

Central Valley Regional Water Quality Control Board
18/19 February 2021 Board Meeting

Response to Comments
for the
Lincoln Center Environmental Remediation Trust
Groundwater Extraction and Treatment System
Tentative Waste Discharge Requirements

The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements, National Pollutant Discharge Elimination System (NPDES) Permit CA0084255 renewal for the Lincoln Center Environmental Remediation Trust (Discharger) Groundwater Extraction and Treatment System (Facility).

The tentative NPDES Permit was issued for a 30-day public comment period on 11 December 2020 with comments due by 11 January 2021. The Central Valley Water Board received public comments regarding the tentative Permit by the due date from the Discharger. Some changes were made to the proposed Permit based on public comments received.

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

DISCHARGER COMMENTS

1. Confirmation of Monthly Receiving Water Monitoring for Temperature at RSW-002

The Discharger requests confirmation that monthly temperature data collection at RSW-002 satisfies the requirements set forth in Attachment E, Section VIII. Attachment E, Section VIII requires submittal of receiving water data for temperature in addition to participation in the Delta Regional Monitoring Program (RMP), in order to evaluate compliance with the Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Waters and Enclosed Bays and Estuaries of California (Thermal Plan).

RESPONSE: Central Valley Water Board staff confirms that the receiving water temperature monitoring required in Table E-5, Receiving Water Monitoring, is sufficient to evaluate compliance with the proposed permit.

2. Clarification Throughout Permit About No Upstream Receiving Water Location.

The Discharger points out language in the current and proposed permit noting the infeasibility of monitoring an upstream receiving water location, since the Facility discharges to a storm drain that terminates at the head of Fourteen Mile Slough. Therefore, there is no physical upstream receiving water location to determine compliance with the Basin Plan receiving water temperature limitation. The tentative order contains language requiring an upstream sample for temperature. The Discharger requests consistency about this throughout the permit and confirmation that RSW-002 is the appropriate location for background receiving water sampling.

RESPONSE: Central Valley Water Board staff concurs and the requested changes have been made in the proposed Order.