

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 25/26 July 2013**

**Responses to Written Comments for the
CalMat Co., Walter A. and Elizabeth A. Baun, and Darrell B. and Janet Delevan
Sanger Sand and Gravel Plant
Fresno County
Tentative Waste Discharge Requirements/NPDES Permit**

At a public hearing scheduled for 25/26 July 2013, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of Waste Discharge Requirements (WDRs) (NPDES No. CA0078174) for the CalMat Co. et al. Sanger Sand and Gravel Plant. This document contains staff response to a written comment received from a designated party regarding the tentative WDRs/NPDES permit circulated on 22 May 2013. Written comments from interested parties were required by public notice to be submitted to the Central Valley Water Board by 5:00 pm on 24 June 2013 to receive full consideration. A written comment was received from:

- Buada Associates on behalf of CalMat Co. dba Vulcan Materials Company West Region (CalMat) (24 June 2013)

The written comment from the above designated party is summarized below, followed by the response of Central Valley Water Board staff. Based on the comment and as explained below, Central Valley Water Board staff proposes changes to the tentative WDRs/NPDES permit. Central Valley Water Board staff also proposes changes to the tentative WDRs/NPDES permit to correct typographical errors and to improve clarity.

CALMAT COMMENTS

CALMAT COMMENT 1: Acid-Soluble Aluminum Monitoring Requirement

CalMat notes that 1) there is no EPA-approved analytical method for acid-soluble aluminum and 2) the use of the EPA method 200.7 would generate misleading acid-soluble data since digestion is a required process for EPA method 200.7. Therefore, CalMat requests that the “Aluminum, Total Recoverable/Acid Soluble” effluent monitoring requirement be removed from the tentative WDRs/NPDES permit. CalMat also states that if the Central Valley Water Board does not remove the “Aluminum Total Recoverable/Acid Soluble” monitoring requirement, the tentative WDRs/NPDES permit should allow the analytical method modifications specified in the USEPA’s Ambient Water Quality Criteria for Aluminum document (EPA 440/5-86-0008).

RESPONSE: Central Valley Water Board staff does not agree that aluminum monitoring should be eliminated. Aluminum monitoring is necessary to determine whether CalMat’s discharge has a reasonable potential to cause or contribute to an exceedance of applicable water quality standards. However, Central Valley Water Board staff concurs that the acid-soluble measurement does not require a digestion

process. The tentative WDRs/NPDES permit allows the Discharger to sample for either total recoverable OR acid-soluble aluminum. Therefore, the tentative WDRs/NPDES permit includes footnote 2 in Table E-2 of the MRP to ensure that the Discharger uses an analytical method described in 40 CFR Part 136 when testing for total recoverable aluminum. Footnote 6 in Table E-2 of the MRP is to ensure that the Discharger follows the analytical method described in the USEPA's Ambient Water Quality Criteria for Aluminum document or other approved standard method when testing for acid-soluble aluminum.

Central Valley Water Board staff proposes to revise Table E-2 of the MRP as follows to improve clarity and to address CalMat's comment:

Aluminum, Total Recoverable/ OR Acid Soluble	µg/L	Grab	1/Month ¹¹	2, 6
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² Pollutants shall be analyzed using the analytical methods described in 40 CFR Part 136 or an EPA approved Alternate Testing Procedure; where no methods are specified for a given pollutant that meet a specific reporting limit or method performance standard, an alternate method can be approved by the Executive Officer. For acid-soluble aluminum, the analytical method described in footnote 6 is considered an approved alternate method by the Central Valley Water Board for the purposes of this Order.

⁶ Samples can be analyzed by using ~~either total or acid-soluble~~ (inductively coupled plasma/atomic emission spectrometry or inductively coupled plasma/mass spectrometry) analysis methods, as supported by USEPA's Ambient Water Quality Criteria for Aluminum document (EPA 440/5-86-008), or other standard methods that exclude aluminum silicate particles as approved by the Executive Officer.