



October 21, 2011

71023

Ms. Katie Bowman
Water Resources Control Engineer
Regional Water Quality Control Board
Central Valley Region
Redding, CA 96002

Via Email & U.S. Mail
kbowman@waterboards.ca.gov

**RE: Draft NPDES Permit (CA0085162)
Grizzly Ranch Community Services District (GRCSO)
Plumas County, California**

Dear Katie:

At the request of the GRCSO, I have completed a review of the draft permit. The permit in general is well written and meets the new standard required boilerplate, thus limiting the options for comments. We appreciate that the *Standard Provisions* and the findings are unchangeable. To that end, many of the required reports do not always make a lot of sense since the plant is not operating.

Our primary concerns, as you will see in the following comments, are associated with conflicts between the existing land application Waste Discharge Requirements R5-2007-0001, treatment of REC-0001 as a compliance point applicable to mandatory penalties, and confusion regarding the actual compliance location for EFF-001. Also, Plumas County would appreciate the opportunity to discuss consolidation of the permits.

Specific questions and comments follow.

Discharge Prohibitions (Section III)

When the plant is operating, GRCSO is prohibited as follows:

1. Discharge to Big Grizzly Creek is prohibited from the last Saturday in April to 15 November **and/or**
2. If dilution of effluent is < 100:1
3. Discharge of backwash water >10 ug/L of arsenic to irrigation pond is also prohibited

Effluent Limits

Pg. 10, IV.A.1(a), states that the discharger will maintain compliance with effluent limits at discharge point EFF-001, with compliance measured at monitoring location "Big Grizzly Creek." We assume then that the actual compliance point is monitoring location RSW-002? Elsewhere in the document the compliance point is specified as EFF-001 and identified as the outfall diffuser sampling port. Clarification as to the compliance point is needed.

Mandatory Minimum Penalties

The permit needs to clarify which discharges are subject to Mandatory Minimum Penalties, or MMPs. Generally, MMPs are applied to discharge points specified in Table 2 on Page 1 of the permit. The permit lists both EFF-001 and REC-001 in this table. REC-001 is not a point source discharge to surface water and, therefore, should not be included as a MMP location. It should also not be included as a discharge point in Table 2 because it goes to land, not to surface water. Therefore, it can be monitored under the permit in the Monitoring and Reporting Program (although we feel this is duplicative with Order R5-2007-0001) but should not be a point of MMPs. The preferred condition is to have the point REC-001 removed from the NPDES permit altogether, as the discharge to land is already covered appropriately under Order R5-2007-0001.

Also, the compliance point for EFF-001 addressed previously needs to be resolved if the MMPs apply to the EFF-001 location.

Recycled Water Permit Conflicts

Order R5-2007-0001 was adopted in January 2007. The Order covers the application of tertiary-treated effluent to the golf course during the summer months. This draft permit also includes a number of conditions associated with the discharge of treated water to the golf course. Is R5-2007-0001 to be rescinded? A number of conflicts exist between the two permits; one includes the setback requirements (see below):

<u>Setback</u>	<u>Proposed</u> <u>(NPDES)</u> (ft)	<u>Current</u> <u>(WDR)</u> (ft)
Property Line	50	25
Public Road	N/A	30
Drainage	50	50
Irrigation Wells	100	150

Section C, Pg. 12, is redundant to Section E and conflicts with Order R5-2007-0001. Both Orders require signage, which is consistent, although the NPDES permit specifies the actual sign to be used. Constituents in the permits vary.

Groundwater

Groundwater is not regulated by the NPDES system. Groundwater requirements for application of waste to land should be included in Order R5-2007-0001. No provisions for monitoring of groundwater are included in Order R5-2007-0001, and the limitations in Table 8 appear to be arbitrary. Groundwater quality is covered by the anti-degradation requirements in 11.N. Pg. 8. Groundwater requirements should be removed from the NPDES permit and included in WDR R5-2007-0001.

Required Reports

Reports specified in the permit in addition to the standard weekly, monthly, and quarterly reporting include:

Pg. 19 A.2.j. Preventative Contingency Plan (upon request)

Pg. 22 C.2.a. TRE Work Plan/TRE Study (if required for toxicity)

Pg. 23 C.2.a.i. TRE Work Plan (90 days from effective date of order)

Pg. 24 C.2.b. Salinity EC (within 2 years of discharging; Work Plan within 6 months, study and report within 24 months)

Pg. 25 C.2.c. Aluminum Study (same as salinity)

Pg. 25 C.2.d. Salinity Evaluation and Minimization Plan (9 months after adoption)

Pg. E-15 D.2 Analytical Methods Report (60 days after adoption)

Pg. E-16 D.4 Annual Operations Report (30 January each year)

Pg. E-16 D.5 Annual Pretreatment Reporting Requirements (28 February each year)

Many of the required reports require sampling of the plant effluent and receiving water. Since the plant is not yet operating, we propose the reports be required "x" days following the "start of operations" rather than following "adoption of the order," with the exception of those reports that do not require sampling.

Monitoring and Reporting Program

E-3, Table 1. Delete REC-001, add to R5-2007-0001 (again, confusion regarding the compliance location for REC-001).

Pg. 10/11 Table E-7 and E-8 re RSW-001 and RSW-002. Again, this is addressed previously in the need for clarification as to the compliance monitoring location for EFF-001. In addition, the upstream and downstream compliance sampling should evaluate the impact on water quality at RSW-002, so the constituents of concern should be the same.

We would appreciate the opportunity to meet with you to discuss the permit. Let me know if you have any questions and what time would be best to get together to discuss.

Sincerely,

VESTRA Resources, Inc.



Wendy Johnston
Project Manager

CC: Robert Perreault/Plumas County
Cinda Leonard/Plumas County