

California Regional Water Quality Control Board San Francisco Bay Region

RESPONSE TO WRITTEN COMMENTS

On the Amendment to an NPDES Permit for Discharges from
the Orinda Water Treatment Plant

The Regional Water Board received written comments from the East Bay Municipal Utility District on a tentative order distributed from December 7, 2012, through January 11, 2013, for public comment.

This response to comments summarizes each comment in italics, followed by Regional Water Board staff response. For the full content and context of each comment, refer to the comment letter. Revisions to the tentative order are shown with underline or described within quotations for additions and ~~striketrough~~ for deletions. In addition, the following describes four Regional Water Board staff initiated changes.

EAST BAY MUNICIPAL UTILITY DISTRICT

East Bay Municipal Utility District (EBMUD) Comment 1

Mokelumne Aqueduct is misspelled (see pages 1, F-1, and F-2).

Response

Comment noted; we made the corrections.

EBMUD Comment 2

P. F-2, first paragraph, last sentence:

Replace “Discharge Point E-004 is only used during rare water transfers to discharge excess raw water” with “Discharge Point E-004 is for raw water transfers from other sources.”

Response

We have made a change in response to this comment, but not as proposed since EBMUD’s proposed change does not fully describe the discharge. However, the change shown below addresses the intent of the comment.

Discharge Point E-004 is only used ~~during rare water transfers~~ to discharge excess raw water during rare drought conditions so it is used infrequently.

EBMUD Comment 3

P. F-12, Table F-2 (Beneficial Uses of San Pablo Creek and San Pablo Reservoir):

Revise table so that it is consistent with Order No. R2-2009-0067 (Table F-5) or the current Basin Plan (Table 2-1).

Response

Table F-2 is consistent with the most recent Basin Plan amendment of December 31, 2011 (see Table 2.1 online at http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/bp_ch2.shtml#2.1; accessed January 16, 2013).

EBMUD Comment 4

*P. F-12, Table F-2 (Beneficial Uses of San Pablo Creek and San Pablo Reservoir):
Per the Basin Plan, include the following qualifier for REC-1: “Water quality objectives apply; water contact recreation is prohibited or limited to protect public health.”*

Response

We added “East Bay Municipal Utility District prohibits water contact recreation to protect public health” as a qualifier in a footnote of Table F-2 (see description in Staff Initiated Change 4).

EBMUD Comment 5

Attachment B and C:

EBMUD made minor corrections in the Orinda Water Treatment Plant Map (Figure B-2, Attachment B) and the Flow Schematic figure (Attachment C) to update some features based on current operations.

Response

We replaced Figure B-2, Orinda Water Treatment Plant Map in Attachment B, and the Flow Schematic figure in Attachment C with the revised figures.

STAFF INITIATED CHANGES

In addition to minor editorial and formatting changes, Regional Water Board staff has made the following changes to the tentative order distributed for public comment:

STAFF INITIATED CHANGE 1

P.1, Findings:

We added the following new finding 10 in page 1 to indicate compliance with recently enacted AB 685, which added to the Water Code section 106.3. This policy became effective January 1, 2013.

It is the policy of the State that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. This Order is consistent with this policy with requirements that meet maximum contaminant levels designed to protect human health and ensure that water is safe for domestic use.

STAFF INITIATED CHANGE 2

P. F-1, Section B-Background:

We added the number of customers to whom EBMUD provides potable water as follows:

The East Bay Municipal Utility District (hereinafter “Discharger”) owns and operates the Orinda Water Treatment Plant (Plant). The Plant is the largest of six potable water

treatment facilities that the Discharger operates in the East Bay to treat water prior to distribution to 1.34 million Alameda and Contra Costa County customers.

STAFF INITIATED CHANGE 3

P. F-4, Section E.2.a:

We added the average volume of San Pablo Reservoir as follows:

The mixing zone encompasses 1.3 miles of the creek, or about 7 percent of the creek above the reservoir. San Pablo Reservoir is 4.2 miles long, with an average surface area of 720 acres and average volume of 12.5 billion gallons of water. Based on the range of water surface elevations, the mixing zone comprises a maximum of 7 percent of the reservoir volume.

STAFF INITIATED CHANGE 4

P. F-12, Table F-2:

We replaced Table F-2 with one that is consistent with Table 5 in the Permit to streamline content and to highlight the revised beneficial use categories applicable to San Pablo Creek and San Pablo Reservoir since the Permit was adopted in 2009. The new table is shown below:

Table F-2. Beneficial Uses of San Pablo Creek and San Pablo Reservoir

Receiving Water Name	Beneficial Uses
San Pablo Creek	Cold fresh water habitat (COLD) ¹ Rare freshwater habitat (RARE) ¹ Contact water recreation (REC-1) ^{1,2} Non-contact water recreation (REC-2) Fish migration (MIGR) Fish spawning (SPWN) Warm freshwater habitat (WARM) Wildlife habitat (WILD) Municipal and domestic supply (MUN)
San Pablo Reservoir	Commercial or recreational collection of fish intended for human consumption (COMM) ¹ Cold fresh water habitat (COLD) Municipal and domestic supply (MUN) Water contact recreation (REC-1) ² Non-contact water recreation (REC-2) Fish spawning (SPWN) Warm freshwater habitat (WARM) Wildlife habitat (WILD)

Notes:

¹ These beneficial uses were applied to San Pablo Creek or San Pablo Reservoir since the Permit was adopted in 2009 based on amendments to the San Francisco Basin Plan through December 31, 2011.

² The East Bay Municipal Utility District prohibits water contact recreation to protect public health.