
North Coast Regional Water Quality Control Board

**Response to Written Comments
Waste Discharge Requirements
Order No. R1-2020-0024
Waste Discharge Requirements
for the
Lewiston Community Services District Wastewater Treatment Facility
Regional Water Quality Control Board, North Coast Region
October 15, 2020**

Comment Letters Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements for Order No. R1-2020-0024 (Draft Order) for the Lewiston Community Services District (Discharger) Wastewater Treatment Facility (Facility) was August 9, 2020. The Discharger provided timely comments. No other comments were received during the public comment period. North Coast Regional Water Quality Control Board (Regional Water Board) staff met with the Discharger's engineer on August 4, 2020 to review and discuss the Discharger's comments.

In this document, the comments are summarized, followed by the Regional Water Board staff response. Text to be added is identified by underline and text to be deleted is identified by ~~strike-through~~ in this document. The term "Draft Order" refers to the version of the permit that was sent out for public comment. The term "Proposed Order" refers to the version of the permit that has been modified in response to comments and is being presented to the Regional Water Board for consideration.

Discharger Comments

Comment 1: Page 11, Section IV

The new collection system, wastewater treatment plant, and Trinity Dam Blvd. Lift Station (TDBLS) are expected to be brought online during November or December of 2020. The anticipated effective date of the WDR is January 2021, including the effluent limits shown in Table 4, on Page 11. The District recommends that there be a grace

period to allow time for the biology to adjust to the new nutrient removal process. Adjustments to the mean cell residence time, mixed liquor recycle, wasting rate, filtration, and disinfection may occur a few months before the process fully meets effluent limits.

Response 1: General Provision T has been added to the Proposed Order as follows:

The Discharger may, at least 30 days in advance of operating the upgraded Facility, submit a startup operations plan for Executive Officer approval. The plan shall describe the actions the Discharger will take during a specific period that requires adjusting and testing new treatment plant units, including steps to prevent violations of this Order. If the Discharger pursues this option, the startup operations plan will define the shortest reasonable time required for the period of adjusting and testing to meet effluent limits, which is not to exceed 90 days for biological treatment units and 30 days for any other treatment unit.

The Discharger is responsible for assuring that the discharge from the Facility will comply with narrative and numeric water quality standards and for protecting the beneficial uses of receiving waters. See also Response 6 below.

Comment 2: Page 4, Section II

Refer to Page 4, third paragraph, third sentence. The Lewiston Community Services District (LCSD) LCSD has 203 residential connections, 28 commercial connections, and 22 connections at the Trinity Dam Mobile Home Park (TDMHP) for a total of 253 connections.

Response 2: Section II.B of the Proposed Order has been modified as follows:

“The Facility will serve approximately ~~259~~253 residential and commercial connections within the community of Lewiston.

Comment 3: Page 4, Section II

Refer to Page 4, fifth paragraph. Replace the existing paragraph with the following paragraph below:

“The project consists of consolidating and upgrading the facilities and will include replacing collection systems for the former Lewiston Park Mutual Water Company (LPMWC) and Trinity Dam Mobile Home Park (TDMHP) in their entirety, portions of the LCSD (formerly LVMWC) collection system, and LCSD laterals made of Orangeburg pipe and those that are failing on private property. The existing suspended pipeline over the Trinity River will be replaced. The existing LCSD (formerly LPMWC) wastewater treatment plant (WWTP) will be replaced with an Aero-Mod activated sludge plant. Lift Stations 1 and 2 will be decommissioned and the new TDBLS will be constructed to convey all sewage from the former LVMWC and TDMHP to the new LCSD WWTP. The

existing LCSD oxidation ponds will be repurposed for use as an emergency effluent retention basin. The former LPMWC percolation beds will be reconstructed into eight leach field beds. The leach field beds are located approximately 75 feet north of the Trinity River. Aerobically digested sludge will be dried in four drying beds at the LCSD WWTP and trucked to a permitted landfill for ultimate disposal.”

Response 3: Section II.B of the Proposed Order has been modified as follows:

“The project to consolidate and upgrade the facilities will include replacing the collection systems for the former LPMWC and TDMHP in their entirety, portions of the LCSD (formerly LVMWC)-LVMWC collection system, and LCSD-LVMWC lateral pipelines made of Orangeburg pipe, a pipe material made of wood pulp and sealed with coal tar and that is long past its useful life, and those that are failing on private property serving private properties. The existing suspended pipeline over the Trinity River will be ~~retained and upgraded or replaced.~~ The existing LCSD (formerly LPMWC) wastewater treatment facility will be replaced with an Aero-Mod activated sludge facility. Lift Station 1 and 2 will be decommissioned, and a new lift station (TDBLS) will be constructed to convey all wastewater from the former LVMWC and TDMHP to the new LCSD wastewater treatment facility. ~~Lift Station 2 will be relocated.~~ The existing LCSD-LVMWC oxidation ponds will be lined and repurposed for use as an emergency effluent retention basin and two sludge storage basins. The ~~former existing~~ LPMWC percolation beds will be reconstructed into eight leach field beds. The leach field beds are located approximately 75 feet north of the Trinity River. Aerobically digested sludge will be dried in four drying beds at the LCSD wastewater treatment facility and disposed of at a permitted landfill.” ~~Aerobically digested sludge will be pumped from the treatment facility to the sludge storage basins. Each sludge storage basin will be dried in place every other year, and dried sludge disposed of at a permitted landfill.~~

Comment 4: Page 25, Attachment C

Refer to Attachment C, Page 25, WWTF Layout. Replace the existing figure with the attached figure.

Response 4: Attachment C WWTF Layout will be replaced with the figure provided by the Discharger.

Comment 5: Page 27, Section I

Refer to Page 27, Item I.C. Laboratory Certification. Replace the second sentence with the following sentence below:

“The Discharger may analyze pollutants with short hold times (e.g., pH, chlorine residual, settleable solids, EC, temperature, etc.) in its on-site laboratory provided that the Discharger has standard operating procedures (SOPs) that identify quality assurance/quality control procedures to be followed to ensure accurate results.”

Response 5: Attachment E. I.C. of the Proposed Order has been modified as follows:

The Discharger may analyze pollutants with short hold times (e.g., pH, chlorine residual, settleable solids, EC, temperature, etc.) in its on-site laboratory provided that the Discharger has standard operating procedures (SOPs) that identify quality assurance/quality control procedures to be followed to ensure accurate results.

Comment 6: Page 29, Section III

Refer to Page 29, Section III Monitoring Requirements. PACE Engineering, Inc. has summarized the annual sampling requirements and their corresponding costs, refer to Attachment 1, Estimated Annual Sampling Costs. The proposed sampling requirements will cost the District an estimated \$8,656.00 annually. LCSD is a small, severely disadvantaged community that will increase its sewer rate for a typical single-family home to \$73.70 per month in FY 21-22. This increase equates to approximately 3.7% of their median household income based upon the 2015 RCAC Income Survey. We respectfully request that the minimum sampling frequency for total coliform at EFF-002 be altered from weekly to monthly as it is currently, and change the groundwater sampling requirements for total coliform, total nitrogen, and nitrate from quarterly to annually. This will save approximately \$4,000 annually in certified lab costs, not to mention operator time to grab and transport the samples to the certified lab.

Response 6: Regional Water Board staff appreciate the cost of compliance associated with the required monitoring. However, the proposed monitoring frequency is necessary for the new Facility to ensure surface and groundwater protection. Less frequent monitoring requirements may be appropriate if justified by the results of the first year of monitoring. The frequencies set forth in the Proposed Order will ensure that the Facility will meet established effluent limitations. Frequent monitoring ensures that the wastewater treatment facility is operated at the level that will ensure compliance with effluent limitations and groundwater quality objectives. At the Dischargers request, the Executive Officer may, upon a showing of good cause, reduce the monitoring frequency following the first year of reliable and compliant operation.

Comment 7: Page 37, Attachment F

Refer to Attachment F, United States Department of the Interior, Bureau of Reclamation License Agreement. Replace with the attached fully executed License Agreement and Amendment No. 1 for the use of the existing percolation ponds and the site occupied by the TDBLS.

Response 7: These updated documents are on file and are available for review upon request.

Comment 8: Page 38, Attachment G

Refer to Attachment G, USBLM Right-of-Way Agreement and replace with the attached 2015 Right-of-Way Grant Correction for the use of the existing oxidation ponds.

Response 8: These updated documents are on file and are available for review upon request.