

Central Valley Regional Water Quality Control Board  
18/19 February 2016 Board Meeting

Response to Comments  
for the  
City of Grass Valley  
Wastewater Treatment Plant  
Tentative Waste Discharge Requirements

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The following are Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements (NPDES Permit) for the City of Grass Valley Wastewater Treatment Plant, Nevada County.

The tentative NPDES Permit was issued for a 30-day public comment period on 25 November 2015 and comments were due 28 December 2015.

The Central Valley Water Board received comments regarding the tentative NPDES Permit by the due date from the following interested party:

- City of Grass Valley Wastewater Treatment Plant (Discharger)

The submitted comments were accepted into the record, and are summarized below, followed by Central Valley Water Board staff responses.

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**CITY OF GRASS VALLEY (DISCHARGER) COMMENTS**

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**Discharger, Comment No. 1.**

The Discharger requests that the Central Valley Water Board include language in the proposed permit that allows the Discharger to submit a letter to the Executive Officer in 2017 (after implementing its pretreatment program through 2016) requesting rescission of all pretreatment program requirements. The Discharger concludes that rescission of the requirements for its pretreatment program will allow reallocation of resources to other wastewater efforts.

**Response:** The number of industrial dischargers has decreased from three to one over the previous permit term and the associated reduction in percentage of total wastewater flow to the Facility from industrial dischargers has decreased from as much as 40 percent to approximately 0.1 percent. Central Valley Water Board staff concurs that there is sufficient rationale to include language in the proposed permit that will allow the Discharger to submit a letter to the Executive Officer in 2017 requesting rescission of all pretreatment program requirements. Also, during the upcoming permit term, if industrial user discharge and maximum allowable headworks loading are consistently above historical observations the Central Valley

Water Board may reopen the Order at any time to add the requirement for reestablishing a pretreatment Program. Attachment E, section X.D.5., first paragraph, third sentence and Attachment F, section VI.B.5.a.v. of the proposed Order were modified, as shown in underline/strikeout format below.

Attachment E, section X.D.5., first paragraph, third sentence:

Following the submission of the initial annual Pretreatment Report on 28 February 2017, if the remaining categorical industrial user is in compliance with the Discharger's prescribed pretreatment requirements over the previous two years and the Facility has not violated effluent limitations due to the categorical industrial user's discharge over the two year period, then the Discharger may submit a letter to the Executive Officer for approval to discontinue Annual Pretreatment Program Reporting Requirements.

Attachment F, section VI.B.5.a.v.:

- v. Subsequent to submission of the initial annual Pretreatment Report in February 2017, if the categorical industrial user (CIU) is in compliance with the Discharger's prescribed pretreatment requirements over the previous two years and the Facility has not violated effluent limitations due to the CIU's discharge over the two year period, the Discharger may request approval from the Executive Officer to discontinue the pretreatment requirements to submit annual pretreatment reports.

## **Discharger, Comment No. 2.**

The Discharger is requesting removal of the monitoring requirements for total chlorine residual from the proposed permit based on its continuous operation of an ultraviolet light disinfection system at the WWTP since September 2009. The Discharger contends that the requirement in the proposed permit to conduct effluent monitoring for total chlorine residual was precluded by a 9 February 2010 letter from the Central Valley Water Board.

**Response:** Central Valley Water Board permitting staff do not concur that monitoring requirements for total chlorine residual can be removed from the proposed permit presently. The 9 February 2010 letter is predicated on the statement that "no chlorine is used for wastewater treatment or maintenance of the wastewater treatment plant". However, during a 16 July 2015 site visit and in April and July 2015 email correspondence between the Discharger and Central Valley Water Board staff, the Discharger stated that a chlorine solution is routinely used in the wastewater treatment process at the clarifiers and RAS and digester pumps, for plant maintenance, to spray down and flush structures, and for sludge processing. Also, chlorine containing compounds are used for UV lamp cleaning, where the water from the cleaning process is returned to the headworks. With the routine use of chlorine for maintenance purposes the chance remains for a discharge to occur; therefore, staff cannot concur with the request to discontinue total chlorine residual monitoring until data documenting that chlorine residual is absent from the effluent

discharge are available. In addition, because the Discharger has not performed any chlorine residual monitoring since receiving the 9 February 2010 letter, there is no data available to determine whether chlorine is present in the effluent.

Central Valley Water Board staff has revised the language in the proposed permit allowing the Discharger to discontinue chlorine residual monitoring in 2017 if all the samples are non-detect by conducting total chlorine residual monitoring for a year after the effective date of the proposed Order. Attachment E, section IV.A.1., Table E-3, Footnote 9; Attachment F, section IV.C.3.a.ii.(b), second paragraph; and Attachment F, section VII.B.8. of the proposed Order were modified, as shown in underline/strikeout format below.

Attachment E, section IV.A.1., Table E-3, Footnote 9:

9. Chlorine residual monitoring is required at a minimum of once per day when chlorine is used for maintenance purposes. In addition, if chlorine is scheduled to be used for maintenance purposes, the Discharger shall monitor chlorine residual one week prior to use and one week after the end of use. Monitoring is not required for the use of chlorinated potable water for filter backwashing. When chlorine or chlorine-containing products are not in use in the treatment process, the Discharger shall so state in the monthly self-monitoring report. After a calendar year following the effective date of the permit, total chlorine residual data will be reviewed to determine if continued monitoring is warranted. The Discharger may ~~request discontinuation of~~ chlorine monitoring once a calendar year ~~trend~~ of non-detects is established.

Attachment F, section IV.C.3.a.ii.(b), second paragraph:

The Discharger uses chlorine in the plant water supply which is used for pump seal water at the primary clarifiers, return activated sludge pumps, and digester pumps and in lime slurry batches. This water is also used for pressing operations for dewatering sludge, and the filtrate from the belt filter press is rerouted to the headworks. The Discharger states that these flows are minimal and any residual chlorine would be consumed immediately by demand. Due to the periodic chlorine use, this Order requires monitoring for chlorine when it is used for maintenance purposes. After monitoring for one calendar year following the effective date of the permit, the Discharger may request to discontinue chlorine monitoring if a chlorine residual is not detected within the year.

Attachment F, section VII.B.8.:

Order R5-2009-0067 required continuous monitoring for chlorine residual. In September 2009, the Discharger converted from chlorine disinfection with UV disinfection. This Order requires daily monitoring for chlorine residual during periods of chlorine use in the treatment system. After a calendar year following the effective date of the permit, total chlorine residual monitoring may be discontinued if a chlorine residual is not detected in the effluent.