
North Coast Regional Water Quality Control Board

**AMENDMENT ORDER No. R1-2024-0030
NPDES NO. CA0024058
WDID NO. 1B820450SON**

AMENDMENT OF ORDER No. R1-2021-0002

FOR THE

**RUSSIAN RIVER COUNTY SANITATION DISTRICT AND SONOMA WATER
RUSSIAN RIVER WASTEWATER TREATMENT FACILITY
SONOMA COUNTY**

The California Regional Water Board, North Coast Region, hereinafter referred to as the Regional Water Board finds that:

1. Sonoma Water is the contract operator, and the Russian River County Sanitation District (RRCSD or District) (collectively, Permittees) is the owner of the Russian River Wastewater Treatment Facility at 18400 Neeley Road, in Guerneville. The District and Sonoma Water are also the owner and operator for the wastewater collection system, respectively, including associated infrastructure that collects and carries wastewater from the service area to the Russian River Wastewater Treatment Facility (Facility).
2. The Facility is currently permitted to discharge treated wastewater under Order No. R1-2021-0002, National Pollutant Discharge Elimination System (NPDES) Permit No. CA0024058, adopted on June 17, 2021 (Permit). The Permit will expire on July 31, 2026.
3. The Facility provides tertiary treatment and ultraviolet light disinfection and discharges treated wastewater to the Russian River, a water of the United States. From May 15 through September 30, when discharges to the Russian River are prohibited, disinfected tertiary recycled water is used for irrigation of the Northwood Golf Course, located south of the Facility and on the opposite side of the Russian River. Treated wastewater not used by the Northwood Golf Course is disposed of through land disposal through spray irrigation on the upper and

lower areas of the Burch property; 17 acres of wooded property adjacent to the Facility.

4. In 2019, the Permittees reported multiple unauthorized discharges of raw sewage from their collection system. It was alleged that 885,664 gallons of raw sewage diluted with rainwater was discharged into the Russian River on February 14-15, February 26, and March 1-2, 2019, for a total of eight days. These alleged acts constitute violations of Water Code section 13385, subdivision (a), for which discretionary penalties were assessed pursuant to Water Code section 13385, subdivision (c).
5. On December 13, 2023, the Regional Water Board adopted Order No. R1-20233-0049, Settlement Agreement and Stipulation for Entry of Order for the Sonoma County Water Agency and Russian River County Sanitation District. The Order imposed an administrative civil liability of \$1,033,546 to resolve the alleged violations. Of this, \$886,545 of the administrative civil liability was suspended pending completion of the enhanced compliance action (ECA) titled "West County Water Quality and Recycled Water Supply Feasibility Project with Stakeholder Committee".
6. Comments on the Draft Stipulated Settlement Agreement were received from 81 citizens and the Russian River Watershed Protection Committee. While no changes were made to the Proposed Stipulated Settlement Agreement in response to the comments received, Regional Water Board staff committed to proposing revisions to the Permittees' NPDES Permit in 2024, to provide additional requirements to the Flood Control and Flow Reduction Mitigation provisions that will require the District to implement both short-term and long-term fixes to the collection system in a timely manner. In accordance with staff's commitment, this Amendment Order revises Order No. R1-2022-0002 to require the implementation of identified short-term and long-term corrective actions and provides an accelerated due date to the Permittees' Collection System Operations and Maintenance Plan.
7. Pursuant to 40 CFR Sections 123.25, 124.5(c)(2) and 122.62, only those conditions to be modified by this amendment shall be reopened with this amendment. All other aspects of the existing Permit shall remain in effect and are not subject to modification by this amendment.
8. The Permittees and interested agencies and persons have been notified of the Regional Water Board's intent to modify Waste Discharge Requirements and Master Recycling Permit, Order No. R1-2021-0002 and have been provided the opportunity to submit their written views and recommendations. Notification was provided through posting on the [Regional Water Board's website for tentative orders for Board decisions](#) on September 6, 2024. Order No. R1-2024-0030 was subject to a 30-day written comment period.

9. On December 5, 2024, after due notice to the Permittees and all other affected persons, the Regional Water Board conducted a public hearing and evidence was received regarding Amendment Order No. R1-2024-0030.

IT IS HEREBY ORDERED that the Permittees, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted hereunder and the provisions of the Clean Water Act as amended, shall comply with the following revisions identified in underline and strikeout format to indicate language to be added to and deleted, respectively, from Order No. R1-2021-0002.

Order No. R1-2021-0002 shall be Amended as follows:

1. Section 6.3.6.2.2.3 of the Order has been modified to clarify the requirements of the Engineering Evaluation Final Report and to require a schedule of implementation for all corrective actions identified in this report. Additionally, this section has been modified to identify that this report will be submitted to the Regional Water Board's Executive Officer for review and approval. The changes made to Section 6.3.6.2.2.3 are as follows:

6.3.6.2.2.3. Upon completion of the engineering evaluation, the Permittees shall submit ~~a written report~~ an Engineering Evaluation Final Report and supporting engineering calculations, modeling, and maps to the Regional Water Board Executive Officer by August 1, 2025 for review and approval. The Engineering Evaluation Final Report shall include all supporting engineering calculations, modeling, and maps used for this study, describing ~~describe~~ the results of the engineering evaluation and ~~a the Permittees'~~ plan to correct all identified deficiencies, and provide a schedule of implementation for all corrective actions proposed in the collection system and treatment plant. Corrective actions shall include including engineering and both short-term contingency measures and as well as cost effective, long-term approaches that will be implemented to prevent, reduce, and mitigate for spills sanitary sewer overflows and/or unauthorized releases. Corrective actions identified may consist of, but are not limited to, engineering solutions, operational/process management changes, and capital improvement projects that are necessary in order to eliminate, reduce, and mitigate overflow events.

2. A new section, Section 6.3.6.2.3., has been added to the Order to require the submission of an updated Collection System Operations and Maintenance Plan by no later than April 1, 2025, to ensure the timely incorporation of short-term corrective actions identified by the Permittees. The Permittee's Collection System Management Plan would otherwise be due for an update in April 2026, as part of their required Sanitary Sewer Management Plan update. Section 6.3.6.2.3 has been added as follows:

6.3.6.2.3. By April 1, 2025, the Permittees shall submit a revised Collection System Operations and Management Plan (O&M Plan) that incorporates flow reduction mitigation measures and operational changes identified since the last O&M Plan submittal. Additionally, the O&M Plan shall identify how the Permittees will monitor and respond to conditions within the Russian River watershed that have been identified as having a strong relation to the occurrence of flooding in the Russian River within the District's service area.

Other Modifications

1. Fact Sheet Section 6.3.6.2, Flood Control and Flow Reduction Mitigation (Special Provision 6.3.6.2), has been modified to include the following paragraph to identify why changes to section 6.3.6.2 of the Order were made. The added paragraph reads as follows:

In response to public comments received during the adoption of Order No. R1-2023-0049, Settlement Agreement and Stipulation for Entry of Order for the Sonoma County Water Agency and Russian River County Sanitation District, this Order has been modified to require that the Engineering Evaluation Final Report include a schedule of implementation for all corrective actions identified to be submitted for Executive Officer review and approval. Additionally, The Order has been modified to include a requirement for the Permittees to submit an updated Collection System Operations and Maintenance Plan to reflect those identified corrective actions that may be immediately implemented. These changes are necessary to ensure that identified corrective actions are implemented by the Permittees in a timely manner, to eliminate, reduce, and mitigate overflow events.

2. Fact Sheet Section 8.1, Public Participation, Notification of Interested Parties, has been modified to include the following paragraph to identify that the Amendment Order and the proposed modifications to Order No. R1-2021-0002 were properly noticed. The added paragraph reads as follows:

Additionally, the Regional Water Board notified the Permittees and interested agencies and persons of its intent to modify Order No. R1-2021-0002 and provided the opportunity to submit written comments and recommendations. Notification was provided through posting on the [Regional Water Board's Internet site](#) at: http://www.waterboards.ca.gov/northcoast/public_notices/public_hearings/npdes_permits_and_wdrs.shtml on September 6, 2024. On December 5-6, 2024, after due notice to the Permittees and all other affected persons, the Regional Water Board conducted a public hearing and evidence was received regarding adoption of Order No. R1-2024-0030, modifying Order No. R1-2021-0002.

3. Fact Sheet Section 8.2, Public Participation, has been modified to include the following paragraph to identify that the Amendment Order and the proposed

modifications to Order No. R1-2021-0002 were properly noticed. The added paragraph reads as follows:

Furthermore, to be fully responded to by staff and considered by the Regional Water Board, written comments on modifications to Order No. R1-2021-0002 contained in Order No. R1-2024-0030 were due at the Regional Water Board offices by 5:00 p.m. on October 7, 2024.

Certification:

I, Valerie Quinto, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, North Coast Region, on December 5, 2024.

Valerie Quinto
Executive Officer

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