

APPENDIX C

RESPONSE TO WRITTEN COMMENTS
on Tentative Order for
Delta Diablo Wastewater Treatment Plant
2500 Pittsburg-Antioch Highway, Antioch, Contra Costa County

The Regional Water Board received a written comment from Delta Diablo on a tentative order distributed in May 2014 for public comment. Delta Diablo's comment is summarized below in *italics*, followed by the Regional Water Board staff response. For the full content and context of her comments, refer to the comment letter.

This document also contains revisions to correct typographical errors. All revisions are shown with underline text for additions and strikethrough ~~text~~ for deletions.

Delta Diablo

Comment: *Delta Diablo requested that the water flea, Ceriodaphnia dubia, be allowed for chronic toxicity testing when the mussel, Mytilus galloprovincialis, is unavailable.*

Response: We agree and revised the tentative order as follows:

MRP section V.B.1.b.

- b. Test Species.** The test species shall be the mussel (*Mytilus galloprovincialis*) unless a more sensitive species is identified. *Ceriodaphnia dubia* may be used as an alternate species when *M. galloprovincialis* is unavailable.

Fact Sheet section IV.C.6.d.

- d. Screening Phase Study.** The MRP requires the Discharger to conduct a chronic toxicity screening phase study, as described in MRP Appendix E-1, prior to permit reissuance. The Discharger performed three rounds of chronic toxicity screening in 2013 and found toxicity in its effluent to the mussel *Mytilus galloprovincialis* and the water flea (*C. dubia*). *M. galloprovincialis* was ~~to be~~ the most sensitive species, but there are certain times of the year when *M. galloprovincialis* embryos and larvae are not available for testing. Under those circumstances, the Discharger may substitute *C. dubia* as the test species.

Typographical Corrections

In addition to making minor editorial and formatting changes, we made the following changes:

We corrected a typographical error in MRP section V.B.1.c.iv as follows:

- iv. If accelerated monitoring confirms consistent toxicity in excess of the trigger in ii, above, the Discharger shall continue accelerated monitoring and initiate toxicity reduction evaluation (TRE) procedures in accordance with ~~Fact Sheet~~ section V.B.3, below.

We corrected a typographical error for sample type and frequency in MRP Table E-4 as follows:

Table E-4. Pretreatment and Biosolids Monitoring

Constituents	Sampling Frequency			Sample Type	
	Influent INF-001 ^[1]	Effluent EFF-001 ^[1]	Biosolids BIO-001	Influent and Effluent	Biosolids
VOC ^[2]	1/5 Years	1/5 Years	1/5 Years	Grab	Grab ^[5b]
BNA ^[3]	1/5 Years	1/5 Years	1/5 Years	Grab	Grab ^[5b]
Metals ^[4]	1/Year	1/Month	1/Year	C-24 ^[5a]	Grab ^[5b]
Cyanide, Total	2/Year	1/Month	1/Year	Grab	Grab ^[5b]

Sample Type and Frequency:

- C-24 = 24 hour composite
- 1/Month = once per month
- 1/Year = once per year
- 2/Year = twice per year
- 1/5 Years = ~~four times per year~~ once every five years

We corrected a typographical error in MRP Section IX.3 as follows:

2. Unauthorized Discharges from Municipal Wastewater Treatment Plants

The following requirements apply to municipal wastewater treatment plants that experience an unauthorized discharge at their treatment facilities and supersede requirements imposed on the Discharger by the Executive Officer by letter of May 1, 2008.

a. Two (2)-Hour Notification

For any unauthorized discharges that enter a drainage channel or a surface water, the Discharger shall, as soon as possible, but not later than two (2) hours after becoming aware of the discharge, notify the California Emergency Management Agency Office of Emergency Services (CalEMA OES, currently 800-852-7550), the local health officers or directors of environmental health with jurisdiction over the affected water bodies, and the Regional Water Board. Timely notification by the Discharger to CalEMA OES also satisfies notification to the Regional Water Board. Notification shall include the following:

We revised Fact Sheet section II.A.3 to correct factual and typographical errors as follows:

- 3. **Wastewater Treatment.** The Discharger treats all of its influent (about 13.1 MGD) to secondary treatment standards. Treatment processes includes screening and grit removal, primary clarification, biological treatment using trickling towers or aeration basins (or both), secondary clarification, disinfection using sodium hypochlorite, and dechlorination using sodium bisulfate. Attachment C provides a flow schematic. About 6.3 MGD of

secondary-treated effluent after secondary clarification is routed to tertiary treatment units (flocculating clarifiers, sand filters, and chlorination and dechlorination) at a separate treatment facility.

We corrected a typographical error for Monitoring Data in Fact Sheet Table F-2 as follows:

Table F-2. Historic Effluent Limitations and Monitoring Data

Parameter	Units	Effluent Limitations					Monitoring Data (1/19/09– 11/30/13)
		Monthly Average	Weekly Average	Daily Maximum	Instantaneous Maximum	Instantaneous Minimum	Highest Daily Discharge
Biochemical Oxygen Demand, 5-day @ 20°C (BOD ₅)	mg/L	30	45	---	---	---	36 ^[1]
Total Suspended Solids (TSS)	mg/L	30	45	---	---	---	29 ^[1]
Oil and Grease	mg/L	10	---	20	---	---	<5
pH	standard units	---	---	---	9.0	6.0	6.8-7.7 ^[2]
Total Residual Chlorine	mg/L	---	---	---	0.0	---	0.0
Enterococcus	MPN/100 mL	35 ^[3]	---	---	---	---	48
Copper	µg/L	38	---	53	---	---	8.7
Selenium	µg/L	4.1	---	8.2	---	---	1.3
Cyanide	µg/L	18	---	45	---	---	5.7
Bromoform	µg/L	39	---	77	---	---	0.2
Chlorodibromomethane	µg/L	3.6	---	7.1	---	---	0.2
Bis(2-ethylhexyl)phthalate	µg/L	12	---	24	---	---	2.4
Methylene Chloride	µg/L	43	---	85	---	---	0.3
Dioxin-TEQ	µg/L	1.4x10 ⁻⁸	---	2.8x10 ⁻⁸	---	---	2.81.9x10 ⁻⁷⁸
Ammonia as N	mg/L as N	210	---	260	---	---	47