

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 8/9/10 June 2011**

**Response to Written Comments for the
Santa Fe Aggregates, Inc. and Walter John Seaborn
Sand and Gravel Plant
Tulare County
Tentative Waste Discharge Requirements/NPDES Permit**

At a public hearing scheduled for 8/9/10 June 2011, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of renewed Waste Discharge Requirements (WDRs) (NPDES No. CA0082708) for the Santa Fe Aggregates, Inc. and Walter John Seaborn, Sand and Gravel Plant. The final meeting agenda will be available at http://www.waterboards.ca.gov/centralvalley/board_info/meetings/#2011/ at least ten days before the meeting. The agenda will provide the date the proposed WDRs will be heard, indicate the anticipated order of agenda items, and may include staff revisions to the proposed WDRs.

This document contains responses to written comments received from interested parties regarding the revised tentative WDRs circulated on 5 April 2011. Written comments from interested parties on the revised portions of the tentative WDRs only were required by public notice to be submitted to the Central Valley Water Board by 5:00 pm on 9 May 2011 to receive full consideration. Written comments were received from:

- EMKO Environmental, Inc. on behalf of Santa Fe Aggregates, Inc., 11 April 2011

Written comments from the above interested party are summarized below, followed by the response of the Central Valley Water Board staff.

SANTA FE AGGREGATES, INC. (Discharger) COMMENTS

DISCHARGER COMMENT 1: The Discharger requests that the Central Valley Water Board remove the statement in the Fact Sheet of the WDRs that states that the discharge caused or threatened to cause potential violations of the receiving water limitation for pH. The Discharger presents pH values for the effluent and upstream and downstream receiving water for several months. The Discharger states that given the pH measurements, the effluent flow, and flow in the St. Johns River, there are occasions when it is chemically impossible for the effluent to cause the downstream receiving water to increase in pH as much as it did. The Discharger also requests that language be added to the WDRs acknowledging that natural conditions within the St. Johns River can result in pH variations that do not meet the receiving water limitations.

RESPONSE: The requested changes have not been made. Central Valley Water Board staff reviewed self-monitoring reports to confirm the pH values the Discharger presented in its comments. Staff found that the pH values reported in the self-monitoring reports for February and March 2006 and May 2007 do not match the pH

values the Discharger presented in its comments. For example, in May 2007, the date that pH was 7.6 in the upstream receiving water and 8.0 in the downstream receiving water, no pH measurement was taken at the effluent; therefore, the Discharger's argument that the effluent could not have caused pH to change by more than 0.3 units in the receiving water is unsupported. Similarly, in February and March 2006 there were no occasions when the upstream pH was 7.6, the downstream pH was 8.0, and the effluent pH was 8.0 on the same date.

While Central Valley Water Board staff is not assuming that zero mixing occurs at the downstream receiving water monitoring location, it is possible that when there is a low flow in the St. Johns River the downstream receiving water sample may be comprised of a large fraction of effluent. Additionally, the Discharger has not conducted a study to show that the pH at the upstream receiving water monitoring location varies significantly compared to the downstream receiving water pH when samples are collected at approximately the same time and there is no discharge occurring.

DISCHARGER COMMENT 2: In regards to the effluent pH monitoring frequency, the Discharger states that there exists enough effluent pH data to adequately assess the stability of the pH in the effluent.

RESPONSE: The effluent pH monitoring frequency has not been changed. While the Discharger may be correct in stating that the effluent pH data show effluent pH is stable, the data also show that the effluent pH is frequently near the maximum pH effluent limitation. The pH effluent limitations are instantaneous limitations and quarterly monitoring is insufficient to detect short-term pH changes that can occur within a pond system. Furthermore, Central Valley Water Board staff does not believe that monthly effluent pH monitoring is an onerous requirement.