

ITEM: 30

SUBJECT: Uncontested NPDES Permits

REPORT: Following are proposed permits. All agencies and the dischargers concur, or have offered no comments. Consideration of NPDES Permit Renewal and Time Schedule Orders

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| a | <p>AmeriPride Services Inc., Operable Unit 3, Sacramento County</p> <p>AmeriPride Services, Inc. (Discharger) is the owner and operator of a groundwater extraction and treatment system (Operable Unit 3) (Facility). The Discharger also operates an industrial laundry facility at 7620 Wilbur Way in Sacramento County. Dry cleaning operations by the previous owner on the Discharger's property led to the releases of volatile organic compounds (VOCs), which have impacted both soil and groundwater. The impacted groundwater extends east from the Discharger's laundry facility property to neighboring properties, including the property of the groundwater extraction and treatment Facility. The property on which the extraction and treatment Facility is located (8450 Gerber Road, Sacramento) is owned by Huhtamaki Food Service, Inc.</p> <p>Two groundwater extraction wells pump groundwater to the treatment system via underground pipes. The treatment system consists of two granulated activated carbon (GAC) vessels, operated in series. Extracted groundwater passes through the GAC units where VOCs and its daughter products are adsorbed. The treated groundwater is sent, via an underground pipe, to an unnamed storm water ditch adjacent to the Facility where it is conveyed and discharged to Beacon Creek, a tributary to the Sacramento River via Morrison Creek. The average flow through the Facility varies from 125 to 230 gallons per minute. The Facility is operated 24 hours per day, 7 days per week except when it is necessary to shut the system down for maintenance.</p> <p>The tentative NPDES permit was issued for public review on 29 June 2012. Effluent limitations in the proposed permit renewal include limits for pH, chromium VI, acute and chronic whole effluent toxicity, and VOCs of concern. These effluent limits are carried forward from the existing permit.</p> <p>The Discharger submitted comments in response to the tentative permit. The following is a summary of the comments and Central Valley Water Board staff responses.</p> <p><i>Trigger for Accelerated Chronic Whole Effluent Toxicity (WET) Monitoring.</i> <i>The Discharger commented that the numeric chronic whole effluent toxicity trigger should be revised based on a Toxicity Reduction Evaluation (TRE) that was conducted by the Discharger.</i></p> <p>The NPDES permit requires the Discharger to conduct chronic WET testing and includes a provision requiring the Discharger investigate the causes of, and identify corrective actions to reduce or eliminate effluent toxicity. If the discharge exhibits toxicity, the Discharger is required to initiate a TRE, and take actions to mitigate the impact of the discharge and prevent recurrence of toxicity. A TRE is a site-specific</p> |
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| | <p>study conducted in a stepwise process to identify the source(s) of toxicity and the effective control measures for effluent toxicity. TREs are designed to identify the causative agents and sources of effluent toxicity, evaluate the effectiveness of the toxicity control options, and confirm the reduction in effluent toxicity.</p> <p>In 2008 and 2009 the Discharger began experiencing intermittent low level toxicity to <i>Ceriodaphnia dubia</i> reproduction. The Discharger conducted accelerated monitoring and submitted a TRE Work Plan in August 2009 to formally investigate the toxicity. All analytical results for VOCs, semi-volatile organic compounds, poly aromatic hydrocarbons, and pesticides were not detected in the discharge. Therefore, those constituents were ruled out as possible causes of the toxicity. Some detection of metals was identified, but the concentrations were well below aquatic toxicity criteria and were also ruled out as the source of toxicity to <i>Ceriodaphnia dubia</i> reproduction. The only metal of concern for the discharge is Chromium VI, which is naturally occurring in the groundwater. The proposed Order includes chemical-specific water quality-based effluent limitations for Chromium VI to control the toxicity of the discharge.</p> <p>The level of chronic toxicity that has been measured is low and has not been persistent; therefore measures to identify the toxicant(s) were not feasible. Since, the toxicants in the discharge are well-known, the Discharger does not add any chemicals, and the level of toxicity has been low, a modification of the numeric toxicity trigger was recommended in the TRE Work Plan. For <i>Ceriodaphnia dubia</i> reproduction, the TRE Work Plan recommends that in addition to the numeric toxicity trigger of > 1 Chronic Toxic Unit (TUC), the reproduction rate of the effluent sample must also be less than 50 percent of the control sample. This will ensure a strong enough toxic response to allow feasible identification of the toxicant.</p> <p>For this discharge, the water quality of consistent and of a known quality and the proposed Order includes chemical-specific effluent limits to prevent aquatic toxicity. The Discharger has conducted a TRE to determine the cause of the toxicity, but since the level of toxicity was too low and not persistent, they were unable to identify a toxicant. Due to the nature of the discharge, if the numeric toxicity trigger were to be unchanged for <i>Ceriodaphnia dubia</i> reproduction and the same low level of toxicity was experienced, the Discharger would likely arrive to the same inconclusive conclusion. Based on the site-specific conditions of this discharge, this change to the numeric chronic toxicity trigger is appropriate.</p> |
| b | <p>City of Jackson, Wastewater Treatment Plant, Amador County</p> <p>The City of Jackson owns and operates a tertiary wastewater treatment plant. Treated wastewater is discharged to Jackson Creek, a water of the United States, and a tributary to Lake Amador. Discharges from the treatment plant are currently regulated by Waste Discharge Requirements Order R5-2007-0133 (NPDES Permit), issued by the Central Valley Regional Water Quality Control Board on 25 October 2007. The current NPDES Permit includes a Prohibition, prohibiting the discharge of treated wastewater in excess of five percent of the total flow into Lake Amador, a known existing domestic water supply for surrounding homes.</p> |

The existing treatment system consists of a two oxidation ditches for secondary treatment, sand filters for filtration, and chlorine disinfection. Solids resulting from the treatment are hauled off-site to a landfill for disposal.

The City of Jackson is a small disadvantaged community which has been unable to stay on schedule to comply with the existing Prohibition, and will therefore be unable to comply with the October 2012 prohibition date. The City is proposing land application to nearby land during periods in which there is not sufficient dilution to discharge to Jackson Creek (and Lake Amador). The City submitted the Draft Environment Impact Report to the Central Valley Water Board in July 2012. The draft environmental document proposes a compliance project to implement land disposal and reclamation of the wastewater, and to implement treatment plant upgrades, to comply with Prohibition III.E of the existing permit. But additional time is required to complete the compliance project.

An Order is proposed to amend the existing NPDES Permit, Order R5-2007-0133, extending the Discharge Prohibition III.E effective date from 25 October 2012 to 1 March 2015, allowing additional time for the Discharger to implement the proposed land disposal project.

A Notice of Public Hearing was sent to the discharger and interested parties on 24 July 2012 with a 30-day public comment period. No written public comments were received.

RECOMMENDATION: Adopt the proposed NPDES Permit and Time Schedule Orders.

Mgmt. Review _____

Legal Review _____

October 5 2012

Central Valley Regional Water Quality Control Board meeting
11020 Sun Center Dr. #200
Rancho Cordova, CA 95670