

Central Valley Regional Water Quality Control Board
31 July/1 August Board Meeting

Response to Comments for the Nevada County Sanitation District No. 1
Cascade Shores Wastewater Treatment Plant
Tentative Waste Discharge Requirements and Cease and Desist Order

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 (NPDES Permit renewal) and Cease and Desist Order (CDO) for the Nevada County Sanitation District No. 1, Cascade Shores Wastewater Treatment Plant. Public comments regarding the proposed Orders were required to be submitted to the Regional Water Board by 5:00 p. m. on 8 July 2008 in order to receive full consideration.

The Regional Water Board received comments regarding the proposed NPDES Permit renewal and CDO by the due date from the Nevada County Sanitation District No. 1 (Discharger). The submitted comments were accepted into the record, and are summarized below, followed by Regional Water Board staff responses.

**NEVADA COUNTY SANITATION DISTRICT NO. 1 (DISCHARGER)
COMMENTS**

Discharger Comment No. 1. Effluent Limitations – The Discharger requested that Settleable Solids be deleted as an effluent limitation since the requirements for a tertiary treatment plant already have stringent TSS and BOD requirements.

RESPONSE: Regional Water Board staff concurs and has made the deletion. Tertiary treatment processes result in solids removal reflective of the design capabilities of the treatment system. The TSS limitations of 10 mg/L (monthly average), 15 mg/L (weekly average) and 25 mg/L (daily maximum) includes suspended and settleable matter in the analysis and a separate analysis for settleable matter is no longer necessary. With the TSS limitations in place, and the receiving water limitations for settleable solids, the settleable solids limits can be removed as an effluent limitation.

Discharger Comment No. 2. Interim Effluent Limitations for BOD and TSS – The Discharger requested that the average monthly limit of 15 mg/L and the average weekly limit of 20 mg/L contained in the previous permit be removed and the previous permit maximum daily BOD and TSS limitation of 35 mg/L be used as the only interim limit.

RESPONSE: Regional Water Board staff does not concur with the requested change. The BOD and TSS limitations took effect on 14 June 2006 and only using a daily maximum of 35 mg/L without the monthly and weekly limitations would be considered backsliding.

Discharger Comment No. 3. Receiving Water Turbidity – The Discharger requested the addition of the following language to make this permit consistent with permits recently issued for other Region 5 dischargers with tertiary treatment.

Turbidity to increase as follows:

- a. More than 1 Nephelometric Turbidity Unit (NTU) where natural turbidity is between 0 and 5 NTUs. (When wastewater is treated to a tertiary level, including coagulation, a one-month averaging period may be used when determining compliance with Receiving Water Limitation 17.a. for turbidity.)
- b. More than 20 percent where natural turbidity is between 5 and 50 NTUs.
- c. More than 10 NTU where natural turbidity is between 50 and 100 NTUs.
- d. More than 10 percent where natural turbidity is greater than 100 NTUs.

RESPONSE: Regional Water Board staff concurs and the above language has been inserted.

Discharger Comment No. 4. Special Provision d. Best Practicable Treatment or Control (BPTC) Evaluation Tasks – The Discharger commented that there is no rationale/justification in spending additional public resources assessing BPTC when a new BPTC wastewater treatment facility is being constructed. The new plant design represents BPTC and satisfies Resolution 88-63. The Discharger requests that the BPTC Evaluation be removed, or be contingent upon the new facility failing to meet one or more effluent limitations upon the new facility coming on-line and its operations optimized over the initial six to eight months of operations.

RESPONSE: Regional Water Board staff concurs that the new wastewater treatment facility being constructed as designed may satisfy BPTC, however, until a compliance evaluation is completed it is unknown whether the new facility will result in compliance with all effluent limitations, particularly aluminum and copper. Language was inserted clarifying that no further action is required with respect to BPTC as long as compliance is achieved and no deficiencies are documented.

Discharger Comment No. 5. Treatment Feasibility Study – This requirement states: *“The Discharger is required to perform an engineering treatment feasibility study examining the feasibility, costs, and benefits of different treatment options that may be required to remove copper and aluminum from the discharge.”* The Discharger stated this requirement is not necessary since it is expected that the new treatment facility will result in compliance with the effluent limitations for aluminum and copper. If the treated effluent from the new facility does not comply, the Discharger intends to perform a discharger-specific water-effect ratio (WER) for copper and aluminum. The Discharger requests that the treatment feasibility study requirement be removed from the Order or alternatively, that this requirement be made contingent upon continued reasonable potential following the new plant coming on line and

discharger-specific WER adjustments, should they be needed, for copper and aluminum. Only after these actions is a treatment feasibility study for these metals warranted.

RESPONSE: Regional Water Board staff concurs that a treatment feasibility study will only be needed in the event that either aluminum and copper still have reasonable potential upon completion of the new facility and discharger-specific WER adjustments, if needed. Additional language has been added clarifying that a treatment feasibility study will only be needed if reasonable potential still exists. The timelines for submittal are the same as the BPTC assessment since one report may satisfy both provisions for aluminum and copper.

Discharger Comment No. 6. Stormwater Requirements – The Discharger requested clarification the flow from the facility is less than 1mgd and no storm water is directly discharged from the facility.

RESPONSE: Regional Water Board staff concurs and has made the suggested edits for clarification.