

Central Valley Regional Water Quality Control Board
6/7 February 2014 Board Meeting

Response to Comments
for the
City of Lincoln
Wastewater Treatment and Reclamation Facility
Tentative Waste Discharge Requirements

The following are Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements (NPDES Permit) for the City of Lincoln, Wastewater Treatment and Reclamation Facility (Facility), in Placer County.

The tentative NPDES Permit was issued for a 30-day public comment period on 26 November 2013 and comments were due 26 December 2013.

The Central Valley Water Board received timely comments regarding the tentative NPDES Permit by the due date from the following interested parties:

- Stantec Consulting Services Inc., consultants for the City of Lincoln (City)
- Central Valley Clean Water Association (CVCWA)
- U.S. Environmental Protection Agency (EPA)

Changes, where necessary, were made to the tentative NPDES Permit based on public comments received. The submitted comments were accepted into the record, and are summarized below, followed by Central Valley Water Board staff responses.

CITY COMMENTS

City Comment No. 1. Page 6 (IV.A.2.e.ii) – The Mercury Mass Limit

The City contends that the mercury mass limit is incorrectly shown as 0.0234 pounds per month (lbs/mo), and instead the mercury mass limit in the tentative NPDES Permit should be 0.0238 lbs/mo.

Response: Central Valley Water Board staff does not concur. The proposed mercury mass-based limit was derived by adding the calculated mercury mass loading from the additional municipal sewage the City will accept from Placer County to the City's existing mercury mass based limit of 0.022 lbs/mo. Mercury mass loadings are calculated by multiplying the maximum effluent concentration (MEC) by flow and the conversion factor of 8.34. Placer County's MEC for mercury was 0.00323 ug/L and the increased flow is 1.7 MGD, which equates to an additional mercury mass loading of 0.0014 lbs/mo. Thus the proposed NPDES Permit contains a final mercury mass limit of 0.0234 lb/mo when the regionalization project is complete based on the maximum loading from the existing Facility and the additional loading from Placer County.

City Comment No. 2. Table E-8

The City states that the word “average” was inadvertently left out of footnote #3, which should read “Report daily minimum hourly average dose...”.

Response: Central Valley Water Board staff concurs, and has made changes to footnote #3, Table E-8 in the Monitoring and Reporting Program, Attachment E, of the proposed NPDES Permit, as shown in part in underline format below:

Report daily minimum hourly average UV dose and daily average UV dose.

City Comment No. 3. Table F-1

The City requests that Table F-1 appropriately include the name of the City’s Interim Director, Michael Kashiwagi, Interwest Consulting.

Response: Central Valley Water Board staff concurs and has made changes to the proposed NPDES Permit, Table F-1 as shown in part in underline/strikethrough format below:

- **Table F-1 of Attachment F – Fact Sheet:**

Table F-1. Effluent Monitoring

WDID	5A31NP00011
Discharger	City of Lincoln
Name of Facility	Wastewater Treatment and Reclamation Facility
Facility Address	1245 Fiddymment Road
	Lincoln, CA 95648
	Placer County
Facility Contact, Title and Phone	Stephen Gittings, Chief Plant Operator, (916) 773-8100
Authorized Person to Sign and Submit Reports	Mark Miller <u>Michael Kashiwagi, Interwest Consulting, Interim Director of Public Services, (916) 434-2450</u>

City Comment No. 4. Page F-4 (II.A)

The City states the Facility’s treatment of sludge is not anaerobically digested, and requests that the Fact Sheet of the tentative NPDES Permit be corrected.

RESPONSE: Central Valley Water Board staff concurs. The following changes have been made to the Fact Sheet, Section II.A. as shown in part in underline/strikethrough format below.

Sludge is ~~anaerobically digested and~~ dewatered using a belt filter press. Dried Sludge is hauled to a landfill.

City Comment No. 5. Table F-3

The City requests that Footnote #3 in Table F-3 be corrected to reflect the correct mercury mass limit of 0.0238 pounds per month.

RESPONSE: Central Valley Water Board staff does not concur. See response to Comment No. 1.

CVCWA COMMENTS

CVCWA Comment

CVCWA states that the tentative NPDES Permit contains duplicative regulation through Provision VI.C.5.c., Collection System, that states the City's "collection system is part of the system that is subject to this order," and as such, the City "must operate and maintain its collection system ...and mitigate any discharge from the collection system in violation of this Order." CVCWA contends that the State Water Resources Control Board (State Water Board) regulates sanitary sewer systems greater than one mile in length that collect and convey untreated or partially treated water to treatment facilities under the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, Order No. 2006-0003-DWQ (State Water Board Order No. 2006-0003-DWQ). State Water Board Order No. 2006-0003-DWQ requires enrollees, which includes municipalities that operate sanitary sewer systems, to develop sewer system management plans and other measures to prevent sanitary sewer overflows.

Sanitary sewer systems pose unique challenges for water quality regulation, and the State Water Board has adequately addressed these challenges in State Water Board Order No. 2006-0003-DWQ with which the City must comply. Thus the Regional Board does not need to regulate collection systems further in the City's NPDES permit. CVCWA further contends that the inclusion of the collection systems as part of the NPDES permit subjects the City to possible third party lawsuits because any sanitary sewer overflow will violate the permit's Discharge Prohibitions.

Thus CVCWA respectfully requests that the Regional Board delete from the Tentative Order paragraph VI.C.5.c and the corresponding discussion on pages F-60 and F-61 in the Fact Sheet.

RESPONSE: The following changes have been made to the proposed NPDES Permit, Section VI.C.5.c and d. as shown in part in underline/strikethrough format below, and throughout the proposed NPDES Permit as appropriate.

c. Collection System. On 2 May 2006, the State Water Board adopted State Water Board Order No. 2006-0003-DWQ, Statewide General WDRs for Sanitary Sewer Systems. The Discharger shall be subject to the requirements of Order No. 2006-0003-DWQ and any future revisions thereto. Order No. 2006-0003-DWQ requires that all public agencies that currently own or operate sanitary sewer systems apply for coverage under the general

~~WDRs. The Discharger has applied for and has been approved for coverage under Order 2006-0003-DWQ for operation of its wastewater collection system. The Discharger's collection system is part of the system that is subject to this Order. As such, the Discharger must properly operate and maintain its collection system (40 C.F.R. § 122.411). The Discharger must report any non-compliance (40 C.F.R. § 122.41(l)(6) and (7)) and mitigate any discharge from the collection system in violation of this Order (40 C.F.R. § 122.41(d)). See the Order at Standard Provision VI.A.2.c and Attachment D, subsections I.D, V.E, V.H, and I.C.~~

d. Limited portions of the wastewater collection system may be outside the service area of the Discharger. In order to assure compliance with Discharge Prohibitions against overflows and bypasses, and to assure protection of the entire collection system and treatment works from industrial discharges, it is necessary that the Discharger control discharges into the system. To control discharges into the entire collection system, the Discharger shall establish interagency agreements with the collection system users. The interagency agreements shall contain, at a minimum, requirements for ~~reporting of unauthorized releases of wastewater, maintenance of the collection system, backup power or adequate wet well capacity at all pump stations to prevent overflows during power outages and pump failures, and pump station high water alarm notification systems.~~ The agreements shall also require implementation of an industrial pretreatment program that meets the minimum requirements of this permit.

EPA COMMENTS

EPA Comment No. 1. Biosolids:

EPA summarized comments they requested on a previous draft of the Permit, i.e., prior to circulation of the tentative NPDES Permit on 26 November 2013. Because Staff concurred with the comments during the previous draft, the tentative NPDES Permit contained the changes accordingly. Additional changes to the proposed NPDES Permit are not necessary.

EPA Comment No. 2. Pretreatment

EPA summarized comments they requested on a previous draft of the Permit, i.e., prior to issuance of the tentative NPDES Permit on 26 November 2013. Because Staff concurred with the comments during the previous draft, the tentative NPDES Permit contained the changes accordingly. Additional changes to the proposed NPDES Permit are not necessary.

EPA Comment No. 3. Factsheet clarifications - Backsliding for Cu (pg. F-47)

The EPA acknowledges the backsliding and removal of Cu effluent limits and requests inclusion of a sentence/discussion describing the rationale.

RESPONSE: Central Valley Water Board staff concurs. Section IV.D.3.b.iii in the Fact Sheet, Attachment F, of the proposed NPDES Permit was changed as shown in underline format below:

Copper. The Discharger conducted a copper water effects ratio (WER) study during the term of the previous permit that indicated a dissolved WER for copper of 6.34 is appropriate and protective of the beneficial uses of the receiving water. Effluent data and receiving water

monitoring collected between December 2008 and March 2013 indicates that the discharge does not demonstrate reasonable potential to cause or contribute to an exceedance of the CTR aquatic life criteria of 14 µg/L.

EPA Comment No. 4. Factsheet clarifications – Historical data for mercury in Table F-3

EPA states that the RPA section for mercury includes relevant monitoring data including maximum effluent concentration etc. EPA requests to include, revise/update this information in Table F-3.

RESPONSE: Central Valley Water Board staff concurs and has made changes to the tentative Permit, Table F-4 as shown in part below in underline/strikethrough format:

Table F-1. Historic Effluent Limitations and Monitoring Data

Parameter	Units	Effluent Limitation			Monitoring Data (December 2008 – March 2013)		
		Average Monthly	Average Weekly	Maximum Daily	Highest Average Monthly Discharge	Highest Average Weekly Discharge	Highest Daily Discharge
Mercury, Total Recoverable	lbs/month	0.022 ³	--	--	NR 0.0006	--	--

NR = Not Reported

³ The total monthly mass discharge of total mercury discharged to Auburn Ravine Creek not to exceed this value until 1 September 2015. Upon compliance with VI.C.6.b.i, the total cumulative mass discharge of total mercury shall not exceed 0.0234 pounds/month for a calendar month.