

LATE REVISIONS –25 April 2008

Item 19.c. U.S. Department of Interior, National Park Service, Yosemite National Park, El Portal Wastewater Treatment Facility, Mariposa County – *Consideration of Renewal of NPDES Permit*

Deletions in ~~strikeout~~. Additions in **bold underline**.

LIMITATIONS AND DISCHARGE REQUIREMENTS

Page 3 Modify the fifth sentence of the first paragraph of Finding B, as follows:

B.Wastewater is discharged to the Merced River by ~~seepage~~ **percolation** from Discharge D-001 or directly, via an outfall pipe from Discharge D-002...

Page 10 -11 Make the following modifications to *Table 7. Interim Effluent Limitations* in Effluent Limitations Section IV.A.2:

Parameter	Units	Maximum Daily
Copper	ug/L	24.5 <u>25</u>

Page 20 Make the following modifications to the section Provisions VI.C.2.a.iii., *Numeric Monitoring Trigger*, as follows:

iii. Numeric Monitoring Trigger. The numeric toxicity monitoring trigger is > 4 ~~4~~ **TUc** (where TUc = 100/NOEC).

Page 24 Revise Provisions VI.C.7.a.i., *Compliance Schedules for Final Effluent Limitations for Copper*, by adding the following sentence to the end of the subsection:

The Discharger submitted a revised compliance schedule justification on 7 April 2008.

Page 24 Revise Provisions VI.C.7.a., by adding the following subsection to the end of the section:

iv. The Discharger's revised compliance schedule justification requests the Regional Water Board consider a time schedule order to provide additional time to comply with the copper limit, as the Discharger does not believe it can comply by 18 May 2010. As described in more detail in Fact Sheet Section VII.B.7.a., additional time will be necessary to comply with the final copper limit. A separate time schedule order will be considered at a later date.

MONITORING AND REPORTING PROGRAM

Page E-3 Revise the thirteenth row and footnotes of, *Table E-3. Effluent Monitoring D-001*, as follows:

Aluminum ^{8,9}	ug/L	12-hr Composite ³	1/month	1, <u>10</u>
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⁹Monitoring frequency may be reduced to quarterly sampling after 12 months of monitoring.

¹⁰Either total or acid-soluble (inductively coupled plasma/atomic emission spectrometry or inductively coupled plasma/mass spectrometry) analysis method, as supported by USEPA’s Ambient Water Quality Criteria for Aluminum document (EPA 440/5-86-008).

Page E-6 Revise *Table E-5 Chronic Toxicity Testing Dilution Series*, as follows:

Table E-5. Chronic Toxicity Testing Dilution Series

Sample	Dilutions (%)					Controls	
	100	75 <u>50</u>	50 <u>25</u>	25 <u>12.5</u>	12.5 <u>6.3</u>	Receiving Water	Laboratory Water
% Effluent	100	75 <u>50</u>	50 <u>25</u>	25 <u>12.5</u>	12.5 <u>6.3</u>	0	0
% Receiving Water	0	25 <u>50</u>	50 <u>75</u>	75 <u>87.5</u>	87.5 <u>93.7</u>	100	0
% Laboratory Water	0	0	0	0	0	0	100

Page E-8 Revise the sixth row and footnotes of *Table E-8a., Receiving Water Monitoring Requirements*, as follows:

Aluminum ^{2,6}	ug/L	Grab	1/month	1, <u>7</u>
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- ⁶ Monitoring frequency may be reduced to quarterly sampling after 24 months of monitoring.
- ⁷ Either total or acid-soluble (inductively coupled plasma/atomic emission spectrometry or inductively coupled plasma/mass spectrometry) analysis method, as supported by USEPA's Ambient Water Quality Criteria for Aluminum document (EPA 440/5-86-008).

FACT SHEET

Page F-13 Revise the language in Section IV.C.3.d., *Water Quality-Based Effluent Limitations, Aluminum*, with the addition of the following paragraph at the end of the section:

The Discharger has requested using alternate aluminum testing protocol to meet monitoring requirements. In USEPA's Ambient Water Quality Criteria for Aluminum—1988 [EPA 440/5-86-008], USEPA states that “[a]cid-soluble aluminum...is probably the best measurement at the present...”; however, USEPA has not yet approved an acid-soluble test method for aluminum. Replacing the ICP/AES portion of the analytical procedure with ICP/MS would allow lower detection limits to be achieved. Based on USEPA's discussion of aluminum analytical methods, this Order allows the use of the alternate aluminum testing protocol described above to meet monitoring requirements.

Page F-23 Revise *Table F-5 Interim Effluent Limitation Calculation Summary*, as follows:

Parameter	Units	MEC	Mean	Std. Dev.	# of Samples	Interim Limitation
Copper	ug/L	19.7	8.46 8.14	5.33 5.01	28 31	24.5 25

Page F-27 Revise the language in Section VI.C.2., *Chronic Toxicity*, as follows:

- 2. Chronic Toxicity.** Quarterly chronic whole effluent toxicity testing is required **for one year** in order to demonstrate compliance with the Basin Plan's narrative toxicity objective. **If no toxicity is present, toxicity monitoring may be reduced to once a year.**

Page F-29 Revise the language in Section VII.B.2.a., *Chronic Whole Effluent Toxicity Requirements*, as follows:

Monitoring Trigger. A numeric toxicity monitoring trigger of > 4 TUc (where TUc = 100/NOEC) is applied in the provision, ~~because this Order does not allow any dilution for the chronic condition~~ **based on available receiving water dilution.** Therefore, a TRE is triggered when the effluent exhibits a pattern of toxicity at 400 **25%** effluent.

Page F-34 Revise the first sentence in Section VII.B.7.a., *Compliance Schedules*, as follows:

- a. The Discharger submitted a request and justification dated 12 March 2008, **and a revised justification dated 7 April 2008**, for a compliance schedule for copper. A compliance schedule is appropriate, because the Discharger must conduct studies and may need to upgrade the WWTF to comply. The compliance schedule justification included all items specified in Paragraph 3, items (a) through (d), of Section 2.1 of the SIP. This Order establishes a compliance schedule for the new, final, water quality-based effluent limitation for copper and requires full compliance by 18 May 2010, as required by the SIP. This Order requires submittal of annual progress reports. These reports serve as interim requirements that will allow the Regional Water Board to evaluate the Discharger's progress towards compliance.

The revised compliance schedule justification states that the Discharger intends to conduct both mixing zone and water effect ratio studies for copper. Concurrently, the Discharger will conduct engineering feasibility and alternatives screening studies. Completion of these activities will take approximately two years or until April 2010. Should construction of additional WWTF upgrades be required, the compliance schedule justification indicates it would take the Discharger approximately three years to complete the bid, pre-design, design, and construction activities, or until April 2013. Given that this extends beyond the 18 May 2010 compliance date in this Order, the Discharger requests that the Regional Water Board adopt a time schedule order to provide additional time to comply with the final copper limit. The schedule provided by the Discharger is reasonable and consideration of a time schedule Order subsequent to the adoption of this Order is appropriate.