
**Response to Written Comments
Draft Waste Discharge Requirements
Order No. R1-2023-0006
National Pollutant Discharge Elimination System (NPDES)
for the
Covelo Community Services District
Wastewater Treatment Facility
Regional Water Quality Control Board, North Coast Region
June 15, 2023**

Comments Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements for Order No. R1-2023-0006, National Pollutant Discharge Elimination System Permit (Draft Permit) for the Covelo Community Services District (CSD or Permittee) Wastewater Treatment Facility (Facility) was March 13, 2023. Regional Water Board staff (Staff) received three written comments within the allotted public comment period from the Permittee.

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.

Covelo CSD Comments

Comment 1: Section 2.6. provides a description of location of the Facility. The Permittee provided a correction that the facility is located in northern Mendocino County rather than southern Humboldt County.

Response 1: The Permittee, Covelo Community Services District, operates a wastewater treatment facility within a disadvantaged community located along the Town Creek in ~~southern Humboldt County~~ northern Mendocino County.

Comment 2: Attachment F, Section 2. The CSD provided a correction to the Facility Description regarding the number of connections the Permittee serves. The Permittee

stated that Facility serves about 190 residential and 161 commercial Residential Equivalent Units (REUs).

Response 2: The Permittee's collection system collects wastewater from about ~~430 residential connections and 4 commercial dischargers.~~ 190 residential equivalent units (REUs) and 161 commercial REUs.

Comment 3: Attachment C, page C-2. The CSD states that the current facility flow schematic used in the draft order was carried over from the previous Order and is inaccurate. A revised "facility flow diagram" has been submitted by the CSD to the Regional Water Board.

Response 3: The revised "facility flow diagram" submitted by the CSD has been incorporated into the Proposed Order.

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. Regional Water Board staff informed the Permittee of the changes made to the Draft Permit on March 16, 2023 and the Permittee did not have any objections to the proposed staff-initiated changes.

1. The draft Order's Table of Contents was corrected to address editorial errors.
2. **Section 4.2.5.** Regional Water Board staff corrected an outdated reference to section 64435 (renumbered 64431) and Table 3-2 which is no longer included in the Basin Plan.

The Basin Plan requires that waters designated for use as MUN shall not contain concentrations of chemical constituents in excess of the limits specified in CCR, title 22, division 4, chapter 15, article 4.1, section ~~64435~~ 64431, and article 5.5, section 64444, and listed in ~~Table 3-2 of the Basin Plan.~~