



**CITY OF GRASS VALLEY  
PUBLIC WORKS DEPARTMENT**

125 East Main Street  
Grass Valley, CA 95945  
530-477-4625  
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December 28, 2015

Mr. Joshua Palmer  
Senior Water Resource Control Engineer  
California Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive – Suite 200  
Rancho Cordova, CA 95670-6114

**Subject: City of Grass Valley Wastewater Treatment Plant Tentative Order Comment Letter**

Dear Mr. Palmer,

The City of Grass Valley (City) appreciates this opportunity to provide comments on the Tentative Order for the City's National Pollutant Discharge Elimination System (NPDES) permit (CA0079898), which regulates its Wastewater Treatment Plant (WWTP), for consideration by the Central Valley Regional Water Quality Control Board (Central Valley Water Board). The City's comments on the Tentative Order are related to the following:

- Pretreatment Program
- Chlorine residual monitoring

**Pretreatment Program**

The City currently operates a Pretreatment Program to regulate industrial users discharging wastewater to its collection system and WWTP. In administering its Pretreatment Program, the City is required to permit, inspect, sample, and enforce its industrial users as well as prepare periodic reports summarizing the program. The City currently has one permitted categorical industrial user in its Pretreatment Program that discharges approximately 1,000 gallons of wastewater per day. This discharge represents approximately 0.1 percent of the total wastewater flow to the WWTP and pollutant loads of less than 1 percent of the maximum allowable headworks loading (MAHL) of the WWTP (e.g., 0.3 percent of MAHL for copper).

The City met with Central Valley Water Board staff on 20 November 2015 to discuss comments on the Administrative Draft of the NPDES permit including ceasing the requirement of the City to implement a pretreatment program because the City only has one small industrial user and

the capacity of the WWTP is significantly below the typical threshold for establishing a pretreatment program (e.g., wastewater treatment plants with a flow rate of 5 million gallons per day or greater). From that discussion, the City agreed to continue to implement its Pretreatment Program through 2016 to demonstrate two years of compliance following cessation of accepting mine drainage from Drew Tunnel in September 2014.

Special Provision (VI.C.5.a) in the Tentative Order (pages 15-16) does not include language that allows for the City to cease its Pretreatment Program following a demonstration of two years of compliance through 2016. The Reporting Requirements (X.D.5) in Attachment E of the Tentative Order (pages E-18-21) and Rationale for Provisions (VI.B.5.a) in Attachment F of the Tentative Order (pages F-57-58) only include language allowing the City to submit a letter for approval by the Executive Officer to discontinue the requirement to submit annual pretreatment reports. The language in the Tentative Order still requires implementation of a pretreatment program with the potential exception of ceasing annual reporting requirements.

Since the City's only industrial user has limited impact the WWTP, the City requests that Central Valley Water Board include language in the NPDES permit (Special Provision VI.C.5.a) (as well as revisions to Attachments E and F) that allows the City to submit a letter to the Executive Officer in 2017 requesting rescission of all pretreatment program requirements following demonstration of compliance with the pretreatment regulations and that the WWTP has not violated effluent limitations due to its industrial user. The City will still maintain the ability to regulate its industrial user through its Sewer Use Ordinance outside the constraints of an approved pretreatment program. This approach was similarly applied in the City of Colfax NPDES permit (CA0079529, Order No. R5-2013-0045).

The continued implementation of a full Pretreatment Program for one small industrial user that has little impact on the WWTP and has no instances of non-compliance is not an effective use of the City's limited resources. If the requirements for its Pretreatment Program are rescinded, the City can reallocate resources from its Pretreatment Program to other wastewater efforts to better protect environmental health.

### **Chlorine Residual Monitoring**

In September 2009, the City began full operation of an ultraviolet light disinfection system at the WWTP that replaced its prior chlorination disinfection system. In a letter to the Central Valley Water Board, dated 20 January 2010, the City requested to discontinue monitoring requirements for total chlorine residual. The Central Valley Regional Water Board, in the attached letter dated 9 February 2010, approved the City's request to discontinue monitoring requirements for total chlorine residual.

Table E-3 of Attachment E of the Tentative Order includes a requirement for the City to conduct effluent monitoring for total chlorine residual. The City requests that the requirement for total chlorine residual monitoring be removed from the NPDES permit.

The City appreciates the opportunities that the Central Valley Water Board staff have provided to submit comments on the Administrative Draft and Tentative Orders of the City's NPDES

permit. The City also appreciates Central Valley Water Board staff for meeting with us on 20 November 2015 to discuss our initial comments on the Administrative Draft Order.

If you have any questions, or need further information, on the City's comments, please contact me at (530) 274-4351.

Sincerely,

**CITY OF GRASS VALLEY**  
Public Works Department,

A handwritten signature in black ink, appearing to read "T.M. Kiser", written over a horizontal line.

Timothy M. Kiser, PE  
Public Works Director/City Engineer

Attachment: Chlorine Monitoring, City of Grass Valley, Wastewater Treatment Plant, Nevada County, dated 9 February 2010

cc: Nichole Morgan, Central Valley Regional Water Quality Control Board  
Brian Taylor, Central Valley Regional Water Quality Control Board  
Mike Busse, City of Grass Valley  
Gorman Lau, Larry Walker Associates



Linda S. Adams  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board Central Valley Region

Katherine Hart, Chair

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Arnold  
Schwarzenegger  
Governor

9 February 2010

Mike Healy  
Deputy Director of Public Works  
City of Grass Valley  
125 E Main St  
Grass Valley, CA 95945

## **CHLORINE MONITORING, CITY OF GRASS VALLEY, WASTEWATER TREATMENT PLANT, NEVADA COUNTY**

Waste Discharge Requirements (WDRs) Order R5-2007-0163 (NPDES CA0079898), Attachment E, Table E-3 requires the City of Grass Valley (Discharger) to continuously monitor the effluent from its wastewater treatment plant for total residual chlorine. The Discharger sent a letter dated 20 January 2010 requesting to discontinue monitoring effluent for total residual chlorine, because the Discharger has converted from chlorine disinfection to ultraviolet disinfection.

Staff of the Central Valley Water Board recognizes that continuous chlorine monitoring is not necessary without a reasonable possibility for chlorine residual to be present anywhere in the wastewater treatment system or effluent. Therefore, Central Valley Water Board Compliance/Enforcement staff will use its discretion to not take enforcement action for violations of the monitoring requirement for total residual chlorine in WDRs Order R5-2007-0163, Attachment E, Table E-3, provided that no chlorine is used for wastewater treatment or maintenance of the wastewater treatment plant. We have also requested that the Permitting staff update Attachment E to delete the need for continuous chlorine monitoring.

If you have any questions regarding this matter, please contact Spencer Joplin at (916) 464-4660 or [sjoplin@waterboards.ca.gov](mailto:sjoplin@waterboards.ca.gov).

WENDY WYELS  
Supervisor  
Compliance and Enforcement Section

SMJ/T:\R5S Sections\Compliance Enforcement\\_Staff\sjoplin\Facilities\Nevada Cnty 29\Grass Valley City WWTP 5A290100001\Grass Valley City WWTP 2010-02-09 Chlorine Monitoring.Doc