

**Regional Water Quality Control Board  
Central Valley Region  
Board Meeting – 25 April 2008**

**Response to Written Comments on Tentative Waste Discharge Requirements for U.S.  
Department of Interior, National Park Service, Yosemite National Park, El Portal  
Wastewater Treatment Facility, Mariposa County**

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At a public hearing scheduled for 25 April 2008, the Regional Water Quality Control Board, Central Valley Region (Regional Water Board) will consider adoption of Waste Discharge Requirements (NPDES No. CA0081759) (hereafter Permit) for the El Portal Wastewater Treatment Facility, which was circulated as tentative on 27 February 2008. This document contains responses to written comments received from interested parties regarding the tentative Permit. Written comments from interested parties were required to be received by the Regional Water Board by noon on 7 April 2008 in order to receive full consideration. Only the U.S. Department of Interior, National Park Service, Yosemite National Park commented.

Written comments from the Discharger are summarized by staff below, followed by the staff responses.

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**NATIONAL PARK SERVICE (NPS) COMMENTS**

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**NPS - COMMENT - 1:** The NPS requests changing the pond discharge description from seepage to percolation.

**RESPONSE:** The change is proposed as a late revision.

**NPS - COMMENT - 2:** The NPS identified a calculation error in the interim copper limit.

**RESPONSE:** A proposed late revision corrects the interim copper limitation.

**NPS - COMMENT - 3:** The NPS requests that the receiving water limitation language regarding fecal coliform be clarified to indicate that increases are over background levels at sampling locations.

**RESPONSE:** The current standard permit language adequately makes the requested distinction. The change has not been made.

**NPS - COMMENT - 4:** The NPS indicates it will conduct a study to develop site-specific Water Effects Ratio and dissolved-to-total metals translator to develop site-specific effluent limitations.

**RESPONSE:** No changes necessary or made.

**NPS - COMMENT - 5:** The NPS requests that the trigger point of >1 Chronic Toxic Unit (TUc) be changed to >4 TUc based on available dilution.

**RESPONSE:** Late revisions have been proposed that will change in the trigger point as requested and provide Fact Sheet language to support the change.

**NPS - COMMENT - 6:** The NPS again refers to the >1 TUc trigger point and the cost of accelerated monitoring.

**RESPONSE:** See response to Comment-5.

**NPS - COMMENT - 7:** The NPS requests clarification regarding the Corrective Action Plan and Implementation Plan for copper.

**RESPONSE:** As the Order states, the copper limitation is based on a default Water Effects Ratio (WER) and dissolved-to-total metal translator (DTTMT). The development of a site-specific WER and DTTMT, and an assimilative capacity/mixing zone study may be included as part of the Corrective Action Plan and Implementation Plan required in the Order. No change has been made.

**NPS - COMMENT - 8:** The NPS requests that language be added to the Compliance Determination section of the Order to specify that an acid soluble method can be used to determine compliance with aluminum effluent limits.

**RESPONSE:** The requested change has not been made because the Order does not include aluminum limitations at this time. However, a late revision has been proposed that will modify the monitoring program to allow the use of the acid-soluble method for aluminum monitoring. A reopener provision is included in the Order, should a limit be appropriate based on additional monitoring data. Language for determining compliance will be proposed at the time a limit is deemed necessary and proposed for Regional Water Board consideration.

**NPS - COMMENT - 9:** The NPS requests clarification of whether receiving water monitoring locations are upstream or downstream.

**RESPONSE:** The clarification has been made.

**NPS - COMMENT – 10:** The NPS requests a change in the upstream receiving water monitoring location.

**RESPONSE:** The change has been made.

**NPS - COMMENT – 11a:** The NPS requests removal of settleable solids monitoring.

**RESPONSE:** The change has not been made. Settleable solids monitoring is an indicator of proper functioning of the clarification and filtration systems and is included in RWB permits for both secondary and tertiary treatment facilities.

**NPS - COMMENT – 11b:** The NPS requests effluent total coliform and receiving water fecal coliform monitoring be replaced with E. coli monitoring based on a Basin Plan amendment.

**RESPONSE:** The change has not been made. The Basin Plan amendment that the NPS refers to was approved by the Regional Water Board; however, it has not been approved by the State Water Resources Control Board or USEPA and is thus not in effect. Further, the Regional Water Board has withdrawn its request for State Water Board and USEPA consideration of the amendment pending State Water Board consideration of a state wide coliform objective. The applicable WQO for receiving water coliform is the fecal coliform objective in the Basin Plan and thus the applicable monitoring is for fecal coliform. Fecal coliform monitoring requirements are carried over from the previous Order and remain appropriate.

**NPS - COMMENT - 12:** The NPS requests clarification regarding whether separate tests are necessary for the acute and chronic whole effluent toxicity testing.

**RESPONSE:** The Order requires submittal of acute and chronic whole effluent toxicity test results that may be provided by the same test. Two separate sampling events and tests are not required.

**NPS - COMMENT – 13:** The NPS requests a reduction of monitoring frequency for chronic whole effluent toxicity testing based on previous test results.

**RESPONSE:** A late revision is proposed that will allow a reduction in chronic whole effluent toxicity testing after four quarters if no toxicity is detected.

**NPS - COMMENT - 14:** The NPS requests a reduction of effluent monitoring frequency for aluminum.

**RESPONSE:** A late revision is proposed that will allow the effluent monitoring frequency to be reduced from monthly to quarterly after one year. A late revision is proposed that will allow the receiving water monitoring frequency to be reduced from monthly to quarterly after two years. Receiving water background conditions may not be adequately characterized in one year, depending on weather conditions.