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

STAFF SUMMARY REPORT (Vincent Christian) MEETING DATE: February 8, 2012

ITEM: 7

SUBJECT: Central Contra Costa Sanitary District, Central Contra Costa Sanitary

District Wastewater Treatment Plant and Associated Wastewater Collection System, Martinez, Contra Costa County – Reissuance of NPDES Permit

CHRONOLOGY: January 2007– NPDES Permit Reissued

DISCUSSION: This Revised Tentative Order (Appendix A) would reissue the NPDES permit for

the Central Contra Costa Sanitary District Wastewater Treatment Plant, which provides secondary treatment for 38.7 million gallons per day of wastewater,

serving about 455,000 people in Contra Costa County.

The District, the San Luis & Delta-Mendota Water Authority and State Water Contractors (Water Agencies), and the San Francisco Baykeeper submitted comments (Appendix B) on a tentative order distributed for public review, and we prepared responses (Appendix C) and made revisions where appropriate. All revisions are reflected in the attached Revised Tentative Order.

The issue that we anticipate will be contested is from the Water Agencies who expressed concerns about ammonium impacts to diatom and copepod populations in Suisun Bay. They suggested three options to address their concerns. First, they requested that the tentative order require nitrification (and possibly denitrification) of the discharge to remove ammonium. As an alternative, they requested that the Board delay permit reissuance to allow time to collect additional information needed to determine whether nitrification is warranted. As their third alternative, they requested that the Board set a schedule for completing necessary studies, commit to reevaluating the ammonium issue within one year, and in the meantime impose interim performance-based limit effluent limits consistent with current ammonia discharges.

We agree that the potential effects of ammonium are of growing concern, but there are significant unresolved scientific uncertainties about the effects and their causes. We propose in the Revised Tentative Order an approach similar to the Water Agencies' third alternative. We have initiated additional studies through the Aquatic Science Center with funding from the Bay Area Clean Water Agencies. The Revised Tentative Order also includes a performance-based ammonia mass limit to avoid degradation of receiving water quality.

Finally, Appendix D of this package consists of additional comments submitted after the close of the comment period. Many of the issues raised in these late letters have been discussed amongst stakeholders. These letters serve to illustrate the scientific debate about ammonium impacts to Suisun Bay, and the need for

additional studies. We recommend that the Chair accept these letters. All parties have received copies of them and may discuss them in oral presentations, so there is no surprise or prejudice (Cal. Code Regs., tit. 23, § 648.4).

RECOMMEN-

DATION Adoption of the Revised Tentative Order

CIWQS Place ID: 213875

Appendices: A. Revised Tentative Order

B. Comments

C. Response to Comments

D. Additional Correspondence Received After Close of Comment Period