



PUBLIC WORKS

CITY OF
**PALO
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March 10, 2014

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

VIA EMAIL: robert.schlipf@waterboards.ca.gov

Subject: Comments on Tentative Order for Municipal Wastewater Discharges of Nutrients to San Francisco Bay, NPDES Permit

Dear Mr. Schlipf:

The City of Palo Alto Regional Water Quality Control Plant appreciates the opportunity to comment on the Tentative Order for Municipal Wastewater Discharges of Nutrients to San Francisco Bay, NPDES Permit. The City of Palo Alto runs and operates a regional wastewater treatment plant that serves 220,000 residents and is the sixth largest wastewater treatment plant in the Bay Area. Palo Alto supports the comments submitted by the Bay Area Clean Water Agencies, and Palo Alto requests that the San Francisco Water Quality Control Board (Water Board) considers the following comments on the Tentative Order and hopes that changes will be made prior to issuance of the final Order.

1. Palo Alto is concerned about the optimization study timeline.

Palo Alto understands that the Water Board is expecting an optimization study from BACWA that provides information regarding the different treatment processes and optimization opportunities. Palo Alto's wastewater treatment plant process is slightly different than other advanced secondary plants in the San Francisco Bay. Therefore, Palo Alto wants to clarify that the Water Board plans on accepting one plan that will cover all wastewater treatment plants including Palo Alto's unique treatment process.

2. Palo Alto recommends adding Fact Sheet language to clarify the requirement to report on the nutrient load impacts of optimization and upgrades implemented in response to other regulations or requirements.

Palo Alto appreciates the opportunity to describe the impact on nutrient loading of optimization and upgrades implemented in response to other regulations or requirements in the optimization and upgrades studies. Palo Alto is scheduled to retire the sewage sludge



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incinerators by 2019, due to the increased requirements from the Environmental Protection Agency. Palo Alto is under pressure to balance competing environmental benefits when deciding how to upgrade our facilities. Palo Alto is currently planning on updating the biosolids processing facility to a process that creates energy; however that process will increase the nutrient loading in the effluent. The change in the biosolids processing will reduce the amount of GHG being emitted. Therefore, Palo Alto strongly supports BACWA's proposed language to the Fact Sheet.

This Order requires Dischargers to evaluate the impact on nutrient loads due to treatment plant optimization and upgrades implemented in response to other regulations or requirements. The Regional Water Board understands reductions in nutrient loads may impact the loads of other pollutants in the effluent as well as biosolid quality, and vice versa. For example, an upgrade from biosolids incineration to anaerobic digestion will result in an increase in nutrient loading to the POTW effluent. This requirement will allow Dischargers to show how nutrient loads will increase or decrease after process changes made in response to other regulations and requirements, and will help elucidate the balance of competing environmental benefits.

Palo Alto appreciates the opportunity to comment on this Tentative Order and thanks you for considering our concerns.

Regards,



Karin North
Manager, Environmental Controls Programs

cc: David Williams, Executive Director, Bay Area Clean Water Agencies