

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
NORTH COAST REGION**

**CLEANUP AND ABATEMENT ORDER AND
INVESTIGATIVE ORDER NO. R1-2026-0043**

for

**Russian River County Sanitation District and Sonoma Water
Russian River Wastewater Treatment Facility
WDID No. 1B820450SON, NPDES Permit No. CA0024058**

Sonoma County

This Cleanup and Abatement Order (Order) is issued to Russian River County Sanitation District and Sonoma Water (collectively, Permittees) based on provisions of California Water Code (Water Code) section 13304, which authorizes the North Coast Regional Water Quality Control Board (North Coast Water Board) to issue a Cleanup and Abatement Order, and Water Code section 13267, which authorizes the North Coast Water Board to require the preparation and submittal of technical and monitoring reports.

The Executive Officer finds, with respect to the Permittees' acts, or failure to act, the following:

Purpose Of the Order

1. This Order requires the Permittees to abate certain conditions that caused an alleged unauthorized discharge event of approximately 4,942,154 gallons of untreated and partially treated wastewater from the Russian River Wastewater Treatment Facility (Facility) to the Russian River, a water of the state and United States, from January 6, 2026 to January 8, 2026.¹ Such discharges of untreated or partially treated wastewater can create an imminent threat to waters of the state, the environment, and public health. This Order requires investigation and abatement actions to prevent further harm and unauthorized discharges consistent with the *Porter-Cologne Water Quality Control Act* (Wat. Code § 13000 *et seq.*), the *Water Quality Control Plan for the North Coast Region* (Basin Plan), State Water Resources Control Board (State Water Board) Resolution 92-49, *Policies and Procedures for Investigation and Cleanup and Abatement of Discharges under Water Code Section 13304* (Resolution 92-49), and other applicable State and Regional Water Board plans, policies, and regulations.

¹ The Regional Water Board administers and enforces the Porter-Cologne Water Quality Control Act which authorizes the Regional Water Board to regulate discharges of waste into "waters of the state." (Wat. Code, § 13260.) "Waters of the state" means "any surface water or groundwater, including saline waters, within the boundaries of the state." (Wat. Code, § 13050 subd. (e).) All waters of the United States within the borders of California are also waters of the state.

Facility Location and Description

2. The Russian River County Sanitation District owns the Facility located at 18400 Neeley Road, Guerneville, California 95446, and its associated collection system. Sonoma Water is the contract operator responsible for the management, operation, and maintenance of the Facility and collection system. The Permittees are subject to Waste Discharge Requirements (WDRs), a Master Recycling Permit, and National Pollutant Discharge Elimination System (NPDES) Permit No. CA0024058, Order No. R1-2021-0002.² The wastewater collection, treatment, and disposal systems serving the Facility are regulated under Order No. R1-2021-0002, which was adopted by the North Coast Water Board on June 17, 2021, and became effective on August 1, 2021. Order No. R1-2021-0002 was subsequently modified by Amendment Order No. R1-2024-0030,³ which was adopted by the North Coast Water Board Executive Officer and became effective on December 5, 2024. The collection system is also separately regulated under *Statewide Waste Discharge Requirements General Order for Sanitary Sewer Systems, Order WQ 2022-0103 DWQ* (2022 General Order).⁴
3. The Facility is designed to treat an average dry weather flow of 0.71 million gallons per day (MGD) and a peak wet weather flow of 3.5 MGD. The treatment system consists of headworks, a biological secondary treatment process using activated sludge (aeration basins), biological nutrient removal (BNR), secondary clarification, and advanced wastewater treatment, which includes tertiary filtration and ultraviolet (UV) light disinfection. Final treated effluent is stored in a 3.5 MG finished water pond before disposal. The Facility's disposal system consists of two distinct methods: (1) irrigation of the Upper and Lower Burch property and Northwood Golf Course during the "discharge prohibition" period (May 15 through September 30), and (2) discharge of tertiary treated effluent to the Russian River via Discharge Point 002 or 005 during the "discharge season" (October 1 through May 14). Additionally, the Facility utilizes an emergency storage pond with a capacity of approximately 1.0 million gallons to manage high influent flows during wet weather events. Solids are dewatered using a belt filter press before being hauled off-site for disposal.

² The NPDES permit can be found online at:

https://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/2024/R1-2021-0002.pdf

³ Amendment Order No. R1-2024-0030 can be found online at:

https://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/2024/R1-2024-0030.pdf

⁴ Statewide General Waste Discharge Requirements for Sanitary Sewer Systems can be found online at:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2022/wqo_2022-0103-dwq.pdf

4. The collection system consists of approximately 35 miles of gravity sewer pipelines, over 4 miles of force mains, and 11 regional lift stations that convey wastewater from the greater Guerneville area to the Facility. The service area encompasses approximately 2,700 equivalent single-family dwellings, serving a population of approximately 6,500 people.
5. As established in Amendment Order No. R1-2024-0030, the collection system and treatment plant are significantly impacted by the Russian River and its tributaries during flood events, necessitating an Engineering Evaluation Report and an updated Collection System Operations and Maintenance Plan to mitigate inflow and infiltration. Amendment Order No. R1-2024-0030 revised the applicable NPDES permit, Order No. R1-2021-0002, to require implementation of identified short-term and long-term corrective actions and provided an accelerated due date (from April 2026 to August 2025) to the Permittees' Collection System Operations and Maintenance Plan.

Background

6. From late 2025 into early January 2026, the Russian River watershed experienced a series of rain events that saturated the ground within the Permittees' collection system service area and caused water levels in the Russian River to rise. The elevated river levels and saturated ground conditions contributed to increased inflow and infiltration into the collection system. Floodwaters also inundated local streets and entered the collection system through unbolted or unsecured manholes. As a result, on January 5, 2026, the Facility began receiving very high influent flows caused by the combined effects of rainfall, elevated river conditions, inflow and infiltration, and direct floodwater entry into the sewer system.
7. The Permittees conducted post-rain event investigations and submitted two letters⁵ (collectively, Spill Reports) outlining their findings. The Spill Reports identified the cause of the alleged January 6 to 8, 2026 unauthorized discharge event as high influent flows compounded by specific collection system operational challenges. The Permittees were unable to close isolation valve VLP41-3 because the operational trigger thresholds for valve closure were not reached before Fife Creek rose rapidly and receded, leaving insufficient time to implement the operational safeguard. The Permittees determined that the existing standard operating procedure (SOP) trigger thresholds did not adequately account for the rapid rise of Fife Creek or uncertainty in river stage forecasts. In addition, the Permittees did not close collection system isolation valve VL32-1 until after the discharge started at the Facility. The isolation

⁵ Letter dated January 12, 2026 with subject line: *Russian River County Sanitation District- January 2026 Notice of Unauthorized Discharge*. Follow-up letter dated February 9, 2026 with subject line: *Russian River County Sanitation District Wastewater Treatment Facility- January 6, 2026 Spill of Untreated Wastewater*. In their February 9, 2026 response, Permittees raised the defenses of upset and bypass.

valves were intended to be closed prior to the flood event under an existing SOP to prevent entry of floodwaters into the collection system. Furthermore, multiple manhole covers were found unbolted or otherwise unsecured, allowing floodwaters and excess inflow/infiltration to displace the covers and directly enter the sewer system. These conditions caused influent flows to exceed 4 MGD, surpassing the Facility's peak wet weather design capacity of 3.5 MGD.

8. The excessive influent flows overwhelmed the Facility's headworks, causing the rag washers to underperform, ultimately becoming overwhelmed and bypassed, which allowed solids and debris to accumulate within downstream treatment processes. The high volume of flow exceeded the capacity of the splitter box, forcing influent and return activated sludge to be distributed across Aeration Basins 1, 2, and 3. This hydraulic overload washed out the biological secondary treatment process, disrupting the Facility's ability to effectively treat wastewater. Although Permittees' staff attempted to manage the excess volume by cycling lift station pumping to prevent collection system overflows and by adding chemicals to improve settling, those measures were insufficient to restore biological process control. The resulting high turbidity overwhelmed the tertiary filters and reduced the Facility's overall treatment capacity.
9. The alleged unauthorized discharge event began at approximately 7:14 a.m. on January 6, 2026, when the water levels in Aeration Basin # 3⁶ overtopped the structure's walls. The overflowing untreated wastewater from Aeration Basin # 3 merged with ponded stormwater in the lower irrigation area. As the event progressed and treatment unit bypasses continued, the Facility's emergency storage pond also reached capacity and began to overflow at approximately 2:30 p.m. on January 6, 2026. Untreated wastewater (from Aeration Basin # 3) and partially treated wastewater (from the emergency storage pond) overflowed, traveled across the ground through adjacent forested lands, and then discharged into the Russian River. The discharge continued until 6:50 a.m. on January 8, 2026, when influent flows subsided sufficiently for operations staff to regain control of the secondary process.
10. Refined calculations provided in the Permittees' Spill Reports indicate that a total of 4,942,154 gallons of untreated and partially treated wastewater were discharged to the ground and to the Russian River during the event. This discharge contained untreated and partially treated wastewater (i.e. tertiary treated effluent that exceeded turbidity requirements), creating a condition of pollution and nuisance and posing a threat to public health and the environment. In response to the spill,⁷ the Sonoma

⁶ At the time of the event, Aeration Basin # 3 (a basin planned for future conversion to an aeration basin) was operated as a flow equalization basin.

⁷ The 2022 General Order defines a "spill" as "a discharge of sewage from any portion of a sanitary sewer system due to a sanitary sewer system overflow, operational failure, and/or infrastructure failure" that reaches a surface water of the state. The terms "spill" and "sewage spill" are used interchangeably in this Order.

County Department of Public Health issued water contact advisories for the Russian River and several coastal beaches, which remained in effect six days until January 12, 2026.⁸

11. On February 11, 2026, the North Coast Water Board issued a Notice of Violation (NOV) to the Permittees for the unauthorized discharge of untreated and partially treated wastewater from the Facility to the Russian River. The NOV cited violations of Order No. R1-2021-0002 and Clean Water Act section 301. The NOV required submission of a formal written response within 30 days describing all corrective actions taken or planned, including a proposed time schedule for implementation, to prevent future similar violations.
12. On March 10, 2026, the Permittees provided a written response to the February 11, 2026 NOV. The response provided a summary of corrective actions taken, actions underway, and a proposed implementation schedule for planned corrective actions as discussed below in the Required Actions section of this Order.

Beneficial Uses and Water Quality Objectives

13. Discharges to surface waters from the Facility go to the Guerneville Hydrologic Subarea of the Lower Russian River Hydrologic Area. The beneficial uses of surface waters impacted by the Facility's discharge are defined in the Basin Plan. The beneficial uses applicable to surface waters within the Guerneville Hydrologic Subarea of the Lower Russian River Hydrologic Area are Municipal and Domestic Supply (MUN), Agricultural Supply (AGR), Industrial Service Supply (IND), Industrial Process Supply (PRO), Groundwater Recharge (GWR), Freshwater Replenishment (FRSH), Navigation (NAV), Hydropower Generation (POW), Water Contact Recreation (REC-1), Non-Contact Water Recreation (REC-2), Commercial and Sport Fishing (COMM), Warm Freshwater Habitat (WARM), Cold Freshwater Habitat (COLD), Wildlife Habitat (WILD), Rare, Threatened, or Endangered Species (RARE), Migration of Aquatic Organisms (MIGR), Spawning, Reproduction, and/or Early Development (SPWN), Estuarine Habitat (EST), Aquaculture (AQUA), and Shellfish Harvesting (SHELL).

The Water Contact Recreation (REC-1) beneficial use was specifically affected by this event as water contact advisories were issued by the Sonoma County Department of Public Health for the Russian River and coastal beaches following the discharge event.

14. The Basin Plan designates beneficial uses (Chapter 2) as noted above and establishes water quality objectives (Chapter 3) for the protection of those uses. Beneficial uses of any specifically identified water body generally apply to all of its

⁸ Sonoma County Department of Public Health Water Contact Advisories for the Russian River can be found online at: <https://www.sonomawater.org/rrcsd-spill>

tributaries. Water quality objectives that are considered of particular importance in protecting the beneficial uses from unreasonable effects due to the Facility's discharge of untreated and partially treated wastewater to the Russian River include the following:

- a) Bacteria: "The bacteriological quality of waters of the North Coast Region shall not be degraded beyond natural background levels." For waters designated for REC-1, the Basin Plan specifies that "in no case shall coliform concentrations in waters of the North Coast Region exceed" specific limits for *E. coli*.
- b) Biostimulatory Substances: "Waters shall not contain biostimulatory substances in concentrations that promote aquatic growths to the extent that such growths cause nuisance or adversely affect beneficial uses."
- c) Suspended Material: "Waters shall not contain suspended material in concentrations that cause nuisance or adversely affect beneficial uses."
- d) Settleable Material: "Waters shall not contain substances in concentrations that result in deposition of material that causes nuisance or adversely affect beneficial uses."
- e) Turbidity: "Turbidity shall not be increased more than 20 percent above naturally occurring background levels. Allowable zones of dilution within which higher percentages can be tolerated may be defined for specific discharges upon the issuance of discharge permits or waiver thereof."
- f) Floating Material: "Waters shall not contain floating material, including solids, liquids, foams, and scum, in concentrations that cause nuisance or adversely affect beneficial uses."
- g) Oil and Grease: "Waters shall not contain oils, greases, waxes, or other materials in concentrations that result in a visible film or coating on the surface of the water or on objects in the water that cause nuisance, or that otherwise adversely affect beneficial uses."
- h) Dissolved Oxygen: "The dissolved oxygen content of the Russian River... shall not be reduced below 7.0 mg/L."
- i) Toxicity: "All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life."
- j) Color: "Waters shall be free of coloration that causes nuisance or adversely affects beneficial uses."

- k) Tastes and Odors: “Waters shall not contain taste- or odor-producing substances in concentrations that impart undesirable tastes or odors to fish flesh or other edible products of aquatic origin, or that cause nuisance (as defined in Water Code section 13050(m)), or adversely affect beneficial uses.”

Legal Basis of Order

15. Water Code section 13304, subdivision (a) states, in relevant part: “A person who has discharged or discharges waste into waters of this state in violation of any waste discharge requirements or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and causes, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts....”
16. Water Code section 13304, subdivision (a) further states: “Upon failure of any person to comply with the cleanup or abatement order, the Attorney General, at the request of the board, shall petition the superior court for that county for the issuance of an injunction requiring the person to comply with the order. In the suit, the court shall have jurisdiction to grant a prohibitory or mandatory injunction, either preliminary or permanent, as the facts may warrant.”
17. “Waste” is defined by Water Code section 13050, subdivision (d) to include “sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin, or from any producing, manufacturing, or processing operation, including waste placed within containers of whatever nature prior to, and for purposes of, disposal.”
18. “Pollution” is defined by Water Code section 13050, subdivision (l)(1) as “an alteration of the quality of the waters of the state by waste to a degree which unreasonably affects either waters of the state for beneficial use or facilities which serve these beneficial uses.”
19. The Facility's activities and recent system failure pose a future threat to water quality if no remedial action is taken by:
 - a) Threatening to cause discharges of untreated and partially treated wastewater into the Russian River, a water of the state and the United States.
 - b) Threatening to permit waste to be discharged where it is, or probably will be, discharged to waters of the state, creating and/or threatening to create a condition of pollution:

- i. The Facility is located within the Guerneville Hydrologic Subarea. The Russian River serves as a primary source of domestic and municipal water supply (MUN), agricultural irrigation (AGR), and water-contact recreation (REC-1). The river also provides critical habitat for several species of rare, threatened, or endangered species (RARE), including Coho salmon and steelhead trout, as well as supporting cold freshwater habitat (COLD), migration of aquatic organisms (MIGR), and spawning, reproduction, and/or early development (SPWN).
- ii. The washout of the Facility's biological secondary treatment process and the resulting overtopping of Basin No. 3 and the Emergency Storage Pond have resulted and could in the future result in the discharge of waste containing high concentrations of pathogens, nutrients, and suspended solids including, but not limited to, fecal coliform and ammonia.
- iii. The potential for hydraulic overloading of the treatment system and the vulnerability of the collection system to floodwaters create an imminent threat to surface water quality and beneficial uses, which has the potential to:
 - a. Impact the MUN beneficial use established for the purpose of protecting human health.
 - b. Impact the REC-1 and REC-2 beneficial uses by exposing recreators to bacterial sources and biostimulatory substances, necessitating the issuance of public health advisories.
 - c. Impact the COLD, MIGR, and SPWN beneficial uses through the introduction of ammonia and the depletion of dissolved oxygen.
 - d. Impact the AGR beneficial use by introducing elevated concentrations of salts and nutrients into irrigation supplies.

Unauthorized discharges of untreated and partially treated wastewater from the Facility threaten to alter the quality of waters of the state and the United States to a degree that unreasonably affects the waters for beneficial uses. The presence of pathogens, nutrients, and other constituents associated with partially treated and untreated wastewater in the Russian River threatens to create a condition of pollution or nuisance.

20. Abatement is necessary to ensure that the conditions causing threatened discharges of waste to waters of the state threatening to create a condition of pollution are appropriately mitigated and that any threatened impacts to beneficial uses are prevented. Issuance of this Order pursuant to Water Code section 13304 is appropriate and consistent with the policies of the North Coast Water Board and the State Water Resources Control Board.

Technical Reports Required

21. Water Code section 13267, subdivision (a) provides that the Regional Water Board may investigate the quality of any water of the state within its region in connection with any action relating to the Basin Plan. Water Code section 13267, subdivision (b) provides that the North Coast Water Board, in conducting an investigation, may require a discharger to furnish, under penalty of perjury, technical or monitoring program reports. The burden, including costs, of these technical reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The technical reports required by this Order pursuant to Water Code section 13267 are necessary to protect the waters of the state.
22. This Order requires the Permittees to submit a Flow Monitoring Plan, a Flood-Susceptible Manhole Assessment Workplan, and a Corrective Action Plan (CAP) – consisting of four technical reports (see below Required Actions 2.a – 2.d) and a CAP Implementation Schedule – followed by a Final Inflow/Infiltration (I/I) Study Report, and Completion Reports. North Coast Water Board staff estimates that the total cost of preparing and submitting these reports and conducting the associated technical requirements is between approximately \$32,544 – \$74,322 based on estimates from the July 1, 2023 Underground Storage Tank Cleanup Fund 2023 Cost Guidelines Update (Cost Guidelines Update).⁹ The burden of compiling these reports, including the costs of the technical or monitoring reports required by this Order, bear a reasonable relationship to the need for these reports and the benefit to be gained by these reports, as discussed below:
 - a) Corrective Action Plan and Flood-Susceptible Manhole Assessment: The CAP and manhole assessment (see below Required Actions 2 and 3) are technical reports prepared by a licensed professional to address short-term abatement measures. The benefit of the reports is to provide a professional engineering approach to abating conditions and preventing future unauthorized discharges to the Russian River. The scope of preparing the plans is described in the 2023 Cost Guidelines Update, with estimated costs ranging between \$7,642 and \$17,012. The burden bears a reasonable relationship to the need for the report as it ensures that remedial actions are professionally designed and implemented.
 - b) Collection System Assessments, Storm Preparedness, and Resilience: Associated tasks (see below Required Actions 2.a – 2.d and 4) involve a review of the January 6-8, 2026 spill event, identification of infrastructure challenges (such as flood-susceptible manholes), and the development of updated Standard Operating Procedures (SOPs). The benefit of these assessments and the updated plans is to ensure that the Permittees implement lessons learned to

⁹ Cost Guideline Update available online:
https://www.waterboards.ca.gov/water_issues/programs/ustcf/docs/2023/2023-costguidelines.pdf

minimize I/I and prevent the reoccurrence of similar unauthorized discharge events. The scope of these reporting efforts is comparable to preparing three Site Assessment Reports as described in the 2023 Cost Guidelines Update. Estimated costs for the associated reporting requirements and tasks range between \$9,810 and \$25,392.

- c) I/I Study Work Plan and Flow Monitoring Plan: The technical reports (see below Required Actions 1 and 2.c) are necessary to identify collection system vulnerabilities through near-term execution of an I/I study and flow meter installation. The benefit of the work plans is establishing a data-driven understanding of high I/I potential areas, which is critical for prioritizing repairs to protect the Russian River from untreated wastewater discharges. The technical reports are comparable to the intensive field-work portion of a Site Assessment. Estimated costs for completing the work plans and associated field monitoring range between \$8,866 and \$17,590, depending on the number of monitoring locations and data analysis complexity.
- d) Final I/I Study Report: This technical report (see below Required Action 6) will provide the final analysis of data collected during the 2026-2027 wet season and specific improvement recommendations and a proposed schedule of implementation. The benefit derived from the Final I/I Study Report is the translation of monitoring data into actionable engineering projects to reduce the collection system's susceptibility to storm events. The scope of this reporting effort is comparable to a Cleanup Plan as described in the 2023 Cost Guidelines Update, which is estimated to cost between \$2,956 and \$5,864.
- e) Completion Reports: The technical reports (see below Required Actions 5 and 7) are necessary to provide documented evidence, including photographs and site maps, that the Permittees have successfully implemented the CAP and Flood-Susceptible Manhole Assessment Report actions. The benefit derived from the reports is the verification that abatement activities are complete and are achieving effective protection of waters of the state. The scope of this report is comparable to a Cleanup Progress Report or Site Assessment Report as described in the 2023 Cost Guidelines Update, which is estimated to cost between \$3,270 and \$8,464.

California Environmental Quality Act

- 24. Issuance of this Order is being taken for the protection of the environment and to enforce the laws and regulations administered by the North Coast Water Board and, as such, is exempt from provisions of the California Environmental Quality Act (CEQA) (Public Resources Code section 21000 et seq.) in accordance with California Code of Regulations, title 14, sections 15061, subdivision (b)(3), 15306, 15307, 15308, and 15321. This Order generally requires the Permittees to submit plans for approval prior to implementation of abatement activities at the Facility.

Mere plan submittal is exempt from CEQA as such submittal will not cause a direct or indirect physical change in the environment and/or is an activity that cannot possibly have a significant effect on the environment. CEQA review at this time would be premature and speculative as there is simply not enough information concerning the Permittees' proposed abatement activities and possible associated environmental impacts. If the North Coast Water Board determines that implementation of any plan required by this Order will have a significant effect on the environment that is not otherwise exempt from CEQA, the North Coast Water Board will conduct the necessary and appropriate environmental review prior to implementation of the applicable plan. The Permittees will bear the costs, including the North Coast Water Board's costs, of determining whether implementation of any plan required by this Order will have a significant effect on the environment and, if so, in preparing any documents necessary for the North Coast Water Board to satisfy its environmental review obligations under CEQA. If necessary, the Permittees and a consultant acceptable to the North Coast Water Board shall enter into a memorandum of understanding with the North Coast Water Board regarding such costs prior to undertaking any necessary environmental review.

REQUIRED ACTIONS

IT IS HEREBY ORDERED, pursuant to Water Code sections 13304 and 13267, the Permittees shall abate the threatened impacts to water quality in accordance with the scope and schedule set forth below and provide the technical reports as required below.

- 1) By **September 1, 2026**, the Permittees shall submit a **Flow Monitoring Plan** for approval by the North Coast Water Board or its delegated officer. The Flow Monitoring Plan shall identify proposed monitoring locations where temporary flow monitoring equipment will be installed within the collection system. Flow monitoring locations shall be selected to characterize dry-weather and wet-weather flow conditions within the collection system, with emphasis on low-lying and flood-susceptible areas. Monitoring locations shall include, where appropriate, representative upstream and downstream points within major sub-basins; areas with known or suspected inflow and infiltration; locations affected by high groundwater, surface flooding, river stage, or backwater conditions; areas tributary to pump stations or other hydraulically constrained infrastructure; and locations associated with prior spills, surcharge, backups, or wet-weather capacity limitations. The selected locations shall be hydraulically meaningful, safely accessible, suitable for obtaining reliable flow data, and sufficient to support evaluation of peak flows, wet-weather response, inflow and infiltration sources.

The Flow Monitoring Plan shall include a schedule for installing the flow meters no later than **October 1, 2026**, the first day of the 2026-2027 wet season. The Permittees shall submit written confirmation of flow meter installation to the North Coast Water Board no later than 2 working days after completion.

- 2) By **October 1, 2026**, the Permittees shall submit a **Corrective Action Plan (CAP)** for approval by the North Coast Water Board or its delegated officer. The CAP shall be prepared by an appropriately licensed professional and shall identify the short-term abatement measures, operational corrections, infrastructure improvements, and implementation schedule necessary to abate conditions and to prevent future sanitary sewer overflows and unauthorized discharges of untreated and/or partially treated wastewater from the Facility or collection system to the Russian River.

The Permittees shall implement the CAP in accordance with the implementation schedule approved by the North Coast Water Board or its delegated officer. The CAP shall include, at a minimum, the following components:

a) **Collection System Operational Challenges and Vulnerabilities Identified During Post-Event Investigations Report:**

The CAP shall include a complete summary of, and corrective actions to abate, all collection system operational challenges, response actions, and infrastructure vulnerabilities identified during the Permittees' review of the alleged January 6-8, 2026 unauthorized discharge event. This component shall include an updated implementation schedule and shall address, at a minimum, SOPs for closing isolation valves during flood events; displaced manholes; and manhole covers not secured to prevent displacement.

- b) **Updated Collection System Pre-Storm Preparedness Procedures:** The CAP shall include updated pre-storm preparedness procedures and SOPs, based on lessons learned from the alleged January 6-8, 2026 unauthorized discharge event, to ensure timely implementation of inflow/infiltration minimization measures in vulnerable areas, including low-lying and flood-prone areas. The SOPs shall be updated to incorporate lower trigger thresholds, consideration of Fife Creek conditions, and an appropriate safety factor to account for uncertainty in river state forecasts. In addition, the procedures shall include staff training requirements and shall address, at a minimum, timely closure of isolation valves, proper securing of manhole covers, and replacement of missing, damaged, or stripped manhole bolts to reduce the risk of reoccurring sewer spills and other unauthorized discharges. Implementation of the updated SOPs shall be documented in the Completion Report, per Required Actions 2.e , 7 and 8. The Completion Report shall include, at minimum, records of staff training on updated SOPs and the finalized SOPs.

c) **Collection System Inflow/Infiltration (I/I) Study:**

The CAP shall include a Collection System I/I Study (I/I Study) component that describes the methods, schedule, and deliverables for evaluating wet-weather flow response within the collection system. The goal for the I/I Study is to identify and prioritize areas of the collection system with high I/I potential and determine corrective actions necessary to reduce I/I sources, to reduce the risk of

unauthorized wastewater discharges to the Russian River. The I/I Study will analyze and incorporate data collection from implementation of the **Flow Monitoring Plan** (Required Action 1). At a minimum, the I/I Study shall include:

- i. A data analysis plan to evaluate historical flow data, rainfall data, and flow data collected during the 2026-2027 wet weather season, to identify areas of disproportionate wet-weather response.
- ii. A targeted field investigation plan for areas identified as having high I/I potential, which at a minimum shall include closed circuit television (CCTV) and manhole inspections.

For CCTV inspections, the CAP shall require use of National Association of Sewer Service Companies Pipeline Assessment Certification Program (NASSCO PACP) or an equivalent condition assessment methodology acceptable to the North Coast Water Board or its delegated officer. CCTV results shall include pipe segment condition ratings, defect coding, inspection logs, photographs, video files or electronic access to video files, and GIS-based mapping of inspected segments and significant defects. The CCTV results, in combination with flow monitoring results, rainfall-response analysis, targeted smoke testing, and/or manhole inspection results, shall be used to prioritize corrective actions based on defect severity, I/I contribution potential, overflow risk, proximity to surface waters, and implementation feasibility.

- iii. A framework for developing a prioritized rehabilitation and improvement plan that identifies corrective actions to reduce I/I sources. The Permittees shall submit a proposed implementation schedule for all corrective actions identified in the I/I Study as part of the Final I/I Study Report required under Required Action 6, pursuant to Required Action 6.h.

d) **Additional Actions to Increase Facility Preparedness and Resilience:**

The CAP shall include additional measures to improve overall collection system preparedness, wet weather response, and treatment plant resilience during atmospheric river, flood, and other high-flow events within a **High-Flow SOP**. The purpose of this High Flow SOP is to establish clear operational triggers, staffing assignments, communication protocols, pre-storm, active-storm and post-storm procedures, and operational strategies to reduce the risk of sewer spills, Facility bypasses, and upsets during high-flow events.

The High-Flow SOP shall include, at a minimum:

- i. **Operational triggers** based on forecasted rainfall, stream stage, flood warnings, influent flow rates, wet well levels, collection system conditions, groundwater conditions, and other relevant indicators;

- ii. **Pre-storm preparation procedures**, including procedures to verify that flood-susceptible manholes have been inspected and secured as appropriate, isolation valves are in the proper position, and critical pump stations have been inspected, consistent with the updated collection system SOPs per Required Action 2.b; verification of backup power readiness; and verification of emergency equipment availability;
- iii. **Staffing and duty assignments** for pre-storm, active storm, and post-storm conditions, including identification of responsible staff, backup staff, and escalation procedures;
- iv. **Communication protocols** for internal coordination, emergency response coordination, regulatory notifications, and documentation of operational decisions during high-flow events;
- v. **Collection system operational procedures**, including procedures to verify and timely implement inflow and infiltration minimization measures; isolate vulnerable areas where appropriate; monitor pump stations; and respond to surcharging, manhole displacement, or observed overflows consistent with the updated collection system SOPs per Required Action 2.b;
- vi. **Treatment facility operational strategies** to protect the Facility's secondary treatment process during high-flow events, including procedures for managing hydraulic loading, protecting biological treatment, optimizing solids handling, maintaining disinfection, and preventing avoidable treatment upsets or bypasses;
- vii. **Emergency response and contingency measures**, including procedures for deployment of portable pumps, generators, temporary storage, bypass prevention measures, spill containment, public access controls, and field response during flood conditions;
- viii. **Post-event inspection and documentation procedures**, including procedures to verify completion of post-event inspections of manholes, pump stations, critical collection system assets, and treatment plant process units, consistent with the updated collection system SOPs per Required Action 2.b; documentation of any observed deficiencies, damage, overflows, bypasses, or operational deviations; and identification of corrective actions; and
- ix. **Training and review requirements**, including routine staff training, tabletop exercises or drills, post-event debriefs, and periodic updates to the High-Flow SOP based on lessons learned from storm events and system improvements.

e) **CAP Implementation Schedule and Completion Reporting**

The CAP shall include a schedule of implementation of all recommended corrective actions, operational improvements, SOP updates, and training activities identified in each required CAP component; and a proposed date for submittal of a **CAP Completion Report** per Required Action 7 below. Unless otherwise approved by the North Coast Water Board or its delegated officer, all CAP recommended corrective actions shall be initiated within 15 days and completed within 1 year after CAP approval.

- 3) By **October 1, 2026**, the Permittees shall submit a **Flood-Susceptible Manhole Assessment Workplan** for approval by the North Coast Water Board or its delegated officer. The workplan shall provide a plan for conducting a comprehensive flood-susceptible manhole assessment that identifies collection system manholes susceptible to flooding. The assessment (further specified in Required Action 4) shall evaluate each flood-susceptible manhole and identify the appropriate method of preventing manhole displacement, unauthorized access, and floodwater inflow, including whether the manhole should be secured, secured using an alternative method, or intentionally remain unsecured to protect against upstream or lateral backups.
- 4) By **February 1, 2027**, the Permittees shall submit a **Final Flood-Susceptible Manhole Assessment Report** for approval by the North Coast Water Board or its delegated officer. The Final Flood-Susceptible Manhole Assessment Report shall identify, for each flood susceptible manhole, the appropriate method of preventing displacement, unauthorized access, and floodwater inflow, and recommend whether each manhole should be secured, secured using an alternative method, or intentionally remain unsecured to protect against upstream or lateral backups. For any manhole proposed to remain unsecured, the assessment report shall provide the engineering basis for that determination and identify alternative measures to prevent manhole displacement, unauthorized access, and floodwater inflow during flood conditions. The assessment report shall also identify unsecured manholes in areas susceptible to flooding, summarize the most recent condition assessment for those manholes, and include recommended corrective actions and a proposed implementation schedule for the recommended corrective action(s) and any additional actions necessary to prevent future manhole displacement, unauthorized access, and floodwater inflow.

The Final Flood-Susceptible Manhole Assessment Report shall further include a proposed submittal date for the Manhole Completion Report (further specified in Required Action 5). The Manhole Completion Report shall be submitted no later than 24 months after approval of the Final Flood-Susceptible Manhole Assessment Report.

- 5) No later than the submittal date in the approved Flood-Susceptible Manhole Assessment Report, the Permittees shall submit a **Manhole Completion Report** for review and approval by the North Coast Water Board or its delegated officer, documenting timely implementation of the corrective actions. At a minimum, the Manhole Completion Report shall include the following:
- a) A summary of corrective actions performed for each flood-susceptible manhole, including:
 - i. Identification of corrective actions completed for each manhole;
 - ii. Date stamps and descriptive labels identifying the asset, location, and type of corrective action;
 - iii. Photographs of each completed action;
 - iv. Date stamps and descriptive labels identifying the asset, location, and type of corrective action; and
 - v. A map or GIS figure showing the exact location of each flood-susceptible manhole.
 - b) Documentation demonstrating that all field work was performed, including:
 - i. Manhole inspection forms and findings;
 - ii. Work orders, maintenance logs, and contractor service records;
 - iii. Materials specifications used for corrective actions; and
 - iv. Any other documentation demonstrating completion of required corrective actions.
 - c) A table comparing the approved Final Flood-Susceptible Manhole Assessment Report implementation schedule to actual completion dates for each corrective action. The table shall clearly identify and explain any delays or deviations.
 - d) A certification signed under penalty of perjury by the Permittees or a duly authorized representative verifying that corrective actions identified within the Final Flood-Susceptible Manhole Assessment Report were fully implemented and that all information provided is true, accurate, and complete; and a certification, where required, signed and stamped by the responsible licensed professional for all portions of the report involving professional judgment or oversight.

- 6) By **October 1, 2027**, the Permittees shall submit a **Final I/I Study Report** for North Coast Water Board's or its delegated officer's approval.

The Final I/I Study Report shall include, at a minimum:

- a) A summary of flow monitoring locations, monitoring periods, rainfall data, and flow monitoring results;
- b) An evaluation of historical flow data, rainfall data, and 2026–2027 wet-season flow monitoring data;
- c) Identification of areas of the collection system with disproportionate wet-weather response and high I/I potential;
- d) A summary of targeted field investigations completed, including CCTV inspection, targeted smoke testing, and manhole inspections
- e) NASSCO PACP condition ratings, or equivalent condition assessment ratings acceptable to the North Coast Water Board or its delegated officer, for inspected pipe segments; a summary of structural and operation and maintenance defects; identification of defects contributing or potentially contributing to I/I; maps showing inspected segments and significant defects;
- f) Identification of confirmed and suspected I/I sources;
- g) A prioritized list of recommended corrective actions, rehabilitation measures, and operational improvements to reduce I/I; and
- h) A proposed implementation schedule for completing the recommended improvements.¹⁰

If the Permittees determine that insufficient rainfall occurred during the monitoring period to generate representative wet-weather flow data, the Permittees shall submit, no later than **July 3, 2027 (90 days before the October 1, 2027 due date)**, a written request proposing an alternate due date for the Final I/I Study Report. The request shall include the basis for the determination, a summary of available rainfall and flow monitoring data, and a proposed revised schedule for completing the Collection System I/I Study.

- 7) No later than the submittal date in the approved CAP, the Permittees shall provide a **CAP Completion Report** to the North Coast Water Board adequately documenting timely implementation of the approved CAP.

¹⁰ The proposed implementation schedule for this Required Action is for planning purposes only and is not binding on the Permittees. The North Coast Water Board reserves its full authority under any statute, regulation, ordinance, or other law to require implementation of corrective actions, rehabilitation measures, and/or operational improvements to reduce I/I through future proceedings.

- 8) The CAP Completion Report required under Required Action 7 shall provide complete and verifiable documentation demonstrating that all corrective actions, operational improvements, manhole upgrades, SOP updates, training activities, and implementation measures required by the approved CAP have been fully completed. At a minimum, the CAP Completion Report shall include the following:
- a) A narrative summary of all corrective actions, organized according to each CAP subsection (2.a through 2.d). For each corrective action, the summary shall:
 - i. Identify what was completed;
 - ii. Describe how the corrective action resolves the identified operational deficiency, vulnerability, or infrastructure failure; and
 - iii. Reference the corresponding CAP subsection and supporting documentation.
 - b) For all physical corrective actions implemented under the CAP, the Completion Report shall include:
 - i. Photographs of each completed action;
 - ii. Date-stamps and descriptive labels identifying the asset, location, and type of corrective action; and
 - iii. A map or GIS figure showing the exact location of each improvement, including secured manholes, valve upgrades, repaired or replaced components, or other field improvements completed under the CAP.
 - c) Documentation demonstrating that all field work was performed, including
 - i. Inspection logs;
 - ii. CCTV inspection logs and PACP compliant summary tables, where applicable;
 - iii. Manhole inspection forms and findings;
 - iv. Valve inspection and verification records;
 - v. Work orders, maintenance logs, and contractor service records;
 - vi. Materials specifications used for corrective actions; and
 - vii. Any other documentation demonstrating completion of required corrective actions.
 - d) Copies of all Standard Operating Procedures updated under the CAP, including but not limited to:
 - i. Pre-storm preparedness SOPs;
 - ii. Inflow/Infiltration minimization procedures;
 - iii. High-Flow SOP; and
 - iv. Any other operational SOPs updated under Required Actions 2.b or 2.d.

- e) Records demonstrating that staff training required by the CAP was completed, including:
 - i. Training sign-in sheets or rosters; dates of trainings; agendas and training materials; and
 - ii. Documentation of any drills, tabletop exercises, or post-training evaluations.
- f) If emergency response, storm-readiness, or flood-preparedness measures were triggered or implemented during the reporting period, the Completion Report shall include documentation demonstrating:
 - i. The measures put into service;
 - ii. Staffing assignments during storm events;
 - iii. Verification of high-flow or storm response procedures used; and
 - iv. Field records showing secured manholes, valve closures, or other storm response actions.
- g) A table comparing the approved CAP implementation schedule to actual completion dates for each corrective action. The table shall clearly identify and explain any delays or deviations.
- h) A certification signed under penalty of perjury by the Permittees or a duly authorized representative verifying that the CAP has been fully implemented and that all information provided is true, accurate, and complete; and a certification, where required, signed and stamped by the responsible licensed professional for all portions of the report involving professional judgment or oversight.

GENERAL REQUIREMENTS AND NOTICES

1. **Duty to Use Qualified Professionals:** The Permittees shall provide technical and monitoring reports prepared under the direction of appropriately qualified professionals. In preparing the technical reports, any engineering or geologic evaluations and judgments shall be performed by or under the direction of registered professionals pursuant to California Business and Professions Code sections 6735, 7835, and 7835.1. Reports submitted by or on behalf of the Permittees shall include a statement of qualifications and registration numbers of the responsible lead professional. The lead professional shall sign and affix their registration stamp to the report.
2. **Signatory Requirements:** All reports submitted by the Permittees shall include a cover letter signed by the Permittees, or a duly authorized representative, certifying under penalty of law that the signer has examined and is familiar with the report and that to his/her knowledge, the report is true, complete, and accurate. The Permittees shall also state in the cover letter whether they will implement the recommendations/proposals provided in the report and the schedule for

implementation. Any person signing a document submitted under this Order shall make the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

3. **Reasonable Access:** The Permittees shall allow the North Coast Water Board, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to enter at reasonable times to inspect the Facility and any records that must be kept under the conditions of this Order for the purposes of assuring compliance with this Order or as otherwise authorized by the Water Code.
4. **Cost Recovery:** Pursuant to Water Code section 13304, the State or North Coast Water Board is entitled to all reasonable costs it actually incurs to investigate and abate the effects of unauthorized discharges of waste and to oversee/supervise the cleanup of waste or other restoration action, required by this Order.
5. **Delayed Compliance:** If for any reason, the Permittees are unable to perform any activity or submit any document in compliance with the schedule set forth herein, or in compliance with any work schedule submitted pursuant to this Order and approved by the North Coast Water Board Executive Officer or its delegated officer, the Permittees may request, in writing, an extension of the time specified. The extension request shall include justification for the delay. Any extension request shall be submitted as soon as a delay is recognized but no later than 30 days prior to the compliance date. An extension may only be granted by modification of this Order or by a letter from the North Coast Water Board Executive Officer or its delegated officer.
6. **Potential Liability:** If the Permittees fail to comply with the requirements of this Order, the North Coast Water Board may refer this matter to the Attorney General for judicial enforcement or a complaint for administrative civil liability may be issued. Failure to comply with this Order may result in the assessment of an administrative civil liability up to \$5,000 per day of violation of Water Code section 13304 requirements and up to \$1,000 per day of violation of Water Code section 13267 technical reporting requirements. (Wat. Code, §§ 13350, 13268.) The North Coast Water Board reserves the right to take any enforcement actions authorized by law, including, but not limited to, violation of the terms and conditions of this Order.

7. **No Limitation of Water Board Authority:** This Order in no way limits the authority of the North Coast Water Board to institute additional enforcement actions or to require additional investigation and cleanup of the Facility consistent with the Water Code. This Order may be revised as additional information becomes available.
8. **Modifications:** Any modification to this Order shall be in writing and approved by the North Coast Water Board or its delegated officer.

This Order is effective upon the date of signature.

Valerie Quinto
Executive Officer

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