



# Central Contra Costa Sanitary District

Protecting public health and the environment

5019 Imhoff Place, Martinez, CA 94553-4392

November 1, 2011

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San Francisco Bay Regional Water Board  
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Via Email: [vchristian@waterboards.ca.gov](mailto:vchristian@waterboards.ca.gov)

**Subject: Comments Regarding Tentative Order Reissuing the NPDES Permit (CA0037648) for the Central Contra Costa Sanitary District**

Dear Mr. Christian:

Thank you for the opportunity to comment on the Tentative Order for the reissuance of the Central Contra Costa Sanitary District (District) Wastewater Treatment Plant NPDES Permit. The District would like to thank you for your diligence and care in preparing the Tentative Order. Detailed comments are shown in the attached document. A compilation of eight years of pretreatment monitoring data is also included electronically with these comments to support the request for a reduction in monitoring frequencies for volatile organic compounds (VOCs) and base/neutrals and acids extractable organic compounds (BNAs). Please feel free to contact me at 925-229-7284 should you have any questions or require additional information. Thank you for your consideration of these comments.

Sincerely,

Margaret P. Orr, P.E.  
Director of Plant Operations

MPO/amt

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**Central Contra Costa Sanitary District  
Wastewater Treatment Plant**

**Comments on Tentative NPDES Permit  
DRAFT  
November 1, 2011**

The Central Contra Cost Sanitary District (District) appreciates the opportunity to submit the following comments on the Tentative Order (TO) reissuing the NPDES permit for the Wastewater Treatment Plant (CA0037648). Due to variations in formatting on different computers and printers, page numbers listed may be approximate.

**COMMENTS ON NPDES PERMIT TENTATIVE ORDER**

- 1. The District requests several specific revisions to the facility information for accuracy and clarity.**

The District requests that the revisions to facility information shown below are incorporated into the TO for accuracy.

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**Table 4. Facility Information**

<b>Discharger</b>	Central Contra Costa Sanitary District
<b>Name of Facility</b>	Central Contra Costa Sanitary District Wastewater Treatment Plant and its associated wastewater collection system
<b>Facility Address</b>	5019 Imhoff Place, Martinez CA 94553, Contra Costa County
<b>CIWQS Place Number</b>	213875
<b>CIWQS Party Number</b>	220151
<b>Facility Contact, Title, and Phone</b>	Margaret P. Orr P.E., Director of Plant Operations, 925-228-9500
<b>Mailing Address</b>	5019 Imhoff Place, Martinez, CA 94553, Contra Costa County
<b>Type of Facility</b>	Publicly Owned Treatment Works
<b>Facility Design Flow</b>	53.8 million gallons per day (MGD) (average dry weather design flow) 250 MGD (peak wet weather <u>influent</u> design flow)
<b>Service Area</b>	Danville, Lafayette, Martinez, Moraga, Orinda, Pleasant Hill, San Ramon, Walnut Creek, Concord, Clayton, and adjacent unincorporated areas, including Alamo, Blackhawk, Clyde, and Pacheco
<b>Service Population</b>	455,000

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**B. Facility Description and Discharge Location**

- 1. Facility Description.** The Discharger owns and operates the Central Contra Costa Sanitary District Wastewater Treatment Plant (hereinafter the Plant), and its associated wastewater collection system (hereinafter collectively the Facility). The Plant, located north of Concord and east of Martinez, (See Attachment B) provides secondary treatment of domestic, commercial, and industrial wastewater for Danville, Lafayette,

Martinez, Moraga, Orinda, Pleasant Hill, San Ramon, Walnut Creek, Concord, Clayton, and adjacent unincorporated areas, including Alamo, Blackhawk, Clyde, and Pacheco. The population of the service area is approximately 455,000. From April 2007 through December 2010, the maximum daily influent flow rate was 141 MGD, and the average daily flow rate was 38.7 MGD. Both rates are well within the permitted design capacity, 53.8 MGD average dry weather design flow, and 250 MGD peak wet weather design flow. Twenty-two (22) significant industrial users also discharge to the Facility, and these discharges are regulated by the Facility's pretreatment program.

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4. **Discharge Point.** Secondary-treated wastewater is discharged at Discharge Point 001 to Suisun Bay about 3.5 miles from the Facility via a submerged outfall equipped with a multiport diffuser. The location of the outfall diffuser is approximately 1600 feet offshore at an average depth of approximately 24 feet.

The Plant has three holding basins (A, B, and C) for temporary storage of wet weather flows, with a combined volume of 170 million gallons. These basins are used to store excess wastewater after primary treatment when inflow exceeds the Plant's secondary treatment capacity. When flows subside, the stored wastewater is routed back to the headworks for full treatment.

...

6. **Biosolids Management.** Secondary sludge is thickened via dissolved air flotation, combined with primary sludge and lime, dewatered by centrifuges, and incinerated on-site. Ash is hauled by a contractor to an off-site recycling facility and used as a soil amendment. If Facility incinerators are inoperable, biosolids are diverted to sludge storage facilities and then may be hauled to local landfills or to the East Bay Municipal Utilities District for treatment and disposal.

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**Table F-1. Facility Information**

<b>WDID</b>	2 071008001
<b>CIWQS Place ID</b>	213875
<b>Discharger</b>	Central Contra Costa Sanitary District
<b>Name of Facility</b>	Central Contra Costa Sanitary District Wastewater Treatment Plant and its associated wastewater collection system
<b>Facility Address</b>	5019 Imhoff Place, Martinez, CA 94553 Contra Costa County
<b>Facility Contact, Title, Phone</b>	Margaret P. Orr, P.E., Director of Plant Operations, (925) <u>229-7284-228-9500</u>
<b>Authorized Person to Sign and Submit Reports</b>	Same as above
<b>Mailing Address</b>	5019 Imhoff Place, Martinez, CA 94553
<b>Billing Address</b>	Same as Mailing Address
<b>Type of Facility</b>	Publicly Owned Treatment Works (POTW)
<b>Major or Minor Facility</b>	Major
<b>Threat to Water Quality</b>	1
<b>Complexity</b>	B

<b>Pretreatment Program</b>	Yes
<b>Reclamation Requirements</b>	Regional Water Board Order No. 96-011
<b>Mercury and PCBs Discharge Requirements</b>	Regional Water Board Order No. R2-2007-0077
<b>Facility Permitted Flow</b>	53.8 million gallons per day (MGD) (average daily dry weather flow)
<b>Facility Design Flow</b>	53.8 MGD (average <del>daily</del> dry weather flow) 250 MGD (peak wet weather <u>influent</u> design flow)
<b>Watershed</b>	Suisun
<b>Receiving Water</b>	Suisun Bay
<b>Receiving Water Type</b>	Estuarine
<b>Service Area</b>	Danville, Lafayette, Martinez, Moraga, Orinda, Pleasant Hill, San Ramon, Walnut Creek, Concord, Clayton, and adjacent unincorporated areas, including Alamo, Blackhawk, Clyde, and Pacheco
<b>Service Area Population</b>	455,000

Page (F-4 – F-5)

**A. Description of Wastewater and Biosolids Treatment**

1. **Facility Description.** The Discharger owns and operates the Central Contra Costa Sanitary District Wastewater Treatment Plant (hereinafter the Plant), and its associated wastewater collection system (hereinafter collectively the Facility). The Plant, located north of Concord and east of Martinez, (See Attachment B) provides secondary treatment of domestic, commercial, and industrial wastewater for Danville, Lafayette, Martinez, Moraga, Orinda, Pleasant Hill, San Ramon, Walnut Creek, Concord, Clayton, and adjacent unincorporated areas, including Alamo, Blackhawk, Clyde, and Pacheco. The population of the service area is approximately 455,000. From April 2007 through December 2010, the maximum daily influent flow rate was 141 MGD and the average daily flow rate was 38.7 MGD. Both rates are well within the permitted design capacity, 53.8 MGD average dry weather design flow and 250 MGD peak wet weather design flow. Twenty-two (22) significant industrial users also discharge to the Facility, and these discharges are regulated by the Facility’s pretreatment program.
  
2. **Collection System.** The Discharger’s wastewater collection system includes approximately 1,500 miles of pipeline ranging from 6 to 102 inches in diameter, and 16 ~~17~~ wastewater pumping stations. The City of Concord separately maintains the collection system for most of Concord’s city limits and the City of Clayton.
  
- ...
  
4. **Discharge Point.** Secondary-treated wastewater is discharged at Discharge Point 001 to Suisun Bay about 3.5 miles from the Facility via a submerged outfall equipped with a multiport diffuser. The location of the outfall diffuser is approximately 1600 feet offshore at an average depth of approximately 24 feet.

The Plant has ~~three~~ holding basins (A-North, B, and C) for temporary storage of wet weather flows, with a combined volume of 170 ~~140~~ million gallons. These basins are used to store excess wastewater after primary treatment when inflow exceeds the Plant’s

secondary treatment capacity. When flows subside, the stored wastewater is routed back to the headworks for full treatment.

...

8. **Outfall Pipe Maintenance.** About every 5 to 10 years, during the dry season, the Discharger drains and inspects its 3.5-mile long, 72-inch reinforced concrete outfall pipe to verify the alignment and assess the physical integrity of the pipe joint seals. During this time, fully-treated effluent is diverted to a holding basin and then discharged to Walnut Creek from a concrete weir at the holding basin. This maintenance project was last done in 2003, and it took 18 weeks to dewater the outfall, inspect it, repair the damaged joints, and return it to service. The Discharger has informed the Water Board that an inspection (and any necessary repairs identified as a result), will have to be completed ~~intends to do this~~ again during this permit cycle to ensure the integrity of the outfall. The fully treated effluent will be discharged to Walnut Creek via a new concrete weir structure at the Holding Basin B. The Discharger ~~also~~ expects that the diversion time will be similar to the last event, although it could vary depending on the extent of repairs needed. This bypass is necessary for unavoidable essential maintenance and is subject to Federal Standard Provisions, section I.G (Attachment D).

## 2. The District requests clarification of the minimum dilution requirement.

The District understands that the minimum dilution requirement of 44:1 is consistent with the dilution credit included in the ammonia limits calculations ( $D=43$ ), and is intended to protect beneficial uses. Initial dilution was modeled and several ratios were identified following guidance in the State Implementation Policy (SIP). As explained in the District's Near Field Mixing Zone and Dilution Analysis (Larry Walker Associates, 2011), the 44:1 dilution ratio is representative of average dry weather design flow and is intended to be used to calculate effluent limits based on chronic criteria that are protective of beneficial uses. It is very important to the District that it is clear that this minimum initial dilution requirement is consistent with its derivation and could not be interpreted to apply under all possible conditions. For these reasons, the District requests the following revisions to the TO:

(Page 8)

### III. DISCHARGE PROHIBITIONS

- A. Discharge of treated wastewater at a location or in a manner different from that described in this Order is prohibited.
- B. Discharge of treated wastewater at any point where it does not receive an initial dilution of at least 44:1 ( $D=43$  under the average dry-weather flow conditions) as described in Fact Sheet section IV.C.4.b is prohibited.

(Page F-10)

#### A. Discharge Prohibitions

1. **Discharge Prohibition III.A (No discharge other than that described in this Order):** This prohibition is based on 40 CFR 122.21(a), "Duty to Apply," and CWC

section 13260, which requires filing an application and Report of Waste Discharge before a discharge can occur. Discharges not described in the permit application and Report of Waste Discharge, and subsequently in this Order, are prohibited.

2. **Discharge Prohibition III.B (No discharge from a point receiving less than 44:1 dilution (D=43) as described in Fact Sheet section IV.C.4.b):** This prohibition is based on the dilution credit granted for total ammonia in this Order, which is the estimated initial dilution at the average dry weather flow rate (53.8 MGD). ~~If The~~ actual dilution of is less than 44:1 (D=43), as defined in Fact Sheet section IV.C.4.b, was used to calculate the limitations for total ammonia ~~may not be sufficient~~ to protect beneficial uses. Furthermore, Basin Plan Discharge Prohibition 1 (Table 4-1) prohibits the discharge of any wastewater that does not receive a minimum initial dilution of at least 10:1 (D=9).
  
4. **Discharge Prohibition III.D. (Average dry weather flow not to exceed permitted average dry weather design capacity):** This prohibition is based on the design treatment capacity of the Facility treatment system. The permitted average dry weather flow rate is 53.8 MGD. Exceedance of the Plant's permitted average dry weather flow design capacity could result in lowering the reliability of achieving compliance with water quality requirements.

(Page F-18 – F-19)

#### 4. WQBEL Calculations

- a. **Pollutants with Reasonable Potential.** WQBELs were developed for the toxic and priority pollutants determined to have reasonable potential to cause or contribute to exceedances of the WQOs. The WQBELs were calculated based on WQOs and the procedures specified in SIP section 1.4. The WQOs used for each pollutant with reasonable potential are discussed below.
  
- b. **Dilution Credit.** The SIP allows dilution credits for completely-mixed discharges, and under certain circumstances for incompletely-mixed discharges. The Discharger submitted a Near-field Mixing Zone and Dilution Analysis for the Central Contra Costa Sanitary District Outfall Diffuser to San Pablo Bay, dated May 27, 2011. The report presents the findings regarding the initial dilution of the discharge at the outfall.

The near-field dilution was estimated using the USEPA-supported CORMIX modeling package. The study used the average dry-weather flow rate to calculate a chronic dilution ratio and the 99<sup>th</sup> percentile daily flow rate to calculate an acute dilution ratio.

The study found that near-field mixing is complete at 125 feet from the diffuser center line. Initial dilutions estimated by CORMIX are:

44:1 (D=43) at the permitted average dry weather flow rate (53.8 MGD), representing chronic conditions; and

34:1 (D=33) at the 99<sup>th</sup> percentile daily effluent flow rate (70.3 MGD), representing acute discharge conditions.

### c. Development of WQBELs for Specific Pollutants

#### (5) Bis(2-ethylhexyl)phthalate

(c) WQBELs. WQBELs for bis(2-ethylhexyl)phthalate, calculated according to SIP procedures with a CV of 2.6 and a dilution credit of  $D = 9$  (dilution ratio = 10:1), are an AMEL of 55 ug/L and an MDEL of 170 ug/L.

### 3. The District requests that the narrative chronic toxicity effluent limitation be revised to more accurately reflect the appropriate Basin Plan language.

The narrative chronic toxicity effluent limit included in the TO is based on language in the San Francisco Bay Basin (Region 2) Water Quality Control Plan (Basin Plan) that states that “there shall be no chronic toxicity in ambient waters.” The language included in the TO indicates that there shall be no chronic toxicity in the effluent, which is far more stringent than the Basin Plan requirement, since initial dilution under chronic conditions was determined to be 44:1 (D=43). For this reason, the District requests the following revision:

(Page 10)

- a. The discharge shall not contain levels of toxicity that would cause chronic toxicity in the receiving water. There shall be no chronic toxicity in the discharge as discharged. Chronic toxicity is a detrimental biological effect of growth rate, reproduction, fertilization success, larval development, or any other relevant measure of the health of an organism population or community. Compliance with this limit shall be determined by analysis of indicator organisms and toxicity tests measured at EFF-001 as described in the MRP.

### 4. The District requests removal of the requirement to measure pH, temperature and ammonia concurrently in both the effluent and the receiving water, as it is neither practical nor necessary.

The District requests the removal of Footnote 8 from Table E-3, which indicates that ammonia samples must be collected concurrently with effluent and receiving water monitoring for temperature and pH. The Regional Monitoring Program (RMP) is responsible for receiving water monitoring, and it may not be practical to coordinate timing of sampling between organizations. Also, the footnote is not necessary because effluent pH and temperature are reported daily and will certainly be available for the one day per month that the 24-hour composite sample for ammonia is collected.

(Page E-4)

#### **Footnotes to Table E-3:**

- [1] **Flow Monitoring.** Flow shall be monitored continuously, and the following information shall be reported in self-monitoring reports for each month:

- Daily average flow (MGD)
  - Total daily flow volume (MG)
  - Monthly average flow (MGD)
  - Total monthly flow volume (MG)
  - Maximum and minimum daily average flow rates (MGD) and time of occurrence
- [2] **CBOD and TSS % Removal.** The percent removal for CBOD and TSS shall be reported for each calendar month in accordance with Effluent Limitation IV.A.1. Samples for CBOD and TSS shall be collected simultaneously with influent samples.
- [3] **Oil and Grease.** Each oil and grease sampling and analysis event shall be conducted in accordance with Standard Methods 21<sup>st</sup> Ed.
- [4] **pH.** If pH is monitored continuously, the minimum and maximum pH values for each day shall be reported in monthly Self-Monitoring Reports (SMRs).
- [5] **Dissolved Sulfides.** Measured when dissolved oxygen concentration is less than 2.0 mg/L.
- [6] **Acute toxicity.** Acute bioassay tests shall be performed in accordance with section V.A of this MRP.
- [7] **Chronic toxicity.** Critical life stage toxicity tests shall be performed and reported in accordance with the Chronic Toxicity Requirements of specified in section V.B of this MRP.
- [8] ~~Total Ammonia. Monitoring for total ammonia shall occur concurrently with effluent and receiving water monitoring for temperature and pH for determination of the un-ionized ammonia fraction.~~

**5. The District requests that detailed chronic toxicity test information be retained onsite and made available for review as an alternative to routine reporting.**

The District questions the value of providing the requested level of detail about chronic toxicity tests (in addition to the results), in PDF format with the eSMR, and suggests that it would be sufficient to instead retain those records onsite and available for review. The District recommends the following revisions:

(Page E-6)

**2. Chronic Toxicity Reporting Requirements**

- a. **Records Retention Routine Reporting.** Toxicity test results for the current reporting period shall include, at a minimum, for each test. The following data shall be retained on site and made available for inspection for up to five years:
- (1) Sample date
  - (2) Test initiation date
  - (3) Test species
  - (4) End point values for each dilution (e.g., number of young, growth rate, percent survival)
  - (5) No Observable Effect Level (NOEL) values in percent effluent. The NOEL shall equal to the IC<sub>25</sub> or EC<sub>25</sub> (see Appendix E-1). If the IC<sub>25</sub> or EC<sub>25</sub> cannot be statistically determined, the NOEL shall equal to the No Observable Effect Concentration (NOEC) derived using hypothesis testing. The NOEC is the maximum percent effluent concentration that causes no observable effect on test organisms based on a critical life stage toxicity test.
  - (6) IC<sub>15</sub>, IC<sub>25</sub>, IC<sub>40</sub>, and IC<sub>50</sub> values (or EC<sub>15</sub>, EC<sub>25</sub> ... etc.) as percent effluent
  - (7) TU<sub>c</sub> values (TU<sub>c</sub> = 100/NOEL).

- (8) Mean percent mortality ( $\pm$ s.d.) after 96 hours in 100% effluent (if applicable)
- (9) NOEC and LOEC values for reference toxicant tests
- (10) IC<sub>50</sub> or EC<sub>50</sub> values for reference toxicant tests
- (11) Available water quality measurements for each test (pH, dissolved oxygen, temperature, conductivity, hardness, salinity, ammonia)

**6. The District requests revision of the requirement to collect multiple grab samples for pretreatment monitoring and a reduction in monitoring frequencies for volatile organic compounds (VOCs) and base/neutrals and acids extractable organic compounds (BNAs).**

The District requests that pretreatment monitoring sampling requirements be revised for consistency with current monitoring practices and similar requirements in other recent Bay Area POTW permits. The requested revisions would allow the District to continue to collect a single grab sample for certain constituents in place of multiple grab samples equally spaced over a 24-hour period. It is not clear that this more onerous requirement is necessary or would provide any benefit, and is not a practical use of staff resources. This requested revision is consistent with Order No. R2-2011-0007, renewing the NPDES permit for the Napa Sanitation District, and Order No. R2-2011-0046, renewing the NPDES permit for American Canyon. Single grab samples are also consistent with effluent monitoring requirements in Attachment E, the Monitoring and Reporting Program (MRP) for acrylonitrile and bis(2-ethylhexyl)phthalate, and with the monitoring and reporting efficiency goals that drove the recent revisions to Attachment H, the Pretreatment Program Provisions.

The District would also like to request a reduction in the required influent and effluent monitoring frequencies for VOCs and BNAs from once per quarter to twice per year, in accordance with Appendix H-4 to Attachment H. A compilation of the previous eight calendar years (2003 – 2010) of VOC and BNA data is included electronically with these comments. These data are presented as justification for a “reduction” in monitoring frequency from the proposed permit, even though it’s not actually a reduction because the current NPDES permit does not contain pretreatment monitoring requirements. The data consistently show non-detect (ND) levels in the effluent. Of the approximately 1,800 effluent data for BNAs, only 45 (less than 5%) were reported above the minimum detection level (MDL). Of the approximately 1,300 effluent data for VOCs, less than 10% were reported above the MDL.

The TO includes effluent limits for one VOC (acrylonitrile) and one BNA (bis(2-ethylhexyl)phthalate), for which a standard monitoring frequency of twice per year is required. The same twice-per-year monitoring frequency for the remaining VOCs and BNAs, concentrations of which are nearly entirely non-detected, should also be sufficient. In addition, twice-per-year monitoring frequencies for these constituents have been established for many of the larger publicly-owned treatment works (POTWs) in the San Francisco Bay Area, including two of comparable size to the District (East Bay Municipal Utility District and the San Jose/Santa Clara Water Pollution Control Plant). The requested monitoring frequencies are still more than the minimum required by Appendix H-4 of Attachment H (once per year).

Furthermore, the District's Source Control and Public Outreach Programs are effective in controlling industrial, commercial, and residential sources of organic pollutants to the District's system. The District's Pretreatment Program establishes and enforces standards to manage discharges of organic pollutants in process wastewaters. The trend with industrial and commercial businesses is to use less toxic alternatives (e.g. substitutes to chlorinated cleaning solvents) that reduce incidental sources of organic pollutants. The District's Pollution Prevention Program sustains comprehensive messages to residential customers not to discharge pollutants to the drains, and the District's Household Hazardous Waste Collection Facility continues to provide safe disposal options to residents and small businesses.

Two additional corrections (to organophosphate pesticide requirements) are also requested. All requested revisions to *Table E-4. Pretreatment and Biosolids Monitoring Requirements* are shown below.

(Page E-8)

**Table E-4. Pretreatment and Biosolids Monitoring Requirements**

Constituents	Sampling Frequency			Sample Type <sup>[4]</sup>	
	Influent INF-001	Effluent EFF-001 <sup>[3]</sup>	Biosolids BIO-001	INF-001 and EFF-001	Biosolids BIO-001
VOC	1/Quarter 2/Year	1/Quarter 2/Year	2/Year	Multiple Grabs <sup>[4a]</sup>	Grab <sup>[4cd]</sup>
BNA	1/Quarter 2/Year	1/Quarter 2/Year	2/Year	Multiple Grabs <sup>[4a]</sup>	Grab <sup>[4cd]</sup>
Organophosphateorus Pesticides	2/Year	2/Year	2/Year	Multiple Grabs 24-hr Composite <sup>[4ab]</sup>	Grab <sup>[4cd]</sup>
Metals <sup>[1]</sup>	1/Month	1/Month	2/Year	24-hr Composite <sup>[4ab]</sup>	Grab <sup>[4cd]</sup>
Hexavalent Chromium <sup>[2]</sup>	1/Month	1/Month	2/Year	Multiple Grabs <sup>[4a]</sup>	Grab <sup>[4cd]</sup>
Mercury	1/Month	1/Month	2/Year	24-hr Composite <sup>[4ab,4be]</sup>	Grab <sup>[4cd]</sup>
Cyanide	1/Month	1/Month	2/Year	Multiple Grabs <sup>[4a]</sup>	Grab <sup>[4cd]</sup>

**Legend for Table E-4:**

**Constituents:**

VOC volatile organic compounds

BNA base/neutrals and acids extractable organic compounds

**Sampling Frequency:**

1/month once per month

2/year twice per year

**Footnotes for Table E-4:**

[1] The metals are arsenic, cadmium, copper, lead, nickel, silver, zinc, and selenium.

[2] The Discharger may elect to report total chromium instead of hexavalent chromium. Sample collection for total chromium measurements shall be 24-hour composite sampling.

[3] Effluent monitoring conducted in accordance with Table E-3 can be used to satisfy these pretreatment monitoring requirements.

[4] Sample types:

a. Multiple grabs samples for VOC, BNA, hexavalent chromium, and cyanide, must be made up of a minimum of four (4) discrete grab samples, collected at equal intervals spaced over the course of a 24 hour period, with each grab analyzed separately and the results mathematically flow-weighted or with grab samples combined (volumetrically flow-weighted) prior to analysis.

a.b. 24-hour composite samples may be made up discrete grab samples and may be combined (volumetrically flow-weighted) prior to analysis, or they may be mathematically flow-weighted. If an automatic compositor is used, 24-hour composite samples must be obtained through flow-proportioned composite sampling.

- b.e. Automatic compositors are allowed for mercury if either (1) the compositing equipment (hoses and containers) comply with ultraclean specifications, or (2) appropriate equipment blank samples demonstrate that the compositing equipment has not contaminated the sample.
- c.d. The biosolids sample shall be a composite of the biosolids to be disposed. Biosolids collection and monitoring shall comply with the requirements specified in Attachment H, Appendix H-4. The Discharger shall also comply with the biosolids monitoring requirements of 40 CFR 503.

**7. The District requests a correction to the rationale for inclusion of copper effluent limits.**

It appears that the justification for establishing a copper effluent limitation is in error, as the maximum effluent concentration of 12 µg/L does not exceed the governing water quality objective of 14 µg/L. Therefore, the District requests that the following revisions be made to incorporate an appropriate justification.

(Page F-20)

**(b) RPA Results.** This Order establishes effluent limitations for copper consistent with requirements associated with the use of the copper SSOs. because the MEC (12 µg/L) exceeds the governing WQO (14 µg/L), demonstrating reasonable potential by Trigger 1.

**Comments 8 and 9 include revisions requested to ensure clarity of permit requirements and expectations.**

**8. Revision to Table 6 (Page 9):**

**Table 6. Conventional and Non-Conventional Pollutant Effluent Limitations**

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Carbonaceous BOD 5-day @ 20°C (BOD <sub>5</sub> )	mg/L	25	40	---	---	---
Total Suspended Solids (TSS)	mg/L	30	45	---	---	---
BOD and TSS percent removal <sup>[1]</sup>	%	85 minimum	---	---	---	---
Oil and Grease	mg/L	10	---	20	---	---
pH <sup>[2]</sup>	s.u	---	---	---	6.0	9.0
Enterococcus Bacteria	colonies per 100 mL	35 <sup>[3]</sup>	---	---	---	---

**Unit Abbreviations:**

- mg/L = milligrams per liter
- s.u. = standard units
- mL = milliliters

**Footnotes to Table 6:**

- [1] **85 Percent Removal.** The arithmetic mean of CBOD<sub>5</sub> at 20°C and TSS, by concentration, for effluent samples collected in each calendar month shall not exceed 15 percent of the arithmetic mean of the respective values, by concentration, for influent samples collected at INF-001 as described in the MRP (Attachment E) at approximately the same times during the same period.
- [2] **pH.** If the Discharger monitors pH continuously, pursuant to 40 CFR 401.17, the Discharger shall be in compliance with the pH limitation specified herein provided that both of the following conditions are satisfied: (i) the total time during which the

pH values are outside the required range of pH values shall not exceed 7 hours and 26 minutes in any calendar month; and  
(ii) no individual excursion from the range of pH values shall exceed 60 minutes.

[3] Enterococcus Bacteria. The monthly geometric mean shall not exceed 35 colonies per 100 mL.

**9. Revision to Page 15:**

- (1) A sample result is reported as DNQ and the effluent limitation is less than the RL (as defined in Attachment A); or

**Comments 10 – 16 pertain to typographical errors contained in the TO and indicate the District's requested corrections.**

**10. Revision to Page B-1:**

Attachment ~~C~~ Process Flow Diagram B – Facility Map

**11. Revision to Page E-11:**

**C. Discharge Monitoring Reports**

1. As described in section **VIII.B.1** above, at any time during the term of this permit, the State or Regional Water Board may notify the Discharger to electronically submit SMRs that will satisfy federal requirements for submittal of Discharge Monitoring Reports (DMRs.) Until such notification is given, the Discharger shall submit DMRs in accordance with the requirements described below.

**12. Revision to Page F-10:**

3. **Discharge Prohibition III.C (Bypass or overflow of untreated or partially treated wastewaters to waters of the U.S. is prohibited, except as provided for in section I.G.2 of Attachment D):** This prohibition is based on 40 CFR 122.41(m). See Federal Standard Provisions, Attachment D, section G.

**13. Revision to Page F-17:**

**Footnotes to Table F-97:**

- [1] The Maximum Effluent Concentration (MEC) and maximum background concentration are the actual detected concentrations unless preceded by a "<" sign, in which case the value shown is the minimum detection level (DL).  
[2] The MEC or maximum background concentration is "Not Available" when there are no monitoring data for the constituent.  
[3] RPA Results = Yes, if MEC > WQC, B > WQC and MEC is detected, or Trigger 3;  
= No, if MEC and B are < WQC or all effluent data are undetected;  
= Undetermined (Ud), if no criteria have been promulgated or there are insufficient data.  
[4] Units for Total Ammonia are milligrams per liter.

**14. Revision to Page F-23:**

- (c) **WQBELs.** WQBELs for acrylonitrile, calculated according to SIP procedures with a CV of 0.7 and a dilution credit of D = 9 (dilution ratio = 10:1), are an AMEL of 6.3 µg/L and an MDEL of **1314** µg/L. However, the previous order contained an AMEL of 6.3 µg/L and an MDEL of 13 µg/L. The 13 µg/L MDEL is retained from the previous order.

**15. Revision to Page F-31:**

**E. Pretreatment and Biosolids Monitoring**

This Order specifies pretreatment and biosolids monitoring requirements to ensure compliance with pretreatment and biosolids regulations. The previous permit did not contain specific pretreatment and biosolids monitoring, but the Discharger continued to monitor biosolids anyway for the pretreatment and biosolids parameters consistent with the requirements ~~in this of the previous~~ Order.

**16. Revision to Page F-32:**

- c. Sanitary Sewer Overflows and Sewer System Management Plan.** This provision is to explain the Order's requirements as they relate to the Discharger's collection system, and to promote consistency with the State Water Board-adopted General Collection System WDRs (General Order, Order No. 2006-0003-DWQ).