

**Central Valley Regional Water Quality Control Board
Response to Written Comments on
Tentative Cleanup and Abatement Order for
Arbuckle Public Utility District Wastewater Treatment Facility
Colusa County**

This document contains responses to written comments received from interested persons and parties in response to the Tentative Cleanup and Abatement Order which was issued for a 30-day public comment period on 13 August 2024. Written comments from interested parties were required to be received by the Central Valley Water Board by 13 September 2024. Comments were received prior to the deadline from Arbuckle Public Utility District.

Written comments from Arbuckle Public Utility District are summarized below, followed by the response of Central Valley Water Board staff.

COMMENT 1 – Tentative CAO Paragraph 19 (Page 4): On 11 June 2024, the Discharger completed repairs to the clarifier and re-established the treatment required by the WDRs. This Order requires the Discharger to operate the clarifier and digester at the facility to comply Discharge Prohibition A.2 of the WDRs and Provision E.2 of the WDRs. **APUD comment:** APUD simply notes that APUD fully re-established digester operation in August 2024.

RESPONSE 1: The Tentative CAO was revised to include that the Arbuckle Public Utility District re-established digester operation in August 2024.

COMMENT 2 – Tentative CAO Paragraph 24 (Page 5): This Order requires the Discharger to manage the wastewater, such that the freeboard in all seven wastewater ponds is one foot or greater by **1 October 2024**. This Order allows the Discharger additional time to create capacity in order to comply with Discharge Specifications B.8 and B.9 of the WDRs. APUD comment states: While APUD greatly appreciates the Regional Water Board’s revision of this paragraph from “two feet or greater” to “one foot or greater”, APUD continues to have practical and engineering concerns with the proposed October 1, 2024, deadline, especially since APUD’s dredging activities connected to Ponds 2 and 3 will still be ongoing at this time. Based on APUD’s agreement with its dredging contractor and related Notice to Proceed, completion of the dredging in the ponds is anticipated to be completely finished on December 16, 2024. As a result, APUD respectfully requests additional time and the opportunity to observe the effect of those efforts to address percolation rates and pond levels before needing to “immediately” expend highly limited resources to implement the “Spill Prevention and Response Plan” pursuant to Paragraph 6 (Page 10) of the Tentative CAO. Pursuant to Paragraph 5 (Page 10), APUD is committed to submitting the Spill Prevention and Response Plan to the Regional Water Board by October 15, 2024, but respectfully requests until February 15, 2025, to allow adequate time with a cushion for unforeseen

delays to satisfy the freeboard conditions set forth in Paragraph 24 (Page 5) and Paragraph 6 (Page 10).

RESPONSE 2: The minimum one-foot freeboard date of 1 October 2024 has been corrected to read 15 October 2024 as described in Paragraph 6 (Page 9) of the “Hereby Ordered Section” of the Tentative CAO.

Your request to change the compliance date from 15 October 2024 to 15 February 2025 cannot be accepted. The one-foot freeboard limit is an interim limit and needs to be in place prior the rainy season. Capacity is necessary to prevent spills.

COMMENT 3 – Tentative CAO Paragraph 33.b (Page 6): To enhance evaporation and increase freeboard levels due to capacity issues as described in Findings 20 through 24 of this Order, a Varimax V-40 evaporator unit was rented and placed into service in Pond 6 on 28 June 2024. In addition, on 9 July 2024 the Discharger installed a pump with five sprinkler heads next to Pond 3. APUD comment: In addition to the above-referenced evaporator unit in Pond 6 and pump with five sprinkler heads next to Pond 3, and additional set of sprinklers was added to Pond 3 on August 9, 2024.

RESPONSE 3: Changes were made to the text to incorporate APUD’s comment.

COMMENT 4 – Tentative CAO Paragraph 33.c. (Pages 6-7): To increase the percolation rates in the wastewater ponds due to capacity issues at the facility, on 30 May 2024 the Discharger held a special meeting and approved a bid package to publish and start receiving bids for a project to remove sludge from the wastewater ponds (Pond Cleaning Project). The key components of the project include the dewatering of removed sludge from Ponds 2 and 3 with any solids stored onsite placed on a polyethylene liner with at least a 15-millimeter thickness. Filtrate from the dewatering process will be returned to treatment plant and the sludge will be disposed offsite in accordance with the requirements in the WDRs. On 17 July 2024, a “Notice of Award and Agreement Form” to remove sludge from Ponds 2 and 3 was received from a licensed contractor. **APUD comment:** On Monday, August 19, 2024, APUD issued the “Notice to Proceed” to the licensed contractor for the pond dredging activities.

RESPONSE 4: Changes were made to the text to incorporate APUD’s comment.

COMMENT 5 – Tentative CAO Paragraph 33.f (page 7): To comply with the monitoring requirements in the WDRs the Discharger ordered freeboard staff gauges on 3 July 2024. The gauges have been delivered. **APUD comment:** APUD finished installing the gauges in all ponds on August 8, 2024.

RESPONSE 5: Changes were made to the text to incorporate APUD’s comment.

COMMENT 6 – Tentative CAO Paragraph 6 (Page 9): No later than **15 October 2024**, the freeboard levels in all seven wastewater ponds at the facility shall not be less than one foot. If freeboard levels are less than one foot in any one of the seven ponds, the Discharger shall **immediately** notify Central Valley Water Board staff and implement the “*Spill Prevention and Response Plan.*” **APUD comment:** APUD incorporates by

reference its above comments in response to Tentative CAO Paragraph 24 (Page 5), on pages 1-2 above.

RESPONSE 6: Refer to Response No.2

On 12 September 2024, a conference call between Central Valley Water Board staff and Arbuckle Public Utility was held to discuss the comments. Central Valley Water Board staff indicated that all of the comments with the exception of Comment 2 and Comment 6 were acceptable. Based on this decision, Arbuckle Public Utility District requested if the “Spill Prevention and Response Plan” as discussed in Tentative CAO Paragraphs 5 and 6 (Page 9) could be updated as needed due to the work being done by the Discharger to increase freeboard in the wastewater ponds. necessary. Central Valley Board staff agreed, and the following language has been added to Paragraph 5. Because freeboard levels may increase due to work being done by the Discharger, this plan may be amended to optimize their ability to prevent wastewater spills.