

## Ortiz, Aide@Waterboards

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**From:** Allen, Jim <jim\_l\_allen@nps.gov>  
**Sent:** Friday, May 31, 2013 12:43 PM  
**To:** Ortiz, Aide@Waterboards; Scroggins, Matt@Waterboards  
**Cc:** Paul Laymon; Katie A Brown  
**Subject:** Preliminary Draft permit for Wawona Wastwater Treatment Palnt

Matt,

Having had a few weeks now to review the preliminary draft of the new permit for the Wawona Water Treatment Plant I now have many comments and questions that will require additional documentation and discussion with the Board staff. For now there seems to be a common thread among some of the identified sections of the permit that I will address here.

The Fact Sheet (section F) includes the legal requirements and technical rational for the requirements in this order prepared under a standard format to accommodate a broad range of discharge requirements for dischargers in California.

The discharge prohibitions are based on water quality objectives derived from the Basin Plan, National/California Toxics Rule, the State Implementation policy to protect the water of California.

The rational for effluent limitations and discharge specifications section prepared using a standard format does not take into account there has been no river discharge in 20-years from this facility. A rational for effluent limitations should include expectations that the reasonable potential for meeting all water quality objectives is almost certain given historical knowledge of the discharger. In the 27-years of plant operation one small period of surface water discharge occurred more than 20 years ago.

The goal of the NPS is to move away from an NPDES permit for this facility. The Infeasibility Report that generated the Time Schedule Order identified a mutually agreeable understanding which removes the NPDES permit in time by developing additional land/ soils based disposal capacity.

The volume of new permit requirements tax the NPS ability to accomplish this task by requiring focus of resources, time, and finances to implement additional surface water prohibitions, effluent requirements, sampling and reporting all while no discharge to surface water occurs.

Reasonable potential should be based on land discharge and a trigger for sampling and reporting if it appears river discharge is imminent. I would ask for a time extension to allow for further discussions with the Board to evaluate the mutual understanding of the TSO direction and new proposed permit requirements.

Best regards,

Jim L. Allen -  
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