

Regional Water Quality Control Board
North Coast Region

Executive Officer's Summary Report
Thursday, October 8, 2015
Santa Rosa, California

- ITEM: 4
- SUBJECT: Public Hearing to consider adoption of Order No. R1-2015-0029 Waste Discharge Requirements and Master Reclamation Permit for the City of Willits Wastewater Treatment Facility, WDID No. 1B80078OMEN, NPDES No. CA0023060 (*Justin McSmith & Lisa Bernard*)
- BOARD ACTION: The Board will consider adoption of Waste Discharge Requirements and Master Reclamation Permit, Order No. R1-2015-0029. The Order will serve as a National Pollutant Discharge Elimination System (NPDES) permit for a period of five years.
- BACKGROUND: The City of Willits (Permittee) owns and operates the Willits Wastewater Treatment Facility (Facility), a domestic wastewater facility that serves a population of approximately 9,000, including residential and commercial users.
- The Facility includes primary treatment at the headworks building, an enhanced extended aeration activated sludge mechanical secondary treatment process with nutrient removal, ultraviolet light (UV) disinfection, followed by enhanced effluent treatment and storage within enhancement wetlands. The Facility is sized and constructed to provide the current required treatment capacity and accommodate anticipated growth through 2025. Although treatment components of the Facility have been designed to accommodate higher flows, the Permittee has only requested a permitted discharge of an average monthly flow up to 4.0 million gallons per day (mgd).
- Septage is received at the Facility from septage haulers who discharge into a solids separator which is diverted directly into the solids handling portion of the facility. Liquids separated from processing the solids are held in the aerobic digester then returned to the headworks for treatment.
- From October 1 through May 14 each year, treated wastewater from the enhancement wetland may be discharged to Outlet Creek at Discharge Point 003, which is located at the north end of the wetland. From May 15 through September 30 and any other time seasonally appropriate, treated wastewater is recycled for spray irrigation of adjacent pastureland at Discharge Point 004.
- ISSUES: Order No. R1-2015-0029, as proposed, continues to prescribe technology-based effluent limitations at Discharge Point 002 for biochemical oxygen demand (BOD) and total suspended solids (TSS), and water quality based effluent limitations (WQBELs) for total nitrogen. For Discharge Point 003, the proposed Order retains WQBELs for ammonia and total nitrogen for discharges into Outlet

Creek and incorporates new WQBELs for bis (2-ethylhexyl) phthalate and copper due to a reasonable potential to cause or contribute to an exceedance of water quality objectives. The flow at this location is limited to 10% of the receiving water flow.

The proposed Order includes new effluent monitoring and reporting requirements for chronic toxicity, expanded recycled water requirements to ensure compliance with title 22 requirements, and to verify compliance with new WQBELs.

In addition, the proposed Order contains special provisions which require studies and reports to ensure compliance with the operations, recycled water, toxicity, pretreatment, source control, and biosolids disposal requirements.

We received a comment letter from the City of Willits requesting minor modifications to the proposed Order related to calibration of meters, disinfection requirements, recycled water irrigation areas, recycled water requirements, and a request for an extension to submit the Recycled Water Engineering Report. Regional Water Board staff made the requested modifications.

The City's comment letter, as well as staff responses to comments, is included in this agenda package. Adoption of the proposed Order is expected to be uncontested. In addition, we self-initiated a change to the sanitary sewer system reporting requirements in the proposed Order. We eliminated Monitoring and Reporting Program Provision X. D.3.f which requires the Permittee to annually report on activities within its sewer system. This information is already readily available through the statewide online sanitary sewer overflow database.

With exception to the extension request, the regional Water Board staff made the requested modifications. To ensure compliance with Title 22 requirements, the draft Order requires that the City submit the engineering report as soon as possible but not later than November 1, 2016.

RECOMMENDATION: Adopt Order No. R1-2015-0029, as proposed.

**SUPPORTING
DOCUMENTS:**

1. Proposed Order No. R1-2015-0029
2. Response to Comments on Order No. R1-2015-0029
3. Comment Letter Received from the City of Willits
4. Public Notice