

Central Valley Regional Water Quality Control Board
16/17 April 2015 Board Meeting

Response to Comments
for the
Nevada County Sanitation District No. 1
Cascade Shores Wastewater Treatment Plant
Tentative Waste Discharge Requirements

The following are Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements (NPDES Permit) for Nevada County Sanitation District No. 1 Cascade Shores Wastewater Treatment Plant (WWTP), Nevada County.

The tentative NPDES Permit was issued for a 30-day public comment period on 18 February 2015 and comments were due 20 March 2015.

The Central Valley Water Board received comments regarding the tentative NPDES Permit by the due date from the following interested parties:

- Central Valley Clean Water Association (CVCWA)

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

CENTRAL VALLEY CLEAN WATER ASSOCIATION (CVCWA) COMMENTS

CVCWA Comment No. 1.

CVCWA contends the effluent limit for total mercury should be removed. The discharge does not have reasonable potential to cause or contribute to an exceedance of the applicable numeric criteria for mercury and the rationale in the Fact Sheet supporting the imposition of a mercury limit is inadequate.

Response: Central Valley Water Board staff concurs and the proposed Permit has been modified accordingly.

CVCWA, Comment No. 2.

CVCWA believes that the discussion in the Fact Sheet (section VI.B.5.b) regarding the County's collection system is not consistent with language in the Tentative permit and has requested the final paragraph be deleted in its entirety and replaced with language that the Central Valley Water Board has been using in other NPDES permits that it has issued recently, as shown below.

~~Furthermore, the General Order contains requirements for operation and maintenance of collection systems and for reporting and mitigating sanitary sewer overflows. Inasmuch that the Discharger's collection system is part of the system that is subject to this Order, certain standard provisions are applicable as specified in Provisions, section VI.C.5. For instance, the 24-hour reporting requirements in~~

~~this Order are not included in the General Order. The Discharger must comply with both the General Order and this Order. The Discharger and public agencies that are discharging wastewater into the facility were required to obtain enrollment for regulation under the General Order by December 1, 2006.~~

Furthermore, the General Order contains requirement for operation and maintenance of collection systems and for reporting and mitigating sanitary sewer overflows. The Discharger is enrolled under State Water Board General Order No. 206-003-DWQ.

RESPONSE: Central Valley Water Board staff concurs and have modified Section VI.B.5.b of the Fact Sheet to be consistent with previous permits, as shown below.

- b. The State Water Board issued General Waste Discharge Requirements for Sanitary Sewer Systems, Water Quality Order 2006-0003-DWQ (General Order) on May 2, 2006. The Monitoring and Reporting Requirements for the General Order were amended by Water Quality Order WQ 2008-0002-EXEC on February 20, 2008. The General Order requires public agencies that own or operate sanitary sewer systems with greater than one mile of pipes or sewer lines to enroll for coverage under the General Order. The General Order requires agencies to develop sanitary sewer management plans (SSMPs) and report all sanitary sewer overflows (SSOs), among other requirements and prohibitions. The Discharger has applied for and has been approved for coverage under Order 2006-0003-DWQ for operation of its wastewater collection system.

~~Furthermore, the General Order contains requirements for operation and maintenance of collection systems and for reporting and mitigating sanitary sewer overflows. Inasmuch that the Discharger's collection system is part of the system that is subject to this Order, certain standard provisions are applicable as specified in Provisions, section VI.C.5. For instance, the 24-hour reporting requirements in this Order are not included in the General Order. The Discharger must comply with both the General Order and this Order. The Discharger and public agencies that are discharging wastewater into the facility were required to obtain enrollment for regulation under the General Order by 1 December 2006.~~