

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT (Michael Chee)
MEETING DATE: March 9, 2011

ITEM **5A**

SUBJECT: **Updated Pretreatment Program Provisions for 28 Municipal Wastewater Dischargers; Counties of Alameda, Contra Costa, Solano, Sonoma, Napa, Marin, San Francisco, San Mateo, and Santa Clara - Amendment of NPDES Permits**

CHRONOLOGY: August 2001 - Board began adoption of revised pretreatment program provisions as part of reissuance of individual NPDES permits

DISCUSSION: The Revised Tentative Order (Appendix A) would amend 28 of this region's municipal wastewater discharge permits by replacing existing pretreatment program provisions with one up-to-date document as Attachment H of those permits. This amendment is necessary to clarify and streamline current pretreatment provisions, and to include new pretreatment requirements.

Pretreatment is when industrial or commercial (or "nondomestic") users of a sanitary sewer system treat their waste streams through such means as acid neutralization or metal precipitation before the streams are discharged to the sanitary sewer, when those waste streams could be dangerous or hard to treat at the municipal wastewater treatment plant. The pretreatment program is a federal program initiated in 1978 that applies to larger municipal wastewater dischargers with the goals of 1) ensuring the safety of wastewater treatment plants, and 2) controlling toxic pollutants closer to their source, and 3) improving opportunities to recycle and reclaim municipal wastewater and biosolids. The program is implemented through individual NPDES permits that require a municipal discharger to directly regulate its non-domestic users and require those users to reduce or remove toxic pollutants from their waste streams prior to discharge to the sanitary sewer. The pretreatment program has been immensely successful in this region with no catastrophic treatment plant failures and about a 60% reduction in metals discharges to the Bay. Bay Region dischargers have received 15 national awards recognizing pretreatment program excellence since USEPA's award program began in 1989.

The amendment contains revisions that would 1) automatically put in place any new federal pretreatment regulations after a reasonable time period, 2) establish criteria for a municipal discharger to request a reduction in pretreatment monitoring to eliminate unnecessary monitoring costs, 3) require the municipal discharger to submit only electronic files of pretreatment annual and semiannual reports to reduce paper use and mailing costs, 4) reduce

redundancy in reporting requirements, and 5) correct outdated references and revise formatting for clarity.

We received five comment letters (Appendix B). These are from the Bay Area Clean Water Agencies, U.S. EPA, San Francisco Baykeeper, and the cities of Sunnyvale and San Jose. As explained in our response to the comments (Appendix C), we made changes to address all comments, which were mainly clarifications. We expect this item to remain uncontested.

**RECOMMEN-
DATION:**

Adopt the Revised Tentative Order

APPENDICES:

- A. Revised Tentative Order
- B. Comments Received
- C. Response to Comments