

Lahontan Regional Water Quality Control Board

TO: Anne Holden
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FROM: 
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DATE: February 28, 2014

SUBJECT: ADVISORY TEAM COMMENTS ON PROPOSED WASTE DISCHARGE REQUIREMENTS (WDRs) FOR PG&E HINKLEY AGRICULTURAL TREATMENT UNITS

The Advisory Team has reviewed the March 12, 2014, Agenda Item 4 – Waste Discharge Requirements, Pacific Gas and Electric Company Agricultural Treatment Units, and has the following comments to submit:

Comments on WDRs

On page 26, D.4 (receiving water limitations) – The requirement states that “if the discharge of irrigation water containing greater than 10 mg/L nitrate” causes nitrate levels to exceed or increase, then the discharger must provide a contingency plan. Do we intend to only have the requirement for a contingency plan apply when the irrigation water contains nitrate above 10 mg/L – or do we intend to require the contingency plan anytime the nitrate in the groundwater exceeds 10 or increases above 10 or 20% (depending on the background). I think the latter – and recommend removing “containing greater than 10 mg/L nitrate as N.” That way if the discharge of the irrigation water causes an increase – there must be a contingency plan – regardless of whether the irrigation water was above or below 10 mg/L nitrate.

Also on p. 26, D.5 – I think we should change “If the discharge of waste” to “If the discharge of irrigation water” – consistent with D.4, above

Page 27 – first line, carried over from sentence on p. 26 (re Conditions Triggering Environmental Impact Report Mitigation Measures) – after “are described” in first line, I suggest adding “in I.E.1, below”

On page 29 – I.E.1.a.iii – should read “will be defined **as** any domestic water supply”

On page 29, f.n. 7 – after “those” add “agricultural supply wells that are not owned”

On page 34 – III. (Action Plan for Uranium in Soils) – it appears the numbering is off. Under current “2” (which should be 3), in first line – should read “shall submit an action plan” – removing “propose” from line.

Comments on Responses to Comments

In Comment #B16, PG&E submitted its proposed revisions to groundwater monitoring for existing ATUs (and this was provided in Attachment A to the Response to Comments). On Attachment A, PG&E listed specific wells for which it requested certain revisions in monitoring, including either removing it from the sampling, changing the sampling frequency, or using the well as an alternative. For each request, PG&E provided its rationale. For eight specific requests, the written response does not provided an explanation or rationale as to why the proposal is rejected, and those responses were not responsive to the specific request and rationale provided. Please provide additional explanation why PG&E's rationale is not acceptable for the specific requested changes to the following Monitoring Wells: MW-127S1, MW-127S2, MW-14A, MW-27A, MW-27B, MW-32S, MW-42B1, MW-56.

Comments on Findings and Statement of Override

For Impact WTR-2d, in second to last sentence of the first paragraph for the Findings, please change the sentence to read, "...and the importance of addressing the high-level plume concentrations for RETURNING beneficial uses OF THE AQUIFER, ..." Similarly for the finding for WTR 2g on p. 12.

For Impact WTR 2f, the findings note that WTR MM-6 requires monitoring of nitrate levels for one year before creating new agricultural treatment units; however, the responses to comment A7 states that monitoring can be done concurrently with establishment of the new ATUs. Please explain. How much monitoring will PG&E have to do to establish baseline limits before it is able to bring on new ATU units authorized under this Order?

cc: PG&E Hinkley Lyris List (and web posting)