

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

RESPONSE TO COMMENTS

ON THE REISSUANCE OF WASTE DISCHARGE REQUIREMENTS FOR:

Pacific Gas and Electric Company's
PG&E Shell Pond
Bay Point, Contra Costa County
NPDES Permit No. CA0030082

I. Pacific Gas & Electric Company's January 12, 2006 Comments and Response

II. Contra Costa Water District' January 20, 2006 Comments and Response

Note: The format of this staff response begins with a brief introduction of the party's comments, followed with staff's response. Interested persons should refer to the original letters to ascertain the full substance and context of each comment.

III. Minor Editorials

I. Pacific Gas & Electric Company's January 12, 2006 Comments and Response

Comment 1.

PG&E would like to thank staff of the California Regional Water Quality Control Board – San Francisco Bay Region (RWQCB), and in particular staff of the NPDES Division, for working cooperatively with PG&E, the Contra Costa Water District (CCWD) and other stakeholders in finalizing this TO. PG&E notes that the TO has required a significant investment of time and effort on the part of PG&E and RWQCB staff to reach consensus on most issues, but throughout this process PG&E believes that the spirit of cooperation has prevailed.

Response 1.

Comment acknowledged.

Comment 2.

PG&E does not discharge water or treated wastewater resulting from PG&E operations at the site. PG&E only circulates Suisun Bay water through the pond in an attempt to reduce pond salinity, with the ultimate objective of enhancing critical terrestrial and aquatic life habitat at the site. This objective is shared by the stakeholders, and RWQCB staff have provided a high level of support in attempting to expeditiously meet this objective.

Response 2.

Comment acknowledged.

Comment 3.

*Effluent Limitation and Discharge Specification IV.1.b of the Tentative Order (T.O.):
During the pond water circulation process (Suisun Bay water intake and pond water discharge), the pond acts as a "retention basin" whereby turbid influent settles before it is discharged. Background mercury in the influent is either dissolved or adsorbed to suspended particulate*

matter. When wind-driven or pond circulation turbulence results in upwelling of settled particulate matter, this background mercury could be discharged at concentrations greater than what is then being taken into the pond in the influent. This situation currently does not allow the application of intake water credits, and would therefore result in a false “violation” for which PG&E is not, and cannot, be held responsible.

Response 3.

To address this comment, we modified Effluent Limitation and Discharge Specification IV.1.b as follows (Changes are represented by strike-outs for deleted words and underlines for inserted words):

- 1) **Monitoring Requirements.** The Discharger will monitor the pollutant concentrations in the intake and in the effluent (at Monitoring Location M-001A) during the same discharge event; however, the intake sample must be obtained from influent monitoring location M-INF immediately before initiating a discharge at Discharge Point 001.
- 2) **Exception to Condition 1).** During effluent discharges that occur when intake water is not being pumped into the pond (e.g. to lower the pond level during the wet season), the Discharger ~~may use the pollutant concentration of the most recently obtained intake sample (obtained from Monitoring Location M-INF) to determine compliance for this specific effluent discharge.~~ The Discharger must still ~~may use the pollutant concentration of the most recently obtained intake sample (obtained from Monitoring Location M-INF) to determine compliance for this specific effluent discharge.~~ The Discharger must still will monitor the effluent discharge at Monitoring Location M-001A only.
- 3) **Compliance Evaluation.** Compliance shall be evaluated using a 12 sample moving average of the pollutant concentrations in the intake water samples monitored at location M-INF. If the effluent monitoring sample's' ~~(obtained as specified in condition 1) or 2) above)~~ ~~(obtained as specified in condition 1) or 2) above)~~ analytical results indicate that the pollutant concentration ~~in the effluent~~ in the effluent ~~is equal to~~ or less than ~~in the intake water~~ in the intake water ~~the 12 sample moving average~~ the 12 sample moving average at M-INF, then the concentration and mass based effluent limitations specified in IV.A.1.a of this Order are not applicable, and therefore, the discharge is in compliance. Otherwise, ~~if the pollutant concentration is greater in the effluent than in the intake water, the intake water credit not applicable and~~ ~~if the pollutant concentration is greater in the effluent than in the intake water,~~ ~~then~~ the effluent must comply with the effluent limitations specified in IV.A.1.a of this Order.

We believe that this change is more representative of the ambient background's pollutants concentration within the pond than the instantaneous intake water monitoring results. The following changes are consistent with Section 1.4.4 of the State Water Resources Control Board's *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California*.

Comment 4.

Monitoring and Reporting Program (MRP), Effluent Monitoring Requirements, IV.A.1, Salinity, of the T.O.: PG&E monitors other analytical parameters on a monthly basis and requests that RWQCB accordingly modify the Minimum Sampling Frequency for salinity to monthly.

Response 4.

To address this comment, we changed the monitoring frequency from “Discharge Event” to “monthly” in the MRP and Fact Sheet of the T.O.

Comment 5.

MRP, Reporting Requirements, X.B.3., Monitoring Period, Grab, of the T.O.: PG&E’s contracted technicians visit the site twice per week during a Discharge Event. PG&E therefore requests that RWQCB accordingly modify grab sampling to “Not less than twice per week”.

Response 5.

To address this comment, we changed the definition of “Grab” from “Not less than once per day” to “Not less than twice per week” in the MRP of the T.O.

II. Contra Costa Water District’ January 20, 2006 Comments and Response

Comment 1.

Contra Costa Water District would like to acknowledge the RWQCB staff for their efforts to work with all parties affected by this discharge. The PG&E Shell Pond is a unique case, and the individualized attention from RWQCB staff has assured CCWD that the beneficial uses of receiving waters are being fully protected in this case.

Response 1.

Comment acknowledged.

Comment 2.

Provision VI.C.7.b. Discharge Termination and Notification Requirements, of the T.O. Contra Costa Water District (CCWD) wishes to propose one change to the subject Tentative Order, to reduce the Pacific Gas and Electric reporting requirement to CCWD on the subject of Shell Pond discharges from monthly to annual.

Response 2.

We revised the T.O. as requested.

III. Minor Editorials

The following minor editorials were made to the Tentative Order:

- Removed “N/A” from subheading VI.A.7. Special Provision of the Table of Contents.

- Inserted “*average dry weather flow*” in the Facility Design Flow description in the table on pages 3 and F-3.
- Deleted “*pg/L*” and “*ppt*” from footnote [4] of the Effluent Limitations table on page 7.
- Corrected “*E-001*” to “*M-001*” in provision C.2.a. Effluent Monitoring, page 11.
- Removed “*immediately*” from the monitoring location table on page E-3.