

Executive Officer's Summary Report  
9:00 a.m., June 7, 2012  
Willow Creek Community Services District  
Kimtu Cookhouse/Lodge  
135 Willow Road  
Willow Creek, California

Item: 5

Subject: **Public Hearing** on Order No. R1-2012-0048, to consider adoption of Waste Discharge Requirements for **Cloverdale, City of, Wastewater Treatment Facility**, WDID No.1B84032OSON, NPDES Permit No. CA0022977 Sonoma County

### DISCUSSION

The City of Cloverdale is currently discharging under Order No. R1-2006-0004 and National Pollutant Discharge Elimination System (NPDES) Permit No. CA0022977, adopted by the Regional Water Board on June 29, 2006. The Discharger submitted a Report of Waste Discharge, dated December 30, 2010, and applied for an NPDES permit renewal to discharge an average daily dry weather flow of up to 1.0 million gallons per day (mgd) and a peak weekly wet-weather design flow of 8.25 mgd of treated wastewater from the Discharger's Wastewater Treatment Facility (hereinafter Facility). The application was deemed complete on December 1, 2011.

The Discharger owns and operates a municipal wastewater treatment facility and associated wastewater collection and disposal facilities that serve a population of approximately 8,600 people. The Discharger's wastewater makeup is primarily residential flow with a small percentage of the flow coming from commercial or industrial facilities.

The secondary treatment system consists of a 2.8 million gallon primary aeration pond equipped with an extended aeration system, a secondary aeration pond equipped with six aerators, and a settling/polishing pond. The disinfected, secondary effluent is discharged to percolation/evaporation ponds adjacent to the Russian River. The existing Facility does not currently include advanced wastewater treatment and thus, is not currently authorized to discharge directly to the Russian River.

During the term of Order No. R1-2006-0004, the City made significant repairs and replacement of its collection system which has reduced infiltration and inflow to the Facility. Overall, this Facility complies with the terms of its permit with only occasional coliform and total suspended violations in the past, which the City has addressed. To address these violations, the City increased the detention time in its ponds by raising

weir levels, increased the chlorine dose to improve the level of disinfection, and changed the frequency and method of cleaning its underground chlorine contact pipe.

Although the City has been exploring reclamation options, the City does not anticipate that reclamation will begin during the term of this new permit.

The proposed permit contains several noteworthy requirements and changes, including the following:

1. Final effluent limitations and monitoring requirements for two California Toxics Rule (CTR) priority pollutants including copper and dichlorobromomethane (DCBM). The previous Order included interim effluent limitations for copper, cyanide, carbon tetrachloride, mercury and DCBM and monitoring requirements for these five pollutants plus lead, but monitoring conducted during the term of the previous permit resulted in a determination of no reasonable potential for cyanide, carbon tetrachloride, mercury, or lead, to cause or contribute to excursions above water quality standards thus effluent limitations and monitoring requirements for those pollutants were removed from the new permit.
2. Removal of settleable solids effluent limitations and monitoring requirements due to a demonstration of no reasonable potential during the previous permit term.
3. Stricter effluent limitations for chlorine residual in the effluent discharge are established for the protection of aquatic life. The new effluent limitations include a monthly average limit of 0.01 mg/L and a maximum daily limit of 0.02 mg/L. These requirements are more stringent than the requirement in the previous permit to achieve non-detectable levels at a detection limit of 0.1 mg/L.
4. Due to the fact that Cloverdale has not discharged directly to the Russian River since 1985, there is no data available to determine concentrations of nutrients and specific CTR pollutant concentrations in the effluent. Because Cloverdale has an NPDES permit, it is important to determine if there is reasonable potential for pollutants to contribute to excursions above water quality standards. Therefore, monitoring requirements for nutrients (ammonia, nitrate and phosphorus), temperature, hardness, and specific CTR pollutants (copper, bromoform, chlorodibromomethane, dichlorobromomethane, chloroform, and bis(2-ethylhexyl) phthalate) have been established at Monitoring Location EFF-002, the discharge to the percolation ponds. These pollutants must be monitored four times per discharge season, and the monitoring frequency for these pollutants may be reduced or eliminated if monitoring results demonstrate no reasonable potential.
5. In addition, a requirement to monitor one time during the permit term for the full CTR priority pollutant scan and Title 22 pollutants (pollutants for which the

California Department of Public Health have established drinking water standards) has been established at EFF-002.

6. The frequency for groundwater monitoring has been reduced from 6 times per year to quarterly. Two Russian River monitoring locations (SS-1 and SS-2) are monitored during each groundwater monitoring event. The Russian River monitoring has been modified to remove coliform monitoring and to include monitoring for temperature and hardness. The monitoring program includes a requirement for the City to submit a Quality Assurance/Quality Control Plan for its groundwater monitoring program to ensure that groundwater data is reliable and defensible.
7. Spill reporting requirements have been incorporated into the proposed Order to maintain consistency with State Water Resources Control Board Order No. WQ 2008-0002-EXEC. These requirements include 2-hour reporting to the Regional Water Board, California Emergency Management Agency, and local health department of all spills and unauthorized discharges, and 24-hour written certification that these agencies were contacted. In addition, spill reporting language addresses requirements for submitting spill reports based on the volume of the spill and whether it entered surface waters or not.

The draft permit and/or information to access the draft Orders on the Regional Water Board website was originally mailed to the Permittee, interested agencies and persons, and the draft permit was open for public comment between March 4, 2012, and April 13, 2012. The City of Cloverdale submitted the only comment letter. The proposed Order was modified in response to some of the comments received. The comment letter is included as Attachment 1.

During the public comment period, Regional Water Board staff also identified some changes that are needed to provide clarity, correct typographical errors, and to provide consistency between language in the permit, monitoring and reporting program, and Fact Sheet.

This permit package includes a Response to Comments document (Attachment 2) that summarizes staff's responses to comments received and a summary of changes that staff identified. Attachment 2.A provides a description of additional changes recommended by Staff.

**PRELIMINARY STAFF  
RECOMMENDATION:**

Adopt Order No. R1-2012-0048 as proposed.