

City of  
**SACRAMENTO**  
Department of Utilities

October 1, 2013  
130224:BLS:EC

Alexander MacDonald  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670-6114

**SUBJECT:** Comments on Tentative Renewal NPDES Permit for Aerojet Rocketdyne, Inc., Stormwater Waste Discharge Requirements, Order No. R5-2013-XXXX, (NPDES No. CA000411)

Dear Mr. MacDonald,

The City of Sacramento (City) appreciates the opportunity to provide comments on the Tentative Renewal National Pollution Discharge Elimination System (NPDES) permit for Aerojet Rocketdyne, Inc. (Aerojet) Stormwater Waste Discharge Requirements (Order). The City provides water to more than 135,000 customer accounts serving approximately 473,509 residents. The City treats surface water at two facilities, the E.A. Fairbairn Water Treatment Plant on the American River, and the Sacramento River Water Treatment Plant just downstream of the confluence of the American and Sacramento Rivers. We are actively involved in protection of the quality of our drinking water source water, and value the high-quality American River as an important resource for the entire region.

We have reviewed the Order, as well as its Attachments, and have several general comments for you to consider as well as numerous minor comments. The following are the general comments on the Tentative Renewal Order:

1. Request to Revise and Clarify Effluent Monitoring Requirements

① We disagree with revising the monitoring requirements to only two points on any discharge event as proposed in Section IV. A. 1. of Attachment E - Monitoring and

Reporting Program. We believe that since there are very limited discharge events (since the stormwater is typically collected in the detention basins for evaporation and percolation) and the points are from different collection basins, it is not unreasonable to require the discharger to sample all four effluent locations for the limited number of constituents listed. This is necessary to adequately assess the potential impacts to the beneficial uses. We suggest deleting "with only two of the four monitoring points required to be sampled on any given discharge event." from this section.

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Also, we want to clarify the basis for complying with the final effluent limits identified in the Order. The Order states in Table 5 that the perchlorate limit is 6 ug/L, based on a maximum daily value. This is consistent with the historical limit and seems most practical given the intermittent nature of the stormwater discharges to the receiving water. However, Attachment F - Fact Sheet, Section IV.D.2., indicates that an alternative averaging period may be applicable for perchlorate – specifically annual average. We disagree with annual averaging based on the type of discharge that occurs and would like the Board to confirm how the data will be evaluated for compliance with effluent limitations.

2. Request for Notification of Discharge Event to Downstream Water Utilities

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The City acknowledges the helpfulness and information provided by Aerojet staff in providing notification of NPDES permit exceedences for the Interim Groundwater Extraction and Treatment Systems. We would like to request that this Order be revised to include a direct notification to the City of Sacramento when there is a discharge event from any of the four stormwater effluent discharge points into Buffalo Creek and contributory to the Lower American River. This notification may also be helpful to other Lower American River water utilities.

We ask for this notification because these large volume events occur very infrequently, so we believe it will not be a significant burden on the discharger and there is a potential for those waters to contain constituents that are not effectively removed by our treatment processes, namely perchlorate. We request that the notification occurs in a timely manner to allow us the ability to prepare for and respond to a potential change in our source water quality.

3. Attachment E – Monitoring and Reporting Plan Report Submittals

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Section X. A. 2. requires the discharger to submit a summary monitoring report only if requested by the Board. Section X. C. requires submittal of a Discharge Monitoring Report. Section X. D. includes a requirement for submittal of an Annual Operations Report. It is unclear to the City what information the discharger is required to summarize, evaluate, and submit at this time. We request clarification on the reporting

requirements (other than Self-Monitoring Reports) that will be submitted by the Discharger. Also, we would like to note that we request that these reports be readily available to the public.

4. Attachment H – Calculation of WQBELS

5 Attachment H is listed in the Table of Contents for the Order, but it was not provided in the document. Attachment F – Fact Sheet, Section IV. C. appears to provide this discussion but this should be clarified. Please clarify if this is an incorrect reference or a missing document. Any additional materials that were omitted from the initial posting of the Tentative Revised Order should be posted for public review and comment prior to finalization of the Revised Order.

6 5. Continued Detection of Perchlorate Upstream in Buffalo Creek and Alder Creek

6 Section IV.C.3.d.iv of Attachment F – Fact Sheet states that there continues to be detections of perchlorate in the upstream sampling sites on both Buffalo Creek and Alder Creek. It states that these are caused by seepage of groundwater containing perchlorate. We remain seriously concerned that this pathway for perchlorate to enter the Lower American River is not being addressed through either the Superfund Remedy or the NPDES permitting process. Can the Board clarify if there are any additional studies or proposals to remediate the seeping groundwater upstream?

Provided below are editorial or minor comments:

Order -

- 7 1. Section I – There is a reference to a summary of the facility in Table 1. Table 1 is a summary of discharger information. We suggest that a brief paragraph be added to this section that describes the general nature of the discharge.
- 8 2. Section II. F. – Anti-Backsliding Requirements on page 6 – This describes the removal of the copper effluent limit and refers to a discussion in Attachment F – Fact Sheet. There is no data provided to support the finding that the copper was from sampling taps. We request the Board to provide a summary of the study or data which supports the removal of the effluent limitations.
- 9 3. Section VI. A. 2. j. – This section refers to Section VI.A.2.i which appears to be an incorrect reference. This should be reviewed and corrected.
- 10 4. Section VII. E. – Total Coliform Organisms Effluent Limitations is shown as Not Applicable. However, bacteria is listed in Section V. A. 2 – Receiving Water Limitations for Surface Water for Bacteria. Can the Board clarify?

## Attachment A – Definitions

- 11 1. Detected, but Not Quantified (DNQ) – There is a reference to “RL”, but it is not defined. Also, should “chemical” be inserted between “estimated” and “concentrations”?
- 12 2. Estimated Chemical Concentration – Should the “ML” be “MDL”?
- 13 3. Not Detected – Definition does not seem to coordinate with the definition for DNQ, MDL, and Estimated Chemical Concentration.
- 14 4. There is no definition provided for Reporting Level or Practical Quantitation Limit, but these are used in Attachment E – Monitoring and Reporting Program.
- 15 5. Source of Drinking Water – This definition is not sufficiently broad enough to include the Tributary Rule or the Sources of Drinking Water Policy. This needs to be expanded to account for sources not specifically designated in the Basin Plan.

## Attachment D – Standard Provisions

- 16 1. Section VI.B. – The text of this subsection is “Etc.”. We request clarification of the content of this subsection.

## Attachment E – Monitoring and Reporting Program

- 17 1. Section I. J. – The text of this subsection is “Etc.” We request clarification of the content of this subsection.
- 18 2. Section II. – The paragraph following Table E-1 includes a reference to Table 1. Should this be a reference to Table 2 of the Order?
- 19 3. Section IV. A. 1. – We disagree with revising the monitoring requirements to only two points on any discharge event. We suggest deleting “with only two of the four monitoring points required to be sampled on any given discharge event.” Please see general comment previously provided.
- 20 4. Section VIII.A.1. – Table E-4a contains Footnote 4 which states that samples are only required if there is stream flow past the monitoring point. This is not sufficiently clear and concise to determine if monitoring is required at these sites. Our understanding is that if any flow occurs at either site and continues toward the retention ponds, then Aerojet should collect upstream comparable values. We request that the Board clarify the term “past”.
- 21 5. Section X.B.6.b. - We suggest that a sentence be added which refers to the signatory and certification requirements from Attachment D – Standard Provisions for the cover letter.
- 22 6. Section X.B.7. – These definitions do not appear to match the requirements of this order. There are references to annual averages for effluent limits, which are not specified in this order – they are daily maximums due to the intermittent nature of the discharge. Can the Board please review and either clarify or

correct the intent? Also, there are several references to other sections of the Order which appear to be incorrect in this section which should be reviewed and corrected.

- 23 7. Section X.B.7.a. – There is a reference to submitting annual data in a June SMR, which directly conflicts with Table E-6 shown as December SMR.
- 24 8. Section X.D.a. – There is a reference to a "plant" which is not described for this discharger.

#### Attachment F – Fact Sheet

- 25 1. Section II.B.5. – This states that the discharges are monitored prior to discharge. Can the Board clarify how far prior to discharge? Are they taken in a timeframe to get data results to determine whether discharge will meet effluent limits prior to discharge?
- 26 2. Section III.C.6. – This includes boilerplate language which should be clarified or deleted.
- 27 3. Section III.D.2. – This includes a reference to Table F-4, which should be revised to F-5. And the title for Table F-5 should be edited to state the Receiving Water as the Lower American River.
- 28 4. Section III.E. – This section is not titled properly and appears to be incorrectly included. This section exempts the discharge from Title 27 due to it consisting of domestic sewage and treated effluent. The discharge is not described as such and this does not apply. The Board should review this section and either remove or edit.
- 29 5. Section IV. – The first paragraph is repeated exactly in the fourth paragraph. Board should consider the text and remove any duplicate.
- 30 6. Section IV.C.3.d. – Table F-7 includes three footnotes which are not defined. Board should add these notes.
- 31 7. Section IV.C.3.d.iv. – The section on perchlorate should include a specific statement that as a primary MCL, and since the Buffalo Creek and Alder Creek receiving waters are designated as MUN, then the perchlorate MCL is an applicable water quality objective for the discharge as part of the Title 22 regulations.
- 32 8. Section IV.D.2. – This section seems to conflict with the final effluent limits identified in the Order. The Order states that the perchlorate limit is 6 ug/L, based on a maximum daily value. This is consistent with the historical limit and seems most practical given the intermittent nature of the stormwater discharges to the receiving water. However, this section refers to using alternative averaging periods – specifically annual average. We do not support annual averaging for such a limited data set and would like the Board to confirm how the data will be evaluated for compliance with effluent limitations. Please see previous general comment.

- 33 9. Section V.A.1. – In order to be consistent with Section V of the Order, this section needs to add un-ionized ammonia to the last sentence.
- 34 10. Section VI.B.1. – In order to be consistent with Section VI.C.2. of the Order, this section needs to include Pollution Prevention, Regional Monitoring Plan, Drinking Water Policy, and Diazinon and Chlorpyrifos Basin Plan Amendment.
- 35 11. Section VI.B.4. – In order to be consistent with Section VI.C.6. of the Order, this section needs to include Storage Pond Operating Requirements.
- 36 12. Section VII.B.2. – We would like to note that as currently written, the order does not retain all the effluent monitoring frequencies since it is proposing to reduce sampling from all four effluents to only two effluents per discharge. We have previously requested that this be revised back to the original permit conditions.
- 37 13. Section VII.E. – Should this section refer to the Effluent and Receiving Water Characterization Study required in Attachment I and the dioxin and furan sampling described in Attachment J?

#### Attachment I – Effluent and Receiving Water Characterization Study

- 38 1. The title of this Attachment is incorrect and should be revised.
- 39 2. Section II.A. – Based on our previous comments, we believe that the upstream compliance monitoring locations should include all four effluent locations during discharge event monitoring. Since the purpose of this study is to provide a general characterization of the effluent and receiving waters, and not to determine compliance with the Order terms, we are amenable to the use of representative effluent locations. Additional information should be provided to clarify how the effluent locations are representative of the four discharge locations.
- 40 3. Section II.E. – We would suggest that the Board be more specific in requesting a Study Report be prepared and submitted in accordance with the requirements of Attachment E. This report is not currently referenced in Attachment E and there could be wide room for interpretation on submittal requirements. We request that this Study Report would also be readily available to the public
- 41 4. Section II.E. – Table I-1 includes a column referring to Maximum Reporting Level which is not clearly defined in the Order. We request that you either define or use an alternate definition previously used.

We would like to thank the Regional Board staff for their diligence on this important issue. We look forward to continuing the excellent communication provided by your staff and Aerojet staff. If you have any questions on the above or anything you'd like to discuss, please do not hesitate to contact me at 916-808-1424.

Sincerely,



Elissa Callman  
Senior Engineer

cc: Bill Busath, Engineering and Water Resources Manager  
Michael Malone, Operations and Maintenance Manager  
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