

Central Valley Regional Water Quality Control Board  
21/22 June 2007 Board Meeting

Response to Comments for the AmeriPride Services, Inc. Operable Unit 3  
Tentative Waste Discharge Requirements

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The following are Regional Water Quality Control Board, Central Valley Region (Regional Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements (a new NPDES Permit) for AmeriPride Services, Inc. Operable Unit 3. Public comments regarding the proposed Order were required to be submitted to the Regional Water Board by 30 April 2007 in order to receive full consideration.

The Regional Water Board received comments regarding the tentative Order by the deadline from AmeriPride Services, Inc. The comments are summarized below, followed by staff responses.

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**AMERIPRIDE SERVICES, INC. COMMENTS**

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**AMERIPRIDE – COMMENT #1. Discharge Flow Monitoring.** The tentative order states that flow would be recorded continuously. AmeriPride proposes to have a recording system that would record the total flow every 10 minutes when the system is operating. AmeriPride would supply monitoring data to the Regional Water Board showing the instantaneous flow rate in gallons per minute and total flow in gallons (approximately 144 data points per day).

**RESPONSE:** Regional Water Board staff considers the proposed flow recording system, which will record the flow every 10 minutes, to meet the requirement of continuous monitoring.

**AMERIPRIDE – COMMENT #2. Acute Toxicity Testing.** Ameripride requests that acute toxicity testing be reduced from quarterly to annually following the first year to match the frequency of chronic toxicity testing.

**RESPONSE:** The proposed quarterly acute toxicity testing is appropriate and necessary to determine compliance with the acute toxicity effluent limitation. Four sampling events are not sufficient to ascertain whether it is appropriate to reduce the monitoring frequency.

**AMERIPRIDE – COMMENT #3. California Toxics Rule (CTR) Monitoring.** AmeriPride requests that the location for which CTR priority pollutant monitoring is required be clarified in the Monitoring and Reporting Program to be EFF-001.

**RESPONSE:** As detailed in the Special Provisions Section VI.C.2.b., monitoring for CTR priority pollutants is required for both the effluent at EFF-001 and the receiving water at RSW-001 (i.e. 50 yards upstream from where the unnamed ditch enters Beacon Creek). The Agenda version of the Order has been revised

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to further clarify that monitoring of the receiving water for CTR constituents is only required when flow exists in Beacon Creek.

**AMERIPRIDE – COMMENT #4. Signature Authorization.** The person authorized to sign and submit reports should be changes to Mr. Jose Peter.

**RESPONSE:** The Agenda version of the Order has been revised to reflect this change.