

APPENDIX B

Comments



Department of Public Works
Larry A. Patterson, P. E., Director

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February 4, 2013

Mr. Dylan Garner
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: City of San Mateo Comments on SFBRWQCB Tentative Order (NPDES Permit No. 0037541)

Dear Mr. Garner:

Enclosed you will find the City of San Mateo's comments regarding the Regional Water Quality Control Board's Tentative Order received on January 2, 2013 for our NPDES permit reissuance. The transmittal letter for the Tentative Order (TO) requested that comments be submitted to your office by February 4, 2013.

The City appreciates the hard work of Water Board staff on this permit. Our comments consist of a few main comments and minor editorial changes, together with requested corresponding changes to the TO. The main comments relate to the monitoring location description for EFF-001b and the pretreatment program monitoring frequencies. The reissued Order will require major expenditures by the City, but we believe that with the requested changes addressed, the final permit will satisfy the common goal that both our agencies share, namely protection of water quality in San Francisco Bay.

Please contact me if you have any questions on the enclosed comments, or would like to discuss them in more detail.

Sincerely,

Chad Davison
Environmental Services Division Manager

Attachment A – Comments on Tentative Order

cc: Larry Patterson, City of San Mateo
Bruce Wolfe, RWQCB
Lila Tang, RWQCB

Bill Johnson, RWQCB
Denise Conners, LWA
Kristine Corneillie, LWA

ATTACHMENT A

February 4, 2013

City of San Mateo

Comments Regarding Tentative Order Dated January 2, 2013 For Reissuance of NPDES Permit No. CA0037541

The City of San Mateo (City) appreciates the opportunity to submit the following comments on the Tentative Order (TO), released for review and comment on January 2, 2013. For requested revisions to the text of the TO, underline is shown for suggested additions, and ~~strike-out~~ is shown for suggested deletions.

1. **The Tentative Order includes language in Provision VI.C.5.a on page 19, prior to Table 9, which indicates that changes to Tasks 3, 4, 5, and 6 may be authorized by the Executive Officer. The City requests this language be extended to also include Tasks 8 and 9 in case the strategy for collection system improvements is changed.**

The Discharger shall implement the following tasks to reduce blending. The Discharger may request, and the Regional Water Board authorizes the Executive Officer to approve, changes to Tasks 3, 4, 5, ~~and 6, 8, and 9~~ and associated deadlines specified below. The request and any approvals must be in writing. The basis for the request may include allowing the Discharger time to consider a change in strategy for achieving compliance with Task 6 for completion of Plant upgrades to reduce blending. The Executive Officer may modify the tasks and deadlines as long as there is reasonable progress toward development of an alternative strategy and reasonable assurance that the alternative strategy will achieve equal or better results.

2. **The City requests the following changes to identify the correct name of the County of San Mateo collection system:**
 - a. **On Page 4 the name of the County of San Mateo collection system should be noted as follows.**

B. Facility Description, Treatment Process, and Discharge Location

The Plant and the collection systems belonging respectively to the City of San Mateo and City of Foster City Estero Municipal Improvement District are collectively the Facility. The Plant, located within the southeast portion of the City of San Mateo and northwest of Foster City (see Facility Map in Attachment B), provides secondary and advanced secondary treatment of domestic, commercial, and industrial wastewater for the City of San Mateo, the City of Foster City, the Town of Hillsborough, and portions of the City of Belmont and unincorporated San Mateo County. The collection systems covered by this Order includes approximately 257 miles of sanitary sewer and 23 pump stations. Three satellite wastewater collection systems (Town of Hillsborough, Crystal Springs County Sanitation District, and the County of San Mateo Tower Road Complex) discharge to the Facility. The service area population is approximately 139,000.

- b. On page F-4 and F-5 the Facility Description (II.A.2) should be updated as follows to include the correct name of the County of San Mateo collection system.

2. Collection System. The Discharger’s wastewater collection system is part of the Facility covered by this Order. The Plant also receives wastewater from the satellite wastewater collection systems of three municipal jurisdictions (Town of Hillsborough, Crystal Springs County Sanitation District, and the County of San Mateo Tower Road Complex). The combined collection system includes approximately 257 miles of sanitary sewer and 23 pump stations.

- c. On page F-38, the Other Special Provisions Specific Tasks to Reduce Blending (5.a) text should be updated as follows to include the correct name of the County of San Mateo collection system.

This Order’s task requirements do not apply to the Discharger’s satellite agencies because they are not permittees under this Order. These satellites include the Town of Hillsborough, Crystal Springs County Sanitation District, and the County of San Mateo Tower Road Complex. Each is subject to the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (General Order, Order No. 2006-0003-DWQ) and Cease and Desist Order No. R2-2009-0020.

3. The City requests an addition to the Facility Description, Treatment Process, and Discharge Location (Page 4) that biosolids are used for beneficial purposes:

Secondary sludge is thickened using dissolved air flotation prior to being blended with primary sludge from a gravity thickener. Thickened sludge is anaerobically digested in two digesters, and then dewatered in a centrifuge. Dewatered ~~sludge is~~ biosolids are trucked to either land application sites for beneficial use or landfills for disposal. Centrate from the centrifuge and overflow from the thickening units are piped to the head of the liquid treatment process. The Discharger manages trucking and disposal of biosolids through outside contractors.

4. The City requests the description of monitoring location EFF-001b (Page E-2) be modified as follows so the monitoring location for bacteria is at a point in the disinfection facilities where adequate contact with the disinfectant is assured.

Table E-1. Monitoring Station Locations

Type of Sampling Location	Monitoring Location Name	Monitoring Location Description
Influent	INF-001	At any point in the plant headworks at which all waste tributary to the plant is present and preceding any phase of treatment.
Effluent	EFF-001	At any point after full treatment prior to the outfall in Lower San Francisco Bay.
Effluent	EFF-001a (formerly EFF-001-D)	At any point in the disinfection facilities where adequate contact with the disinfectant is assured.
Effluent	EFF-001b	At any point at which all blended fully-treated and primary-treated waste tributary to the outfall is

		present (may be the same location as EFF-001, or for bacteria monitoring, may be the same location as EFF-001a).
Biosolids	BIO-001	Biosolids.

5. The City of San Mateo has reviewed its influent, effluent, and biosolids data to consider reduced monitoring frequencies as specified in Attachment H (Page H-13). Attachment H indicates that when there are less than 5 SIU's (the City has 2, both of which are zero discharge SIUs) the minimum sampling frequency is once every five years. Currently, the City is monitoring for metals monthly (twice per year in biosolids) and for organics twice per year. The City requests VOC and BNA monitoring be decreased to once every five years, since the data has been consistently non-detect. The City also requests that metals monitoring be decreased to once per year (in influent, effluent and biosolids), to be consistent with effluent priority pollutant monitoring requirements (except for the few metals that have greater frequency due to effluent limits). Additionally, on page F-36 of the Fact Sheet, Table F-12 should be updated to correspond with the pretreatment program monitoring requirements requested here.

Page E-10:

Table E-6. Pretreatment and Biosolids Monitoring Requirements

Constituents	Sampling Frequency			Sample Type ^[4]	
	Influent INF-001	Effluent EFF-001 ^[1]	Biosolids ^[5] BIO-001	INF-001 and EFF-001	Biosolids BIO-001
VOC ^[2]	2/Year-1/5 Years	2/Year-1/5 Years	2/Year-1/5 Years	Grabs	Grabs ^[6c]
BNA ^[3]	2/Year-1/5 Years	2/Year-1/5 Years	2/Year-1/5 Years	Grabs	Grabs ^[6c]
Metals ^[4]	1/MonthYear	1/MonthYear	21/Year	24-hr Composite ^[6a]	Grabs ^[6c]
Hexavalent Chromium ^[5]	1/QuarterYear	1/MonthYear	21/Year	Grabs	Grabs ^[6c]
Mercury	1/Quarter	1/Month	21/Year	Grab or 24-hr Composite ^[6a,6b]	Grabs ^[6c]
Cyanide, Total	1/Month ^[7]	1/Month	21/Year	Grabs	Grabs ^[6c]

[4] The metals are arsenic, cadmium, copper, lead, nickel, silver, zinc, and selenium. Copper and nickel shall be collected 1/Month in influent and effluent.

[5] When biosolids are used for land application, monitoring frequencies required by 40 CFR Part 503 shall be followed.

6. The TO indicates that both Chad Davisson and Brad Underwood are authorized to sign and submit reports (Facility Information, Table F-1, Page F-3). Since the City of San Mateo owns the majority of the system, performs the day-to-day operation, and conducts all regulatory reporting, the City requests that only Chad Davisson (or other authorized City of San Mateo employee) be named as the person authorized to sign and submit reports.

Facility Contact, Title, Phone	Chad Davisson, City of San Mateo, Environmental Services Division Manager, (650) 522-7385 Brad Underwood, City of Foster City, Public Works Director, (650) 286-3200 610 Foster City Blvd, Foster City CA 94404, bunderwood@fostercity.org
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Authorized Person to Sign & Submit Reports	Same as above <u>Chad Davisson, City of San Mateo, Environmental Services Division Manager, (650) 522-7385</u>
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7. Any changes made to the Tentative Order, based on comments from the City of San Mateo or other commenters, should be reflected in the Fact Sheet to avoid conflicts or ambiguities.