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MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## Central Valley Regional Water Quality Control Board

23 May 2017

Randy Cook  
Corporate Environmental Manager  
AmeriPride Services Inc.  
650 Industrial Boulevard NE  
Minneapolis, MN 55413

CERTIFIED MAIL  
91 7199 9991 7035 8421 8952

### **NOTICE OF APPLICABILITY (NOA); LIMITED THREAT GENERAL WASTE DISCHARGE REQUIREMENTS ORDER R5-2016-0076; OPERABLE UNIT 3 GROUNDWATER EXTRACTION AND TREATMENT FACILITY, SACRAMENTO COUNTY**

Our office received a Notice of Intent application on 3 April 2017 from AmeriPride Services Inc. (hereinafter Discharger), for discharge of treated groundwater to surface water at its Operable Unit 3 groundwater extraction and treatment facility (hereinafter Facility). Based on the application packet submitted by the Discharger, the Facility meets the required conditions for approval under the General Order for Limited Threat Discharges to Surface Water (Limited Threat General Order), as a Tier 2 discharge. This Facility is hereby assigned Limited Threat General Order R5-2016-0076-006 and National Pollutant Discharge Elimination System (NPDES) Permit No. CAG995002. Please reference your Limited Threat General Order number, **R5-2016-0076-006**, in your correspondence and submitted documents.

Discharges to surface water from the Facility are regulated by an individual NPDES permit, Order R5-2012-0100 (NPDES No. CA0085219) issued by the Central Valley Water Board on 4 October 2012. This NOA providing coverage under the Limited Threat General Order shall become effective on **1 August 2017** when the existing individual NPDES permit for the Facility, Order R5-2012-0100, is rescinded by a separate action of the Central Valley Water Board at its regularly scheduled Board meeting.

The enclosed Limited Threat General Order may also be viewed at the following web address: [http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2016-0076\\_mod.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076_mod.pdf). You are urged to familiarize yourself with the contents of the entire document. The Limited Threat General Order prescribes mandatory discharge monitoring and reporting requirements. The project activities shall be operated in accordance with the requirements contained in this NOA and the Limited Threat General Order.

### **PROJECT DESCRIPTION**

The Discharger is the owner and operator of the Facility, a groundwater extraction and treatment system that is addressing impacts emanating from the releases of tetrachloroethylene (PCE) from an industrial dry cleaning facility, which have impacted both soil and groundwater. The property on which the Facility is located in Sacramento County is owned by Huhtamaki Food Service, Inc. The Facility has been in operation since January 2008, with discharges to surface water regulated by an individual NPDES permit.

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | [www.waterboards.ca.gov/centralvalley](http://www.waterboards.ca.gov/centralvalley)

Two groundwater extraction wells pump groundwater to the treatment system via underground pipes. The treatment system consists of two granulated activated carbon (GAC) vessels, operated in series. Extracted groundwater passes through the GAC units where tetrachloroethylene (PCE) and its daughter products (i.e., cis-1,2-dichloroethylene, trans-1,2-dichloroethylene, and trichloroethylene) are adsorbed. The treated groundwater is sent, via an underground pipe, to a Sacramento County storm water ditch adjacent to the Facility where it is conveyed and discharged to Beacon Creek, a water of the U.S. and a tributary to the Sacramento River via Morrison Creek. See enclosed project map. Beacon Creek is an intermittent stream. The maximum daily average flow through the Facility is 0.432 million gallons per day (MGD). The Facility is operated 24 hours per day, 7 days per week except when it is necessary to shut the system down for maintenance.

### **CALIFORNIA TOXICS RULE / STATE IMPLEMENTATION POLICY MONITORING**

The Limited Threat General Order incorporates the requirements of the California Toxics Rule (CTR) and the State Water Resources Control Board's (State Water Board), *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California*, 2005, also known as the State Implementation Policy (SIP). Screening levels for CTR constituents and other constituents of concern are found in Attachment I of the Limited Threat General Order.

The Discharger has an established treatment system with years of effluent data. Therefore, effluent data has been used to evaluate compliance with the screening levels. The Facility is treating groundwater from a groundwater cleanup site that is not expected to vary significantly. In 2006 when the Discharger first applied for an NPDES permit, the untreated wastewater was sampled to evaluate compounds that may be present and may require treatment prior to discharge. The influent is routinely monitored for constituents of concern, including chromium VI, PCE, TCE, and cis-1,2-dichloroethylene. The Discharger's annual remediation report shows the downward concentration trends for volatile organic compounds (VOCs) of concern in the influent groundwater, which is expected for this remediation project. Chromium VI concentrations have been stable in the influent groundwater from 2006-2016, which confirms the expectation that groundwater quality does not vary significantly. The Discharger's NOI included effluent monitoring conducted in May 2016 in accordance with its individual NPDES permit. The effluent data does not exceed the screening levels.

### **EFFLUENT LIMITATIONS**

Effluent limitations are specified in Section V. Effluent Limitations and Discharge Specifications of the Limited Threat General Order. The following effluent limitations are applicable to this discharge and are contained in Section V. A and B of the Limited Threat General Order:

#### **A. Water Quality-Based Effluent Limitations**

##### **1. All Discharges**

a. **Flow.** The discharge flow rate shall not exceed 0.432 MGD.

##### **b. pH**

i. The pH of all discharges within the Sacramento and San Joaquin River Basins (except Goose Lake in Modoc County) shall at all times be within the range of 6.5 and 8.5.

## 2. Tier 2 Discharges

- a. Chronic Whole Effluent Toxicity.** There shall be no chronic toxicity in the discharge. See Section V of the Monitoring and Reporting Program (Attachment C) of the Limited Threat General Order and the site-specific numeric chronic toxicity monitoring trigger under "TOXICITY REDUCTION EVALUATION REQUIREMENTS" below.
- b. Acute Whole Effluent Toxicity.** Survival of aquatic organisms in 96-hour bioassays of undiluted waste for all limited threat discharges shall be no less than:
- i. 70%, minimum for any one bioassay; and
  - ii. 90%, median for any three consecutive bioassays.

## B. Technology-Based Effluent Limitations

### 2. Volatile Organic Compounds (VOC's) Applicable to Remediation Sites

Parameter	Units	Maximum Daily Effluent Limitations
Tetrachloroethylene (PCE)	µg/L	0.5
Trichloroethylene (TCE)	µg/L	0.5
cis-1,2-Dichloroethylene (cis-1,2-DCE)	µg/L	0.5
trans-1,2-Dichloroethylene (trans-1,2-DCE)	µg/L	0.5

The receiving water, Beacon Creek, is not listed under the Clean Water Act 303(d) List of impaired water bodies. Therefore, no additional 303(d) based effluent limitations or monitoring requirements will be added to this Limited Threat General Order.

### RECEIVING WATER LIMITATIONS

The Limited Threat General Order includes receiving surface water limitations in Section VIII.A. Based on the information provided in the NOI, only the following receiving surface water limitations are applicable to this discharge:

- Bacteria (VIII.A.2);
- Biostimulatory substances (VIII.A.3);
- Chemical constituents (VIII.A.4);
- Color (VIII.A.5);
- Dissolved oxygen (VIII.A.6.a);
- Floating material (VIII.A.7);
- Oil and grease (VIII.A.8);
- pH (VIII.A.9.a);
- Pesticides ((VIII.A.10);
- Radioactivity (VIII.A.11);
- Suspended sediments (VIII.A.12);
- Settleable substances (VIII.A.13);
- Suspended material (VIII.A.14);
- Taste and odors (VIII.A.15);

- Temperature (VIII.A.16);
- Toxicity (VIII.A.17); and
- Turbidity (VIII.A.18.a).

**MONITORING AND REPORTING**

Monitoring and reporting requirements are contained in Attachment C of the Limited Threat General Order. The Discharger is required to comply with the following specific monitoring and reporting requirements for the effluent in accordance with Attachment C of the Limited Threat General Order.

**Monitoring Locations** – The Discharger shall monitor the effluent at the specified location as follows:

**Table E-1. Monitoring Station Locations**

Discharge Point Name	Monitoring Location Name	Monitoring Location Description <sup>1</sup>
001	EFF-001	A location where a representative sample of the effluent can be collected prior to discharging to the unnamed ditch which flows to Beacon Creek. (Latitude: 38° 28' 43" ; Longitude: 121° 23' 37")

**Effluent Monitoring** – When discharging to the Sacramento County storm water ditch which flows to Beacon Creek, the Discharger shall monitor the effluent at EFF-001 in accordance Table C-2 of the Limited Threat General Order. The applicable monitoring requirements contained in Table C-2 are as follows:

**Table C-2. Effluent Monitoring**

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Flow	MGD	Estimate	1/Day	
Dissolved Oxygen	mg/L	Grab	1/Quarter	2,3
Electrical Conductivity @ 25 °C	µmhos/cm	Grab	1/Quarter	2,3
pH	standard units	Grab	1/Quarter	2,3
Turbidity	NTU	Grab	1/Quarter	2,3
Temperature	°F	Grab	1/Quarter	2,3
Chromium VI, dissolved	µg/L	Grab	1/Quarter	3,12
Tetrachloroethylene	µg/L	Grab	1/Month	3,12
Trichloroethylene	µg/L	Grab	1/Month	3,12
cis-1,2-Dichloroethylene	µg/L	Grab	1/Month	3,12
trans-1,2-Dichloroethylene	µg/L	Grab	1/Month	3,12
Acute Toxicity	% survival	Grab	1/Year	3,9
Chronic Toxicity	TUc	Grab	1/Year	3,9

- <sup>2</sup> A hand-held field meter may be used, provided the meter utilizes a USEPA-approved algorithm/method and is calibrated and maintained in accordance with the manufacturer's instructions. A calibration and maintenance log for each meter used for monitoring required by this Monitoring and Reporting Program shall be maintained at the Facility.
- <sup>3</sup> Pollutants shall be analyzed using the analytical methods described in 40 C.F.R. part 136 or by methods approved by the Central Valley Water Board or the State Water Board.
- <sup>9</sup> See the Limited Threat General Order MRP (Attachment C, section V) for toxicity monitoring requirements.
- <sup>12</sup> For priority pollutant constituents the reporting level shall be consistent with Sections 2.4.2 and 2.4.3 of the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California

**Receiving Water Monitoring** – Receiving water monitoring in Beacon Creek is not required. Since the discharge flows via the Sacramento County storm water system approximately 0.6 miles prior to entering Beacon Creek, impacts from storm water discharges entering the drainage course could mask actual impacts of the discharge on Beacon Creek. Therefore, receiving water monitoring would not provide sufficient information to evaluate compliance with the receiving water limitations. Where feasible, compliance with the receiving water limitations will be evaluated through monitoring of the Facility's effluent.

**Monitoring Report Submittals** - Monitoring in accordance with the Limited Threat General Order shall begin on 1 August 2017. Monitoring reports shall be submitted to the Central Valley Water Board on a quarterly basis, beginning with the **third quarter 2017**. This report shall be submitted on **1 November 2017**. Quarterly SMRs are required even if there is no discharge. If no discharge occurs during the quarter, the monitoring report must be submitted stating that there has been no discharge. Table E-4, below, summarizes the monitoring report due dates required under the Limited Threat General Order. Quarterly monitoring reports must be submitted until your coverage is formally terminated in accordance with the Limited Threat General Order, even if there is no discharge during the reporting quarter.

**Table E-4. Monitoring Periods and Reporting Schedule**

Sampling Frequency	Monitoring Period Begins On...	Quarterly Report Due Date
1/Day, 1/Week, 1/Month, 1/Quarter	1 August 2017	1 May (1 Jan – 31 Mar) 1 Aug (1 Apr – 30 Jun) 1 Nov (1 Jul – 30 Sep) 1 Feb, of following year (1 Oct – 31 Dec)

The Discharger shall electronically submit SMRs using the State Water Board's California Integrated Water Quality System (CIWQS) Program website <[http://www.waterboards.ca.gov/water\\_issues/programs/ciwqs/](http://www.waterboards.ca.gov/water_issues/programs/ciwqs/)>. The CIWQS website will provide additional information for SMR submittal in the event there will be a planned service interruption for electronic submittal.

**TOXICITY REDUCTION EVALUATION REQUIREMENTS**

For compliance with the Basin Plan's narrative toxicity objective, the Limited Threat General Order requires all Dischargers of Tier 2 and Tier 3 discharges to conduct chronic whole effluent toxicity (WET) testing, as specified in the Monitoring and Reporting Program (Attachment C, section V). Furthermore, the Toxicity Reduction Evaluation Requirements provision (Section IX.C.2) requires the Discharger to investigate the causes of, and identify corrective actions to reduce or eliminate effluent toxicity. The Provision includes a numeric monitoring trigger and accelerated monitoring specifications. This NOA includes a site-specific numeric toxicity monitoring trigger as shown below:

**Site-Specific Numeric Toxicity Monitoring Trigger** – The numeric toxicity monitoring trigger to initiate accelerated monitoring is  $>1$  TUc (where  $TUc = 100/NOEC$ ) for all chronic toxicity end points, except the *Ceriodaphnia dubia* reproduction end point. For the *Ceriodaphnia dubia* reproduction end point, the numeric toxicity monitoring trigger to initiate accelerated monitoring is  $>1$  TUc (where  $TUc = 100/NOEC$ ) AND the reproduction (neonates/female) of the 100 percent effluent sample is less than or equal to 50 percent the reproduction of the control sample.

### **EFFLUENT CHARACTERIZATION MONITORING**

The Limited Threat General Order requires effluent characterization monitoring every 5 years. Samples shall be collected from the effluent and analyzed for the constituents specified in Table I-1 of Attachment I of the Limited Threat General Order, with the results submitted to the Central Valley Water Board within 4 years of the date of this NOA. In accordance with Table I-1, the Discharger shall monitor for constituents for Tier 2 discharges of groundwater (not related to mines).

### **SATISFACTION OF ANTI-BACKSLIDING REQUIREMENTS**

The effluent limitations in this NOA are at least as stringent as the effluent limitations in the previous individual NPDES permit, Order R5-2012-0100, with the exception of limitations for chromium VI. Previous Order R5-2012-0100 included effluent limits for chromium VI. Based on the Discharger's last three years of effluent monitoring data for chromium VI, the discharge does not demonstrate reasonable potential to cause or contribute to an instream excursion of the applicable water quality objectives in the receiving water. All samples were below the screening level. Therefore, the effluent limits for chromium VI have not been included in this NOA.

The less stringent requirements for chromium VI are consistent with the federal antibacksliding regulations of the Clean Water Act (CWA). CWA section 402(o)(2) provides several exceptions to the prohibition against backsliding. CWA 402(o)(2)(B)(i) allows a renewed, reissued, or modified permit to contain a less stringent effluent limitation for a pollutant if information is available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and which would have justified the application of a less stringent effluent limitation at the time of permit issuance. The new data indicates the discharge does not exhibit reasonable potential to cause or contribute to an exceedance of water quality objectives in the receiving water and represents new information that was not available at the time previous Order R5-2012-0100 was adopted. The removal of the effluent limits is also consistent with the antidegradation provisions of 40 CFR 131.12. Thus, removal of the effluent limitations for chromium VI from Order R5-2012-0100 also meets the antibacksliding exception in CWA section 303(d)(4)(B). Any impact on existing water quality will be insignificant.

### **GENERAL INFORMATION AND REQUIREMENTS**

The Discharger must notify Central Valley Water Board staff within 24 hours of having knowledge of 1) the start of each new discharge, 2) noncompliance, and 3) when the discharge ceases. The Central Valley Water Board shall be notified immediately if any effluent limit violation is observed during implementation of the project.

Discharge of material other than what is described in the application is prohibited. The required annual fee (as specified in the annual billing you will receive from the State Water Resources Control Board) shall be submitted until this NOA is officially terminated. You must notify this office in writing when the discharge regulated by the Limited Threat General Order is no longer necessary. If a timely written request is not received, the Discharger will be required to pay additional annual fees as determined by the State Water Resources Control Board.

### **ENFORCEMENT**

Failure to comply with the Limited Threat General Order may result in enforcement actions, which could include civil liability. Effluent limitation violations are subject to a Mandatory Minimum Penalty (MMP) of \$3,000 per violation. In addition, late monitoring reports may be subject to MMPs or discretionary penalties of up to \$1,000 per day late. When discharges do not occur during a quarterly report monitoring period, the Discharger must still submit a quarterly monitoring report indicating that no discharge occurred to avoid being subject to enforcement actions.

### **COMMUNICATION**

All documents, including monitoring reports, response to inspections, written notifications, and documents submitted to comply with this NOA and the Limited Threat General Order, should be submitted to the Site Cleanup Section, attention Nathan Casebeer. Mr. Casebeer can be reached at (916) 464-4665 or [nathan.casebeer@waterboards.ca.gov](mailto:nathan.casebeer@waterboards.ca.gov).

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this NOA, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the internet at: [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

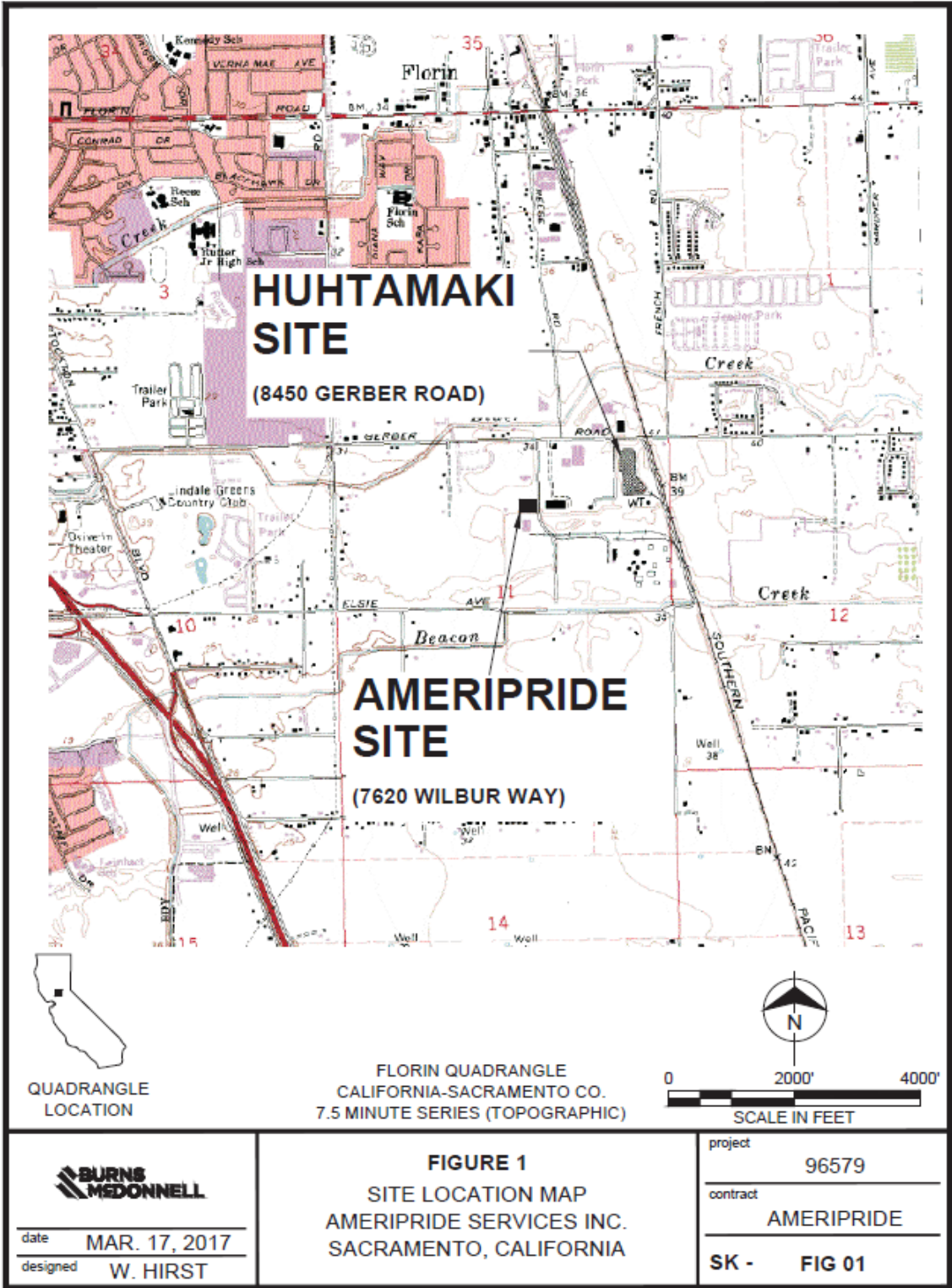
*ORIGINAL SIGNED BY ADAM LAPUTZ FOR*

Pamela C. Creedon  
Executive Officer

Enclosures: Enclosure A, Project Maps  
Limited Threat General Order R5-2016-0076 (Discharger only)

cc: David Smith, U.S. EPA, Region IX, San Francisco (email only)  
Diana Messina, Division of Water Quality, State Water Board, Sacramento (email only)  
Reid Unke, Burns & McDonnell Engineering, Inc. (email only)

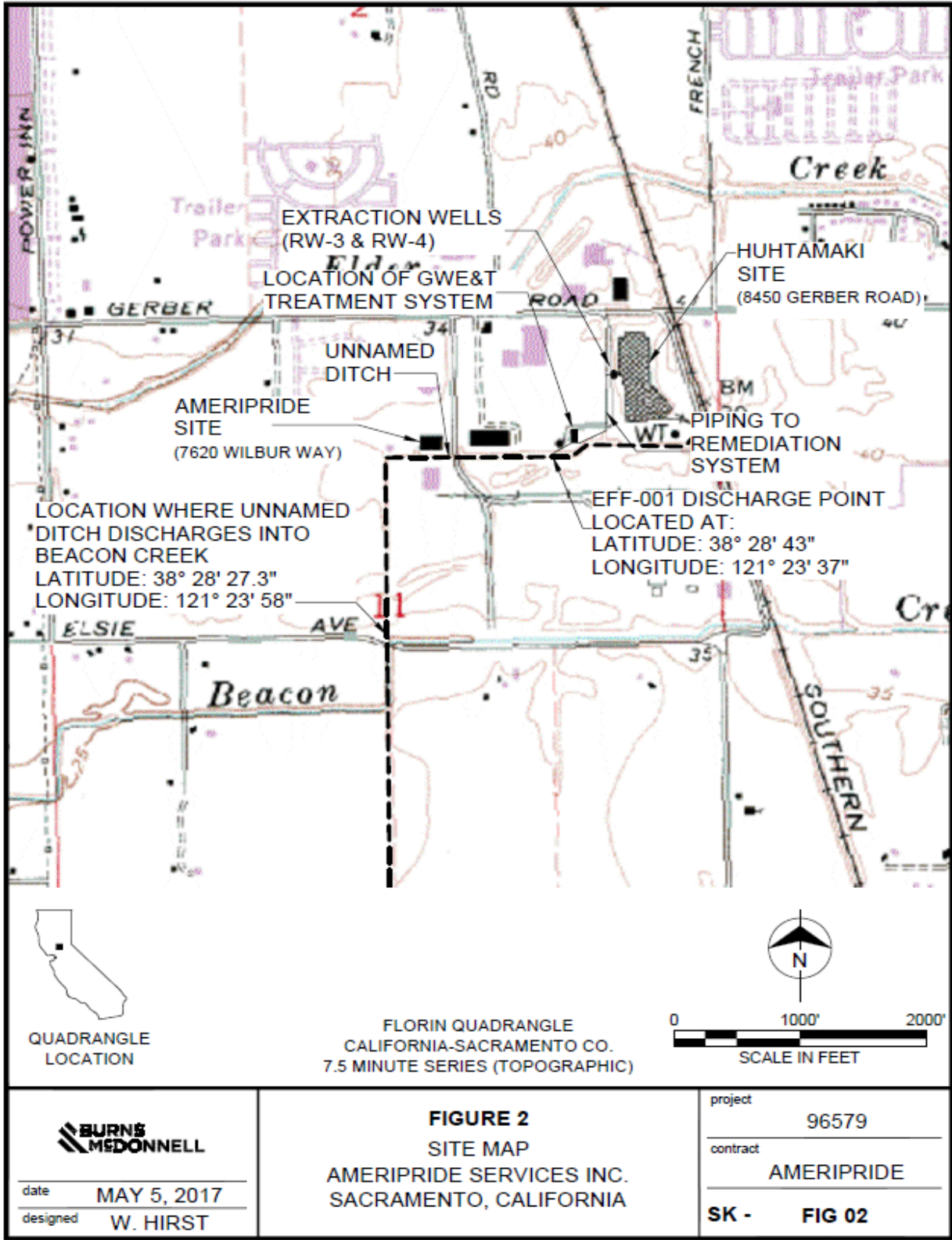




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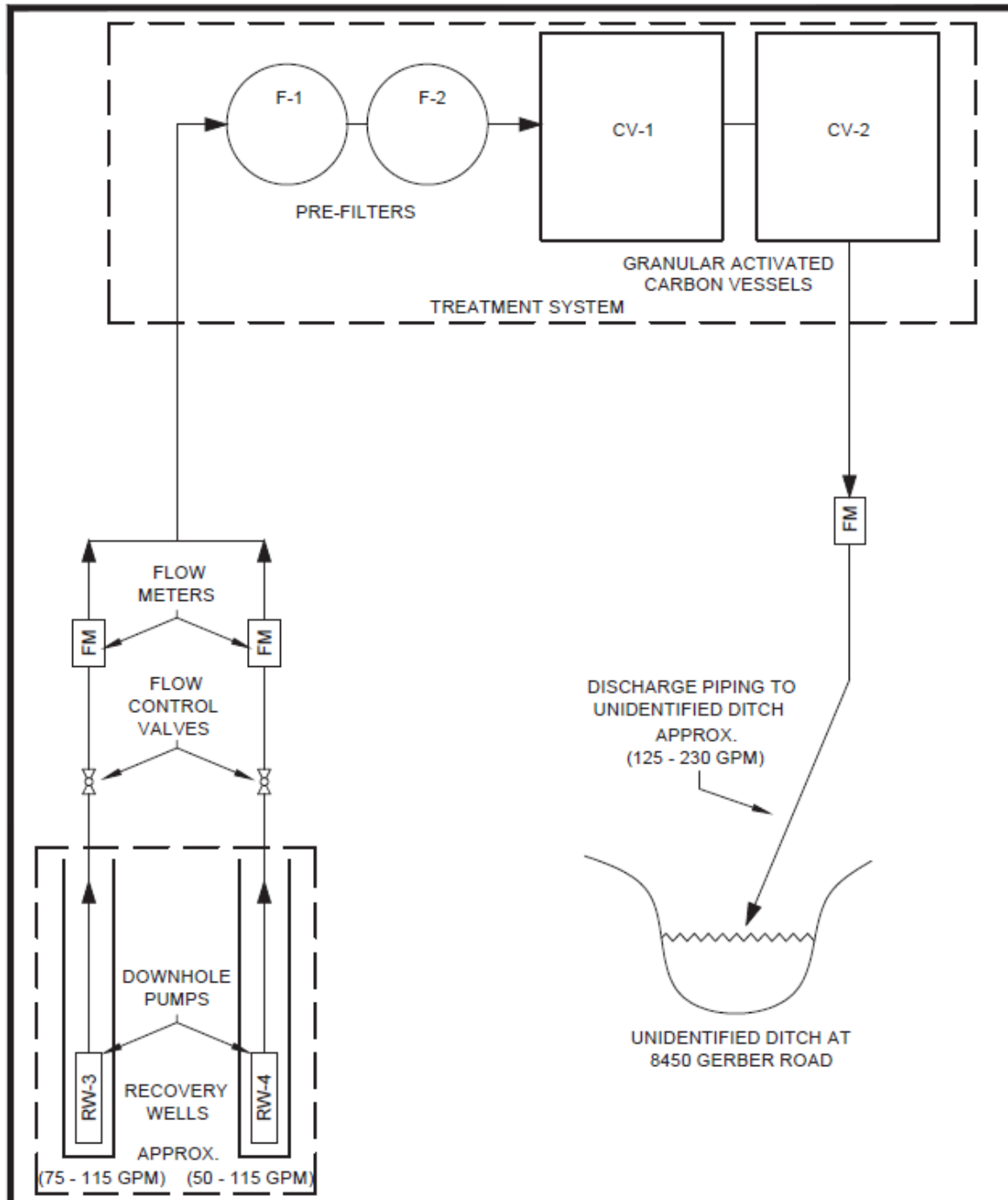
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date **MAR. 17, 2017**  
 designed **W. HIRST**

**FIGURE 3**  
 PROCESS FLOW DIAGRAM  
 AMERIPRIDE SERVICES INC.  
 SACRAMENTO, CALIFORNIA

project **96579**  
 contract **AMERIPRIDE**  
 dwg. no. **FIG 03**