

Russian River County Sanitation District's Proposed New Discharge Permit

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Dec. 7, 2008

Even after \$5 million dollars worth of improvements a few years ago, the Russian River County Sanitation District (RRCSD) treatment system does not function properly during high flows. The system has violated its discharge permit every year since the Sonoma County Water Agency (SCWA) took over in 1995. A year ago, the District was fined \$99,000 out of a possible \$170,000 for permit violations occurring between Oct. 1, 2004 and May 31, 2007, consisting of 34 effluent limit violations and six prohibited discharges.

Recently, on December 1st, comments were due to the Regional Water Quality Control Board on RRCSD's proposed new discharge permit. In order to address the system's problematic history, many new requirements are being imposed.

One of the biggest problems with the system is with the disinfection process. The SCWA is planning on building a new Ultra-Violet Disinfection system in the next few years that should take care of disinfection problems. It will cost around \$2 million. Unfortunately they have missed an important timeline with this project however and are currently out of compliance with their permit and will receive more mandatory minimum penalties. The ratepayers will have to foot the bill for both the penalties and the project.

Every year RRCSD ratepayer fees go up 3% to 6%. The next raise will bring us close to an annual \$1000 per hookup; one of the highest rates in the State. (Reminder: if 51% of the ratepayers sign and return the protest notice regarding the increase that is sent out by Sonoma County Water Agency in late February, the County can't raise fees.)

And several other major problems still exist as well. There is inadequate storage and more summer irrigation acres are needed. The County conducted separate environmental reviews on each of these components and made a big mess of the review process. So far, they have certified the irrigation EIR but did not select a project. The main project included two pipeline routes to the Graton area, a ridiculously sized project that would entail unknown exorbitant costs.

The other project was a 2.5 million gallon storage basin to equalize high winter flows and allow the system to reliably process more inflowing waste (Cost: about \$6 million). The final EIR was never released on this project. Our group, Russian River Watershed Protection Committee submitted comments along with two geologists who questioned the lack of analysis on the stability of the surrounding hillsides. Furthermore, the 1998 EIR on the RRCSD Expansion stated that a total of 30 million gallons of storage was needed to treat all potential flows. This

project would bring the total flow to about 6 mg. or about 20% of what is actually needed to meet all flow conditions.

While the treatment plant is out of the floodplain, approximately 50% of the collection system is in the flood plain, causing inundation at the plant when floods occur. The higher the flood, the greater that inundation occurs. This is a problem that is not easily addressed and certain measures that have been taken up to now, do not appear to work in floods over 42'.

The North Coast Regional Board has indicated that they would like to see Monte Rio and at least all properties on septic within 600' of the river and tributary creeks hook up to RRCSD. They are concerned about new septic regulations that have been finalized, and could affect properties within 600 feet of the river.

Many of the development minded people in the area would also like to see this happen. Some people convey the impression that the system is way under capacity and can handle a lot of new growth. RRCSD is rated at .510 mgd capacity. (Treatment plant is actually rated at .710 mg when new irrigation area comes on line.) Some are saying that the State should just allow RRCSD violate regulations during floods. (The proposed new Housing Element claims on this basis that about 1775 new hookups could occur.)

Flows in July and August currently average about .375 million gallons a day (mgd). In September, when most of the tourists and summer people go home, the flows go down to around .300 mgd. In January and March of 1995, big flood years, the flows got as high as 10 mgd and water supplies had to be trucked in because drinking water wells had to be shut down. To determine that we have more system capacity based on September flows is crazy.

RRCSD made lengthy comments on this flow issue in our response to the new proposed discharge permit. We strongly believe that because this system exists in a flood plain, the conventional means of determining flows are irrelevant. It would be ironic if people with working septics are forced to hookup to a system that is guaranteed to fail whenever there is a flood.

The Regional Board will conduct a hearing on this permit at their meeting on January 29, 2009. Related documents can be found on their website at www.waterboards.ca.gov/northcoast People can make comments up until that date, but they will not be responded to by staff and may not be considered at all.

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