



# SIERRA PACIFIC INDUSTRIES

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August 2, 2022

Mr. Brad Shelton, P.G.

Senior Engineering Geologist

California Regional Water Quality Control

Board Central Valley Region

11020 Sun Center Drive, #200

Sacramento, California 95670

Re: Tentative Waste Discharge Requirements and  
Monitoring and Reporting Program R5-2022-00XX  
Sierra Pacific Industries, Martell Division Facility  
Martell, California

Dear Mr. Shelton,

Following removal of Tentative Waste Discharge Requirements and Monitoring and Reporting Program R5-2022-00XX (WDR/MRP) from the uncontested calendar of the June 10, 2022 Board meeting, Sierra Pacific Industries (SPI) is requesting changes in the Order's text, regarding several subjects of concern found in the Tentative WDR/MRP that are listed as follows:

**Concern** – Requirement for analysis of PAHs and Dioxins and Furans in all monitoring wells and surface water samples annually.

**Request** – SPI requests changes in the WDR Information Sheet *Table 10 — Recent PAH, Dioxin, and Furan Monitoring Results* (Information Sheet item 31) data that was added to the 11 February 2022 Tentative WDRs previously reviewed by SPI. Dioxin and Furan congener reporting limits listed in Table 10 do not appear to agree with the laboratory reports. The laboratory used the minimum levels (method limits for J flags) for dioxins and furans specified in EPA Method 1635B. The laboratory also indicates that “detection limits are only reported when an analyte is not present in the sample.” SPI requests that the table numerical values for RLs and MDLs be modified to reflect the laboratory values if they are to remain in the WDR.

SPI requests that the language in the WDR Findings/Site Conditions section be amended to include in item 30., g., a statement after the first sentence, to the effect of “Since detections of PAH constituents and dioxin and furan congeners were sporadic and no concentrations were above the reporting limit (estimated concentrations reported below the reporting limits only) during sampling events from 2012

to 2015, analysis frequency for PAHs and dioxin and furans was changed from semiannual to every five years, as was provided for in Table 2 of the 2014 MRP; therefore, the discharger did not analyze laboratory samples for PAHs, dioxins, and furans in the years 2016 through 2019.”

During the time period between 2012 and 2014 (semiannual sampling and analysis) detections of dioxin and furan congeners (estimated values) were reported in only three wells other than well B-14 (one detection in upgradient well B-1, one detection in downgradient well B-13, and one detection in downgradient well LD-2A). Based on the Regional Board’s evaluation of the historical detections the 2014 MRP changed sampling and analysis requirements for PAHs, and dioxins and furans to only monitoring wells associated with the Ash Disposal Area (wells B-5, B-8, B-14, B-15 and B-16). Only samples collected from well B-14 (immediately downgradient from the leachate basin) between 2012 and 2020 were reported with consistent detections (estimated values) of three dioxin and furan congeners. Removal of wood waste material (disturbance of the material during clean closure efforts) has been conducted since approximately 1997 and existing monitoring well analysis results are representative of impacts to groundwater quality that may be related to disturbance of the materials. Considering these four historical dioxin and furan detections in only three wells’ samples (other than well B-14) between 2012 and 2014, and no detections of PAHs reported in the Ash Disposal Area wells during the 2<sup>nd</sup> semiannual 2015 or 1<sup>st</sup> semiannual 2020 monitoring events, SPI requests that language be included in both the WDR and the MRP that provides an allowance for modification of the number of wells sampled and frequency of sampling for PAHs and dioxins and furans following two years of annual sampling and analysis, should an evaluation of the analysis results indicate an absence of detections of the constituents of concern in certain wells’ or surface water samples.

**Concern** – Limitation of TDS concentration at 500 mg/L in Wood Waste Landfill leachate.

**Request** – Include the provision for use of field measurements of electrical conductivity according to the conversion factor submitted to the Regional Board on 2 December 2009, in place of laboratory reported TDS concentrations as was included in the 2014 WDR under section B. Discharge Specifications, No. 7.

**Concern** – Piezometers are not differentiated from monitoring wells in Table 1, page 4 of the MRP, and item b. below the table indicates “groundwater samples shall be collected from each well and analyzed for Monitoring Parameters...” This could be misconstrued to indicate the piezometers are required to be sampled.

**Request** – The piezometers need to be differentiated from the monitoring wells in the table and text indicating the piezometers are to be gauged for water levels only.

**Concern** – Table 5, page 8 of the MRP indicates that groundwater conditions are to be reported annually, while the text preceding the table in item d. indicates they are to be reported semiannually.

**Request** – Table 5 and the preceding text need to be consistent.

**Concern** – On pages 5, 6, and 19 of the WDR, the text indicates the Amended ROWD was submitted on 8 March 2022, 7 March 2022 and 8 March 2022 respectively.

**Request** – Revise the text to indicate the Amended ROWD was submitted to the Board on 7 March 2022.

We appreciate your consideration of this request for revisions to the tentative WDR and MRP R5-2022-00XX, and the opportunity to work cooperatively with the Regional Water Board on this matter. If you have any questions or need any additional information, please contact Bruce Cannon at (209) 536-2208.

Sincerely Yours,

A handwritten signature in black ink, appearing to read 'Steve Carey', written over a light blue horizontal line.

Steve Carey

Area Manager