



# California Regional Water Quality Control Board Central Valley Region

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15 September 2008

Mr. Tom Skjelstad, General Manager  
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## **DISCHARGER PERMIT SUMMARY AND INFEASIBILITY REPORT REQUEST FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT (NPDES NO. CA0077828); DONNER SUMMIT PUBLIC UTILITIES DISTRICT WASTEWATER TREATMENT PLANT, NEVADA COUNTY**

Enclosed is the Discharger Permit Summary for NPDES permit renewal for the Donner Summit Public Utilities District Wastewater Treatment Plant. The intent of providing the Discharger Permit Summary is to allow the Discharger the opportunity to conduct a review of the draft reasonable potential analysis (RPA) and proposed effluent limitations. The draft RPA assumes that dilution will be granted to assist in compliance for nitrates and dibromochloromethane. If ultimately dilution is not granted for these constituents, compliance time schedules will be needed for these constituents. Any questions or comments regarding the Discharger Permit Summary must be submitted to the Central Valley Regional Water Quality Control Board (Regional Water Board) office no later than **30 September 2008**

This is NOT the formal comment period for renewal of the NPDES Permit. The purpose of this letter is two fold: 1) to allow the Discharger and interested parties to review and comment on data and calculations that will be the foundation of effluent limitation in the tentative Permit, and 2) to allow the Discharger to supply information for possible compliance time schedules that might be needed in the revised Permit. Any information received in response to this letter will be used to draft a tentative NPDES Permit that will be circulated for formal public review and comment for a minimum of 30 days. There are many parts of the proposed Permit that are not summarized in this letter. Persons who do not provide comments at this time will still have the opportunity later to submit comments when the entire tentative Permits is available for review.

Federal regulations require effluent limitations for all pollutants that are or may be discharged at a level that will cause or have the reasonable potential to cause, or contribute to an in-stream excursion above a narrative or numerical water quality standard. Based on information submitted as part of the application, in studies, and as directed by monitoring and reporting programs, it appears that the discharge has a reasonable potential to cause or contribute to an

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in-stream excursion above a water quality standard for several parameters. A summary of the reasonable potential analysis (RPA) is provided in Attachment 1.

The Regional Water Board conducted the RPA in accordance with Section 1.3 of the SIP. Although the SIP applies directly to the control of CTR priority pollutants, the State Water Board has held that the Regional Water Board may use the SIP as guidance for water quality-based toxics control. The SIP states in the introduction "*The goal of this Policy is to establish a standardized approach for permitting discharges of toxic pollutants to non-ocean surface waters in a manner that promotes statewide consistency.*" Therefore, the RPA procedures from the SIP were used to evaluate reasonable potential for both CTR and non-CTR constituents. Water quality-based effluent limitations (WQBELs) were calculated in accordance with section 1.4 of the SIP. Proposed effluent limitations, both technology and water quality-based, are also shown in Attachment A.

The enclosed Discharger Permit Summary proposes new effluent limitations for copper, silver, zinc, cyanide, carbon tetrachloride, dichlorobromomethane, aluminum, and manganese with which the Discharger may be unable to immediately comply. Compliance time schedules for meeting the new or more stringent effluent limitations may be allowed in the permit, or a separate enforcement order, as allowed by the Basin Plan and State Policy. However, the Discharger must request the time schedules and provide justification prior to adoption of the proposed Orders, but preferably prior to issuance of the tentative Orders. For compliance schedules to be considered for the effluent limitations listed above, please provide the corresponding justification in an Infeasibility Report to the Regional Water Board by **30 September 2008**, which will allow inclusion of the time schedules in the tentative orders. The Infeasibility Report must include the following justification:

1. Documentation that diligent efforts have been made to quantify pollutant levels in the discharge and identify the sources of the pollutant in the waste stream;
2. Documentation of source control and/or pollution minimization measures currently underway or completed;
3. A schedule for additional or future source control measures, pollutant minimization actions, or waste treatment (e.g., facility upgrades, pollution prevention plans); and
4. A demonstration that the proposed schedule is as short as practicable.

If you have any questions regarding this NPDES Permit renewal, please contact Ken Landau at (916) 464-4839 or [klandau@waterboards.ca.gov](mailto:klandau@waterboards.ca.gov). The data and information for which the RPA and projected effluent limitations are based, are available upon request.



KENNETH D. LANDAU  
Assistant Executive Officer

Enclosure: Discharge Permit Summary

cc: Nevada County Environmental Health Department, Nevada City  
Mr. Bill Jennings, California Sport Fishing Alliance, Stockton  
Bill Oudegeest, P. O. Box 728, Soda Springs, CA 95728  
Kathryn Gray, 2060 Webster St., Palo Alto, CA 94301  
Jason J. Rainey, SYRCL, 216 Main Street, Nevada City, CA 95959  
Peter Van Zant, Sierra Watch, 408 Board Street, Suite 12, Nevada City, CA 95959  
Susan Snider, 11731 Stillwater Creek Rd., Nevada City, CA 95959

**APPENDIX A**

**Table A. Parameters with Reasonable Potential**

Pollutant	Basis for Applying Criteria/Objective	Source of applied Criteria/Objective	Most Stringent Applicable Criteria (ug/L)	MEC (ug/L)	Background (ug/L)	Effluent Limit?
Zinc	126PP CTR/NTR	CTR Aquatic Life	30.64	30.8	6.1	Y
Copper	126PP CTR/NTR	CTR Aquatic Life	2.36	7.8	0.6	Y
Hexavalent Chromium	126PP CTR/NTR	CTR Aquatic Life	11.43	20	ND	N, additional monitoring required with reopener
Silver	126PP CTR/NTR	CTR Aquatic Life	0.23	0.26	ND	N, additional monitoring required with reopener
Cyanide	126PP CTR/NTR	CTR Aquatic Life	5.2	33	2	Y
Carbon Tetrachloride	126PP CTR/NTR	CTR Human Health	0.25	0.3	ND	Y
Dichlorobromomethane	126PP CTR/NTR	CTR Human Health	0.56	8.2	ND	Y

Aldrin	BP- narrative	BP narrative/numeric	0.00013 <sup>a</sup>	0.005	ND	N, additional monitoring required with reopener
4,4'-DDT	BP- narrative	BP narrative/numeric	0.00059 <sup>a</sup>	0.006	ND	N, additional monitoring required with reopener
alpha-BHC	BP- narrative	BP narrative/numeric	0.005 <sup>a</sup>	0.44	ND	N, additional monitoring required with reopener
Aluminum	EPA	Aquatic Life	87	1310	1310	Y
Iron	CA Secondary MCL	Human Health	300	49	744	N
Manganese	CA Secondary MCL	Human Health	50	88.4	150	Y
Nitrate	CA Primary MCL	Human Health	10,000	80,000	ND	Y
Ammonia	BP-narrative, Toxics	NAWQC aquatic life (monthly average)		2.83	n/a	Y
a. Minimum quantifiable level required by Appendix 4 of the SIP.						

**Table B. Effluent Limits**

Parameter	Units	Effluent Limitations		
		Average Monthly	Average Weekly	Maximum Daily
BOD 5-day @ 20°C	mg/L	10	15	30
	lbs/day <sup>a</sup>	43	65	130
Total Suspended Solids	mg/L	10	15	30
	lbs/day <sup>a</sup>	43	65	130
Zinc, Total Recoverable	ug/L	15	--	30
Dichlorobromomethane	ug/L	5.2	--	10
Copper, Total Recoverable	ug/L	1.5	--	3.1
Cyanide	ug/L	4.3	--	8.5
Carbon Tetrachloride	ug/L	0.25	--	0.50
Aluminum	ug/L	71	--	143
Nitrate	mg/L	110	--	304
Manganese	mg/l	100	--	--
Ammonia	mg/L	0.8	--	2.1
Chlorine Residual	mg/L	--	0.01 <sup>b</sup>	0.02 <sup>c</sup>
Total Coliform Organisms	MPN/100 mL	23 <sup>d</sup>	--	240

- a. Based upon a dry weather treatment design flow of 0.52 mgd.
- b. 4-day average.
- c. 1-hour average.
- d. Monthly median

Effluent pH, standard units: 6.5 to 8.5

An annual average EC limit of 636 µmhos/cm