

GRATON COMMUNITY SERVICES DISTRICT

250 ROSS LANE • MAIL: PO BOX 534, GRATON, CALIFORNIA 95444 • 707/823-1542



February 25th, 2025

Sabrina Cegielski
California Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

Bypass Event Confirmation

Can you confirm or correct my understanding of the bypass event?

- From **9:30 a.m. on 2/15/2025 to 8:00 a.m. on 2/24/2025**, the Graton Community Services District wastewater treatment facility bypassed the SAF and filtration units. Very diluted secondary effluent from the aeration ponds was sent directly **to the chlorine contact basin to ensure adequate disinfection prior to discharge**. From there, the effluent was discharged:
 - Into the West holding pond, while the East pond was discharging to Atascadero Creek.

Required Report Submission

Could you submit a report explicitly addressing **Section I.G.3. (a, b, and c) of Attachment D of Order R1-2018-0001**?

Prohibition of Bypass (40 C.F.R. § 122.41(m)(4)(i))

- **3.a. Justification for Bypass:**

The District believes that this bypass of the SAF and tertiary filtration processes was necessary to process diluted wastewater at a rate that prevented severe flood related damage to treatment process facilities and equipment. Had the District not initiated bypassing of the SAF and filters, we believe the flood conditions would have caused severe damage and inhibited our ability to adequately treat wastewater for a prolonged period, create the potential for release of untreated water into the environment and result in significant equipment repair costs. Prior to bypassing, floodwaters had entered the sludge pump electrical box, requiring shutdown to avoid further damage. Additionally, water reached motor level on the SAF mixing motor, and the backup generator's block heater failed after being submerged. The generator remains non-operational due to flood-related damage.

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- **3.b. Feasibility of Alternatives:**

The District asserts that no feasible alternatives, such as auxiliary treatment facilities or retention of untreated waste, were available. The bypass was necessary due to **severe atmospheric river storm conditions and flooding**, making other options impractical in those conditions.

- **3.c. Notification Compliance:**

The District submitted the required notice to the Regional Water Board in compliance with **Standard Provisions – Permit Compliance I.G.5**. The District made every effort to manage the flood conditions for as long as possible within the “normal” operating mode, and notified the Regional Water Board, via written notification (email to Sabrina) upon commencement of bypass.

Floodwater Management and Recovery

On **Sunday, February 23rd**, The District began pumping floodwaters from the storm catch basins back to the headworks for treatment, increasing hydraulic loading. By **Monday, February 24th**, treatment pond levels were safe enough to **shut down operations and assess property damage**. After **inspecting equipment, draining water from the sludge pump electrical box, and conducting necessary testing**, normal plant processes resumed, and tertiary filtration restarted.

Let me know if any clarifications or additional details are needed.

*John Gibson
Chief Plant Operator
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