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## Central Valley Regional Water Quality Control Board

24 October 2014

Clint Schelbert  
Project Superintendent  
Sacramento Municipal Utility District  
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Sacramento, CA 95817

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### **NOTICE OF APPLICABILITY (NOA); LIMITED THREAT GENERAL WASTE DISCHARGE REQUIREMENTS ORDER R5-2013-0073-01; SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD) IOWA HILL GEOTECHNICAL EXPLORATORY DRIFT TUNNEL PROJECT, EL DORADO COUNTY**

Our office received a Report of Waste Discharge application on 18 August 2014 from SMUD (hereinafter Discharger) for the Iowa Hill Geotechnical Exploratory Drift Tunnel Project (Project), for discharge of treated process water to surface water. Based on the application packet and subsequent information submitted by the Discharger, staff has determined that the project meets the required conditions for approval under the 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 (Limited Threat General Order). The Project is hereby assigned Limited Threat General Order R5-2013-0073-01-038 and National Pollutant Discharge Elimination System (NPDES) Permit No. CAG995002. Please reference your Limited Threat General Order number, **R5-2013-0073-01-038**, in your correspondence and submitted documents.

The enclosed Limited Threat General Order may also be viewed at the following web address: [http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0073-01.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073-01.pdf). You are urged to familiarize yourself with the contents of the entire document. The Limited Threat General Order prescribes mandatory discharge monitoring and reporting requirements. The project activities shall be operated in accordance with the requirements contained in this NOA and the Limited Threat General Order.

### **CALIFORNIA TOXICS RULE / STATE IMPLEMENTATION POLICY MONITORING**

The Limited Threat General Order incorporates the requirements of the California Toxics Rule (CTR) and the State Water Resources Control Board's (State Water Board), *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California*, 2005, also known as the State Implementation Policy (SIP). Screening levels for CTR constituents and other constituents of concern are found in Attachment B of the Limited Threat General Order. Review of your water quality data in comparison to the screening levels, showed no reasonable potential for the discharge to cause or contribute to an exceedence of water quality objectives in Slab Creek Reservoir.

## **PROJECT DESCRIPTION**

The Project site is located in a rural area on the northwest flank of Iowa Hill situated above the east shore of Slab Creek Reservoir, north of Camino, California. Site access is via Slab Creek Reservoir Road, which connects to North Canyon Road and Carson or Larsen roads off U.S. Highway 50. The purpose of the project is to investigate the subsurface geotechnical conditions by mining a geotechnical exploratory drift in the vicinity of the planned upper reservoir and underground powerhouse for energy storage and production. The work is scheduled to be performed between 1 October 2014 and 31 August 2015. During the tunneling and coring operations infiltration water may be encountered and in the event that there is more water than is needed for operations, the surplus water will be treated and discharged to Slab Creek Reservoir. Treatment of the discharge water includes removal of fine-grained suspended solids and oil, and possible pH adjustments prior to discharge. The capacity of the treatment system is 0.144 million gallons per day and discharge flow will not exceed the treatment system capacity.

## **EFFLUENT LIMITATIONS**

Effluent limitations are specified in Section V. Effluent Limitations and Discharge Specifications of the Limited Threat General Order. The following effluent limitations are applicable to this discharge and are contained in Section V. A through C of the Limited Threat General Order:

### **A. Effluent Limitations – Applicable to All Limited Threat Discharges**

**2. Acute Whole Effluent Toxicity.** Survival of aquatic organisms in 96-hour bioassays of undiluted waste for all limited threat discharges shall be no less than:

- a. 70%, minimum for any one bioassay; and
- b. 90%, median for any three consecutive bioassays.

### **B. Effluent Limitations – Limited Threat Discharge to Specific Waterbodies**

**4.** The pH of all limited threat discharges within the Sacramento and San Joaquin River Basins (except Goose Creek) shall at all times be within the range of 6.5 and 8.5.

Slab Creek Reservoir is listed for mercury under the Clean Water Act 303(d) List of impaired water bodies. A Total Maximum Daily Load (TMDL) has not yet been established for Slab Creek Reservoir and mercury was not detected in the groundwater sample collected by the Discharger. Therefore, no additional 303(d) based effluent limitations or monitoring requirements are included in this NOA (R5-2013-0073-01-038).

## **MONITORING AND REPORTING**

The Discharger must notify Central Valley Water Board staff 24 hours 1) before the start of each new discharge, 2) as soon as noncompliance is anticipated, and 3) when the discharge ceases. The Discharger must submit quarterly reports, as described in Attachment E, Section X, even if there is no discharge during the reporting quarter, until the Discharger formally requests that coverage under the Limited Threat General Order be terminated.

Monitoring and reporting requirements are contained in Attachment E of the Limited Threat General Order. The Discharger is required to comply with the following specific monitoring and reporting requirements for the effluent and receiving water in lieu of those specified in Attachment E of the Limited Threat General Order. With the slow flow and inconsistent flow

patterns in Slab Creek Reservoir, along with the small quantity of effluent discharged to reservoir, only visual receiving water monitoring is required in this NOA because other data would not be consistently representative of the up or downstream conditions.

**Monitoring Locations** – The Discharger shall monitor the effluent when discharging to Slab Creek Reservoir at the specified location as follows:

**Table E-1. Monitoring Station Locations**

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
001	EFF-001	A location where a representative sample of the effluent can be collected prior to discharging to Slab Creek Reservoir.

**Effluent Monitoring** – The Discharger shall monitor the effluent when discharging to Slab Creek Reservoir at EFF-001 as follows:

**Table E-2. Effluent Monitoring**

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Total Flow	MGD	Estimate	1/Week	2,3
Electrical Conductivity @ 25 °C	µmhos/cm	Grab	1/Week	2,3
pH	standard units	Grab	1/Week	2,3
Turbidity	NTU	Grab	1/Week	2,3
Temperature	°F	Grab	1/Week	2,3
Dissolved Oxygen	mg/L	Grab	1/Week	2,3
Hardness, Total (as CaCO <sub>3</sub> )	mg/L	Grab	1/Year	2,3
Iron, Total Recoverable	µg/L	Grab	1/Quarter	2
Manganese, Total Recoverable	µg/L	Grab	1/Quarter	2
Mercury, Total Recoverable	µg/L	Grab	1/Quarter	2
Acute Toxicity	% survival	Grab	1/Project Term <sup>8</sup>	--
Chronic Toxicity	--	Grab	1/Project Term <sup>8</sup>	--

<sup>2</sup> Pollutants shall be analyzed using the analytical methods described in 40 CFR Part 136 or by methods approved by the Central Valley Water Board or the State Water Board.

<sup>3</sup> A hand-held field meter may be used, provided the meter utilizes a USEPA-approved algorithm/method and is calibrated and maintained in accordance with the manufacturer's instructions. A calibration and maintenance log for each meter used for monitoring required by this Monitoring and Reporting Program shall be maintained at the Facility.

<sup>8</sup> Sample to be collected from EFF-001 within 6 months of initiation of discharge and for acute toxicity the test species shall be fathead minnows (*Pimephales promelas*).

**Receiving Water Monitoring** – A log shall be kept of the receiving water conditions within 250 feet upstream and downstream of the discharge to Slab Creek Reservoir. Attention shall be given to the presence or absence of:

- a. Floating or suspended matter
- b. Discoloration
- c. Bottom deposits
- d. Aquatic life
- e. Visible films, sheens, or coatings
- f. Fungi, slimes, or objectionable growths
- g. Potential nuisance conditions

Notes on receiving water conditions shall be summarized in the monitoring report.

**Reporting** – Monitoring in accordance with the Limited Threat General Order shall begin upon initiation of discharge. Monitoring reports shall be submitted to the Central Valley Water Board on a quarterly basis, beginning with the Fourth Quarter 2014. This report shall be submitted on 1 February 2015. If the discharge has not begun there is no need to monitor. However, a monitoring report must be submitted stating that there has been no discharge. Quarterly monitoring reports are due on 1 May, 1 August, 1 November, and 1 February. The reports must be submitted until your coverage is formally terminated in accordance with the Limited Threat General Order, even if there is no discharge during the reporting quarter.

Reports shall be submitted electronically (as a pdf file) to: [centralvalleysacramento@waterboards.ca.gov](mailto:centralvalleysacramento@waterboards.ca.gov) and shall include the attached monitoring report transmittal form.

#### **GENERAL INFORMATION AND REQUIREMENTS**

The Central Valley Water Board shall be notified immediately if any effluent limit violation is observed during implementation of the project.

Discharge of material other than what is described in the application is prohibited. The required annual fee (as specified in the annual billing you will receive from the State Water Resources Control Board) shall be submitted until this NOA is officially terminated. You must notify this office in writing when the discharge regulated by the Limited Threat General Order is no longer necessary. If a timely written request is not received, the Discharger will be required to pay additional annual fees as determined by the State Water Resources Control Board.

#### **ENFORCEMENT**

Failure to comply with the Limited Threat General Order may result in enforcement actions, which could include civil liability. Effluent limitation violations are subject to a Mandatory Minimum Penalty (MMP) of \$3,000 per violation. In addition, late monitoring reports may be subject to MMPs. When discharges do not occur during a quarterly report monitoring period, the Discharger must still submit a quarterly monitoring report indicating that no discharge occurred to avoid being subject to enforcement actions.

#### **COMMUNICATION**

All monitoring report submittals, notification of the beginning and end of discharge, and questions regarding compliance and enforcement shall be directed to Lucio Orellana of the

Central Valley Water Board's NPDES Compliance and Enforcement Unit. Mr. Orellana can be reached at (916) 464-4660 or [Lucio.Orellana@waterboards.ca.gov](mailto:Lucio.Orellana@waterboards.ca.gov).

Questions regarding the permitting aspects of this Low Threat General Order, and written notification for termination of coverage under the Low Threat General Order, shall be directed to Josh Palmer of the Central Valley Water Board's NPDES Permitting Unit. Mr. Palmer can be reached at (916) 464-4674 or [Joshua.Palmer@waterboards.ca.gov](mailto:Joshua.Palmer@waterboards.ca.gov).

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this NOA, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day.

Copies of the law and regulations applicable to filing petitions may be found on the Internet at: [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

***Original Signed by Adam Laputz for***

Pamela C. Creedon  
Executive Officer

Enclosures (2): General Order R5-2013-0073-01 (Discharger only)  
Monitoring Report Transmittal Form

cc: David Smith, U.S. EPA, Region IX, San Francisco (email only)  
Phil Isorena, Division of Water Quality, State Water Board, Sacramento (email only)