Central Valley Regional Water Quality Control Board
9/10 June 2022 Board Meeting

Response to Comments
for the
Sierra Pacific Industries, Shasta Lake Division
Tentative Waste Discharge Requirements

The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to comments submitted by interested persons and parties regarding the tentative Waste Discharge Requirements, National Pollutant Discharge Elimination System (NPDES) Permit CA0081400 renewal for the Sierra Pacific Industries (Discharger) Shasta Lake Division Sawmill (Facility).

The tentative NPDES Permit was issued for a 30-day public comment period on 13 April 2022 with comments due by 13 May 2022. The Central Valley Water Board received public comments regarding the tentative Permit by the due date from the Sacramento River Source Water Protection Program. Some changes were made to the proposed Permit based on public comments received. Late comments were received on 16 May 2022 by the Discharger and have not been addressed in this Response to Comments document.

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

SACRAMENTO RIVER SOURCE WATER PROTECTION PROGRAM (SRSWPP) COMMENTS

1. **Consideration of a Storm Water Action Level (SWAL) for Iron**

   SRSWPP requests that a SWAL for filtered iron be included in the Order for the protection of the secondary maximum contaminant level (MCL). The SWAL included in the tentative Order is for dissolved iron, based on the NAWQA standard. The secondary MCL is lower than the NAWQA standard and its respective SWAL. According to the tentative Fact Sheet, the downstream receiving water exceeded the secondary MCL, warranting a need for a SWAL.

   Response: The tentative Order included some inconsistencies with the iron SWAL. The correct references to the iron SWAL refer to a total recoverable fraction. The inconsistencies have been fixed, and references to the dissolved fraction have been removed. The tentative Fact Sheet incorrectly summarized the downstream receiving water results. There were no downstream monitoring results for iron, and the Fact Sheet has been modified to reflect this. The Fact Sheet has also been modified to highlight that the Monitoring and Reporting Program includes monitoring of the effluent, upstream receiving water, and downstream receiving water for filtered iron in order to assess the secondary

MCL. A filtered iron SWAL has not been included in this Order due to a lack of filtered iron data. However, the permit does not allow for the discharge to cause an exceedance of the secondary MCL in the receiving water and requires the proper monitoring to verify compliance. If monitoring data or other new information indicates that the discharge is causing an exceedance of the secondary MCL, the permit includes provisions to reopen the Order to require additional monitoring, action levels, or other provisions as appropriate.

2. **Consideration of a SWAL for Manganese**
   SRSWPP requests that a SWAL for manganese be reconsidered in the Order to account for the secondary MCL. According to the tentative Fact Sheet, the downstream receiving water exceeded the secondary MCL, warranting a need for a SWAL.

   Response: The tentative Fact Sheet incorrectly summarized the downstream receiving water results. There were no downstream monitoring results for manganese, and the Fact Sheet has been modified to reflect this. The Fact Sheet has also been modified to highlight that the Monitoring and Reporting Program includes monitoring of the effluent, upstream receiving water, and downstream receiving water for filtered manganese in order to assess the discharge's threat to cause an exceedance of the secondary MCL. A filtered manganese SWAL has not been included in this Order due to a lack of filtered manganese data. However, the permit does not allow for the discharge to cause an exceedance of the secondary MCL in the receiving water and requires the proper monitoring to verify compliance. If monitoring data or other new information indicates that the discharge is causing an exceedance of the secondary MCL, the permit includes provisions to reopen the Order to require additional monitoring, action levels, or other provisions as appropriate.

3. **Removal of the Term "Dissolved" in Relation to Secondary MCLs**
   SRSWPP requests the removal of reference to the dissolved fraction for aluminum, manganese, and iron as it relates to compliance with the secondary MCLs. The appropriate fraction for these constituents for evaluating secondary maximum contaminant levels would be filtration with a 1.5 micron filter, not a conventional dissolved analysis.

   RESPONSE: The Central Valley Water Board staff concur. The Tentative Order used the descriptor "dissolved" in monitoring tables throughout Attachment E, with notes for secondary MCLs that a 1.5 micron filter must be used. Replacing the word "dissolved" in these areas with "filtered" removes some ambiguity for dischargers and laboratories that are familiar with conventional dissolved analysis. Therefore, Attachment E has been revised to reference a "filtered" fraction for aluminum, iron, and manganese, instead of a "dissolved" fraction.

4. **Consideration of Both Primary and Secondary MCLs for Aluminum**
   SRSWPP requests that both primary and secondary MCLs for aluminum be considered as relevant water quality objectives in the Central Valley Water Board's decision-making process. The secondary MCL of 200 ug/L is considered in the Order, but the tentative Fact Sheet includes no reference to the primary MCL for aluminum.

   RESPONSE: Reference to the primary MCL of 1,000 ug/L total recoverable aluminum has been added to the Fact Sheet. The total recoverable aluminum SWAL of 750 ug/L would be protective of the primary MCL. Therefore, no further adjustments have been made to address this comment.

CENTRAL VALLEY WATER BOARD STAFF CHANGES (Staff Changes)

1. **Table 5: Storm Water Action Levels:** Units for SWALs for aluminum and iron were modified in this table from mg/L to ug/L to correct inadvertent errors in the tentative Order. Additionally, the SWAL for iron in this table was changed from dissolved iron to total recoverable iron. The Staff Changes serve to correctly represent the applicable SWALs for consistency within the permit. Staff Changes are shown below in strikeout/underline format.

Table 1. Storm Water Action Levels

Parameters	Units	Instantaneous Maximum Action Level	Annual Action Level
Chemical Oxygen Demand (COD)	mg/L		120
Oil and Grease	mg/L	25	15
Total Suspended Solids	mg/L	400	100
Tannins and Lignins	mg/L		30
Aluminum, Total Recoverable	~~mg/L~~ ug/L		750
Iron, ~~Dissolved~~ Total Recoverable	~~mg/L~~ ug/L		1,000
Copper, Total Recoverable	ug/L		33.4
Zinc, Total Recoverable	ug/L		260