

## Response to Written Comments

### **In Consideration of Waste Discharge Requirements And Master Reclamation Order No. R1-2015-0029, Renewed National Pollutant Discharge Elimination System (NPDES) Permit for the City of Willits Wastewater Treatment Facility**

**Regional Water Quality Control Board, North Coast Region  
October 8, 2015**

#### **Comment Letter Received**

The initial deadline for submission of public comments regarding the draft Waste Discharge Requirements (Draft Permit) was August 17, 2015. The City of Willits (City) requested additional time during the public comment period to meet with North Coast Regional Water Board (Regional Water Board) staff and discuss the City's questions and concerns on the Draft Permit. The deadline was subsequently extended to August 31, 2015. The City provided timely comments on August 31, 2015 (Attachment A). Regional Water Board staff has restated the City's comments or summarized them for brevity. Regional Water Board staff was able to accommodate all the requested modifications, as discussed below. No other comments were received.

*Comment 1 - The draft permit requires meter calibration either annually or per the manufacturer's recommendations, whichever is most frequent and the City requests that this requirement not apply to locations INF-001, INF-002, INF-003, EFF-002 and EFF-004. These existing monitoring points measure flow using existing Siemens Sitrans magnetic flow meters (magmeters). In addition, the City will be installing two new magmeters in order to measure the flows to and from the equalization basins during high flow events. According to the manufacturer, magmeters are the world wide industry standard and almost above reproach for accuracy and dependability. The magmeters are factory calibrated and require no maintenance after installation. Magmeters meters cannot be field calibrated except under extraordinary circumstances. Depending on the type of meter, doing so without the manufacturer's engineering representative present usually voids the warranty as well as any guarantee of accuracy.*

**Response 1:** Based upon documentation provided by the City that calibration of magmeters is neither practical nor appropriate given the manufacturer's recommendations, Regional Water Board staff modified Attachment E, section I.D. of the proposed Order to state the following:

"All flow measurement devices shall be calibrated or field verified annually or in accordance with the manufacturer's recommended intervals to ensure continued accuracy of the devices."

***Comment 2 – The City plans to replace the Langemann Gate at EFF-003 with a v-notch weir because it will perform better in the vault location. We would like this to be included in the permit as a future change during the life of the upcoming permit.***

**Response 2:** Regional Water Board staff added the following language to Attachment F, section II.E. of the proposed Order:

“In addition, the Permittee is considering plans to replace the Langemann Gate at EFF-003 with a v-notch weir to enhance flow monitoring performance.”

***Comment 3 – Table Note 1. For Table E-2 Monitoring Station Locations (page E-3) conflicts with the new influent metering plan included with, and described in, the Draft Permit. The City requests that this note be removed from the document.***

**Response 3:** Table Note 1. For Table E-2 Monitoring Station Locations has been removed from Attachment E.

***Comment 4 – The WWTF produces effluent that meets disinfected secondary-23 standards under title 22 and some of the UV disinfection requirements in section D.1 are based on tertiary standards. The City requests that all tertiary disinfection requirements be removed from the permit. (i.e. UV power and turbidity measurements (pg 12), and weekly calibration against a reference bench top unit (pg 13).***

**Response 4:** Regional Water Board staff made the requested changes after verifying that this was acceptable to the State Water Board Division of Drinking Water staff under the recycled water requirements.

***Comment 5 – [City] staff wishes to clarify the parcels in which we are permitted to irrigate with recycled water. The map on page C-4 needs modification and a revised map is included with this letter as “Revised C-4 Map”. The revised map includes a field to the north of the treatment facility, which is part of APN 108-04-003 (identified on the map). Furthermore, we would like to list all parcel numbers we are permitted to irrigate in the new permit as: APNs 108-04-003, 007-01-001, 108-08-017, 108-07-003, 108-03-006, 108-02-005.***

**Response 5:** Regional Water Board staff understands that the requested area is part of a parcel previously included in the map; the requested area has historically been irrigated with wastewater, and was not previously shown in the map in error. We accept Revised C-4 Map, and have made the requested modifications to the proposed Order section IV.C.

***Comment 6 – Under the irrigation requirements (pg 11, ii) there is a requirement for “correction within 72 hours of learning [of] runoff, or prior to release of 1,000 gallons, whichever comes first.” With our current rate of discharge via irrigation, a 1,000 gallon leak can occur within a matter of seconds. The City would like this modified to simply state within 24 hours, and strike the mention of 72 hours and 1,000 gallons. The rate at which we irrigate makes the 1,000 gpm requirement unachievable. Our current irrigation safety measures for detecting leaks and preventing pipe breaks in the system include PLC set points for high PSI, low PSI, low flow, and high flow. These set points are set to conditions of irrigation needs for the day. If any conditions trigger these set points, the PLC automatically shuts down the irrigation pumps. This will prevent any irrigation water from flowing from the intended application site.***

**Response 6:** Regional Water Board staff made the requested revision.

***Comment 7 – The City requests that the deadline for the Recycled Water Engineering Report listed in Table E-14 on page 19 be changed to March 1, 2017. Also, staff noticed the deadline for the Updated Operations & Maintenance Manual in Table E-14 is October 1, 2015, and believe that this was intended to be October 1, 2016.***

**Response 7:** Unfortunately staff cannot approve the City’s request for an extension on the deadline for the Recycled Water Engineering Report. The State Water Board Division of Drinking Water (DDW) requires a facility that reuses recycled water for beneficial reuse to submit a Recycled Water Engineering Report for its approval prior to reuse.

We recognize that the City has been beneficially reusing its effluent without DDW approval for the past 30 years. As such, we request that the City submit and engineering report as soon as possible but no later than November, 1, 2016.

The Wastewater Reclamation Study that the City of Willits submitted in March of 2014 provides a good framework for the engineering report. Additional information needed for the report such as descriptions of raw wastewater characteristics, the treatment process, system redundancy, and the monitoring and reporting program can be obtained from annual reports. A guidance document for the development of the engineering report can be found at [http://www.waterboards.ca.gov/drinking\\_water/certlic/drinkingwater/documents/recharge/ERGUIDE2001.pdf](http://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/recharge/ERGUIDE2001.pdf).

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