

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

Response to Written Comments for Big Valley Power Sawmill and Cogeneration
Facility Tentative Waste Discharge Requirements

The following are responses to written comments received from interested parties in response to the Tentative Waste Discharge Requirements for the Big Valley Power Sawmill and Cogeneration Facility issued on 8 May 2007. Written comments from interested parties on the proposed Order were required to be received by the Regional Water Quality Control Board (Regional Water Board) by 7 June 2007 in order to receive full consideration. Comments were received by the due date from the following parties:

1. Vestra Resources, Inc. (Vestra)

Written comments from the above interested parties are summarized below, followed by the response of the Regional Water Board staff.

VESTRA RESOURCES, INC. (VESTRA) COMMENTS

VESTRA –COMMENT #1: Vestra submitted comments on behalf of the Discharger (Big Valley Power). Vestra requested modification of the proposed ash storage methods and requirements.

RESPONSE

Staff finds that the commenter's proposed ash storage method is consistent with the requirements for similar facilities. A late revision has been proposed to update Finding 11 to read:

Approximately five cubic yards of ash will be generated each day. Fly ash and bottom ash will be stockpiled on site until it is delivered to local farms and tilled into the fields as a soil amendment or disposed of at an approved landfill facility. Historically, ash has been stored in an area adjacent to the power plant prior to shipment offsite. The discharger proposes to continue to store ash in this area but will construct a berm to ensure ash and any storm water falling on the ash remains in the bermed area. As necessary to ensure containment, ash may be placed in metal bins and stored in covered areas of the site.

Additionally, a late revision has been proposed to update Discharge Specification B.6 to read:

The wood ash storage area shall be separated from the wood fuel stockpiles and adequately bermed to prevent runoff to surface waters or surface water drainage courses. As necessary to ensure containment,

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ash may be placed in metal bins and stored in covered areas of the facility.

VESTRA –COMMENT #2: Vestra questioned the need for a pollution minimization plan (Page 5, paragraphs 21 and 22, and Page 10, Provision 3).

RESPONSE

The requirement for a Pollutant Minimization and Control plan was not made pursuant to the State Implementation Plan but as a tool to ensure consistency with the Antidegradation Policy so that the discharge does not create a condition of pollution or nuisance and that the highest water quality will be maintained. Instead of Pollutant Minimization and Control measures, a better description is Best Practicable Treatment or Control (BPTC). A late revision has been proposed to modify the tentative WDRs to request a Best Practicable Treatment or Control plan instead of a Pollutant Minimization and Control measures plan. The facility has not operated for several years and operational knowledge of the facility is no longer available. Board staff anticipates that the operation of the facility will evolve over the first year and BVP will likely desire to adjust chemical dosing rates and possibly select different treatment chemicals. The BPTC plan will describe the steps taken to assure that the changes will be made in a manner that “(a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained.”

VESTRA –COMMENT #3: The discharge for aluminum given in Discharge Specification 3 is incorrect.

RESPONSE

The commenter is correct. The secondary MCL for aluminum is 200 ug/L. A late revision has been proposed to correct the limit for aluminum in Discharge Specification B.3 to 200 ug/L.

6/11/2007
BJS