SUPPLEMENTAL

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

> STAFF SUMMARY REPORT (Marcia Liao) MEETING DATE: May 13, 2015

ITEM: 6 -- Supplemental

SUBJECT: Las Gallinas Valley Sanitary District, Sewage Treatment Plant and

Wastewater Collection System, San Rafael, Marin County –

Reissuance of NPDES Permit and Rescission of Cease and Desist Order

DISCUSSION: We recommend the following revision to our Response to Bay Area Clean

Water Agencies Comment 6 (deletions are shown in strikethrough text):

Response to BACWA Comment 6

We disagree. Basin Plan section 4.5.5.3.1 and Table 4-3 require acute toxicity WQBELs. Furthermore, while chronic tests are generally more sensitive than acute tests, the chronic toxicity limits in the tentative order were made less stringent by allowing for dilution credits, whereas the Basin Plan does not allow dilution

credits for acute toxicity limits.

CIWQS: Place ID 236598