

ITEM: 8

SUBJECT: Lincoln Center Environmental Remediation Trust, Groundwater Treatment System, San Joaquin County

BOARD ACTION: *Consideration of an NPDES Permit Renewal (NPDES No. CA0084255)*

BACKGROUND: In October 2005, the Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) adopted Waste Discharge Requirements Order No. R5-2005-0144 for the Lincoln Center Environmental Remediation Trust (Discharger) Groundwater Treatment System in San Joaquin County. The Discharger operates the ground water treatment system as part of a remedial action to clean groundwater polluted with volatile organic compounds (VOCs), including perchloroethene (PCE) solvent contamination, considered carcinogenic and thus a threat to public health in groundwater designated for use as drinking water in the vicinity of the Lincoln Center remediation site. Pumped groundwater is treated by air stripping and granular activated carbon. The treated groundwater is discharged to Fourteen-Mile Slough via the City of Stockton's storm drain system. The proposed Order is the 5-year renewal of the NPDES Permit for Lincoln Center Groundwater Treatment System discharge.

ISSUES: The Central Valley Water Board office received public comments from the Discharger. The Discharger is contesting a more stringent proposed effluent limit for 1,1 dichloroethylene (1,1-DCE)

The existing permit includes a technology-based effluent limitation for 1,1-DCE of 0.5 µg/L as a daily maximum. However, based on data submitted with the Report of Waste Discharge, it has been determined that the discharge has reasonable potential to cause or contribute to an instream exceedance of the California Toxics Rule (CTR) human health criterion for 1,1-DCE of 0.057 µg/L. Therefore, in accordance with Section 1.3 of the State Implementation Policy, new, more stringent, water quality-based effluent limits are included in the proposed Order of 0.057 µg/L and 0.11 µg/L, as a monthly average and daily maximum, respectively. The Discharger contends there is no reasonable potential and is requesting the Central Valley Water Board revert back to using the less stringent technology-based effluent limit.

Central Valley Water Board staff does not concur. Although 1,1-DCE has not been detected in the effluent, 1,1-DCE was detected twice in the influent to the ground water treatment system in 37 monthly samples collected between July 2007 and June 2010, demonstrating reasonable potential to exceed the CTR human health criterion. In addition, 1,1-DCE is one of the constituents of concern in the groundwater. Therefore, the finding of reasonable potential and the establishment of the more stringent water quality-based effluent limitations is reasonable and necessary.

The Discharger is concerned that the more stringent limits for 1,1-DCE could result in violations if the concentrations of this constituent increase in the groundwater. However, as the Discharger indicated in its evaluation of the treatment system to meet the more stringent limits, the system in its current configuration is unlikely to exceed the proposed 1,1-DCE effluent limits and therefore the Discharger has not requested a compliance schedule. No changes are proposed to the Order.

Mgmt. Review _____

Legal Review _____

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