

Enclosure No. 1 Tentative Discharge Option

The following is a Tentative Discharge Option (Tentative Option) for the City of Jackson Wastewater Treatment Plant (WWTP) tentative NPDES permit renewal. The tentative NPDES permit renewal proposes a Discharge Prohibition that only allows the City of Jackson (Discharger) to discharge tertiary treated WWTP effluent to Jackson Creek when the creek-flow-to-effluent-flow ratio is equal or greater than 20-to-1. The tentative NPDES permit also proposes a five year time schedule for the Discharger to comply with the Discharge Prohibition. The basis of the proposed prohibition is to protect the use of Jackson Creek water as a domestic water supply by immediate downstream residents.

The proposed Tentative Option allows for continued year-round discharge of tertiary treated WWTP effluent to Jackson Creek under all in-stream flow conditions. This option is being proposed in response to concerns expressed by the Department of Fish and Game's 18 July 2003 letter (signed by Larry L. Eng, Ph.D., Deputy Regional Manager) regarding the necessity to maintain in-stream flow in Jackson Creek for the protection of aquatic life and wildlife. This proposed option also addresses in-stream flows that may need to be maintained for existing downstream water right holders.

Both maintenance of in-stream flows and the need for dilution of the wastewater discharged to the Creek are further impacted with the recent repair of the upstream unlined Amador Canal that has historically contributed significant flow to Jackson Creek via overflows and subsurface contributions. A recent proposal for the construction of a piping system for the upstream canal is expected to eliminate upstream contributions of flow to Jackson Creek, further exacerbating the downstream flow.

The Tentative Option proposes modifications to the tentative NPDES permit to address the (1) deletion of the proposed Discharge Prohibition, and (2) modifications to incorporate the proposed final ammonia limitations in Section IV.A.1.f. of the tentative permit (effective from 18 May 2010 to five years after the permit adoption date) as final ammonia effluent limitations.