

Central Valley Regional Water Quality Control Board
14/15 December 2023 Board Meeting

Changes to Amended Waste Discharge Requirements
for
the Limited Threat General Order

The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative order amending Waste Discharge Requirements (NPDES Permit No. CAG995002) for Limited Threat Discharges to Surface Water.

The tentative amending order was issued for a 30-day public comment period on 6 October 2023 with comments due by 6 November 2023. The Central Valley Water Board received public comments regarding the tentative amending order by the due date from Recology and Tetra Tech. Changes were made to the proposed Permit amendment based on public comments received.

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

RECOLOGY AND TETRA TECH COMMENTS

1. Section IX.C.2.b.ii second paragraph and Section X.K first paragraph: Please include “(as 100/EC25 and 100/IC25)”

RESPONSE: Central Valley Water Board staff concur that the IC₂₅ (a point estimate of the toxic concentration that would cause a 25-percent reduction in a non-lethal biological measurement) should be included with EC₂₅ (a point estimate of the toxicant concentration that would cause an observable adverse effect in 25 percent of the test organisms).and have revised the proposed amending Order accordingly. Note that the revision was made to the second paragraph of Section X.K, not the first. However, since only one point estimate of the toxic concentration may apply, the wording was modified to “(as 100/EC₂₅ or 100/IC₂₅)”.

2. Attachment D: Incorrect Table of Contents order: Section order repeats V. Rationale for Receiving Water Limitations, and VI. Rationale for Provisions. Change to:

- VII. Rationale for Receiving Water Limitations
- VIII. Rationale for Provisions
- IX. Rationale for Monitoring and Reporting Requirements
- X. Public Participation

RESPONSE: Central Valley Water Board staff concur and have revised the proposed amending Order accordingly.

STAFF REVISIONS

Minor corrections that were made to the tentative amending order pertaining to the reporting limit for total residual chlorine are presented below.

CORRECTION #1: Attachment C.IV.A.2.f, Effluent Monitoring Requirements. Modify Total Residual Chlorine requirements as follows:

- f. **Total Residual Chlorine** must be monitored using an analytical method that is sufficiently sensitive to measure at the permitted level of 0.1 mg/L.

CORRECTION #2: Attachment D.IX.B.2.e (previously Attachment D.VII.B.2.e), Rationale for Monitoring and Reporting Requirements. Modify Effluent Monitoring as follows:

- e. Monitoring for total residual chlorine using grab samples is established for all low threat discharges and super chlorination project discharges to determine compliance with effluent limitations. As discussed in section VI.C.3 of this Fact Sheet, the Central Valley Water Board acknowledges the complications of achieving relatively low RLs in field locations. This General Order allows Dischargers to use handheld monitoring devices to monitor total residual chlorine in the effluent. This General Order also requires Dischargers to utilize a method capable of achieving an RL of 0.1 mg/L until the State Water Board adopts a state-wide policy with a specified reporting level achievable in the field and laboratory. The RL of 0.1 mg/L represents a level that hand-held field meters can achieve.