to accommodate projected wastewater flows.

A workplan for a hydrogeologic investigation is required. The workplan proposal shall be designed to investigate:

- **a.** Current and projected depths of the disposal area;
- **b.** Site specific lithologic profile;
- **c.** Depth to groundwater, including seasonal variations;
- **d.** Seasonal groundwater gradients;
- **e.** Calculated capacity of areal soils to accommodate current and projected wastewater flows;
- **f.** Concentration gradients of targeted wastewater constituents in groundwater measured at various points extending away from the disposal areas, towards French Creek; and.
- **g.** Concentration of targeted wastewater constituents in French Creek at locations upstream and downstream of the Facility.

Information developed in accordance with implementation of an approved investigation workplan shall be summarized in a subsequent report, which models the fate and transport of wastewater pollutant disposal. The workplan shall be submitted to the Executive Officer for approval **within 2 months after permit adoption.** A summary report of work shall be submitted annually starting February 1, 2017, until completion of the hydrogeologic study as approved by the Executive Officer.