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## North Coast Regional Water Quality Control Board

**Response to Written Comments  
Draft Waste Discharge Requirements and Master Recycling Permit  
Order No. R1-2022-0004  
for the  
Gualala Community Services District  
Wastewater Treatment Facility and Recycled Water System  
Regional Water Quality Control Board, North Coast Region  
April 7, 2022**

### Comments Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements and Master Recycling Permit for Order No. R1-2022-0004, for the Gualala Community Services District (Permittee or District) Wastewater Treatment Facility and Recycled Water System (Facility) was January 14, 2022. Regional Water Board Staff (staff) received a single comment letter from the U.S. Fish and Wildlife Service (FWS) within the allotted public comment period.

Staff met with the Permittee, along with representatives from both the Sea Ranch North Wastewater Treatment Plant and The Sea Ranch Golf Links on January 11, 2022 to discuss the Proposed Order. The Sea Ranch North Wastewater Treatment Plant, owned and operated by Sonoma Water, discharges secondary treated wastewater to the Permittee for tertiary treatment, disinfection, and storage prior to reclamation at The Sea Ranch Golf Links. No written comments were provided by these parties and no concerns were expressed during the meeting. Staff further notified the Permittee of the proposed staff-initiated changes to the Proposed Permit that are described in this Response to Comments document in a meeting on January 18, 2022. The Permittee indicated that staff's changes to the Proposed Order are acceptable.

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

## 1. FWS Comment

**Comment:** The U.S. Fish and Wildlife Service (FWS) provided an e-mail response indicating that *the discharger can view the FWS IPaC System (a project planning tool that streamlines FWS environmental review process) and generate a species list to provide proper consideration to any applicable listed species in the action area.* They further provided a link to the FWS IPaC website and invited the Permittee to respond to the e-mail with any questions.

**Response:** Section II.I of the Proposed Order specifies that this Order does not authorize any act that results in the taking of a threatened or endangered species or any act that is now prohibited, or becomes prohibited in the future, under either the California Endangered Species Act (Fish and Game Code sections 2050 to 2097) or the Federal Endangered Species Act (16 U.S.C.A sections 1531 to 1544). Furthermore, this section indicates that the permittee is responsible for meeting all requirements of the applicable Endangered Species Act.

No changes were made to the Proposed Order in response to this comment.

## 2. Staff Initiated Changes

The following section describes changes made to the Proposed Order initiated by staff.

### 1. Land Discharge Requirements clarification (Order section IV.E).

Section IV.E, Land Discharge Requirements – Discharge Point 003, has been modified to identify that the effluent limitations for tertiary treated recycled water apply to any effluent discharged to the percolation pond. Section IV.E.1. has been modified to read as follows:

Disinfected tertiary treated effluent may be discharged to the percolation pond at Discharge Point 003 when authorized by the Regional Water Board Executive Officer. During periods of discharge to the percolation pond, the effluent limitations identified in Section IV.A shall apply.

### 2. Monitoring and Reporting Program (MRP) Table Identification Correction.

Tables within the MRP were inadvertently Identified with a Prefix of “E” and should have been identified with a “D”, representative of the MRP’s Attachment designation. The MRP tables and any references to such has been corrected to use a prefix of “D”. For example, Table E-1, Monitoring Station Locations, is now titled Table D-1, Monitoring Station Locations.

## 3. Monitoring Station Locations Clarification.

Table E-1, Monitoring Station Locations, of the Monitoring and Reporting Program has been modified to list Monitoring Locations INF-001, INF-001A, INF-001B(2), and INF-001C in separate rows. Table E-1 has been modified to read as follows:

**Table E-1 D-1. Monitoring Station Locations**

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
--	<del>INF-001 INF-001(A) INF-001(B)(2) INF-001(C)</del>	<del>Influent wastewater at a representative point preceding treatment. Sampling location INF-001 shall represent influent coming in from the Gualala CSD collection system (INF-001(A)) and Sea Ranch North (INF-001(B)(2)) each day and shall not include flows being brought back in from storage or plant recirculation flows. The volume of any septage, landfill leachate or other trucked waste to the plant shall be recorded each day of delivery (INF-001C). Any flows brought back from storage and/or plant recirculation flows shall be recorded and identified separately from influent flow.</del>
==	<u>INF-001</u>	<u>Influent wastewater consisting of the combined flows of INF-001A and INF-001B(2) at a representative point preceding treatment</u>
==	<u>INF-001A</u>	<u>Influent wastewater from the Gualala CSD collection system at a representative point preceding treatment and shall not include flows being brought back in from storage or plant recirculation flows.</u>
--	INF-001B(1)	Influent wastewater to the Sea Ranch North influent storage pond shall represent influent from the Sea Ranch North collection system. This monitoring location shall also be used to record the influent storage pond freeboard and volume in accordance with Table E-6 D-6.
==	<u>INF-001B(2)</u>	<u>Influent wastewater to the Gualala CSD from the Sea Ranch North WWTF at a representative point preceding treatment and prior to mixing with any waste streams.</u>
==	<u>INF-001C</u>	<u>Landfill leachate or other trucked waste delivered to the plant. This monitoring location shall also be used to record the volume of this waste to the plant and shall be recorded each day of delivery</u>

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
--	INT-001A(1) <del>INT-001a(2)</del> <u>INT-001A(2)</u>	Location for monitoring surface loading rate through tertiary filters and pretreatment process monitoring prior to the tertiary filters. INT-001A(1): prior to the travelling bridge filter INT-001A(2): prior to the NOVA filter
--	INT-001B(1) <del>INT-001b(2)</del> <u>INT-001B(2)</u>	Treated wastewater immediately following the tertiary filters for monitoring the turbidity of the tertiary treated effluent prior to chlorination. INT-001B(1): following the travelling bridge filter INT-001B(2): following the NOVA filter
001A 001B	REC-001	Effluent monitoring location following tertiary treatment and disinfection to demonstrate compliance with water recycling effluent limitations in Order section IV.A. and Disinfection Process Requirements in Order section IV.B.2, prior to discharge to recycled water storage ponds at GCSD (Discharge Point 001A) and Sea Ranch North (Discharge Point 001B).
002	REC-002	Effluent monitoring location following tertiary storage and prior to distribution to The Sea Ranch Golf Links for water recycling.
003	LND-001	Effluent monitoring location following recycled water storage ponds representing disinfected tertiary effluent discharged to the percolation pond at The Sea Ranch Golf Links.
--	Pond-001 Pond-002 Pond-003 Pond-004	Recycled water storage ponds located at the Gualala CSD WWTF (Ponds 001 through 003) and the Sea Ranch North WWTF (Pond 004) to be monitored in accordance with Tables <del>E-6</del> <u>D-6</u> and <del>E-7</del> <u>D-7</u> . Any future addition of storage ponds shall be identified and numbered for reporting.
--	GW-001 GW-002 GW-003 GW-004	Monitoring wells in the vicinity of the percolation pond at The Sea Ranch Golf Links to be monitored immediately prior to, during and following any discharge to the percolation pond.
--	BIO-001	A representative sample of the sludge or biosolids generated when removed for disposal.

#### 4. Influent Monitoring Clarification (MRP section III.A).

MRP Section III.A identifies that influent monitoring is required for monitoring locations INF-001, INF-001A, INF-001B, but these locations names do not reflect those identified in Table E-1 of the Draft Order. Section III.A has been updated as follows to clarify the monitoring locations subject to this section.

##### **A. Influent Monitoring – Monitoring Locations INF-001, INF-001A, INF-001B, INF-001B(2), and INF-001C**

1. The Discharger shall monitor influent wastewater from Gualala CSD and Sea Ranch North to the Facility at Monitoring Locations INF-001A and ~~INF-001B~~ INF-001B(2), respectively, as follows in Table E-2 D-2:

**Table E-2 D-2. Influent Flow – Monitoring Locations INF-001A and ~~INF-001B~~ INF-001B(2)**

Parameter	Units	Sample Type	Minimum Sampling Frequency
Influent Flow 1	mgd	Meter	Continuous
Biochemical Oxygen Demand (5-day @ 20°C) (BOD)	mg/L	Grab	Monthly
Total Suspended Solids (TSS)	mg/L	Grab	Monthly
Table Notes:			
1. The Discharger shall report the daily average, monthly average, and peak hourly flows.			

2. The Discharger shall also report the combined flows of INF-001A and ~~INF-001B~~ INF-001B(2) as INF-001.
3. The Discharger shall also report the volume of any trucked waste into the Facility at INF-001C

#### 5. Storage Pond Monitoring Clarification (MRP section III.G).

MRP Section III.G incorrectly identifies that the Sea Ranch North influent storage pond as POND-001(B)(1). Section III.G has been updated as follows to correct this monitoring location name:

##### **G. Storage Pond Monitoring**

1. The Discharger shall monitor all influent (~~POND-001(B)(1)~~ INF-001B(1)) and recycled water storage ponds and impoundments (currently POND-001 through POND-004) as described in Table E-6 D-6.

## 6. Land Discharge Monitoring Frequency Clarification.

MRP Table E-8 omitted Table Note 1, indicating that the minimum sampling frequency of the effluent discharge to the percolation pond shall be at the initiation of the discharge and weekly thereafter until discharge ceases. Table E-8, now identified as Table D-8, has been updated as follows:

**Table ~~E-8~~ D-8. Land Discharge Monitoring to Percolation Pond – Discharge Point 003 - Monitoring Location LND-001**

<b>Parameter</b>	<b>Units</b>	<b>Sample Type</b>	<b>Minimum Sampling Frequency <sup>1</sup></b>
Flow	Mgd	Meter	Continuous
Nitrate, Total (as N)	mg/L	grab	Weekly
Total Dissolved Solids	mg/L	grab	Weekly
Specific Conductance	mg/L	grab	Weekly
Chloride	mg/L	grab	Weekly
pH	pH Units	grab	Weekly

**Table Notes:**

1. The effluent discharge to the percolation pond shall be sampled at the initiation of discharge and weekly thereafter until the discharge ceases, at a location before the effluent enters the percolation pond.