Appendix C

Response to Comments

California Regional Water Quality Control Board
San Francisco Bay Region

RESPONSE TO WRITTEN COMMENTS
On August 2012 Tentative Order for
Sewer Authority Mid-Coastside, San Mateo County

The Regional Water Board received written comments from the Sewer Authority Mid-Coastside (Discharger) and the Monterey Bay National Marine Sanctuary (Sanctuary) on a tentative order distributed for public comment. This response to those comments summarizes each comment in *italics* (paraphrased for brevity) and follows with a staff response. Revisions are shown in ~~strikeout~~ for deletions and underline for additions. For the full content and context of each comment, refer to the comment letter.

Sewer Authority Mid-Coastside

Discharger Comment on Dilution Ratio
The Discharger is concerned that the minimum initial dilution has been reduced from 119:1 to 79:1. The Discharger requests that the Tentative Order retain the historic 119:1 dilution ratio and adjust the effluent limits accordingly. *The Discharger contends that assuming no ocean current at the diffuser, which is the basis for the 79:1dilution factor, is an unnecessarily conservative interpretation of the Ocean Plan. By evaluating 44,915 data near the outfall, the Discharger asserts that there was never an instance when no ocean current was encountered and that moderate to significant currents are present the majority of the time. It further argues that the outfall achieves at least 550:1 dilution based on the lower 10^{th} percentile of the observed ocean current speeds (11.5 cm/sec).*

The Discharger recognizes that Ocean Plan Section III.C.4.d requires that dilution estimates be based on the assumption that no currents of sufficient strength to influence the initial dilution process flow across the discharge structure. However, it cites Ocean Plan Section III.C.4.e as allowing alternative methods of calculating the initial dilution ratio. It refers to the recently adopted North San Mateo County Sanitation District permit (Order No. R2-2012-0013) as an example. Accordingly, the Discharger requests that the historic 119:1 dilution ratio be maintained to avoid reducing its effluent limits by about 34%.

Response to Discharger Comment on Dilution Ratio
We disagree. The Discharger's most recent dilution study did not confirm the validity of the dilution ratio used in the previous order (119:1). Instead, it concluded that, based on the outfall diffuser's current configuration and the assumption that no currents flow across the discharge structure, the dilution ratio should be 79:1. This value is consistent with Ocean Plan section III.C.4.d, which defines "minimum initial dilution" as follows:

> For the purpose of this Plan, minimum initial dilution [Dm] is the lowest average initial dilution within any single month of the year. Dilution estimates shall be based on observed waste flow characteristics, observed receiving water density structure, and the assumption that no currents, of sufficient strength to influence the initial dilution process, flow across the discharge structure.

Ocean Plan section III.C.4.e states:

> The Executive Director of the [State Water Board] shall identify standard dilution models for use in determining Dm, and shall assist the Regional Board in evaluating Dm for specific waste discharges. Dischargers may propose alternative methods of calculating Dm, and the Regional Board may accept such methods upon verification of its accuracy and applicability.

We interpret section III.C.4.e to authorize the Regional Water Board to accept alternative dilution models in addition to any standard dilution models the State Water Board identifies. We do not interpret this section to grant the Regional Water Board broad authority to accept alternative definitions for "minimum initial dilution" that differ greatly from the definition set forth in Ocean Plan section III.C.4.d.

Nevertheless, we recognize that ocean currents always exist at the outfall. We believe a conservative estimate of minimum initial dilution is appropriate, particularly when implementing water quality objectives expressed as daily or instantaneous maxima. However, for water quality objectives expressed as six-month medians, we believe a less conservative assumption is in order. For this reason, we used 79:1 (based on no current) to implement the Ocean Plan's daily and instantaneous maxima water quality objectives, and we used 180:1 (based on a current of 10 centimeters per second, the lowest average current measured from June through October 1976) to implement the Ocean Plan's six-month median water quality objectives. We cited Ocean Plan section III.C.4.e as our basis for this adjustment.

We recently took a slightly different approach with the North San Mateo County Sanitary District. In that case, we applied the same dilution assumption to all water quality objectives, regardless of their timeframes. We believe our approach here is better because we applied Ocean Plan section III.C.4.e more selectively only to the six-month median water quality objectives, and we are therefore more consistent with the intent of Ocean Plan section III.C.4.d. We note that the Discharger will have no difficulty complying with the slightly more stringent chlorine and toxicity limits. The Regional Water Board may also revise these limits with the next permit reissuance if the Discharger provides justification consistent with the Ocean Plan and anti-backsliding and antidegradation requirements.

Discharger Minor Comment 1
The Discharger requests that the turbidity monitoring frequency be reduced to quarterly. *The Discharger argues that, since there is no effluent limit, frequent monitoring is not required for compliance evaluation purposes.*

Response to Discharger Minor Comment 1
We agree. We removed monitoring requirements for turbidity and also settleable solids. We also reduced the monitoring frequency to once a quarter for temperature, dissolved oxygen, and sulfides.

The revised Table E-3 and Table F-8 are shown below:

Table E-3. Effluent Monitoring

Parameter	Units[(1)]	Sample Type [(2)]	Minimum Sampling Frequency
Flow[(3)]	MGD	Continuous	Continuous
BOD_5	mg/L	C-24	1/Week
TSS	mg/L	C-24	2/Week

Parameter	Units[1]	Sample Type [2]	Minimum Sampling Frequency
BOD_5 and TSS % Removal[4]	%	Calculate	1/Month
pH	pH units	Grab	1/Day
Oil & Grease [5]	mg/L	Grabs	1/Quarter
~~Settleable Solids~~	~~mg/L~~	~~C 24~~	~~1/Quarter~~
~~Turbidity~~	~~mg/L~~	~~C 24~~	~~1/Day~~
Temperature	°C	Grab	~~1/Day~~ 1/Quarter
Dissolved Oxygen	mg/L, % saturation	Grab	~~1/Day~~ 1/Quarter
Sulfides (if DO < 5.0 mg/L) Total and Dissolved[6]	mg/L	Grab	~~1/Day~~ 1/Quarter
Total Chlorine Residual[7]	mg/L	Continuous	1/Hour
Ammonia as Nitrogen	mg/L	C-24	2/Month
Enterococcus[8]	MPN/100 mL	Grab	1/Week
Acute Toxicity[9]	% survival	Flow Through	1/Quarter
Chronic Toxicity[10]	TU_c	C-24	1/Year
All Other Table B Parameters[11]	---	---	1/Year

(1) Unit Abbreviations:

MGD = million gallons per day
mg/L = milligrams per liter
µg/L = micrograms per liter
~~NTU = Nephelometric Turbidity Units~~
% Saturation = percent saturation of dissolved oxygen in water
MPN/100 mL = Most Probable Number per 100 milliliters
°C = degree Celsius

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Table F-8. Monitoring Requirements Summary

Parameter	Influent INF-001	Effluent EFF-001, EFF-001b, or EFF-002	Sludge and Biosolids	Receiving Water
Flow	Continuous	Continuous		
BOD_5	1/Week	1/Week		
Total Suspended Solids (TSS)	2/Week	2/Week		
BOD_5 and TSS % Removal		1/Month		
pH		1/Day		1/Year
Oil and Grease		1/Quarter		
~~Settleable Solids~~		~~1/Quarter~~		
~~Turbidity~~		~~1/Day~~		
Temperature		~~1/Day~~ 1/Quarter		1/Year
Dissolved Oxygen		~~1/Day~~ 1/Quarter		1/Year
Sulfides (if DO < 5.0 mg/L) Total and Dissolved		~~1/Day~~ 1/Quarter		
Salinity				1/Year
Standard Observations				1/Year (Attachment G,

				section III.C.1)
Chlorine, Total Residual		1/Hour		
Total Ammonia as Nitrogen		2/Month		1/Year
Enterococcus		1Week		
Total Coliform				1/Year
Fecal Coliform				1/Year
Acute Toxicity		1/Quarter		
Chronic Toxicity		1/Year		
All Other Table B pollutants		1/Year		
Metric tons/year			See Attachment G section III.B.1	
Paint filter test			See Attachment G section III.B.2	

Discharger Minor Comment 2
The Discharger requests that language regarding chronic toxicity screening be retained. *The Discharger points out that this wording from the previous order clarifies the conditions under which a screening study can be terminated early.*

Response to Discharger Minor Comment 2
We agree. We revised Monitoring and Reporting Program section V.B.1.d as shown below:

d. Rescreening. The Discharger shall conduct a screening chronic toxicity test as described in Appendix E-1 following any significant change in the nature of the effluent and at least 180 days prior to application for permit reissuance. The Discharger shall conduct screening tests with a minimum of three test species, if possible including a vertebrate, an invertebrate, and an aquatic plant, for the first three suites of tests. If the first suite of re-screening tests demonstrates that the same species is the most sensitive then re-screening does not need to include more than one suite of tests. If a different species is the most sensitive or if there is ambiguity, then the Discharger shall proceed with suites of screening tests for a minimum of three, but not to exceed five suites. After the screening period, monitoring shall be conducted using the most sensitive species.

Discharger Minor Comment 3
The Discharger requests replacing language in Monitoring and Reporting Program Appendix E-1 with the text similar to that in the San Francisco Oceanside Permit (Order No. R2-2009-0062). *Monitoring and Reporting Program Appendix E-1, Section II.B.5, specifies the chronic toxicity screening study dilution series as 100%, 85%, 70%, 50%, 25%, and 0 %. The San Francisco permit specifies,"Dilution series should include the IWC, and four concentrations that bracket the IWC, or other concentrations approved by the Executive Officer."*

Response to Discharger Minor Comment 3
We agree. This revision is appropriate given the significant dilution that occurs at the outfall. We revised Monitoring and Reporting Program Appendix E-1, section II.B.5 as shown below.

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5. Dilution series ~~of 100%, 85%, 70%, 50%, 25%, and 0 %, where "%" is percent effluent as discharged, or as otherwise approved by the Executive Officer~~ should include the Instream

Waste Concentration (IWC), and four concentrations that bracket the IWC, or other concentrations approved by the Executive Officer.

For clarity, we also revised Monitoring and Reporting Program Section V.B.1.f as shown below:

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f. Dilution Series. The Discharger shall conduct tests with a control and five effluent concentrations of 0.32%, 0.63%, 1.3%, 2.6%, and 5.2%, <u>in which 1.3% is the Instream Waste Concentration (IWC), calculated as the inverse of the dilution factor, with the other four concentrations, 0.32%, 0.63%, 2.6%, and 5.2%, bracket the IWC</u>.

Discharger Minor Comment 4

The Discharger requests that all censored results in Fact Sheet Table F-7 be calculated using dilution.

The Discharger notes that step 4 of the Ocean Plan Appendix VI reasonable potential analysis procedure calls for adjusting all effluent monitoring data, including censored values (e.g., "not detected" (ND) or "detected but not quantified" (DNQ)), to the concentration expected after complete mixing (i.e., dilution). The Discharger notes that this adjustment is used in the recently adopted ocean discharge permit, North San Mateo County Sanitation District (R2-2012-0013).

Response to Discharger Minor Comment 4

We agree. We revised Table F-7 as requested. In addition, we revised Monitoring and Reporting Program section VII.D to clarify expectations related to minimum levels (MLs).

The revised Table F-7 is shown below:

Table F-7. Reasonable Potential Analysis

Table B Pollutant	WQO (µg/L)[1][a,b,c,e,f]	No. of Samples	No. of Non-Detects ~~or DNQs~~	Max Effluent Conc. (µg/L)[1][a]	Max Expected Conc. After mixing (µg/L)[1][a,c,e,f]	Projected 95th percentile (µg/L)[1][a,d]	RPA Result, Comment
Objectives for Protection of Marine Aquatic Life)[1][b,c]							
Arsenic	8/32/80	6	2	1.9	3.0/3.0/3.0	3.0/3.0/3.0	Endpoint 2 – No Reasonable Potential, 95th percentile less than respective WQO
Cadmium	1/4/10	6	6	<10	~~<10~~ <u><0.055/<0.13 / <0.13</u>	--	Endpoint 3 – RPA is Inconclusive, less than 3 detects or greater than 80% ND or DNQ
Chromium (VI)	2/8/20	6	6	<10	~~<10~~ <u><0.055/<0.13 / <0.13</u>	--	Endpoint 3 – RPA is Inconclusive
Copper	3/12/30	6	1	22	2.1/2.3/2.3	2.2/2.4/2.4	Endpoint 2 – No Reasonable Potential, 95th percentile less than respective WQO
Lead	2/8/20	6	4	0.3	0.0017/ 0.0038/0.0038	--	Endpoint 3 – RPA is Inconclusive
Mercury	0.04/0.16/0.4	6	5	0.022	0.00062/0.00077/ 0.00077	--	Endpoint 3 – RPA is Inconclusive
Nickel	5/20/50	6	2	5.5	0.030/0.069/ 0.069	0.048/0.11/ 0.11	Endpoint 2 – No Reasonable Potential, 95th percentile less than respective WQO
Selenium	15/60/150	6	5	1.2	0.0066/ 0.015/0.015	--	Endpoint 3 – RPA is Inconclusive
Silver	0.7/2.8/7	6	5	0.14	0.16/0.16/0.16	--	Endpoint 3 – RPA is Inconclusive

Table B Pollutant	WQO (µg/L)[1][a,b,c,e,f]	No. of Samples	No. of Non-Detects ~~or DNQs~~	Max Effluent Conc. (µg/L)[1][a]	Max Expected Conc. After mixing (µg/L)[1][a,c,e,f]	Projected 95th percentile (µg/L)[1][a,d]	RPA Result, Comment
Zinc	20/80/200	6	0	91	8.5/9.0/9.0	8.8/9.7/9.7	Endpoint 2 – No Reasonable Potential, 95th percentile less than respective WQO
Cyanide	1/4/10	6	5	60	0.33/0.75/0.75	--	Endpoint 3 – RPA is Inconclusive
Total Chlorine Residual	2/8/60	1553	1544	1270	7.0/16/16	---	Max expected conc. > respective WQO, Endpoint 1— An effluent limitation must be developed for the pollutant.
Ammonia (as N)	600/2400/6000	71	0	68100	380/850/850	420/960/ 960	Endpoint 2 – No Reasonable Potential, 95th percentile less than respective WQO
Acute Toxicity[1][e]	0.3 TUa	20	10	0.69 TUa	0.078 TUa	---	Endpoint 1—Best Professional Judgment (see Fact Sheet Section IV.C.6)
Chronic Toxicity[1][e]	1 TUc	5	0	29.4 TUc	0.37 TUc	0.42 TUc	Endpoint 1—Best Professional Judgment (see Fact Sheet Section IV.C.6)
Phenolic Compounds (non-chlorinated)[2]	30/120/300	6	6	<330	~~<330~~ <1.8/<4.1/<4.1	--	Endpoint 3 – RPA is Inconclusive
Chlorinated Phenolics[3]	1/4/10	6	6	<140	~~<140~~ <0.77/<1.8/ <1.8	--	Endpoint 3 – RPA is Inconclusive
Endosulfan[4]	0.009/0.018/0.027	6	6	<0.5	~~<0.5~~ <0.0028/<0.0063/ <0.0063	--	Endpoint 3 – RPA is Inconclusive
Endrin	0.002/0.004/0.006	6	6	<0.1	~~<0.1~~ <0.00055/<0.0013 /<0.0013	--	Endpoint 3 – RPA is Inconclusive
HCH[5]	0.004/0.008/0.012	6	6	<0.5	~~<0.5~~ <0.0028/<0.0063/ <0.0063	--	Endpoint 3 – RPA is Inconclusive
Objectives for Protection of Human Health – Noncarcinogens)[1][f]							
Acrolein	220.	6	6	<25	~~<25~~ <0.31	---	Endpoint 3 – RPA is Inconclusive
Antimony	1,200.	6	6	<6	~~<6~~ <0.075	---	Endpoint 3 – RPA is Inconclusive
Bis(2-Chloroethoxy) Methane	4.4	6	6	<25	~~<25~~ <0.31	---	Endpoint 3 – RPA is Inconclusive
Bis(2-Chloroisopropyl)Ether	1,200.	6	6	<10	~~<10~~ <0.13	---	Endpoint 3 – RPA is Inconclusive
Chlorobenzene	570.	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
Chromium (III)	190,000.	3	1	510	6.4	---	Endpoint 3 – RPA is Inconclusive
Di-n-Butyl Phthalate	3,500.	6	6	<25	~~<25~~ <0.31	---	Endpoint 3 – RPA is Inconclusive
Dichlorobenzenes[6]	5,100.	6	6	<5	~~<5~~ <0.063	---	Endpoint 3 – RPA is Inconclusive
Diethyl Phthalate	33,000.	6	6	<10	~~<10~~ <0.13	---	Endpoint 3 – RPA is Inconclusive
Dimethyl Phthalate	820,000.	6	6	<10	~~<10~~ <0.13	---	Endpoint 3 – RPA is Inconclusive
2-Methyl-4,6-Dinitrophenol	220.	6	6	<25	~~<25~~ <0.31	---	Endpoint 3 – RPA is Inconclusive
2,4-Dinitrophenol	4.0	7	7	<25	~~<25~~ <0.31	---	Endpoint 3 – RPA is Inconclusive
Ethylbenzene	4,100.	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
Fluoranthene	15.	6	6	<5	~~<5~~	---	Endpoint 3 – RPA is

Table B Pollutant	WQO (µg/L)[1][a,b,c,e,f]	No. of Samples	No. of Non-Detects ~~or DNQs~~	Max Effluent Conc. (µg/L)[1][a]	Max Expected Conc. After mixing (µg/L)[1][a,c,e,f]	Projected 95th percentile (µg/L)[1][a,d]	RPA Result, Comment
					~~<0.063~~ <0.063		Inconclusive
Hexachlorocyclopentadiene	58.	10	10	<25	~~<25~~ <0.31	---	Endpoint 3 – RPA is Inconclusive
Nitrobenzene	4.9	6	6	<5	~~<5~~ <0.063	---	Endpoint 3 – RPA is Inconclusive
Thallium	2.	6	6	<1	~~<1~~ <0.013	---	Endpoint 3 – RPA is Inconclusive
Toluene	85,000	6	3	1.3	0.0016	0.033	Endpoint 2 – No Reasonable Potential, 95th percentile less than WQO
Tributyltin	0.0014	5	3	0.0032	4.0 E-5	---	Endpoint 3 – RPA is Inconclusive
1,1,1-Trichloroethane	540,000	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
Objectives for Protection of Human Health – Carcinogens[1][f]							
Acrylonitrile	0.10	6	6	<10	~~<10~~ <0.13	---	Endpoint 3 – RPA is Inconclusive
Aldrin	2.2 E-5	6	6	<0.1	~~<0.1~~ <0.0013	---	Endpoint 3 – RPA is Inconclusive
Benzene	5.9	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
Benzidine	6.9 E-5	6	6	<25	~~<25~~ <0.31	---	Endpoint 3 – RPA is Inconclusive
Beryllium	0.033	6	6	<1	~~<1~~ <0.013	---	Endpoint 3 – RPA is Inconclusive
Bis(2-Chloroethyl)Ether	0.045	6	6	<5	~~<5~~ <0.063	---	Endpoint 3 – RPA is Inconclusive
Bis(2-Ethylhexyl)Phthalate	3.5	6	4	22	0.28	--	Endpoint 3 – RPA is Inconclusive
Carbon Tetrachloride	0.90	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
Chlordane[7]	2.3 E-5	8	8	<0.5	~~<0.5~~ <0.0063	---	Endpoint 3 – RPA is Inconclusive
Chlorodibromomethane	8.6	6	6	<2	~~<2~~ <0.025	---	Endpoint 3 – RPA is Inconclusive
Chloroform	130	6	0	6.1	0.076	0.17	Endpoint 2 – No Reasonable Potential, 95th percentile less than WQO
DDT[8]	1.7 E-4	6	6	<0.4	~~<0.4~~ <0.005	---	Endpoint 3 – RPA is Inconclusive
1,4 Dichlorobenzene	18.	6	6	<10	~~<10~~ <0.13	---	Endpoint 3 – RPA is Inconclusive
3,3'-Dichlorobenzidine	8.1 E-3	6	6	<25	~~<25~~ <0.31	---	Endpoint 3 – RPA is Inconclusive
1,2-Dichloroethane	28.	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
1,1-Dichloroethylene	0.9	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
Dichlorobromomethane	6.2	6	6	<2	~~<2~~ <0.025	---	Endpoint 3 – RPA is Inconclusive
Dichloromethane	450.	6	6	<5	~~<5~~ <0.063	---	Endpoint 3 – RPA is Inconclusive
1,3-Dichloropropylene	8.9	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
Dieldrin	4.0 E-5	6	6	<0.1	~~<0.1~~ <0.0013	---	Endpoint 3 – RPA is Inconclusive
2,4-Dinitrotoluene	2.6	6	6	<25	~~<25~~ <0.31	---	Endpoint 3 – RPA is Inconclusive
1,2-Diphenylhydrazine	0.16	6	6	<0.5	~~<0.5~~ <0.0063	---	Endpoint 3 – RPA is Inconclusive

Table B Pollutant	WQO (µg/L)[(1)[a,b,c,e,f]]	No. of Samples	No. of Non-Detects ~~or DNQs~~	Max Effluent Conc. (µg/L)[(1)[a]]	Max Expected Conc. After mixing (µg/L)[(1)([a,c,e,f]]	Projected 95th percentile (µg/L)[(1)[a,d]]	RPA Result, Comment
Halomethanes[(9)]	130	6	6	<10	~~<10~~ <0.13	---	Endpoint 3 – RPA is Inconclusive
Heptachlor	5 E-5	6	6	<0.2	~~<0.2~~ <0.0025	---	Endpoint 3 – RPA is Inconclusive
Heptachlor Epoxide	2 E-5	6	6	<0.2	~~<0.2~~ <0.0025	---	Endpoint 3 – RPA is Inconclusive
Hexachlorobenzene	2.1 E-4	6	6	<5	~~<5~~ <0.063	---	Endpoint 3 – RPA is Inconclusive
Hexachlorobutadiene	14	6	6	<5	~~<5~~ <0.063	---	Endpoint 3 – RPA is Inconclusive
Hexachloroethane	2.5	6	6	<5	~~<5~~ <0.063	---	Endpoint 3 – RPA is Inconclusive
Isophorone	730.	6	6	<5	~~<5~~ <0.063	---	Endpoint 3 – RPA is Inconclusive
N-Nitrosodimethylamine	7.3	6	6	<25	~~<25~~ <0.31	---	Endpoint 3 – RPA is Inconclusive
N-Nitrosodi-n-Propylamine	0.38	6	6	<25	~~<25~~ <0.31	---	Endpoint 3 – RPA is Inconclusive
N-Nitrosodiphenylamine	2.5	6	6	<5	~~<5~~ <0.063	---	Endpoint 3 – RPA is Inconclusive
PAHs[(10)]	8.8 E-3	7	7	<600	~~<600~~ <7.5	---	Endpoint 3 – RPA is Inconclusive
PCBs	1.9E-5	6	6	<8.8	~~<8.8~~ <0.11	---	Endpoint 3 – RPA is Inconclusive
TCDD Equivalents[(11)]	3.9 E-9	5	5	< MLs[(11)]	< MLs[(11)]	--	Endpoint 3 – RPA is Inconclusive
1,1,2,2-Tetrachloroethane	2.3	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
Tetrachloroethylene	2.0	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
Toxaphene	2.1 E-4	6	6	<5	~~<5~~ <0.063	---	Endpoint 3 – RPA is Inconclusive
Trichloroethylene	27.	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
1,1,2-Trichloroethane	9.4	6	6	<2.5	~~<2.5~~ <0.031	---	Endpoint 3 – RPA is Inconclusive
2,4,6-Trichlorophenol	0.29	7	6	0.92	0.012	---	Endpoint 3 – RPA is Inconclusive
Vinyl Chloride	36.	6	6	<5	~~<5~~ <0.063	---	Endpoint 3 – RPA is Inconclusive

Footnotes:

[(1)[a]] Units are µg/L unless otherwise noted.

[b] For marine aquatic life protection, the WQOs for 6-month median, daily maximum, and instantaneous maximum are separated by "/" and expressed as 6-month median/daily maximum/instantaneous maximum. The dilution ratio of 180:1 is used in 6-month median RPA; the dilution of 79:1 is used for daily maximum and instantaneous maximum RPA.

[c] For marine aquatic life protection, the maximum expected concentrations after mixing (X) is calculated using the formula X = (Ce + DmCs)/(Dm + 1), where Ce is the effluent concentration, Dm is the dilution, and Cs is the background seawater concentration. For RPA purposes, this formula is used to adjust all effluent monitoring data, including censored (ND or DNQ) values, to the concentration X expected after complete mixing. As described above, the maximum expected concentrations after mixing are expressed as 6-month median/daily maximum/instantaneous maximum. The dilution ratio of 180:1 and 79:1 are used in the concentration calculation for 6-month median and daily or instantaneous maximum, respectively.

[d] For marine aquatic life protection, the projected 95th percentiles, as described above, are expressed as 6-month median/daily maximum/instantaneous maximum. The dilution ratio of 180:1 and 79:1 are used in the calculation for 6-month median and daily or instantaneous maximum, respectively.

[e] For marine aquatic life protection, acute and chronic toxicity WQOs are based on the daily maximum. The maximum expected acute or chronic toxicity after mixing are calculated using the dilution factor of 79:1.

[f] For human health protection, the WQOs are based on 30-Day average. The RPA and the maximum expected concentration after mixing are calculated using the dilution factor of 79:1.

(2) Non-chlorinated phenolics is the sum of 2,4-dimethylphenol, 4,6-dinitro-2-methylphenol, 2,4-dinitrophenol, 2-methylphenol, 4-methylphenol, 2-nitrophenol, 4-nitrophenol, and phenol.

(3) Chlorinated phenolics is the sum of 4-chloro-3-methylphenol, 2-chlorophenol, pentachlorophenol, 2,4,5-trichlorophenol, and 2,4,6-trichlorophenol.

(4) Endosulfan is the sum of alpha-endosulfan, beta-endosulfan, and endosulfan sulfate.

(5) HCH is the sum of the alpha, beta, and gamma lindane and the delta isomers of hexachlorocyclohexane.

(6) Dichlorobenzenes is the sum of 1,2-dichlorobenzene and 1,3-dichlorobenzene.

(7) Chlordane is the sum of chlordane-alpha, chlordane-gamma, chlordene-alpha, chlordene-gamma, nonachlor-alpha, nonachlor-gamma, and oxychlordane.

(8) DDT is the sum of 4,4'DDT, 2,4'DDT, 4,4'DDE, 2,4'DDE, 4,4'DDD, and 2,4'DDD.

(9) Halomethanes is the sum of bromoform, bromomethane (methyl bromide), and chloromethane (methyl chloride).

(10) PAHs (polynuclear aromatic hydrocarbons) is the sum of acenaphthylene, anthracene, 1,2-benzanthracene, 3,4-benzofluoranthene, benzo[k]fluoranthene, 1,12-benzoperylene, benzo[a]pyrene, chrysene, dibenzo[ah]anthracene, fluorene, indeno[1,2,3-cd]pyrene, phenanthrene, and pyrene.

(11) TCDD Equivalents is the sum of the chlorinated dibenzodioxins (2,3,7,8-CDDs) and chlorinated dibenzofurans (2,3,4,8-CDFs) multiplied by their respective toxicity equivalency factors listed in Ocean Plan Appendix I. Although some congers were detected above the Reporting Limits (RLs) of the analytical methods, they were all below the Minimum Levels (MLs) stated in Attachment G of the Order. Therefore, the TCDD equivalents are treated as "Detected but not Quantified" or DNQs, and the RPA is inconclusive.

The addition to Monitoring and Reporting Program section VII.D is shown below:

4. Attachment G Section III.A.2 is revised to read as follows:

2. Use of Appropriate Minimum Levels

Table C lists the suggested analytical methods for the 126 priority pollutants and other toxic pollutants that should be used, unless a particular method or minimum level (ML) is required in the MRP. For chlorine residual, the Discharger may use any approved analytical method that has an ML less than or equal to 0.05 mg/L.

For priority pollutant monitoring, when there is more than one ML value for a given substance, the Discharger may select any one of the analytical methods cited in Table C for compliance determination, or any other method described in 40 CFR part 136 or approved by the USEPA (such as the 1600 series) if authorized by the Regional Water Board Executive Officer. However, the ML must be below the effluent limitation and water quality objective. If no ML value is below the effluent limitation and water quality objective, then the method must achieve an ML no greater than the lowest ML value indicated in Table C. All monitoring instruments and equipment shall be properly calibrated and maintained to ensure accuracy of measurements.

Monterey Bay National Marine Sanctuary

Sanctuary Comment

The Marine Sanctuary requests that the two-hour notification requirement specified in Monitoring and Reporting Program Section VII.D be expanded to include the Sanctuary. *For any discharges that could enter the sanctuary, the Sanctuary requests that the Discharger concurrently notify Sanctuary emergency response, the Regional Water Board, the California Emergency Management (CalEMA), and the local health department.*

Response to Sanctuary Comment

We agree. We revised Monitoring and Reporting Program Section VII.D as follows:

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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 (CalEMA, currently 800-852-7550), the local health officers or directors of environmental health with jurisdiction over the affected water bodies, the emergency response of Monterey Bay National Marine Sanctuary (currently 831-236-6797), and the Regional Water Board. Timely notification by the Discharger to CalEMA also satisfies notification to the Regional Water Board.

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