

**CITY OF NEVADA CITY**

**Tentative Order Comments**

**NPDES NO. CA0079901**

April 19, 2022

No.	Section	Comment
1	Table 4 & Attachment H	<p>Ammonia effluent limitations are calculated using a dataset that includes a non-representative effluent ammonia value of 18 mg/L (12/11/2020). Inclusion of this outlier value significantly impacts WQBEL calculations and results in more restrictive effluent limits on ammonia.</p> <p>Section IV.C.3.d.i.(d) of Attachment F (Page F-47), Plant Performance and Attainability, includes a description of the outlier value, which corresponds with City initiation of ammonium sulfate addition. Further, the 18 mg/L effluent ammonia value has been removed when determining effluent limitation attainability. It is stated that after removal of the outlier value, the maximum effluent concentration (MEC) for ammonia is 1.1 mg/L.</p> <p>Based on this information, the City requests removal of the outlier value from the dataset used to calculate WQBELs on ammonia. Removal of the outlier value will result in appropriate effluent limitations.</p> <p>This correction should be made throughout the Order.</p>
2	IV.A.1.e	<p>For consistency with section VII.G, Compliance Determination, the Chronic Whole Effluent Toxicity (WET) effluent limitation should be 1.3 TUC, not 1 TUC (as a median of three consecutive bioassays during a six-week period).</p>
3	VII.J	<p>This section should be removed because there are no mass effluent limits in section IV.A.1.a. Further, compliance with total mercury mass loading effluent limits (the only constituent with mass limits in this Order) is addressed in section VII.I.</p>
4	Attachment E, IV.A.2.j	<p>For clarity, suggest changing "Bis(2-ethylhexyl) phthalate shall be sampled for the first two years of the permit term..." to "Bis(2-ethylhexyl) phthalate shall be sampled for the first 24 months of the permit term..." since the permit will become effective in the middle of the calendar year.</p>
5	Attachment F, III.C.1.b	<p>Insert correct date for ISWEBE Plan and remove highlighting.</p>
6	Attachment F, Table F-4	<p>Diazinon and chlorpyrifos should not be included in the table titled "303(d) List for Deer Creek". The TMDL status is correct, but these two compounds are not on the 303(d) list for Deer Creek.</p>
7	Attachment F, IV.C.3.a.ii	<p>A TMDL for mercury has not yet been established. Thus, mercury should not be included under the section VI.C.3.a heading "Constituents with Total Maximum Daily Load (TMDL)." Instead, mercury should be included in section VI.C.3.b with "Constituents with No Reasonable Potential."</p>
8	Table F-11 & F-13	<p>The Chronic Toxicity effluent limitation should not be 1 TUC. As noted in IV.C.5.b.i and ii of Attachment F, "The effluent chronic toxicity shall not exceed 1.3 chronic toxicity units (as 100/NOEC) AND a percent effect of 25 percent at 100 percent effluent, for any endpoint as the median of up to three consecutive chronic toxicity tests within a 6-week period."</p>

**CITY OF NEVADA CITY**

**Tentative Order Comments**

**NPDES NO. CA0079901**

April 19, 2022

No.	Section	Comment
9	Attachment F, IV.D.1	"For dibromochloromethane and dichlorobromomethane, average weekly effluent limitations have been replaced with maximum daily effluent limitations..." This statement is not correct. The current Order contains a maximum daily effluent limitation, not a maximum weekly effluent limitation on dichlorobromomethane. Further, the current Order does not contain any limitations on dibromochloromethane.
10	Attachment F, IV.D.1	"Furthermore, for total residual chlorine, pH, and total coliform organisms, weekly average effluent limitations have been replaced or supplemented with effluent limitations utilizing shorter averaging periods." This statement is not correct since the effluent limitations on these constituents are unchanged from the current Order.
11	Attachment F, IV.D.3	Section VI.D.2 is missing.
12	Attachment F, VI.B.3.a	The City submitted a notice of intent for the Salt Control Program on <b>April 14, 2022</b> indicating its intent to meet the Alternative Salinity Permitting Approach.