ACWD
ALAMEDA COUNTY WATER DISTRICT

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CALIFORNIA REGIONAL WATER
JUN 08 2012
QUALITY CONTROL BOARD

June 7, 2012

Mr. Farhad Azimzadeh
California Regional Water Quality Control Board
San Francisco Bay Region
NPDES Wastewater Division
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear Mr. Azimzadeh:

Subject: Alameda County Water District Comments for Consideration of Tentative Order for General Waste Discharge Elimination System (NPDES) No. CAG912004

The Alameda County Water District (ACWD) reviewed the Tentative Order for General Waste Discharge Elimination System (NPDES) No. CAG912004 and would like to provide the following comments for consideration by the SF Regional Water Quality Control Board.

TENTATIVE ORDER REFERENCE	ACWD COMMENT(S)
The Tentative Order makes reference to "Aquifer Protection" wells.	ACWD requests that "Aquifer Protection" Wells be deleted and replaced with Aquifer Reclamation Program (ARP) Wells.
The Tentative Order makes reference to "Salinity Barrier Well".	ACWD no longer uses the term Salinity Barrier Wells. ACWD requests that "Salinity Barrier Wells" be deleted and replaced with Aquifer Reclamation Program (ARP) Wells.
Page 3 Section II. Findings: Letters B & C contain the same text.	Delete repeated text
On Page 13 Section V. Receiving Water Limitations 2.g. of the Tentative Order, "Nutrients" is a new addition.	The new tentative order references "*biostimulatory substances…*" ACWD discharges do not contain biostimulatory substances (i.e. nutrients) and, in fact, aid in the improvement of downstream water quality. Thus, this limitation should not apply to ACWD's discharges from E-14 or ARP Wells.

RECYCLED PAPER

TENTATIVE ORDER REFERENCE	ACWD COMMENT(S)
Page 16 Table 2 Trigger Pollutants: The Trigger for Cyanide (CN) is 1.0 µg/L	In a 2009 email correspondence with a member of the SFRWQCB ACWD was told that the CN trigger was 2.9 µg/L. ACWD requests that the Trigger in the Tentative Order be adjusted accordingly. Table 3-3C of the SF Basin Plan further substantiates this point (see attached copy of email & Table 3-3C).
Tables E-2 to E-4 Reporting Limits (RLs)	In May 2012, ACWD sent the SFRWQCB a letter requesting modification of RLs. ACWD requests that the SFRWQCB review the letter and consider ACWD's request for modification of RLs and amend the Tentative Order accordingly (see attached copy of letter).
Page F-6 reference is made to ACWD's discharges having total dissolved solids (TDS) levels below 4,400 mg/L	Historical data collected over the span of the current Order indicates that TDS levels from ACWD discharges is 5,000 mg/L and below.

Thank you for your consideration of our comments. Should you have any questions or need additional information, please feel free to contact myself at (510) 668-6510 or Greg Buncab at (510) 668-6531.

Sincerely,

Douglas G. Chun, P.E.
Water Quality & Regulatory Compliance Manager

dgc/gb
Attachments
By Federal Express
cc: File

"Gina Kathuria"
<GKathuria@waterboards.ca.gov>
02/04/2009 02:39 PM

To <Steve.Dennis@acwd.com>
cc <Marian.Gonzalez@acwd.com>
bcc
Subject Cyanide Issue with Permit Trigger Values re: NPDES CAG912004

Dear Steve,
I am sending this email to clarify how to comply with the CN trigger. The trigger has been changed per adoption of a new CN SSO for San Francisco Bay, the new CN trigger is 2.9 ppb.
The minimum reporting level for CN is 5.0, so anything reported below 5.0 ppb and is J qualified is considered a ND value by the Water Board. In other words, if you report a value between 2.9-4.9 and it is J flagged.. we would consider this to be a ND value.
So based on your email below, you would not be required to conduct accelerated monitoring for CN.

Thanks
Gina

Gina Kathuria, P.E.
Senior Water Resources Engineer
San Francisco Bay Water Board
1515 Clay Street, Suite 1400
Oakland, CA 94612
(510) 622-2378

>>> <Steve.Dennis@acwd.com> 2/4/2009 12:03 PM >>>
Good Morning Gina,

Thank you for your return call to me this morning regarding my question and concern relative to our recent laboratory results for cyanide coming in below the RL but above the listed trigger value in the above referenced permit.

Here is the background on the issue: The listed trigger value for cyanide in the permit is 1.0 ug/L. The Reporting Level (RL) for cyanide is 5.0 ug/L. Since we began coverage under this permit in the 3rd quarter of 2007, our cyanide results have been ND (below the lab's MDL of 2.2 ug/L using SM 4500-CN-C, E). In December of 2008, our contract lab (Montgomery Watson Harza - MWH) picked up a J Flag result of 2.5 ug/L after lowering their MDL to 1.0 ug/L at our request - because of the listed trigger value (we wanted to see if they could get down to the trigger value). The lab was using method EPA 335.4 for these analyses. The result of 2.5 ug/L obviously exceeded the trigger value but the result (lower than the RL) is DNQ (detected not quantified) - and, the method blank came in at 1.6 ug/L (still over the trigger) raising further questions on the confidence of the result. We resampled later in the month of December and ran a split sample to two labs (MWH and Test America). Each came back with J Flag results less than 5.0 ug/L and with hits of 1.5 ug/L and 2.9 mg/L in the method blanks. Lastly, another sample was taken on January 14, 2009 and the results just came in at 2.8 ug/L with the method blank coming in at 2.3 ug/L.

My concern is that if I follow the conditions for accelerated sampling in

the event of a trigger exceedance, I would have to collect an additional 3 samples in this quarter as well as upstream and downstream samples with each additional effluent sample. Presumably, the results could very well come in at J flag levels still exceeding the trigger of 1.0 ug/L but under the RL as the above samples have shown. This could take me down the road to a feasibility study and ultimately a press for a decision by the EO (see page 16 of the permit). We believe these results are artifacts of the analyses whereby the lab is trying to get too low in their detection limits- thus, all the results are questionable.

If at all possible, I would like to avoid the potential costs involved (labor and analytical expenses) of initiating an accelerated monitoring program based on DNQ data which will likely lead only to more DNQ data and further questions that can't be validated by the analytical results. To this end, I would like to request that the RWQCB recognize this issue as one which does not require accelerated monitoring but could instead be noted and qualified in the footnotes of our regular reports. Accordingly, further analysis would be warranted in the event our cyanide analyses exceed the RL of 5.0 ug/L in the future.

I thank you for your time on the phone today and your time to respond to the this issue. I apologize for the length of this email but I wanted to be sure you had all the information.

Thanks!

Steve
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Steve Dennis
Environmental Compliance Officer /
Emergency Services Supervisor
Alameda County Water District
43885 South Grimmer Boulevard
P.O. Box 5110
Fremont, California 94537
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Table 3-3C: Marine [a] Water Quality Objectives for Cyanide in San Francisco Bay [b] (values in ug/l)		
Cyanide	Chronic Objective (4-day Average)	2.9
Cyanide	Acute Objective (1-hour Average)	9.4

Notes:

a. Marine waters are those in which the salinity is equal to or greater than 10 parts per thousand 95% of the time, as set forth in Chapter 4 of the Basin Plan. For waters in which the salinity is between 1 and 10 parts per thousand, the applicable objectives are the more stringent of the freshwater or marine objectives.

b. Objectives apply to all segments of San Francisco Bay, including Sacramento/San Joaquin River Delta (within San Francisco Bay region), Suisun Bay, Carquinez Strait, San Pablo Bay, Central San Francisco Bay, Lower San Francisco Bay, and South San Francisco Bay.

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May 4, 2012

Farhad Azimzadeh
San Francisco Bay Region
California Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear Mr. Azimzadeh:

Subject: Request for Modified Reporting Limits in New Order No. R2-2007-0033, NPDES Permit No. CAG912004

The Alameda County Water District (ACWD) is covered under Order No. R2-2007-0033, NPDES Permit No. CAG912004 for discharge of extracted brackish groundwater and reverse osmosis concentrate. The current permit is due to expire on July 1, 2012. ACWD previously submitted a Notice of Intent for continued coverage under a re-issued permit. Reporting Limits (RLs) for specific metals stipulated in Tables E.3 and E.4 of the current permit exceed the low-level detection capability of the prime contract laboratory engaged by ACWD, necessitating out-sourcing to a sub-contract research laboratory. From past experience, the results obtained in this manner have been inconsistent due to quality assurance/quality control challenges. This concern, combined with the additional turnaround time and cost involved, prompts ACWD to request modification of current RLs, and associated specification of applicable analytical methods, as highlighted in the attached Table 1.

The proposed modifications to the RLs and approved methods will provide a minimum savings to ACWD of $1650/year while retaining the ability to detect low level concentrations approaching (or exceeding) applicable threshold limits. More importantly, the changes will enable us to have increased confidence in the sample results so that corrective action can be taken more quickly whenever a possible threat to the environment is indicated.

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ACWD requests incorporation of the proposed requirements shown in Table 1 in the new NPDES Discharge Permit for Newark Desalination Facility and ARP Wells. Should you have any questions or need additional information, please feel free to contact myself at (510) 668-6510 or Greg Buncab at (510) 668-6531.

Sincerely,

Douglas G. Chun, P.E.
Water Quality & Regulatory Compliance Manager

dgc/gb
By USPS
cc: File

Table1. Existing and Proposed Analytical Methods for Metal Contaminants

Compound	Trigger, µg/L	Existing		Proposed	
		RL, µg/L	Test Method	RL, µg/L	Test Method
Antimony Total	4300	0.5	EPA Method 204.2	0.5	EPA Method 1640
Arsenic Total	36	2	EPA Method 206.3	2	EPA Method 1640
Beryllium		0.5	EPA Methods using GFAA or ICPMS Techniques	1	EPA Method 1640
Cadmium Total	2.2	0.25	EPA Methods using GFAA or ICPMS Techniques	0.25	EPA Method 1640
Chromium Total	11	0.5	Standard Method (SM) 3500	1	EPA Method 1640, for Total, 218.7 for Hexavalent Chromium (dissolved) if triggered
Copper Total	3.1	0.5	EPA Method 200.9	1.5	EPA Method 1640
Cyanide Total	2.9	1.5	SM 4500-CN-C or I	1.5	SM 4500-CN-C & E
Lead Total	2.5	0.5	EPA Method 200.9	1.5	EPA Method 1640
Mercury Total	0.025	0.002	EPA Method 1631	0.002	EPA 1631
Nickel Total	8.2	1	EPA Method 249.2	1	EPA Method 1640
Selenium Total	5.0	2.0	SM 3114B or C	2.0	EPA Method 1640
Silver Total	1.9	0.25	EPA Method 272.2	0.25	EPA Method 1640
Thallium Total	6.3	1	EPA Method 279.2	1	EPA Method 1640
Zinc Total	81	1	EPA Method 200 or 289	5	EPA Method 1640