

Regional Water Quality Control Board
North Coast Region

Executive Officer's Summary Report
9:00 a.m., May 2, 2013
Wharfinger Building
No. 1 Marina Way
Eureka, California

- ITEM: 5
- SUBJECT: Public Hearing to adopt Amendment Order No. R1-2013-0011, amending Waste Discharge Requirements Order No. R1-2002-0037 and Monitoring and Reporting Program Order No. R1-2002-0037 by removing permit requirements related to the sawmill and stormwater for the California Redwood Company, Korbel Woodwaste Disposal Site Waste Discharge Requirements, WDID No. 1B75147OHUM Humboldt County (*Kason Grady*)
- BOARD ACTION: The Board will consider adoption of Amendment Order No. R1-2013-0011, which requires that Staff amend Order No. R1-2002-0037 to ensure consistency with Order No. R1-2013-0008.
- BACKGROUND: The California Redwood Company (hereinafter Permittee) owns and operates the Korbel Sawmill (hereinafter Sawmill) and the Korbel Woodwaste Disposal Site (hereinafter WWDS) in the community of Korbel, Humboldt County, California. The Sawmill and WWDS are directly adjacent to the North Fork of the Mad River (tributary to the Mad River).
- At the Sawmill, Redwood and Douglas Fir logs are sprinkled with water to prevent log splitting in a process called wet decking prior to being used for lumber manufacturing. Sawmill operations include wet and dry log decking and sorting, sawmilling, lumber planing, lumber drying in kilns with an associated boiler water system, antistain wood treatment process, lumber storage and shipping, domestic wastewater collection and disposal, equipment maintenance areas, and byproduct generation of wood chips and soil fines. These byproducts were historically disposed of at the WWDS, however, they are currently being sorted and reused by the DG Fairhaven Power Plant and a local lily bulb farm. The WWDS is a Class III waste management unit with remaining available capacity that is not being actively used.
- The Sawmill has the following three wastewater management systems: (1) commingled wet decking and boiler blowdown process wastewater and storm water that discharges to the North Fork of the Mad River at Discharge Point 001 with a maximum wet weather flow of 13.6 million gallons per day; (2) other process wastewater

including saw cooling water that discharges to upslope forested lands at Discharge Point 002; and (3) domestic wastewater that discharges to onsite leachfields.

Discharges from the Korbel Sawmill and Woodwaste Disposal Site to the North Fork of the Mad River, waters of the United States, are currently permitted in Order No. R1-2002-0037 adopted by the Regional Water Board on May 16, 2002. Discharges from the Sawmill are currently covered by portions of Order No. R1-2002-0037 that relate to NPDES Permit No. CA0022764, while discharges from the WWDS are currently covered by the Waste Discharge Requirements portions of Order No. R1-2002-0037.

The Permittee submitted a Report of Waste Discharge, dated October 26, 2006, with supplemental information submitted on July 2, 2012, applying to renew the NPDES permit for the Sawmill, separately from the WWDS.

ISSUES:

Sawmill NPDES Permit Order No. R1-2013-008

Order No. R1-2013-008 complies with the Mad River Total Maximum Daily Load, which was developed to address sediment impairment in the Mad River, via receiving water limitations for turbidity and sediment control Best Management Practices.

Order No. R1-2013-008 contains new effluent limitations for copper and lead based on the results of recently collected effluent data.

Order No. R1-2013-008 contains a requirement to establish a more representative downstream receiving water monitoring location closer to the discharge to the North Fork of the Mad River.

The draft Order No. R1-2013-008 sent out for public comment had reclassified the Sawmill as a Major discharge based on a draft NPDES Permit Rerating Work Sheet. Further investigation into the factors associated with that work sheet revealed no availability of definitions for key terms. As a result, Staff decided to retract the draft Rating Work Sheet and retain the existing classification for the facility as a Minor discharger until such definitions are made available by US EPA.

The Permittee commented on draft Order No. R1-2013-008 that all references to sewage sludge, biosolids, etc. are not applicable to the Sawmill. Staff has retained references to these terms because they apply to the domestic wastewater system at the Sawmill, which is

covered by Order No. R1-2013-008. In response to the comments associated with this topic, Staff has included definitions of relevant terms in the Order.

The Permittee requested a reduction in chronic bioassay monitoring and other constituents in the discharge to surface waters. Staff did not grant the requested reductions in monitoring frequency to allow for the collection of sufficient data to characterize impacts to receiving waters and because limited existing data have demonstrated reductions in growth response of test organisms during the chronic toxicity tests. Furthermore, other routine effluent monitoring has been retained in order to assess compliance with receiving water limitations.

Sawmill Cease and Desist Order No. R1-2013-0009

The Permittee submitted additional effluent data during the comment period that demonstrated its inability to comply with the draft interim effluent limitations for copper and lead. Staff was able to use the new data to recalculate interim effluent limitations using a statistical analysis that ensures that the limitations are representative of current practices and achievable 95% of the time.

The Permittee also requested and provided justification for a one-year extension on an interim milestone within the compliance schedule. Staff concurred with the request and modified the schedule accordingly.

Amendment Order No. R1-2013-0011

Order No. R1-2013-0011 requires the amendment of Wood Waste Disposal Site Order No. R1-2002-0037 by deleting all references to the sawmill and storm water as a result of the proposed adoption of Order No. R1-2013-0008, which renews the Sawmill NPDES permit separately from the WWDS. The Amendment Order also requires that the Permittee apply for coverage under the General Industrial Storm Water Permit (Order No. 97-03-DWQ) for discharges of storm water from the WWDS. No changes have been made to Order No. R1-2002-0037 in response to comments by the Permittee to update references and findings in that Order because the scope of the amendment is limited to ensuring consistency with the proposed NPDES permit Order No. R1-2013-0008.

RECOMMENDATION: Adopt Order No. R1-2013-0011 as proposed.

**SUPPORTING
DOCUMENTS:**

1. Proposed Order No. R1-2013-0011
2. Enclosure A: Proposed Amended Order No. R1-2002-0037
3. Staff Response to Comments
4. Comment Letter from California Redwood Company
5. Public Notice

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