

LATE REVISIONS

**Reynolds Consumer Products LLC
Reynolds Molded Pulp Mill
Tehama County**

**Proposed Waste Discharge Requirements
NPDES No. CA0004821
Regional Water Quality Control Board, Central Valley Region
Board Meeting – 27 April 2023
ITEM #14**

The proposed Order for Reynolds Consumer Products LLC (Discharger) Reynolds Molded Pulp Mill has late revisions to correctly format table numbers (typographical errors) and to correct an inaccurate statement related to effluent ammonia sampling and the facility type.

1. Correct language in Attachment E, Monitoring and Reporting Program (MRP), in section IV A.1 as follows:

Monitoring Frequency – The Discharger shall perform quarterly acute toxicity testing, ~~concurrent with effluent ammonia sampling.~~

2. Correct typographical errors in Attachment E, Monitoring and Reporting Program (MRP), in section IV.B.7 as follows:

Dilutions – For routine and compliance chronic toxicity monitoring, the chronic toxicity testing shall be performed using the dilution series identified in Table ~~E-4~~ E-3, below. For TRE monitoring, the chronic toxicity testing shall be performed using the dilution series identified in Table ~~E-4~~ E-3, below, unless an alternative dilution series is detailed in the submitted TRE Action Plan. A receiving water control or laboratory water control may be used as the diluent.

3. Correct typographical errors in Attachment E, Monitoring and Reporting Program (MRP), in section V.A.1-2 as follows:
 1. The Discharger shall monitor the settling basins (Ponds 4A and 4B) and aeration pond (Pond 4C) at Monitoring Locations LND-001A, LND-002, and LND-003 in accordance with Table ~~E-3~~ E-4 and the testing requirements described in section V.A.2 below:
 2. **Table ~~E-3~~ E-4 Testing Requirements.** The Discharger shall comply with the following testing requirements when monitoring for the parameters described in Table ~~E-3~~ E-4:
4. Correct typographical errors in Attachment E, Monitoring and Reporting Program (MRP), in section V.B.2 as follows:
 2. **Table ~~E-4~~ E-5 Testing Requirements.** The Discharger shall comply with the following testing requirements when monitoring for the parameters described in Table ~~E-4~~ E-5:

5. Correct typographical errors in Attachment E, Monitoring and Reporting Program (MRP), in section VI.A.1-2 as follows:
 1. The Discharger shall monitor Sacramento River at RSW-001 in accordance with Table ~~E-5~~ E-6 and the testing requirements described in section VI.A.2 below:
 2. **Table ~~E-5~~ E-6 Testing Requirements.** The Discharger shall comply with the following testing requirements when monitoring for the parameters described in Table ~~E-5~~ E-6:
6. Correct typographical errors in Attachment E, Monitoring and Reporting Program (MRP), in section VI.B.1-2 as follows:
 1. The Discharger shall monitor Sacramento River at RSW-002 in accordance with Table ~~E-6~~ E-7 and the testing requirements described in section VI.B.2 below as follows:
 2. **Table ~~E-6~~ E-7 Testing Requirements.** The Discharger shall comply with the following testing requirements when monitoring for the parameters described in Table ~~E-6~~ E-7:
7. Correct typographical errors in Attachment E, Monitoring and Reporting Program (MRP), in section VII.A.4 as follows:
 4. The Discharger shall conduct effluent and receiving water characterization monitoring in accordance with Table ~~E-8~~ E-9 and the testing requirements described in section VII.A.5 below.
8. Correct typographical errors in Attachment E, Monitoring and Reporting Program (MRP), in section VIII.D.1-4 as follows:
 1. **Analytical Methods Report.** The Discharger shall complete and submit an Analytical Methods Report, electronically via CIWQS submittal, by the due date shown in the Technical Reports Table ~~E-10~~ E-11.
 2. **Annual Operations Report.** The Discharger shall submit a written report to the Central Valley Water Board, electronically via CIWQS submittal, containing the following by the due date in the Technical Reports Table ~~E-10~~ E-11:
 3. **Report of Waste Discharge (ROWD).** For the 5-year permit renewal, the Discharger shall submit a written report to the Central Valley Water Board,

electronically via CIWQS submittal, containing, at minimum, the following by the due date in the Technical Reports Table ~~E-10~~ E-11:

4. **Technical Report Submittals.** This Order includes requirements to submit a ROWD, special study technical reports, progress reports, and other reports identified in the MRP (hereafter referred to collectively as “technical reports”). The Technical Reports Table ~~E-10~~ E-11 below summarize all technical reports required by this Order and the due dates for submittal. All technical reports shall be submitted electronically via CIWQS submittal. Technical reports should be uploaded as a PDF, Microsoft Word, or Microsoft Excel file attachment.
9. Correct for accuracy errors in Attachment F, the Fact Sheet, in section IV.D.5.a as follows:

For priority pollutants, the SIP dictates the procedures for conducting the RPA. Acute toxicity is not a priority pollutant. Therefore, the Central Valley Water Board is not restricted to one particular RPA method. Acute whole effluent toxicity is not a priority pollutant. Therefore, due to the site-specific conditions of the discharge, the Central Valley Water Board has used professional judgment in determining the appropriate method for conducting the RPA. U.S. EPA’s September 2010 NPDES Permit Writer’s Manual, page 6-30, states, “State implementation procedures might allow, or even require, a permit writer to determine reasonable potential through a qualitative assessment process without using available facility-specific effluent monitoring data or when such data are not available...A permitting authority might also determine that WQBEL’s are required for specific pollutants for all facilities that exhibit certain operational or discharge characteristics (e.g., WQBEL’s for pathogens in all permits for POTW’s discharging to contact recreational waters).” Although the discharge has been consistently in compliance with the acute effluent limitations, the Facility is a POTW that ~~treats domestic wastewater containing ammonia and other acutely toxic pollutants.~~ discharges process wastewater and cooling and sealing water containing metals and other acutely toxic pollutants. Acute toxicity effluent limits are required to ensure compliance with the Basin Plan’s narrative toxicity objective.

10. Correct typographical errors in Attachment F, the Fact Sheet, in section IV.D.5 as follows:

Table ~~F-13~~ F-12 Notes:

11. Correct typographical errors in Attachment F, the Fact Sheet, in section VI.B.1 b-d as follows:

- bc. Water Effects Ratio (WER) and Metal Translators.** A default WER of 1.0 has been used in this Order for calculating criteria for applicable inorganic constituents. In addition, except for aquatic life criteria for copper, default dissolved-to-total metal translators have been used to convert water quality objectives from dissolved to total recoverable when calculating criteria for applicable inorganic constituents and, if needed, developing effluent limitations. If the Discharger performs studies to determine site-specific WERs and/or site-specific dissolved-to-total metal translators, this Order may be reopened to modify the effluent limitations for the applicable inorganic constituents.
- ed. Temperature Study.** If after review of the Temperature Study it is determined that the discharge has reasonable potential to cause or contribute to an exceedance of a water quality objective this Order may be reopened and effluent limitations added for temperature.
- de. Whole Effluent Toxicity.** This Order requires the Discharger to investigate the causes of, and identify corrective actions to reduce or eliminate, effluent toxicity through a site-specific Toxicity Reduction Evaluation (TRE). This Order may be reopened to include a new chronic toxicity limitation, a new acute toxicity limitation, and/or a limitation for a specific toxicant identified in the TRE.