

Late Revisions - Item 21.

Clear Creek CSD, Water Treatment Plant, Shasta County
27 October 2006

Proposed NPDES Permit

Section III.C.6 – Page F-24:

Antidegradation Policy. Add the following at the end of the paragraph.

This is an existing discharge. No changes to the facility or processes are being proposed. Due to the presence of naturally-occurring rock underlying the settling ponds, the lack of shallow groundwater in the immediate vicinity of the facility, and the low-threat nature of the pollutants introduced into the ponds, there is no reasonable expectation that the quality of groundwater, even if present, will be impacted. The water treatment process only removes naturally occurring constituents from the source water, and then discharges these constituents to the settling ponds. The settling ponds then settle and dissipate these constituents and discharge the clarified water back into the source stream. This process results in a total reduction in mass of these constituents in the receiving water. In some cases, even the concentration of these constituents in the discharge is lower than in the receiving water. Therefore, since the settling ponds remove the constituents, and since no pollutants are added in the settling process, the discharge results in a net reduction in the mass of pollutants in the receiving water when compared to a no project scenario. Furthermore, some degradation to the quality of groundwater and surface water would be warranted due to the public benefit of providing high quality drinking water to the community.

Attachment G – Reasonable Potential Analysis:

Remove the “RPA multiplier” column and the “Projected MEC” columns from the table. Remove footnote 3. Modify footnote 4 by removing everything except, “maximum effluent concentration.”

Response to Comments

Response to comment #13. Remove the second to last paragraph that begins with “The coagulants added to the ponds...” Replace with, “This is an existing discharge. No changes to the facility or processes are being proposed. Due to the presence of naturally-occurring rock underlying the settling ponds, the lack of

shallow groundwater in the immediate vicinity of the facility, and the low-threat nature of the pollutants introduced into the ponds, there is no reasonable expectation that the quality of groundwater, even if present, will be impacted.