

Executive Officer's Summary Report
8:30 a.m., June 10, 2010
Regional Water Quality Control Board
David C. Joseph Hearing Room
5550 Skylane Blvd., Suite A
Santa Rosa, California

Item: 4a

Subject: Public Hearing on Order No.R1-2010-0003 to consider adoption of Waste Discharge Requirements for the College of the Redwoods Wastewater Treatment Facility, NPDES Permit No. CA0006700, WDID No. 1B80121OHUM.

DISCUSSION

The College of the Redwoods (hereinafter Discharger or College) owns and operates a municipal wastewater treatment facility (WWTF) and associated wastewater collection, and disposal facilities that serve a student population on the Eureka campus of approximately 5,700. The WWTF is currently discharging under Order No. R1-2002-0003 and National Pollutant Discharge Elimination System (NPDES) Permit No. CA0006700 adopted on January 24, 2002.

The WWTF treats domestic wastewater, with a design treatment capacity of 0.1 million gallons per day (MGD). Wastewater treatment consists of secondary treatment through the activated sludge process and clarification, disinfection with sodium hypochlorite generated onsite, and dechlorination with sodium metabisulfate prior to discharge.

The treatment facility's point of discharge at Discharge Point 001 to White Slough is located within the Eureka Plain Hydrologic Unit at 40°41'56.20"N latitude and 124°12'11.77"W longitude. The effluent flows overland through a transitional wetland area into an unnamed creek that flows from the storm water collection reservoir on the college campus then comingles with White Slough, a tributary to Humboldt Bay. In accordance with Chapter 1, Paragraph A of the Bays and Estuaries Policy, Resolution No. 82-12, adopted by the Regional Water Board on December 2, 1982, waives the discharge prohibition established in the Bays and Estuaries Policy, allowing College of the Redwoods to discharge to White Slough.

Draft Order R1-2010-0003 maintains many of the existing requirements for the WWTF adopted in January 2002. However, effluent limitations for pH have been tightened in the draft Order to conform with Basin Plan requirements applicable to Humboldt Bay, and effluent limitations for acute toxicity and toxicity triggers for chronic toxicity have been established for the first time. In addition, effluent limitations have been established for priority pollutants which demonstrated reasonable potential to cause or contribute to exceedances of applicable water quality criteria for copper, lead, nickel,

silver, carbon tetrachloride, chlorodibromomethane, dichlorobromomethane, bis(2-ethylhexyl)phthalate, and dioxin equivalents. Changes to monitoring include lowering of requisite analytical detection levels for compliance assessment with chlorine effluent limitations in order to better evaluate potential impacts to aquatic organisms, and increased effluent and surface water monitoring frequencies.

A copy of the draft Order and/or information to access the draft on the Regional Water Board website was mailed to the Discharger, interested agencies, and persons. This item was opened for public comment from March 24, 2010 to April 23, 2010. Staff has been working closely with the College during development of the proposed Order. The only comments received were from the Discharger. The Discharger indicated an inability to immediately comply with several of the new effluent limitations identified in the draft Order and has requested that the Board consider issuance of a Cease and Desist Order at a future Board meeting to allow the College time to achieve compliance.

Based on our review of the available data, staff agrees that the Discharger would likely be in immediate non-compliance with several of the new effluent imitations required under the draft Order. The College has submitted a tentative schedule to perform source identification, reduction and control measures in order to meet these new effluent limitations. The proposal is under review and staff plans to work with the Discharger to derive the most appropriate list of tasks and an associated schedule for to incorporate into a Cease and Desist Order for the Board's consideration prior to the effective date of the draft Order.

PRELIMINARY STAFF
RECOMMENDATION

Adopt the Order as proposed.