
North Coast Regional Water Quality Control Board

July 30, 2018

Mr. Jarod Thiele
City of Ukiah
300 Seminary Avenue
Ukiah, CA 95482-5400
jthiele@cityofukiah.com

Dear Mr. Thiele:

Subject: Response to Emergency Irrigation Discharge Notification

File: City of Ukiah Wastewater Treatment Facility, WDID No. 1B84029OMEN

This letter responds to your July 5, 2018, letter notifying the Regional Water Board of a planned temporary, emergency discharge of disinfected secondary effluent to land at agronomic rates from the City of Ukiah (City) Wastewater Treatment Facility (WWTF). As explained below, Regional Water Board staff finds there is a reasonable basis for the City's need to discharge under the facts and circumstances described. As such, we do not intend to take enforcement action for the discharge activities described below provided that the City complies with the requirements outlined in this letter.

Your letter states that an emergency irrigation discharge is necessary to address difficulties with disposal through the percolation ponds because the City has been unable to empty the percolation ponds at the end of each summer for maintenance necessary to maintain percolation rates. This has resulted in a decrease in the percolation rate. In addition, the late spring rains this year have created the urgent need to remove effluent from the percolation ponds in order to avoid overtopping of the percolation ponds, which would result in a discharge of disinfected secondary effluent to the Russian River during the discharge prohibition season.

We understand that pond levels are still rising with less than $\frac{1}{4}$ foot of freeboard remaining in the ponds and that an uncontrolled discharge of disinfected secondary effluent could occur if the City does not take steps to dispose of some of the ponded water in a controlled manner. The City anticipates that implementation of this temporary disposal plan will

allow the City to empty at least one of the percolation ponds before winter in order to perform maintenance needed to increase percolation rates.

The City proposes to set up a temporary irrigation system on City-owned property immediately to the north of the WWTF that would be used through October 15, 2018. Disinfected secondary effluent would be pumped directly from the percolation ponds through temporary piping and conveyed to the temporary irrigation system as shown on the temporary use site map that you submitted by email on July 18, 2018.

The City's letter includes a Use Area Management Plan (Attachment 2 to the July 5, 2018, letter) that describes irrigation management practices that will be implemented to prevent runoff, minimize the potential for pollutants percolating to groundwater, and protect human health. The irrigation management practices include 100 foot setbacks to all waterways (Russian River and any drainages), irrigation between the hours of 7:30 am and 9:00 pm each day, daily inspections of the irrigation area, repairing breaks prior to beginning irrigation each day, routinely adjusting sprinkler heads to achieve 80% coverage of the irrigation area, applying water at rates that prevent runoff and ponding of water, metering the amount of water irrigated, refraining from use of fertilizer, providing signage (in English and Spanish) identifying the recycled water use, restricting public access, and ceasing irrigation if runoff is observed or if windblown spray carries recycled water off the site. There are no potable water wells or creeks within 100 feet of the proposed temporary irrigation area. The City proposes to report monthly the acreage irrigated, quantity of recycled water used, and copies of daily inspection reports.

Regional Water Board staff understands that the City is in a critical situation and must take action in order to prevent serious violations of its NPDES permit that would result if an uncontrolled discharge of secondary effluent from the percolation ponds to the Russian River were to occur and to prevent potential damage to the percolation ponds.

We will not recommend pursuing enforcement action related to this irrigation discharge provided that the City continues to demonstrate progress toward completing its reclamation system and conducts the discharge in accordance with the plan identified in its July 5, 2018, letter and the following requirements:

1. The City must follow the July 5, 2018, Use Area Management Plan.
2. The City must provide email notification to: Cathleen.Goodwin@waterboards.ca.gov if any conditions described in your letter or Use Area Management Plan change and provide email notification when the irrigation discharge is ceased.
3. The irrigation discharge must cease no later than October 15, 2018, unless the City requests and is granted an extension and demonstrates that weather conditions are appropriate for a continued irrigation discharge.

4. Submit monthly monitoring reports that include details about the acreage irrigated, quantity of recycled water used, calculations of the amount of water applied in inches per acre and the amount of nitrogen applied in pounds per acre, and copies of daily inspection reports summarizing observations related to ponding, runoff, and overspray.

In a follow-up email responding to Regional Water Board staff questions about the proposed emergency irrigation, you confirmed that the City's completion of its Recycled Water System is intended to resolve this problem by increasing the City's capacity for dispensing of its treated wastewater through a combination of river disposal and beneficial reuse through irrigation.

If you have any questions, you may contact Cathleen Goodwin at (707) 576-2687 or by email at Cathleen.Goodwin@waterboards.ca.gov.

Sincerely,

Matthias St. John
Executive Officer

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