

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

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TENTATIVE ORDER R2-2026-00XX

**TERMINATION OF CEASE AND DESIST ORDER R2-2014-0043 AND
ORDER R2-2016-0019 FOR THE CALISTOGA CITY DUNAWEAR WASTEWATER
TREATMENT PLANT,
CALISTOGA, NAPA COUNTY**

WHEREAS the California Regional Water Quality Control Board, San Francisco Bay Region (Regional Water Board) finds that:

- 1. Order Purpose:** The purpose of this Order is to terminate Cease and Desist Order R2-2014-0043 and its amendment, Order R2-2016-0019.
- 2. Background:** The City of Calistoga (Discharger) owns and operates the Dunawear Wastewater Treatment Plant at 1100 Dunawear Lane, Calistoga, and its associated collection system (collectively, Facility). The Facility provides tertiary or secondary treatment of domestic, commercial, and industrial wastewater collected from the City of Calistoga and discharges to the Napa River. The Facility has an average dry weather design treatment capacity of 0.84 million gallons per day.
- 3.** The Discharger is regulated pursuant to National Pollutant Discharge Elimination System (NPDES) Permit CA0037966, which was most recently reissued through Order R2-2022-0010. This order establishes discharge specifications and effluent limits for the Discharger. It prohibits discharges to the Napa River during the dry season from June 16 through October 31, unless inflows exceed influent storage capacity, effluent flows exceed recycled water distribution and storage capacity, and the discharge complies with all effluent limits. At other times, the Discharger may discharge tertiary treated wastewater to the Napa River when it meets a river flow-to-effluent flow ratio of at least 10:1 at its Discharge Points 001 and 003, combined, although the Discharger has not yet constructed Discharge Point 003. The Discharger may discharge secondary treated wastewater at Discharge Point 002 when influent flows exceed its filters capacities, and it meets a river flow-to-effluent flow ratio of at least 56:1 in accordance with Order R2-2022-0010.
- 4.** On September 8, 2010, the Regional Water Board adopted Cease and Desist Order R2-2010-0107, which required the Discharger to complete tasks to comply with the NPDES permit's chlorodibromomethane and dichlorobromomethane effluent limits. It also required that the Discharger comply with interim chlorodibromomethane and dichlorobromomethane effluent limits while it completed the tasks.

Chlorodibromomethane and dichlorobromomethane are pollutants produced as byproducts of chlorine disinfection.

5. On November 12, 2014, the Regional Water Board adopted Cease and Desist Order R2-2014-0043, which required the Discharger to complete additional tasks to bring it into compliance with the NPDES permit's antimony effluent limits and discharge prohibitions. Specifically, the Order required the Discharger to prevent reoccurrence of unauthorized discharges and bypasses to the Napa River, including: (1) seepage from the Discharger's Riverside Ponds, (2) discharges that did not meet the required river flow-to-effluent flow ratios or (3) runoff into the Napa River caused by oversaturation of its irrigation fields.
6. On April 13, 2016, the Regional Water Board adopted Order R2-2016-0019, which amended Cease and Desist Order R2-2014-0043 and rescinded Cease and Desist Order R2-2010-0107. The amendments to Order R2-2014-0043 included updating the compliance points for the interim antimony limits and adding new tasks for the Discharger to come into compliance with its dichlorobromomethane and chlorodibromomethane effluent limits at Discharge Points 001 and 003.
7. **Basis for Termination:** The Discharger completed all outstanding requirements of Order R2-2014-0043, as amended by Order R2-2016-0019. Accordingly, Orders R2-2014-0043 and R2-2016-0019 are no longer necessary and can be terminated. The specific tasks that the Discharger completed are outlined below.
8. The Discharger has demonstrated full compliance with its final chlorodibromomethane effluent limits since December 2014 and its final dichlorobromomethane effluent limits since January 2023. The Discharger credits this compliance with its 2018 addition of an ammonium sulfate feed, which modified its main disinfectant from free chlorine to chloramines and decreased the formation of the disinfection byproducts.
9. The Discharger has demonstrated full compliance with its final antimony effluent limits since December 2015. In 2015, the Discharger identified spas with geothermal wells as the largest antimony sources to its treatment plant, and since then the Discharger collaborated with the major geothermal users in its service area to monitor and limit the antimony load to the Facility by monitoring flows and implementing pretreatment options, such as "closed loop" heat exchange systems and reinjection wells.
10. The Discharger did not report any unauthorized discharges, bypasses, or oversaturation of its irrigation fields since the adoption of R2-2014-0043.
 - a. The Discharger constructed a 16.4-million-gallon irrigation storage pond in October 2016.
 - b. In December 2025, the Discharger completed its Riverside Ponds rehabilitation project. The project included reconfiguring, reconstructing, and re-lining the Riverside Ponds to protect levee integrity, lining new

ponds to eliminate seepage, and building a berm higher than the 100-year floodplain to protect the ponds. Reconfiguration of the ponds consolidated the four ponds into two ponds, which should make the ponds less susceptible to erosion and increased the storage capacity by about 0.5 million gallons. The project also included the stabilization of the banks of parts of Simmons Creek, Diablo Ditch, and the Napa River to protect the Riverside Ponds and the Facility's headworks from bank erosion. Additionally, the Discharger installed a throttle control system at Discharge Point 001 that includes a flow meter and adjustable valve to improve control over the effluent discharge.

- c. To reduce inflow and infiltration into the collection system, the Discharger conducted smoke testing, completed sewer main repairs, rehabilitated and replaced lift stations, lined sewers, replaced sewer mains, and repaired manholes.
11. **CEQA:** The termination of Order R2-2014-0043 and Order R2-2016-0019 is exempt from the California Environmental Quality Act (CEQA) because it is not a project as defined under CEQA. The termination will not result in a direct or reasonably foreseeable indirect physical change in the environment. (Pub. Resources Code, § 21065; Cal. Code Regs., tit. 14, §§ 15378, 15061(b)(3).)
12. **Notification:** The Regional Water Board notified the Discharger and other interested agencies and persons of its intent to terminate Cease and Desist Order R2-2014-0043, as amended by Order R2-2016-0019, and provided an opportunity to submit written comments and recommendations. The public had access to the agenda and any changes in dates and locations through the [Regional Water Board's website](http://waterboards.ca.gov/sanfranciscobay) (waterboards.ca.gov/sanfranciscobay).
13. **Public Hearing:** The Regional Water Board, in a public meeting, heard and considered all comments pertaining to the termination of Cease and Desist Order R2-2014-0043, as amended by Order R2-2016-0019.

THEREFORE, IT IS HEREBY ORDERED pursuant to the Clean Water Act and Water Code division 7 that, as of the date of this Order's adoption, Orders R2-2014-0043 and R2-2016-0019 are terminated, except for enforcement purposes.

This Order was adopted on:

December 9, 2026

I hereby certify that this Order is a full, true, and correct copy of the Order adopted by the Regional Water Board on the date indicated above.

Eileen M. White, P.E.
Executive Officer