
October 17, 2024

Mr. Chad Davison
General Manager, Graton Water District
P.O. Box 534,
Graton, CA 95472
chaddavisson.gcsd@gmail.com

Dear Mr. Davison

Subject: Renewal of National Pollutant Discharge Elimination System Permit

File: Graton Community Services District, Graton Community Services District
Wastewater Treatment, Recycling, and Disposal Facility, WDID No.
1B84060OSON, NPDES Permit No. CA0023639, Place ID: 256050

The draft National Pollutant Discharge Elimination System (NPDES) permit and Waste Discharge Requirements (WDRs), Order No. R1-2025-0001 (Draft Order) for the Graton Wastewater Treatment, Recycling, and Disposal Facility (Facility) is available for public review and comment.

The Draft Order can be viewed on the [Tentative Orders | California Northcoast Regional Water Quality Control Board](https://www.waterboards.ca.gov/northcoast/board_decisions/tentative_orders/)
(https://www.waterboards.ca.gov/northcoast/board_decisions/tentative_orders/).

Although the Draft Order is lengthy, it is important that you review the entire document to ensure that you become familiar with the requirements, identify any requirements that you need help understanding, and identify any potential inaccuracies prior to permit adoption by the Regional Water Board. The Draft Order includes several important changes from the current Order, Order No. R1-2018-0001, as follows:

- 1. Increased Discharge Rate Reopener Provision.** This provision allows the Regional Water Board to reopen this Order if Graton Community Services District submits an Exception Proposal that meets all requirements for increased flow allowance as outlined in the Basin Plan. (Section 6.3.1.11. of the Draft Order and Section 6.2.1.11. of the Factsheet)
- 2. Recycled Water Discharge Prohibition.** Updated language has been included to comply with title 22 Recycled Water Engineering Report accepted by the Division of Drinking Water. (Draft Order Section 3.5)
- 3. Ammonia Impact Ratio.** Reasonable potential is present for ammonia to cause or contribute to exceedances of the Basin Plan's applicable narrative water quality

HECTOR BEDOLLA, CHAIR | VALERIE QUINTO, EXECUTIVE OFFICER

criterion for toxicity. The effluent limitation for ammonia nitrogen has been replaced with an ammonia impact ratio limitation. (Draft Order section 4.2.1) For an explanation of the ammonia impact ratio, please refer to section 4.3.3.1.2.2 of the Draft Order Fact Sheet.

4. **Chronic Toxicity Effluent Targets.** Effluent targets for chronic toxicity have been included as required by the new Toxicity Provisions. (Draft Order Section 4.2.2. and 4.1.3.2) For an explanation of the chronic toxicity, please refer to section 4.3.5.2 of the Draft Order Fact Sheet.
5. **Nitrate Effluent Limitation.** WQBEL for Nitrate was added based on the primary MCL for Nitrate. Monitoring results from the current permit term showed that Nitrate was present in the effluent discharge, in levels that exceeded the primary MCL. (Draft Order section 4.2.1.) (4.3.3.1.2.1. of Draft Order Fact Sheet.)
6. **Total Dissolved Solids (TDS) Effluent Limitation.** WQBEL for TDS was added based on the primary MCL for TDS. Monitoring results from the current permit term showed that TDS was present in the effluent discharge, in levels that exceeded the primary MCL. (Draft Order section 4.2.1.) (4.4.1.1.2. of Draft Order Fact Sheet.)
7. **Manganese Effluent Limitation.** WQBEL for Manganese was added based on the primary MCL for Manganese. Monitoring results from the current permit term showed that Manganese was present in the effluent discharge, in levels that exceeded the primary MCL. (Draft Order section 4.2.1.) (4.4.1.1.1. of Draft Order Fact Sheet.)
8. **Revised Receiving Water Limitations.** Modified receiving water limitations for Dissolved Oxygen, specific conductance, and total dissolved solids have been included in the Draft Order to implement the 2016 amendments to the Basin Plan. (Draft Order section 5.1.)
9. **Bacteria Provisions.** Updated receiving water limitations for bacteria have been included to implement new bacteria provisions in the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California that were adopted by the State Water Board on August 7, 2018. (Draft Order section 5.1.19)
10. **Disaster preparedness assessment report and action plan.** A requirement to prepare a disaster preparedness assessment report has been added that requires the Permittee to assess its vulnerability to natural disasters and extreme weather and other conditions that may be exacerbated by climate change. (Draft MRP section 11.4.2.) (7.6.9. of Draft Order Fact Sheet.)
11. **Pathogen Special Study.** A requirement to prepare a pathogen special study has been added that requires the Permittee to assess the Facility's ability to comply with the bacteria water quality objective in Section 5.1.21 of the Order and required actions outlined in Table 4 of the Russian River Watershed Pathogen TMDL Action Plan. (Draft MRP section 10.4.3.) (7.6.10. of Draft Order Fact Sheet.)

- 12. Compliance Determination Language.** New and updated compliance determination language has been added to Section 7 of the Draft Order that addresses:
- a. Compliance with bacteriological limitations. (Draft Order section 7.8)
 - b. Compliance with the chronic toxicity requirements. (Draft Order section 7.9)
- 13. Monitoring and Reporting Requirements.** Changes to the monitoring and reporting requirements have been made as follows:
- a. New language to ensure that all monitoring is conducted using sufficiently sensitive methods in accordance with U.S. EPA's Sufficiently Sensitive Methods Rule which became effective November 6, 2018. (Draft MRP section 1.5)
 - b. New effluent and receiving water monitoring requirements for *E. coli* bacteria to verify that total coliform effluent limitations result in achievement of Statewide Bacteria Standards. (Draft MRP sections 4.3.1 and 8.1.1)
 - c. The Whole Effluent Toxicity Testing Requirements included in the monitoring and reporting program have been updated significantly to reflect the new Toxicity Provisions. (Draft MRP Section 5)
 - d. Reduced receiving water monitoring for pH and temperature. Discharge Point 001 is challenging to access depending on weather and flow conditions in Atascadero Creek. Receiving water monitoring was frequency reduced from weekly to monthly. Monthly monitoring is sufficient to demonstrate compliance with the Ammonia Impact Ratio effluent limitation. (Table E-8. of the Draft MRP)

Note that Table E-12, Special Reporting Requirements for Special Provision Reports, in the monitoring and reporting program summarizes significant reporting requirements that are embedded throughout the permit. These reporting requirements are in addition to the routine self-monitoring reports that are addressed in MRP section 10, Reporting Requirements, of the Draft MRP. Please carefully review Table E-12. Again, we encourage and appreciate your thorough review of the Draft Order.

A public meeting to consider comments and objections to the Draft Order is scheduled for the Regional Water Board's **April 1-2, 2025** Board Meeting, or as announced in the Regional Water Board's agenda. This public meeting is currently scheduled to take place in-person and via video and teleconference at 5550 Skylane Blvd. Suite A, Santa Rosa, CA 95403, but the format may be changed in the future. Please follow the North Coast Regional Water Quality Control Board website for information on how to participate in the meeting and any updates regarding this agenda item.

Live video and audio broadcasts of the public hearing will be available via the internet and can be accessed at the [CalEPA Public Meeting Live Webcasts website](https://video.calepa.ca.gov/) (<https://video.calepa.ca.gov/>). The public hearing will be recorded.

Please be aware that dates and venues may change. You can access the current agenda for changes in dates on the [North Coast Regional Water Board website](#)

(<https://www.waterboards.ca.gov/northcoast/>). At the hearing, the Regional Water Board will consider whether to affirm, reject, or modify the proposed WDRs.

In order for the Regional Water Board to consider any written evidentiary material concerning this hearing, any documents, including written comments, technical reports and other evidentiary material, must be submitted to the Regional Water Board email at NorthCoast@waterboards.ca.gov attention: *Sabrina Cegielski* by 5:00 p.m. on **November 18, 2024**. All documents that are received timely will be distributed to the Regional Water Board members and interested persons. These records will also become a permanent part of the administrative record for this public hearing. Except at the discretion of the Regional Water Board Chair, written material received after the above date will not be accepted. If the Chair chooses to accept late written material, that material will not be incorporated into the administrative record if doing so would prejudice any party or the Board. The Chair may choose to modify this rule upon a showing of severe hardship (California Code of Regulations, Title 23, sections 648.1 and 648.4).

The Regional Water Board may accept written and oral comments and evidence regarding this item. Written comments and evidence must be submitted to the Regional Water Board by **November 18, 2024**. Oral comments or testimony at the hearing may summarize or explain timely submitted, or late-accepted written evidence but shall not introduce new evidence. The time limit for oral testimony or comments will be set by the Regional Water Board Chair and is subject to change. These time limits normally allow no more than 20 minutes each for Regional Water Board staff and Dischargers. Other interested persons may also provide testimony at this public hearing. However, any testimony given by someone other than staff or the Dischargers, is typically limited to 5 minutes. A timer may be used, and speakers are expected to honor time limits. Where speakers can be grouped by affiliation or interest, such groups will be expected to select a spokesperson to avoid unnecessary or repetitive testimony.

The Draft Order and related documents are available at the [Regional Water Board's website for tentative orders for Board decisions](https://www.waterboards.ca.gov/northcoast/board_decisions/tentative_orders/) (https://www.waterboards.ca.gov/northcoast/board_decisions/tentative_orders/). Additionally, the Proposed Permit and file may be inspected or copied at the Regional Water Board office, 5550 Skylane Blvd, Suite A, Santa Rosa, CA. To make an appointment for document review, please call (707) 576-2220.

You may contact me at Sabrina.Cegielski@waterboards.ca.gov or (707) 543-7126, if you have any questions.

Sincerely,

Sabrina Cegielski
Water Resource Control Engineer
North Coast Water Board

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cc: Amelia Whitson, U.S. EPA, Region 9, CWA Standards and Permits Office (WTR-5), ameliawhitson@epa.gov

John Gibson, Graton Community Services District, Chief Plant Operator,
john.gcsd@gmail.com