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

STAFF SUMMARY REPORT (Robert Schlipf)
MEETING DATE: December 12, 2012

ITEM: **6**

SUBJECT: **Mercury and PCBs from Municipal and Industrial Wastewater Dischargers to San Francisco Bay; Counties of Alameda, Contra Costa, Solano, Napa, Sonoma, Marin, San Francisco, San Mateo, and Santa Clara** - Reissuance of NPDES Permit

CHRONOLOGY: November 2007 – Adopted regional permit to implement San Francisco Bay mercury TMDL for wastewater dischargers
March 2011 – Amended permit to implement San Francisco Bay PCBs TMDL

DISCUSSION: The Revised Tentative Order (Appendix A) would reissue the NPDES permit for discharges of mercury and PCBs from municipal and industrial wastewater dischargers to San Francisco Bay. This permit covers more than 50 permittees.

The most significant changes from the previous permit are that the Revised Tentative Order would (1) implement final mercury limits for municipal wastewater dischargers 15 years ahead of schedule, (2) reduce the group mercury limit for industrial wastewater dischargers by over 20% because several discharges have ceased, and (3) target PCBs monitoring to the 40 PCB congeners that are primarily responsible for fish impairment.

We received six comment letters on a tentative order distributed for public review (Appendix B) and have prepared responses to all the comments (Appendix C). The Revised Tentative Order reflects minor revisions made in response to comments.

The most significant issue in the comment letters relates to the continued use of U.S. EPA draft Method 1668c for PCB congener monitoring. While U.S. EPA supports the continued use of draft Method 1668c, the Bay Area Clean Water Agencies (BACWA) and the City of Palo Alto indicate that Method 1668c does not provide reliable data. BACWA requests that the Water Board further reduce PCBs monitoring so that dischargers can reallocate funds towards an inter-laboratory study. We view the proposed monitoring frequencies to be the minimum necessary to track discharge loads and to allow future refinement to PCB limits. Additionally, the PCBs TMDL requires that the Water Board track discharge loads, and Method 1668c remains the best available method for doing so.

RECOMMEN-
DATION: Adoption of the Revised Tentative Order

Appendices:
A. Revised Tentative Order
B. Comment Letters
C. Response to Comments