

November 21, 2025

Trever Van Noort
City of Grass Valley
Utilities Director
treverv@cityofgrassvalley.com
Submitted via email

Subject: City of Grass Valley National Pollutant Discharge Elimination System (NPDES) Permit Compliance Support Amendment Scope of Services

Dear Mr. Van Noort,

Larry Walker Associates, Inc. (LWA) has assisted the City of Grass Valley (City) and its Wastewater Treatment Plant with National Pollutant Discharge Elimination System (NPDES) permit reissuance and compliance support since 2008. The City is currently regulated under the Municipal General Waste Discharge Requirements Order No. R5-2017-0085-01 (General Permit), which was adopted by the Central Valley Regional Water Quality Control Board (Water Board) in August 2017 and subsequently amended in April 2022. The City filed a Notice of Intent (NOI) for coverage under the General Permit and received its Notice of Applicability (NOA) with an enrollee number of R5-2017-0085-019 in December 2021. The City's coverage under the General Permit will expire in December 2026. The Central Valley Water Board subsequently reissued the General Permit in June 2023 under Order No. R5-2023-0025.

The City's coverage under R5-2017-0085-019 will expire in December 2026, and the City will be required to submit an NOI by January 31, 2026 to apply for coverage under Order No. R5-2023-0025. Additionally, the City is required to conduct an audit and update, as necessary, its Sanitary Sewer Management Plan (SSMP).

To support the City's continued compliance with regulatory requirements, LWA proposes the following scope of services through 2026 as an amendment to its current contract with the City.

Scope of Services

Task 37. Project Coordination

LWA will provide ongoing project management, which includes regular communication with City staff regarding the project schedule, budget, and other issues related to the administration of this work effort.

Task 38. Conduct Audit and Update of 2022 SSMP

The City is regulated under State Water Resources Control Board (State Water Board) Statewide Sanitary Sewer Systems General Order, which was most recently adopted in December 2022. LWA assisted the City in updating its SSMP in 2022, which was under the prior General Order. Under the current General Order, the City was supposed to complete an audit of its SSMP by February 2, 2025 and an update of the SSMP by August 2, 2025.

LWA will conduct an audit of the SSMP and develop an updated SSMP.

Task 39. Provide On-Going NPDES Permit Compliance Services

LWA currently assists the City with data validation, reporting, laboratory issues, and other services to support the City in its NPDES permit compliance activities. These NPDES permit compliance activities include reviewing monthly self-monitoring reports, checking compliance with NPDES permit requirements, preparing the Annual Operations Report, due February 1 annually, and responding to enforcement actions (e.g., Notices of Violation [NOV], administrative civil liabilities [ACLs]) issued by the Central Valley Water Board.

Under this task, LWA will continue to provide on-going NPDES permit compliance services as directed by the City.

Task 40. Assist with NPDES Permit Reissuance

As discussed above, the City’s NPDES permit will expire at the end of 2026 with an NOI due by January 31, 2026. LWA will provide as-needed support to the City in preparing the NOI. LWA will utilize monitoring data to conduct a reasonable potential analysis to identify pollutants for which the City may receive effluent limitations in the new NPDES permit. LWA will conduct a compliance assessment to determine if the City will have difficulty complying with projected effluent limitations. This information will be used to develop a cover letter identifying the City’s requests in the new NPDES permit, including potential compliance schedules for pollutants with which the City may not be able to immediately comply and changes to the monitoring requirements.

It is expected that the Central Valley Water Board may initiate the NPDES permit writing process in Spring of 2026. LWA will review the draft NPDES permit and assist in the development comments for consideration by the Central Valley Water Board. LWA will support the City in meetings with Central Valley Regional Water staff to discuss the NPDES permit. Following approval of the new NPDES permit by the Central Valley Water Board, LWA will review the NPDES permit to ensure that all appropriate revisions have been incorporated. The NPDES permit is expected to contain various compliance activities, status reports, etc. LWA will prepare an NPDES Permit Compliance Activity Schedule for use by the City to summarize, prioritize, and assign responsibility for completion of the compliance activities.

Project Schedule

LWA will work with the City to develop a project schedule for tasks as they are needed.

Budget Amendment

The cost estimate for the work described above will be conducted on a time and materials basis according to LWA’s current billing rates, which are adjusted annually on July 1. The cost estimate for this effort is presented in the table below.

Tasks	Labor Classification →			Associate I	Senior I	Project 2A	Project 1B	Project 1C	Contract Manager
	Labor Cost	Direct Expense	Hours	\$304	\$269	\$248	\$176	\$150	\$155
Task 37: Project Coordination									
Task 37.1 Project Coordination	\$7,334		32	16					16
<i>Task Subtotal</i>	<i>\$7,334</i>		<i>32</i>	<i>16</i>					<i>16</i>
Task 38: Conduct Audit and Update of 2022 SSMP									
Task 38.1 Conduct SSMP Audit	\$3,226		12		12				
Task 38.2 Update SSMP	\$5,158		28		8			20	
<i>Task Subtotal</i>	<i>\$8,384</i>		<i>40</i>		<i>20</i>			<i>20</i>	
Task 39: Provide On-Going NPDES Permit Compliance Services									
Task 39.1 Provide On-going NPDES Permit Compliance Services	\$25,214		120	40			40	40	
<i>Task Subtotal</i>	<i>\$25,214</i>		<i>120</i>	<i>40</i>			<i>40</i>	<i>40</i>	
Task 40: Assist with NPDES Permit Reissuance									
Task 40.1 Assist with NPDES Permit Reissuance	\$18,717		76	24	4	32		16	
<i>Task Subtotal</i>	<i>\$18,717</i>		<i>76</i>	<i>24</i>	<i>4</i>	<i>32</i>		<i>16</i>	
<i>Total Hours</i>			<i>268</i>	<i>80</i>	<i>24</i>	<i>32</i>	<i>40</i>	<i>76</i>	<i>16</i>
Total Cost	\$ 59,649	\$ -		\$24,308	\$ 6,452	\$ 7,943	\$ 7,045	\$11,429	\$ 2,472

This cost estimate will amend the current contract budget of \$746,077 to \$805,726.

We look forward to continuing to work with the City and supporting its NPDES permit compliance. Please don't hesitate to contact me with any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Lau', with a stylized flourish at the end.

Gorman Lau, P.E.

Associate