

California Regional Water Quality Control Board San Francisco Bay Region

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for
Dublin San Ramon Services District Wastewater Treatment Plant and collection system,
Pleasanton, Alameda County

The Regional Water Board received comments from the Alameda County Water District (ACWD) on a draft NPDES permit (Tentative Order) distributed for public comment on May 18, 2022. ACWD's comment letter addresses the Tentative Order and two other draft permits for the East Bay Dischargers Authority (EBDA) (refer to Item 5A) and the City of Livermore (refer to Item 5C). This response to written comments addresses ACWD's comments as they relate to this Tentative Order. The comments are summarized below in *italics* (paraphrased for brevity), followed by staff's response. For the full content and context of the comments, please refer to the comment letter. To request a copy of the letter, see the contact information provided in Attachment F, section 8.7, of the Tentative Order.

ACWD Comment 1

ACWD supports the Dublin San Ramon Services District's (DSRSD's) potential purified water pilot project because it is not expected to introduce any pollutants into Alameda Creek and the Niles Cone Groundwater Basin. ACWD acknowledges that additional evaluation of the project's effluent quality beyond the requirements proposed in the Tentative Order, along with other details of the pilot project, are still in discussion between ACWD, DSRSD, and other cooperating agencies.

Response

We acknowledge ACWD's support of DSRSD's purified water pilot project and willingness to work with other agencies to collect additional information as needed.

ACWD Comment 2a

ACWD notes that the DSRSD Wastewater Treatment Plant, the City of Livermore Water Reclamation Plant and wastewater pipeline, and the Livermore-Amador Valley Water Management Agency (LAVWMA) Pump Station are located within the Alameda Creek Watershed. Any planned or unplanned discharges from these facilities may have an adverse effect in Arroyo de la Laguna, a segment of the Alameda Creek Watershed that provides local water supply and conveys ACWD's water supply to recharge the Niles Cone Groundwater Basin. Therefore, DSRSD, the City of Livermore, LAVWMA, and EBDA should implement all necessary pollution prevention measures and prevent accidental spills.

Response

We agree. The Tentative Order would only permit (1) discharge to the LAVWMA Export and Storage Facilities, which is then conveyed to the East Bay Dischargers Authority's deepwater outfall seven miles offshore in Lower San Francisco Bay, and (2) purified

water discharge to Alamo Canal. It would prohibit other discharges, accidental or not. The DSRSD treatment plant maintains 22 million gallons of storage capacity in the event of an emergency and has a good compliance history. LAVWMA's Export and Storage Facilities also provide 18 million gallons of storage capacity. Nonetheless, the Tentative Order would require pollution prevention and spill prevention protocols. The Regional Standard Provisions, and Monitoring and Reporting Requirements (Attachment G) section 1.3.1 requires that DSRSD maintain a Contingency Plan to ensure that existing facilities remain in, or are rapidly returned to, compliance with the Tentative Order in the event of a process failure or emergency incident. Attachment G section 1.3.2 requires that DSRSD maintain a Spill Prevention Plan to prevent accidental discharges and to minimize the effects of any such discharges. Provisions 6.3.3 and 6.3.4 require DSRSD to continue to implement its Pollutant Minimization Program and Pretreatment Program to reduce or eliminate pollutants from entering the treatment plant.

LAVWMA is permitted to discharge secondary-treated and dechlorinated wastewater from its Export and Storage Facilities to Alamo Canal during extreme wet weather events under a separate NPDES permit (Order R2-2021-0007) when flow in Alamo Canal is high and the discharge receives ample dilution (complete mixing) and flushing. Order R2-2021-007 requires LAVWMA to maintain a Wet Weather Facilities Management Plan to minimize wet weather discharges to Alamo Canal, in addition to maintaining a Contingency Plan and Spill Prevention Plan.

ACWD Comment 2b

ACWD recommends that planned or unplanned discharges to Alamo Canal or Arroyo de la Laguna be analyzed for per- and polyfluoroalkyl substances (PFAS) and that the results be shared with ACWD. ACWD encourages the Regional Water Board to continue to support, initiate, and implement evaluation efforts regarding PFAS in the watershed, such as the San Francisco Estuary Institute's "Study of Per- and Polyfluoroalkyl Substances in Bay Area POTWs: Phase 2 Sampling and Analysis Plan," to regularly share such information, and continue coordinating with agencies impacted by PFAS contamination.

Response

The Tentative Order would not authorize discharge to Arroyo de la Laguna. It would only permit discharge to EBDA's deepwater outfall seven miles offshore in Lower San Francisco Bay and discharge to Alamo Canal. Because the Alamo Canal discharge would be purified, PFAS is not expected to be in the discharge. However, DSRSD may choose to monitor the purified water for PFAS and other contaminants of emerging concern independent of the Tentative Order.

The Water Board is working collaboratively with the Bay Area Clean Water Agencies and the San Francisco Estuary Institute to take a regionwide approach to PFAS monitoring. As described in the [October 2020 Executive Officer's Report](#), our strategy takes a science-based approach toward monitoring PFAS at representative municipal treatment plants rather than requiring PFAS monitoring for every municipal treatment plant in the region. Phase 1 of the San Francisco Estuary Institute's PFAS study

included sampling influent, effluent, and biosolids from the DSRSD Wastewater Treatment Plant. PFAS concentrations there were comparable to those at other treatment plants.

ACWD Comment 2c

ACWD requests that DSRSD set up a 24-hour rapid notification system (e.g., phone numbers and contact names) to immediately alert ACWD of water quality incidences upstream of ACWD facilities so ACWD can take action to prevent pollution of potable groundwater supplies.

Response

We did not change the Tentative Order because it already includes sufficient reporting requirements for chemical spills and unauthorized discharges. Standard Provisions (Attachment D) section 5.5 and Regional Standard Provisions, and Monitoring and Reporting Requirements (Attachment G) section 5.5 require that DSRSD report these types of discharges to the California Office of Emergency Services, which serves as a clearinghouse for unauthorized discharges or spills that could adversely affect the environment.

ACWD Comment 3

ACWD provided contacts for DSRSD to coordinate with ACWD during the CEQA process.

Response

We acknowledge ACWD's provided contacts and note that the Tentative Order is not subject to the provisions of CEQA.