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Edmund G. Brown Jr.
Governor

14 December 2011

CERTIFIED MAIL

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Ms. Sarah Supahon, Superintendent
Indian Springs School District
Post Office Box 70
Big Bend, CA 96011

NOTICE OF APPLICABILITY (NOA); LOW THREAT GENERAL WASTE DISCHARGE REQUIREMENTS ORDER NO. R5-2008-0081, INDIAN SPRINGS SCHOOL DISTRICT, GEOTHERMAL HEATING SYSTEM, SHASTA COUNTY

Our office received a Notice of Intent (NOI) on 28 October 2011, from Indian Springs School District (Discharger) for the Geothermal Heating System Project (Project). Based on the information in the NOI and supplemental information dated 4 November 2011, requesting an exception to effluent and receiving water sampling requirements, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff determined that the Project meets the required conditions for approval under the General Order for Dewatering and Other Low Threat Discharges to Surface Waters (Low Threat General Order). This Project is hereby assigned Low Threat General Order No. **R5-2008-0081-109** and National Pollutant Discharge Elimination System (NPDES) Permit No. CAG995001. Please reference the unique Order No. R5-2008-0081-109 in all future correspondence and documents.

The Low Threat General Order (enclosed) may also be viewed at the following web address: http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2008-0081.pdf. You are urged to familiarize yourself with the contents of the entire document. The Project activities shall be operated in accordance with the requirements contained in this NOA, the Low Threat General Order, and with the information submitted by the Discharger.

The Central Valley Water Board has determined that the discharge from your Project can be appropriately regulated under the Low Threat General Order. Therefore, your existing individual permit, Order No. R5-2006-0104 (NPDES No. CA0081655) will be scheduled for rescission by a separate action of the Central Valley Water Board at a future regularly scheduled Board meeting.

CALIFORNIA TOXICS RULE / STATE IMPLEMENTATION PLAN MONITORING

The Low Threat General Order incorporates the requirements of the California Toxics Rule (CTR) and the State Water Resources Control Board's (State Water Board), *Policy for Implementation of Toxic Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California*, 2005, also known as the State Implementation Plan (SIP).

California Environmental Protection Agency



Screening levels for CTR constituents are found in Attachment B of the Low Threat General Order. Review of the submitted water quality data in comparison to the CTR screening values, showed no reasonable potential to impact the receiving waters.

PROJECT DESCRIPTION

The Discharger is the owner and operator of a geothermal production well and heat-exchange equipment used for heating classrooms and a swimming pool at Indian Springs School in Big Bend, Shasta County. Geothermal water is pumped from an 820 foot well, with the pump set at 336 feet. The geothermal water is passed through a heat exchanger in which potable water is heated by the geothermal water and circulated through the classroom heaters. Spent geothermal water, which has passed through the heat exchanger, is discharged to Indian Springs Creek, a tributary to the Pit River. The maximum design discharge flow at the discharge point is 0.144 million gallons per day (MGD). The average monthly discharge flow rate between November 2006 and April 2011 was reported as 0.035 MGD with a maximum daily flow of reported as 0.102 MGD during peak heating demand.

Wastewater is discharged from Discharge Point No. 001 into Indian Springs Creek. Indian Springs Creek is a seasonal (ephemeral) stream that passes through an area of natural hot springs below the discharge point prior to the combined flow entering the Pit River. The Central Valley Water Board has determined that there is no reasonable potential for pollutants in the discharge to cause or contribute to an increase in the concentration of constituents in Indian Springs Creek or the Pit River.

MONITORING AND REPORTING

The Discharger submitted a request with the NOI for an exception to the Monitoring and Reporting Program, Attachment E, of the Low Threat General Order. The Discharger requested a site-specific effluent and receiving water monitoring program appropriate to a geothermal discharge and consistent with the existing individual Order No. R5-2006-0104. The Central Valley Water Board staff reviewed the request and concurred that effluent monitoring for biochemical oxygen demand, chlorine residual, total suspended solids, and settleable solids; and receiving water monitoring for dissolved oxygen; is not appropriate for this geothermal discharge. Therefore, the following site specific monitoring program for effluent and receiving water sampling shall be implemented as part of this NOA. This site-specific monitoring is being required pursuant to the California Water Code section 13267. The information is necessary to ensure the discharge does not cause exceedances of water quality objectives in the receiving water.

1. EFFLUENT MONITORING REQUIREMENTS

Effluent samples shall be collected downstream from the last connection through which wastes can be admitted to the outfall. Effluent samples should be representative of the volume and quality of the discharge. Time of collection shall be recorded. Pollutants shall be analyzed using the analytical methods described in 40 CFR Part 136. The

following monitoring requirements replace monitoring specified in section IV.A.1 of Attachment E of the Low Threat General Order:

Parameter	Units	Sample Type	Sampling Frequency
Flow	MGD	Meter	Weekly
pH	standard units	Grab	Weekly
Temperature	degrees F	Grab	Weekly
Electrical Conductivity @ 25°C	µmhos/cm	Grab	Quarterly
Total Dissolved Solids	mg/L	Grab	Quarterly

2. RECEIVING WATER MONITORING REQUIREMENTS

The Discharger shall monitor Indian Springs Creek 50 feet upstream from the discharge point (Monitoring Location R-001U) and downstream at the Hot Springs Road Bridge (Monitoring Location R-001D). The following receiving water monitoring requirements replace receiving water monitoring specified in section VIII.A.1 of Attachment E of the Low Threat General Order:

Parameter	Units	Sample Type	Sampling Frequency
pH	standard units	Grab	Weekly
Temperature	degrees F	Grab	Weekly
Electrical Conductivity @ 25°C	µmhos/cm	Grab	Quarterly
Total Dissolved Solids	mg/L	Grab	Quarterly

In conducting the receiving water sampling, a log shall be kept of the receiving water conditions throughout the reach bounded by Monitoring Locations R-001U and R-001D. Attention shall be given to the presence or absence of:

- a. Floating or suspended matter
- b. Discoloration
- c. Bottom deposits
- d. Aquatic life
- e. Visible films, sheens, or coatings
- f. Fungi, slimes, or objectionable growths
- g. Potential nuisance conditions

Notes on receiving water conditions shall be summarized in the monitoring report.

The Discharger must submit quarterly reports, as described in Attachment E, Section X, of the Low Threat General Order even if there is no discharge or receiving water flow during the reporting quarter, until the Discharger formally requests that coverage under the Low Threat General Order and this NOA be terminated.

All Dischargers must notify Central Valley Water Board staff: 1) 24 hours before the start of each new discharge, 2) as soon as noncompliance is anticipated, and 3) when the discharge ceases.

GENERAL INFORMATION AND REQUIREMENTS

The required annual fee (as specified in the annual billing you will receive from the State Water Resources Control Board) shall be submitted until the discharge is terminated. To terminate coverage under the Low Threat General Order, the Discharger must submit written notification to the Central Valley Water Board that the discharge regulated by this Low Threat General Order has ceased and is no longer necessary. If a timely written request is not received, then the Discharger will be required to pay applicable annual fees as determined by the State Water Resources Control Board.

PERMIT RENEWAL

Enrollees covered under General Order R5-2008-0081 at the time of its expiration will continue to be covered until coverage becomes effective under a reissued Order. Upon reissuance of this Order by the Regional Water Board, Dischargers seeking coverage under the reissued Order shall file a revised Notice of Intent in accordance with the reissued Order. Alternatively, the Discharger may seek coverage under an individual Order. Be advised six month or longer lead-time is necessary when seeking an individual order to avoid coverage lapse.

ENFORCEMENT

Failure to comply with the Low Threat General Order may result in enforcement actions, which could include civil liability. Effluent limitation violations are subject to a Mandatory Minimum Penalty (MMP) of \$3,000 per violation. Late reports may be subject to an MMP of \$3,000 for each period of 30 days late. When discharges do not occur during a quarterly monitoring period, the Discharger must still submit a quarterly report indicating that no discharge occurred to avoid being subject to enforcement actions.

All monitoring report submittals, notification of the beginning and end of discharge, and questions regarding compliance and enforcement shall be directed to Kevin Kratzke of the Central Valley Water Board's Redding Office. Mr. Kratzke can be reached at (530) 224-4850 or kkratzke@waterboards.ca.gov.

Original signed by Robert Crandall

(for) Pamela C. Creedon
Executive Officer

KEK: jmtm

Enclosure: General Order WQO 2008-0081 (Discharger only)

cc: See Attached List

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cc: Dave Smith, U.S. Environmental Protection Agency, Region IX, San Francisco
Phil Isorena, Division of Water Quality, State Water Board, Sacramento
Shasta County Environmental Health, Redding
Shasta County Planning Department, Redding
California Division of Oil, Gas & Geothermal Resources, District 6, Sacramento