
Central Valley Regional Water Quality Control Board

FREQUENTLY ASKED QUESTIONS PROPOSED RENEWAL OF GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT FOR LIMITED THREAT DISCHARGES TO SURFACE WATER (LIMITED THREAT GENERAL ORDER)

Q1. I am currently enrolled under the Limited Threat General Order. Do I need to reapply?

A1. Current enrollees under Limited Threat General Order R5-2016-0076-01 will be automatically authorized under the renewed Limited Threat General Order to continue discharging. New analytical results must be submitted every 5 years, for the pollutants specified in Table I-1 of Attachment I of the proposed Limited Threat General Order for the type of wastewater discharged. Those dischargers that have not submitted the suite of analytical results specified in Table I-1 of Attachment I in five years or more must submit an acceptable Notice of Intent that includes the data within 180 days of the effective date of this Order.

Q2. What changes are contained in the proposed renewal of the Limited Threat General Order?

A2. The Limited Threat General Order renewal contains formatting updates to address requirements for posted electronic documents to meet American Disability Act standards.

The Limited Threat General Order renewal also contains the following major updates:

- New technology-based effluent limitations for oil and grease for hydroelectric power projects based on Best Professional Judgement.
- Updated screening levels and effluent limitations for total aluminum based on 2018 United States Environmental Protection Agency (U.S. EPA) National Ambient Water Quality Criteria (NAWQC) for protection of freshwater aquatic life in addition to the Secondary Maximum Contaminant Level.
- Updated screening levels and effluent limitations for chloroform based on the 2015 U.S. EPA NAWQC for protection of human health.

- Updated screening levels and effluent limitations for total mercury based on the Statewide Mercury Provisions in addition to the California Toxics Rule human health criterion.
- Incorporation of requirements for the Salt Control Program including:
 - Conservative effluent limitations for electrical conductivity
 - Requirements for maintenance of a Salinity Evaluation and Minimization Plan for enrollees, as specified in the Notice of Applicability

Q3. What happened to the Tier designations that were in Limited Threat General Order R5-2016-0076-01?

A3. The Tier designations in Limited Threat General Order R5-2016-0076-01 categorized enrollees by discharge type, length, volume, and need for treatment, and certain other requirements were based on the designated Tier. Tier designations were removed to allow for flexibility in the implementation of requirements (e.g. Salt Control Program) for a larger variety of discharges that are eligible for enrollment under the Limited Threat General Order. In lieu of the Tier designations, the renewed Limited Threat General Order specifies requirements by the discharge conditions and considerations that are relevant to constituents of concern.

Q4. How do I determine what analyses are required to submit with the Notice of Intent for my project?

A4. The required analyses to be submitted with the Notice of Intent for the Limited Threat General Order are contained in Table I-1 of Attachment I by wastewater/project type. For example, a construction dewatering project typically involves groundwater pumping and would follow the requirements for Groundwater Source, since the source water is groundwater. If a discharge does not fall within the categories included in Table I-1 or there are questions about the required analyses, Central Valley Water Board staff may be contacted for clarification if the proposed discharge falls within the existing categories or the Other category.

Q5. What is the Salt Control Program?

A5. The Salt Control Program was established by the Central Valley Regional Water Quality Control Board (Central Valley Water Board) to regulate salinity impacts throughout the Central Valley. Dischargers enrolled under the Limited Threat General Order are required to limit salinity impacts from the regulated discharge due to the Salt Control Program. Enrollees are required to submit a [Notice of Intent for the Salt Control Program](https://www.waterboards.ca.gov/centralvalley/water_issues/salinity/forms_temps_guide/salt_noi_form.pdf) (https://www.waterboards.ca.gov/centralvalley/water_issues/salinity/forms_temps_guide/salt_noi_form.pdf) and decide on either the Conservative Salinity

Permitting Approach (Conservative Pathway) or the Alternative Salinity Permitting Approach (Alternative Pathway).

[Guidance for the Salt Control Program Notice of Intent](https://www.waterboards.ca.gov/centralvalley/water_issues/salinity/forms_temps_guide/salt_guidance.pdf)

(https://www.waterboards.ca.gov/centralvalley/water_issues/salinity/forms_temps_guide/salt_guidance.pdf) is available on the Central Valley Water Board's website.

The Conservative Pathway is designed for permittees whose discharges have very low salinity concentrations and can meet conservative electrical conductivity effluent limitations of 700 µmhos/cm and 900 µmhos/cm for the Agricultural Supply and Municipal and Domestic Supply Beneficial Use, respectively. Enrollees that cannot meet the conservative electrical conductivity effluent limitations must enroll in the Alternative Pathway and will be required to participate in the Prioritization and Optimization Study (P&O Study). To participate in the P&O Study, the enrollee must contact the lead entity of the P&O Study, which is the Central Valley Salinity Coalition, through [cvsalts.info](https://www.cvsalinity.org/public-info) (<https://www.cvsalinity.org/public-info>) to determine the annual fee required to participate in the P&O Study. Annual fees are set by Central Valley Salinity Coalition and vary by permit type or industry category. For general fee breakdown, see the [P&O Fee Summary by Industry/Permit Type Tables](https://www.cvsalinity.org/images/P&O%20Fees.pdf) (<https://www.cvsalinity.org/images/P&O%20Fees.pdf>).

Q6. How do I determine whether toxicity testing is required?

A6. Limited Threat General Order R5-2016-0076-01 required acute toxicity test results to be submitted with the Notice of Intent for discharges of liquid mine waste; the Limited Threat General Order renewal does not require acute toxicity testing results to be submitted with the Notice of Intent. The Limited Threat General Order renewal specifies requirements for routine toxicity monitoring by the length and volume of the discharge and project type. Routine chronic toxicity monitoring for discharges greater than or equal to 120 days in length or 0.25 million gallons per day, of liquid mine waste, or with treatment will be specified in the Notice of Applicability. Dischargers will not be required to conduct routine acute toxicity testing since chronic toxicity testing is generally protective of both acute and chronic aquatic toxicity.