

ITEM: 10

SUBJECT: General Order for Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water (General Order)

BOARD ACTION: *Consideration of Adoption of General Waste Discharge Requirements.*

BACKGROUND: There are many discharges of wastewater to surface water having well-defined characteristics and for which well-established treatment technologies exist to eliminate constituents that pose a threat to water quality. Such discharges can not be categorized as “low-threat”, yet do not pose such a significant threat which must be regulated by an individual NPDES permit. The tentative General Order proposes to regulate discharges that are of a limited threat, which include the following:

- Treated or Untreated Groundwater from Cleanup Sites. The Regional Water Board’s Cleanup Program oversees the investigation and cleanup of sites with soil and groundwater pollution by numerous pollutants. Many of these cleanups result in discharges of groundwater to surface waters that pose a limited threat to waters of the United States.
- Wastewater from Superchlorination Projects. Superchlorination projects are defined as those that utilize chlorination with doses that are deliberately selected to produce free or combined residual large enough that dechlorination is required prior to surface water discharge. Superchlorination projects throughout the region produce similar limited threat wastewaters that are discharged to waters of the United States.
- Other Limited Threat Wastewaters. Other miscellaneous limited threat wastewaters throughout the region that do not contain human sewage or significant concentrations of oxygen demanding substances are discharged to waters of the United States.

The proposed General Order is in accordance with federal and state policies that govern over NPDES permits. The Order incorporates requirements of the California Toxic Rule and the State Water Resources Control Board’s Implementation of Toxic Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California, 2005 (also referred to as the SIP).

## ISSUES:

Although no comments were submitted regarding the proposed General Order, the East Bay Municipal Utility District (EBMUD) submitted comments on the tentative General Order for Dewatering and Other Low Threat Discharges to Surface Waters (Low Threat General Order) issued for public comments on 20 March 2008. Regional Water Quality Control Board staff believes that the major issue EBMUD raised is also applicable to the subject Limited Threat General Order. Further detail EBMUD comments are included in Regional Water Board staff's Responses to Comments for the proposed Low Threat General Order.

Total Residual Chlorine: The tentative General Order includes water-quality based effluent limitations for total residual chlorine of 0.011 mg/L as a 4-day average and 0.019 mg/L as a 1-hour average. The limitations are based on USEPA's National Ambient Water Quality Criteria for protection of freshwater aquatic life and the State Water Resources Control Board's draft *Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California*, (TRC/CPO) policy. These criteria are used to interpret the Basin Plan's narrative toxicity objective for chlorine.

EBMUD commented that current field analytical methods are not capable of achieving reporting levels at the proposed permitted levels of 0.011 mg/L as a 4-day average and 0.019 mg/L as a 1-hour average, as included in the tentative General Order. EBMUD suggested that the proposed numeric effluent limitations for total residual chlorine be removed and best management practices (BMPs) be required, consistent with the State Water Resources Control Board's TRC/CPO draft policy.

The proposed General Order regulates discharges that are typically monitored with field monitoring equipment. Because analytical methods for measuring total residual chlorine in the field cannot meet reporting levels in the range of the proposed effluent limitations for a typical drinking water matrix, EBMUD recommended that the Regional Water Board consider including a reporting level of 0.08 mg/L to demonstrate compliance with effluent limitations, consistent with the reporting level adopted by the San Francisco Regional Water Quality Control Board in its General Order for Discharges from Surface Water Treatment Facilities for Potable Water Supply (Order No. R2-2003-0062, NPDES No. CAG382001). EBMUD also recommended that monitoring for dechlorination agent residual be included in the proposed General Order as an acceptable alternative to monitoring for total residual chlorine.

In response to the EBMUD public comment, an additional monitoring requirement is proposed requiring dischargers to utilize a method capable of achieving a reporting level of 0.08 mg/L, which represents a level that hand-held field meters are capable of achieving. Language has been included in the proposed General Order for if the State Water Board adopts a statewide policy with a specified level achievable in the field, those levels will supercede the General Order's 0.08 mg/L reporting level. Compliance determination language for total residual chlorine has been clarified to specify that any quantifiable excursion above the 1-hour

average or 4-day average total residual chlorine effluent limitations is a violation. "Quantifiable" means any excursion greater than or equal to a reporting level of 0.08 mg/L, or any more stringent reporting level included in a final statewide policy or standard for total residual chlorine. A reopener has also been added to allow the Regional Water Board to reopen the Order and modify the chlorine residual requirements consistent with a future statewide policy for total residual chlorine.

Mgmt. Review \_\_\_\_\_

Legal Review \_\_\_\_\_

Central Valley Regional Water Quality Control Board

11020 Sun Center Dr. #200

Rancho Cordova, CA 95670

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