

Regional Water Quality Control Board
North Coast Region

Executive Officer's Summary Report
April 18, 2019
Regional Water Board Office
Santa Rosa, California

ITEM: 5

SUBJECT: Public Hearing on Order No. R1-2019-0005 to consider adoption of proposed Waste Discharge Requirements for the California Redwood Company and the Trinity River Timber Company DBA North Fork Lumber Company Korbel Sawmill, WDID No. 1B800200HUM, NPDES No. CA0005932 (Justin McSmith)

BOARD ACTION: The Board will consider adoption of Waste Discharge Requirements Order No. R1-2019-0005. This Order will serve as a National Pollutant Discharge Elimination System (NPDES) permit for a period of five years.

BACKGROUND: The California Redwood Company (Permittee) is the owner and Trinity River Company doing business as North Fork Lumber Company (Permittee) is the operator of the Korbel Sawmill (Facility). The Korbel Sawmill is situated on approximately 150 acres in the town of Korbel and adjacent to the North Fork of the Mad River. The Facility was formerly operated by California Redwood Company, but North Fork Lumber Company has been operating and maintaining the Facility since June 1, 2016.

The Facility is currently regulated under Waste Discharge Requirements Order No. R1-2013-0008 for discharges of log deck recycled sprinkler water to the North Fork Mad River. Between May 2016 and December 2017, the Facility was completely modernized, and full-time sawmill operations began in January 2018. Onsite operations include decking and sprinkling fir logs; debarking and bucking; sawing, milling, and planing operations; lumber storage and shipping; and by-product generation. The discharge of any process wastewater from the Sawmill, including process wastewater from bark removal, sawing, resawing, edging, trimming, planing, machining, and by-product manufacturing to surface waters is prohibited (see Discharge Prohibitions. III.L). The only discharge water originates from stormwater runoff and log-deck sprinkler water that is treated using settlement basins and a constructed wetland prior to discharge to the Mad River.

Due to the Facility's inability to comply with copper and lead effluent limitations at Discharge Point 001 (Mad River), the Regional Water Board issued Cease and Desist Order R1-2013-0009 (CDO) to . The CDO required the Permittee to develop and implement compliance methods or activities to meet the copper and lead effluent limitations by July 1, 2018. The Permittee proposed to derive site specific water quality criteria for copper and lead by conducting a Water Effect Ratio (WER) study as their preferred alternative to achieving compliance with final limitations. On June 26, 2018, the Permittee submitted its final WER report to the Regional Water Board. Results from the study concluded that the Facility's effluent has a WER value greater than one for copper and lead (a condition where

the metals are effectively less toxic to the primary test species, *Ceriodaphnia dubia* or water flea, in site water relative to the laboratory-controlled water).

Based on the results of the WER study, on November 14, 2018, the Regional Water Board modified the CDO (CDO Modifying Order R1-2018-0057) to “retain the interim effluent limits for copper and lead until December 1, 2019 when the Facility’s new NPDES permit would likely become effective”.

DISCUSSION: The Proposed Order replaces WDR Order No. R1-2013-0008 (Previous Order) and includes new zinc and nickel effluent limitations that apply to the discharge of sprinkler water and stormwater from the Facility. The lead and copper effluent limitations in the Previous Order are no longer included in the Proposed Order because there is no reasonable potential to exceed water quality objectives for these metals once the WER values are used to derive site specific criteria. Effluent limitations for pH are retained from the Previous Order to evaluate the performance of the Facility.

Zinc and nickel effluent limitations included in the Proposed Order are expressed as a Zinc Impact Ratio (ZIR) and a Nickel Impact Ratio (NIR), respectively, and each with a value of 1.0. Compliance with the ZIR and NIR is determined by comparing the effluent limitation of 1.0 with the calculated effluent Impact Ratio. The effluent Impact Ratio is calculated by dividing the concentration of the constituent in the effluent by the constituent’s water quality criteria, a calculation that uses the receiving water hardness measured concurrently with the collection of the effluent sample. To assist the Permittee with calculating the effluent Impact Ratio, Attachment G of the Proposed Order includes an example of an Impact Ratio calculator in an excel format with embedded formulas.

A copy of the Draft Order was posted on the Regional Water Board website and was available for public comment from January 5, 2019 through February 5, 2019. The Discharger submitted timely comments on the Draft Order. The most significant changes made to the Draft Order in response to Permittee’s comments was the inclusion of Impact Ratios to determine compliance with and to track new zinc and nickel effluent limitations and removal of the requirement to develop and implement a pollution prevention plan for zinc and nickel. In addition, Regional Water Board staff met with the Discharger to discuss the Draft Order. Staff made modifications to the Proposed Order in response to the Discharger’s written comments. A full explanation of the comments and responses is documented in the attached Response to Comments document. Staff anticipates that the Proposed Order will be uncontested.

RECOMMENDATIONS: Adopt Order No. R1-2019-0005, as proposed.

SUPPORTING DOCUMENTS:

1. Proposed Order No. R1-2019-0005
2. Comments Provided on Order No. R1-2019-0005
3. Staff Response to Written Comments
4. Impact Ratio Calculator
5. Public Notice