Central Valley Regional Water Quality Control Board
27 February 2026 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements for
Sierra Pacific Industries
Burney Division Sawmill
Shasta County

At a public hearing scheduled for 27 February 2026, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements (NPDES No. CA0003981) for the Sierra Pacific Industries, Burney Division Sawmill. This document contains responses to written comments received from interested persons and parties in response to the tentative Order. Written comments from interested parties were required to be received by the Central Valley Water Board by 17 January 2026 in order to receive full consideration. Comments were received prior to the deadline from:

1. Sacramento River Source Water Protection Program (SRSWPP) (received 16 January 2026)

Written comments from the above interested parties are summarized below, followed by the response of Central Valley Water Board staff.

SACRAMENTO RIVER SOURCE WATER PROTECTION PROGRAM (SRSWPP) COMMENTS

The Sacramento River Source Water Protection Program (SRSWPP) is sponsored by the City of Sacramento and West Sacramento, East Bay Municipal Utility District (EBMUD), and the Sacramento County Water Agency. The SRSWPP seeks to maintain the high quality of the Sacramento River drinking water supply. Utility districts are responsible for ensuring the distribution of water that is both safe and free from unpleasant taste, odor, or other aesthetic effects. To that end, SRSWPP submitted comments on the tentative Order regarding monitoring requirements related to the Secondary Maximum Contaminant Level (MCL) and Storm Water Action Level (SWAL) for aluminum, iron, manganese, and zinc.

SRSWPP COMMENT #1 – Aluminum, Iron, Manganese, and Zinc Secondary MCL Exceedances

SRSWPP states that the historic industrial storm water data for total recoverable aluminum, iron, and manganese presented in Fact Sheet section II.C.2 exceeds the

respective Primary and Secondary MCLs for these parameters and demonstrates that the discharge has the potential to impact downstream receiving water quality.

RESPONSE:

Fact Sheet sections IV.C.3.c.i.(b), IV.C.3.c.iii.(b), and IV.C.3.c.iv.(b) of the tentative Order have been revised to clarify whether the available data demonstrates exceedances to MCLs. In the Storm Water Analysis subsections for aluminum (Fact Sheet section IV.C.3.c.i.(b)), iron (Fact Sheet section IV.C.3.c.iii.(b)), and manganese (Fact Sheet section IV.C.3.c.iv.(b)), the discussions of the potential of the industrial storm water discharge to impact the receiving water are based on the available total recoverable aluminum, iron, and manganese monitoring data; however, assessment of compliance with the Secondary MCL allows for 1.5-micron filtered samples. The prior Order did not require 1.5-micron filtered metals analysis. These sections of the tentative Order have been revised to include a statement that this Order requires 1.5-micron filtered data for assessment of compliance with Secondary MCLs. In addition, these sections of the tentative Order have been revised to remove comparison of dissolved metals to Secondary MCLs (see SRSWPP comment #6).

SRSWPP COMMENT #2 – Monitoring Frequency for Aluminum, Iron, Manganese, and Zinc

SRSWPP states that no logic was provided for the reduction in monitoring frequency from 2/month to 1/month for aluminum, iron, and manganese in the receiving water body (Fact Sheet section VII.D.1.c).

RESPONSE:

Fact Sheet sections VII.B.4 and VII.D.1.c of the tentative Order have been revised. The revisions clarify the reduction of 2/month to 1/month monitoring frequency was for total recoverable aluminum, iron, and manganese in order to compare with the annual average SWAL. In addition, the revision clarifies that the dissolved aluminum, iron, and manganese monitoring was removed because it is not appropriate to compare dissolved fractions to Secondary MCLs. The revision also clarifies the establishment of 1.5-micron filtered aluminum, iron, and manganese at a frequency of once per month. The proposed monitoring frequencies are adequate to assess the impact of the industrial storm water discharge on the receiving water for these parameters.

In addition, the monitoring frequency for zinc in the storm water and in the receiving water was not reduced. Fact Sheet sections VII.B.8 and VII.D.1.d, respectively, provides the rationale for the zinc monitoring frequency.

SRSWPP COMMENT #3 – Historic Receiving Water Data Comparison to MCLs

SRSWPP requested that Fact Sheet section II.C be revised to include presentation of a summary of the historic receiving water data for surface water, which would include a

comparison to Primary and Secondary MCLs for total fractions of aluminum, iron, manganese, and zinc.

RESPONSE:

Fact Sheet sections II.C.1 and 2 of the tentative Order have been revised to include reference to presentation of historical data in Attachment G, Table G-1. Historic receiving water data is presented in Table G-1 (Attachment G) of the tentative Order. In addition, the historic receiving water data is discussed under the Storm Water Analysis subsections of the tentative Order for each parameter included in the Constituents with SWAL section of the Fact Sheet (Fact Sheet section IV.C.3.c).

SRSWPP COMMENT #4 – Comparison Historic Zinc Total Recoverable Data to MCLs

(a) SRSWPP requests that the WQO subsections of Constituents with SWAL for zinc (Fact Sheet section IV.C.3.c.x.(a)) be revised to include the Secondary MCL.

(b) SRSWPP requests that the Storm Water Analysis subsections of Constituents with SWAL be revised to include comparison of historic total metals to the Secondary MCL for zinc (Fact Sheet section IV.C.3.c.x.(b)).

RESPONSE:

Fact Sheet sections IV.C.3.c.x.(a) and (b) of the tentative Order have been revised to include the Secondary MCL for zinc and comparison with the historical total zinc data. Historic receiving water data for total recoverable aluminum, iron, manganese, and zinc as well as their respective water quality objectives (WQOs) including Primary and Secondary MCLs is presented in Table G-1 (Attachment G) of the tentative Order. In addition, total recoverable metals (unfiltered) are compared to secondary MCLs under the Storm Water Analysis subsection of the tentative Order for aluminum (Fact Sheet section IV.C.3.c.i.(b)), iron (Fact Sheet section IV.C.3.c.iii.(b)), and manganese (Fact Sheet section IV.C.3.c.iv.(b)). Whereas the tentative Order did not include a similar discussion for the Secondary MCL for zinc (Fact Sheet section IV.C.3.c.x.(b) despite this information being presented in the tentative Order Attachment G, Table G-1.

SRSWPP COMMENT #5 – Primary and Secondary MCL Compliance Language

SRSWPP requests all references to compliance with Primary and Secondary MCLs in the tentative Order for aluminum, iron, manganese and zinc refer to analysis for total metals concentrations, with the pre-filter at 1.5-microns only applicable to compliance with Secondary MCLs. Specifically, SRSWPP requests that the Constituents with SWAL - WQO subsections for aluminum (Fact Sheet section IV.C.3.c.i.(a)), iron (Fact Sheet section IV.C.3.c.iii.(a)), and manganese (Fact Sheet section IV.C.3.c.iv.(a)) be revised.

RESPONSE:

No changes are proposed to Fact Sheet sections IV.C.3.c.i.(a), IV.C.3.c.iii.(a), and IV.C.3.c.iv.(a) of the tentative Order. The WQO subsections for aluminum, iron and manganese already include a statement for the requirement of 1.5-micron filtered data for Secondary MCL compliance. The WQO subsection for aluminum states that aluminum total recoverable data is required for compliance with Primary MCL. Instead, revisions were made to the tentative Order MRP – Filtered Metals subsections (Attachment E sections IV.B.2.h, VI.A.2.e, VIII.B.2.h, VIII.C.2.f, and IX.C.2.b), to clarify the directions for total recoverable metals analysis requirement after 1.5-micron filtration (See SRSWPP comment #8 – MRP Testing Requirements for Filtered Metals).

SRSWPP COMMENT #6 – Aluminum SWAL Compliance Language

SRSWPP requests that compliance language for aluminum SWAL (WDR section VII.B and MRP section IV.B.2.k) be revised to clarify that total metals analysis is required.

RESPONSE:

Language for compliance with the annual average total recoverable aluminum SWAL (WDR section VII.B and MRP section IV.B.2.k) has been updated to clarify the appropriate total recoverable laboratory metals analysis.

SRSWPP COMMENT #7 – Historical Dissolved Metals Data Comparison Primary and Secondary MCL

SRSWPP requests that Attachment G and the Constituents with SWAL – Storm Water Analysis subsections of the Fact Sheet be revised to remove comparison of historic dissolved metals data to the Primary and Secondary MCLs for aluminum (Fact Sheet section IV.C.3.c.i.(b)), iron (Fact Sheet section IV.C.3.c.iii.(b)), and manganese (Fact Sheet section IV.C.3.c.iv.(b)).

RESPONSE:

Comparison of dissolved metals to Secondary MCLs has been removed from Attachment G and Fact Sheet sections IV.C.3.c.i.(b), IV.C.3.c.iii.(b), and IV.C.3.c.iv.(b) of the tentative Order.

SRSWPP COMMENT #8 – Reconsideration of Storm Water Action Levels for Aluminum, Iron, and Manganese

SRSWPP requests SWALs presented in Attachment G and the Constituents with SWAL subsection of the Fact Sheet of the tentative Order be reconsidered to be at the Primary and Secondary MCLs levels to ensure a SWAL that is protective of human health for aluminum (Fact Sheet section IV.C.3.c.i.(c)), iron (Fact Sheet section IV.C.3.c.i.(c)), and manganese (Fact Sheet section IV.C.3.c.i.(c)).

RESPONSE:

No changes are proposed to the tentative Order. To meet water quality standards, instead of a specific numeric effluent limitation, the State Water Board's NPDES General Permit For Storm Water Discharges Associated With Industrial Activities (Order WQ 2014-0057-DWQ, as amended by Orders WQ 2015-0122-DWQ and WQ 2018-0028-DWQ) and the U.S. EPA's NPDES Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity require facilities to minimize pollutant runoff through site-specific Best Management Practices (BMPs) and a Storm Water Pollution Prevention Plan (SWPPP) (see also 40 C.F.R. 122.44(k)). To ensure that the industrial storm water discharge does not harm the receiving waters, the monitoring program and BMP pollutant control measures are tailored to the specific industrial activities at the facility. Facilities must monitor their industrial storm water discharges and report results, adjusting BMPs as needed to meet permit conditions and water quality goals.

The State Water Board's Industrial General Permit states that compliance with Numeric Action Levels for aluminum, iron, manganese, and zinc requires Total Recoverable analysis by EPA 200.8 method. The numeric SWALs in the tentative Order are analogous to the Numeric Action Levels of the State Water Board's Industrial General Permit. Thus, the monitoring and compliance requirements for the SWALs in the tentative Order are implemented in accordance with the State Water Board's Industrial General Permit.

In addition, and in accordance with the State Water Board's Industrial General Permit, the tentative Order states that an exceedance of a numeric SWAL requires the Discharger to evaluate the effectiveness of the Facility specific Storm Water Pollution Prevention Plan (SWPPP) as it relates to controlling the discharge of pollutants from the Facility by completing a BMP Improvement Evaluation (WDR sections VI.C.2.a.iii and VII.A). If the SWAL continues to be exceeded after implementation of initial BMP improvements, the Discharger shall demonstrate that no further pollutant reduction is technologically available and economically achievable in light of best industry practice to meet the action level (WDR section VI.C.2.a.iii). Thus, the tentative Order includes mechanisms to ensure protection of the receiving water quality.

SRSWPP COMMENT #9 – MRP Testing Requirements for Filtered Metals

(a) SRSWPP requests that the Testing Requirements for Filtered Metals (MRP sections IV.B.2.h and VIII.B.2.h) be clarified that the metal analysis is for the total fraction.

(b) SRSWPP requests that zinc be included in the Industrial Storm Water Discharge Monitoring Table E-2 and Receiving Water Monitoring Table E-6 Testing Requirements for Filtered Metals (MRP sections IV.B.2.h and VIII.B.2.h, respectively).

RESPONSE:

(a) MRP sections IV.B.2.h, VI.A.2.e, VIII.B.2.h, VIII.C.2.f, and IX.C.2.b have been revised to clarify laboratory analysis by total recoverable (acid-soluble) procedures after 1.5-micron filtration.

(b) No changes are proposed. The tentative Order requires that the industrial storm water discharge (SW-006) be monitored for total recoverable zinc (unfiltered) with concurrent upstream and downstream receiving water monitoring (RSW-003 and RSW-004, respectively) for total recoverable and dissolved zinc (Table E-2 in MRP section IV.B.1 and Table E-6 in MRP section VIII.B.1, respectively). The tentative Order did not require 1.5-micron filtered zinc monitoring because the historical industrial storm water discharge and receiving water data (Attachment G and Fact Sheet section IV.C.3.c.x.(b)) demonstrate that the concentration of total recoverable zinc is well below the Secondary MCL (5,000 µg/L). In addition, the tentative Order includes a SWAL for total recoverable zinc at 260 µg/L. Thus, the tentative Order is protective of the receiving water municipal beneficial use without requiring additional filtered zinc monitoring.

SRSWPP COMMENT #10 – MRP Effluent and Receiving Water Characterization Analysis Aluminum, Total

SRSWPP requests Table E-10 in section IX.D.4 of Attachment E be revised to clarify aluminum, total.

RESPONSE:

Table E-10 in MRP section IX.D.4 of the tentative Order (Attachment E) has been revised to specify total aluminum monitoring.

STAFF REVISIONS

1. **Grammatical and Typographical Corrections.**

   Staff has made grammatical and typographical corrections to the proposed Order for clarity.

2. **Applicable Plans, Policies, and Regulations – Impaired Water Bodies on 303(d) List**

   Fact Sheet section III.D.1 was revised from “On 11 May 2022 U.S. EPA gave final approval to California’s 2020 – 2022 section 303(d) List of Water Quality Limited Segments.” to “On 13 December 2024, U.S. EPA gave partial approval and partial disapproval to California’s 2022-2024 section 303(d) List of Water Quality Limited Segments.”

Fact Sheet section III.D.1 was revised from “Canyon Creek is not listed as an impaired water body on the 2022 303(d) list. However, Canyon Creek is tributary to the Pit River and the Pit River (from confluence of N and S Forks to Shasta Lake) and the Pit River is listed as impaired for: aluminum, iron, nutrients, organic enrichment/low dissolved oxygen, and dissolved oxygen.” to “Canyon Creek is not listed as an impaired water body on the 2024 303(d) list. However, Canyon Creek is tributary to the Pit River by approximately 17.5 river miles to the Pit 3 Hydroelectric Dam and the Pit River (from confluence of N and S Forks to Shasta Lake) is listed as impaired for: aluminum, iron, nutrients, organic enrichment/low dissolved oxygen, and dissolved oxygen.”

3. **Receiving Water Limitation Considerations – Review of Other Relevant Factors**

   Fact Sheet section V.A.2.c was revised from “Canyon Creek is not listed as an impaired water body on the Clean Water Act 303(d) List (2022). However, Canyon Creek is tributary to the Pit River and the Pit River (from confluence of N and S Forks to Shasta Lake) and the Pit River is listed as impaired for: aluminum, iron, nutrients, organic enrichment/low dissolved oxygen, and dissolved oxygen.” to “Canyon Creek is not listed as an impaired water body on the 2024 303(d) list. However, Canyon Creek is tributary to the Pit River by approximately 17.5 river miles to the Pit 3 Hydroelectric Dam and the Pit River (from confluence of N and S Forks to Shasta Lake) is listed as impaired for: aluminum, iron, nutrients, organic enrichment/low dissolved oxygen, and dissolved oxygen.”

4. **Public Participation – Notification of Interested Parties and Public Hearing**

   Fact Sheet section VIII.A. was updated with the location of the posting of the Notice of Public Hearing to include the Shasta Superior Courthouse. In addition, the 26-27 February 2026 board meeting date provided in Fact Sheet VIII.C was updated to specify the one-day board meeting date of 27 February 2026.

5. **California Environmental Quality Act (CEQA)**

   Fact Sheet section III.B was updated to provide clarification on the scope of the existing facilities exemption.

6. **Discharge Prohibition III.C**

   Fact Sheet section IV.A.3 was updated to provide clarification on the basis for the nuisance prohibition.