Sierra Pacific Industries

Oroville Division • Oroville, California 95965 • P.O. Box 2198 • (530) 532-6630

18 April 2018

Mr. Ron Falkowski
Engineering Geologist
California Regional Water Quality Control Board
Central Valley Region, Redding
364 Knollcrest Drive
Redding, California 96002

Subject: Comments on the Tentative Waste Discharge Requirements
Sierra Pacific Industries Oroville Cedar Mill

Dear Mr. Falkowski:

Sierra Pacific Industries (SPI) has reviewed the Tentative Information Sheet, Tentative Waste Discharge Requirements, and Tentative Monitoring and Reporting Program for the SPI Cedar Mill located in Oroville, Butte County, during the public comment period. Based on our review, SPI has the following comments for each tentative document for your consideration. Each comment is referenced by section with the comment in ***bold italics***.

Tentative Information Sheet

Section "Background," paragraph 1, sentence 1: Remove the word "***disposal***".

Section "Existing Facility," paragraph 2, sentence 2: Change to – While stored on the log deck, ***a maximum of approximately*** 865,000 gallons per day (gpd) of onsite well water are sprinkled over the logs.

Section "Facility Discharge," paragraph 1, sentence 4: add "***%***" after <2.

Section "Facility Discharge," Constituent table: For COD, there are no potential water quality objectives so replace "***0.010***" with "—".

Tentative Waste Discharge Requirements

Section 5, sentence 2: Change to – While in storage, the logs are sprinkled continuously from an onsite well with ***a maximum of*** approximately 865,000 gallons per day (gpd) of fresh groundwater and/or stormwater runoff mixed with log deck drainage pumped from the 5-acre recycle~~/***disposal***~~ (Pond).

Section 10, sentence 1: Change "21 acres" to "***26 acres of paved surface***".

Section 12, sentence 1: Change to past tense "SPI ***has constructed***...".

Section 12, sentence 3: Change to present tense, "It ***will consists*** of…".

Section 36, Constituent table: For COD, there are no potential water quality objectives so replace "***0.010***" with "—".

Section 37: Based on the short distance from the edge of the recycle pond to groundwater monitoring wells MW-2 and MW-3, it is not clear whether the results of samples collected from these monitoring wells are a true representative of groundwater conditions in the vicinity of the pond and may be a reflection of the surface water to groundwater interface.

Section B (Discharge Specifications), #11, sentence 2: Change to – The Discharger ***will cooperate with Butte County*** Mosquito Vector and Control to maintain best management practices to control vector populations.

Tentative Monitoring and Reporting Program

Section II A, sentence 1: Change to – Pond 1 used for storage~~,~~ ***and*** recycling~~, and disposal~~ of wastewater shall be monitored as specified below.

Section II A, bottom of section: Remove "Evidence of tears, abrasions, cracks, and holes in the geosynthetic liners."

Section III, paragraph 2, sentence 2 (on page 6): Change to – For a Discharger conducting any of its own analysis, reports must also be signed and certified by the ~~***chief of the laboratory***~~ ***legally responsible person***.

Section III A, Monthly Monitoring Reports: Remove section as no monthly reports are required.

Section III B, Quarterly Monitoring Reports: Change title to "~~***Quarterly***~~ ***Biannual*** Monitoring Reports" as no quarterly reports are required. Also, change the heading of Section III B to: ~~***Quarterly***~~ ***Biannual*** monitoring reports shall be submitted to the Board by the 1st day of the second month after the end of the ~~***quarter***~~ ***reporting period*** (i.e., the ~~***January-March***~~ ***January-June*** ~~***quarterly***~~ ***biannual*** report is due by ~~***May 1st***~~ ***August 1st***). Each ~~***Quarterly***~~ ***Biannual*** Monitoring Report shall include the following:

Section III C, Annual Monitoring Reports: Change the heading of this section to – The ~~***Fourth Quarterly***~~ ***Second Biannual*** Monitoring Report will serve as an Annual Monitoring Report. The ~~***Fourth Quarterly***~~ ***Second Biannual*** Monitoring Report for each calendar year shall include the following in addition to the items listed above.

Thank you for your consideration of our comments on the tentative waste discharge requirement documents. If you have any questions or comments, we would be happy to set up a conference call to discuss them with you.

Very truly yours,

SIERRA PACIFIC INDUSTRIES

Mike Vinum
Plant Manager

Enclosure

cc: Mr. Jeremy Higgins, Sierra Pacific Industries
Mr. Steve Misner, Kennedy/Jenks Consultants