

**California Regional Water Quality Control Board
San Francisco Bay Region**

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for
Fairfield-Suisun Wastewater Treatment Plant and wastewater collection system

The Regional Water Board received written comments from Fairfield-Suisun Sewer District on a tentative order distributed for public comment. The comments are summarized below in *italics* (paraphrased for brevity) and followed by a staff response. For the full content and context of the comments, please refer to the comment letter. To request a copy of the comment letter, see the contact information provided in Fact Sheet section VIII.G of the revised tentative order.

Revisions are shown with ~~strike through~~ for deletions and underline for additions.

Fairfield-Suisun Sewer District

Comment 1: The District requests we refer to 5-day biochemical oxygen demand as BOD₅, as opposed to BOD, for consistency.

Response

We agree and revised section IV.B of the tentative order as follows:

Percent Removal. The average monthly percent removal of biochemical oxygen demand (BOD₅) and total suspended solids (TSS) at all discharge points shall not be less than 85 percent (i.e., in each calendar month, the arithmetic mean of BOD₅ and TSS, by concentration, of effluent samples collected at Monitoring Location EFF-001D as described in the MRP, shall not exceed 15 percent of the arithmetic mean of BOD₅ and TSS, by concentration, of influent samples collected at Monitoring Location INF-001 as described in the MRP, at approximately the same times during the same periods).

We revised Fact Sheet section IV.B.2.a as follows:

BOD₅ and TSS. The BOD₅ and TSS effluent limitations are a monthly average of 10 mg/L and a weekly average of 15 mg/L. These limitations, including the 85 percent removal requirements, are unchanged from the previous order. The limitations in this Order are technologically feasible for the advanced wastewater treatment technologies used at the plant. Monitoring data show the Discharger has been able to consistently comply with these limitations.

Comments 2 and 3: The District requests we revise Monitoring and Reporting Program Tables E-3 and E-8 to require that it report average daily dissolved oxygen and temperature values instead of monthly maxima and minima. Also, since pH and temperature are required daily, the District requests we remove footnote 12.

Response

We agree and revised Monitoring and Reporting Program Tables E-3 and E-8 as follows:

Table E-3. Effluent Monitoring – Monitoring Location EFF-001D

Parameter	Units	Sample Type	Minimum Sampling Frequency
Flow ^[1]	MGD	Continuous	Continuous/D
⋮	⋮	⋮	⋮
Oil and Grease	mg/L	Grab	1/Quarter
pH ^[3]	s.u.	Continuous	Continuous/D ^[2]
Turbidity ^[4]	NTU	Continuous or Grab	Continuous/D or 1/Day
Ammonia, Total	mg/L as N	C-24	1/Month ^[2]
Dissolved Oxygen ^[5]	mg/L	Continuous or Grab	Continuous/D or 1/Day
Temperature ^[5]	°C	Continuous or Grab	Continuous/D or 1/Day ^[2]
Copper, Total Recoverable	µg/L	C-24	1/Month
⋮	⋮	⋮	⋮
Chronic Toxicity ^[10]	TU _c	C-24	1/Quarter
Priority Pollutants ^[11]	µg/L	Grab	2/Year ^[2,3]
Standard Observations ^[13,4]	-	-	1/Week

Footnotes:

^[1] The following flow information shall be reported in monthly self-monitoring reports:

- Daily average flow (MGD)
- Total monthly flow volume (MG)

⋮

^[4] If turbidity is monitored continuously, the arithmetic mean for each day shall be reported in self-monitoring reports.

^[5] If dissolved oxygen or temperature is monitored continuously, ~~The monthly instantaneous minimum and maximum shall be reported in self-monitoring reports detailed in Table E-8.~~ the daily arithmetic mean shall also be reported in self-monitoring reports for any day in which an ammonia sample was collected.

^[6] The Discharger may, at its option, analyze for cyanide as weak acid dissociable cyanide using protocols specified in 40 C.F.R. Part 136, or an equivalent method in the latest Standard Method edition.

⋮

^[11] The Discharger shall monitor for the pollutants listed in Attachment G, Table B.

~~^[2] Ammonia monitoring shall occur concurrently with pH and temperature monitoring.~~

^[12,3] If the Discharger opts into the alternate monitoring program established through Order No. R2-2016-0008, it is only required to monitor once for dioxin-TEQ, BNAs, VOCs, and chlorinated pesticides.

^[13,4] Standard observations are specified in Attachment G section III.C.

Table E-8. CIWQS Reporting

Parameter	Method of Reporting: EDF/CDF data upload or manual entry	Method of Reporting: Attached File
All parameters identified in influent, effluent, and receiving water monitoring tables (except Dissolved Oxygen and Temperature)	Required for all results	-
Dissolved Oxygen Temperature	Required for monthly maximum and minimum results only ^[4]	Discharger may use this method for all results or keep records

Parameter	Method of Reporting: EDF/CDF data upload or manual entry	Method of Reporting: Attached File
:	:	:
Collection Time Analysis Time	Not required (Discharger may select "0:00") ^[1]	-

Comment 4: The District requests we correct the flow rate specified in the Fact Sheet.

Response

We agree and revised Fact Sheet section II.A.3 to correct the dry weather flow rate as follows:

The plant has an average dry weather capacity of 23.7 MGD and a peak wet weather capacity of 52.9 MGD. From May 2015 through February 2019, the plant treated a daily dry weather average of ~~14.1~~ 10.5 MGD, with the highest reported average ~~daily~~ wet weather flow being 36.7 MGD.

We revised Fact Sheet section II.B as follows:

Treated effluent is discharged to Boynton Slough, LedgeWood Creek, and Duck Ponds 1 and 2. The primary discharge location is Discharge Point No. 001 to Boynton Slough; discharge to the other three discharge points is intermittent. Annual average effluent flow ~~through Discharge Point No. 001~~ during the previous order term was 14.1 MGD. In 2018, the annual volume discharged to the duck ponds was approximately 3,000 MG. The Discharger discharged an average of about 11 MGD to LedgeWood Creek in January and February of 2017 but did not discharge to LedgeWood Creek in 2018.

Comment 5: The District requests we correct a statement about dioxin-TEQ.

Response

We agree since no dioxin congeners were detected and revised Fact Sheet section IV.C.3.b as follows:

Analysis. The maximum effluent concentrations, most stringent applicable water quality criteria and objectives, and ambient background concentrations used in the analysis are presented in the following table, along with the reasonable potential analysis results (yes, no, or unknown) for each pollutant. Basin Plan sections 7.2.1.2 and 4.7.2.2 require copper and cyanide WQBELs for all individual NPDES permits for municipal wastewater treatment facilities. Dioxin-TEQ has reasonable potential because the receiving water is impaired for dioxin-TEQ ~~and dioxin-TEQ is present in the discharge.~~

We revised footnote 8 of Fact Sheet Table F-7 as follows:

Reasonable potential is based on Trigger 3 because San Francisco Bay is 303(d)-listed for dioxin-TEQ and elevated levels of dioxin-TEQ are found in San Francisco Bay fish tissue. ~~Dioxin-TEQ is also present in the discharge.~~

Comment 6: *The District requests we correct three ambient data values and a unit error in Fact Sheet Table F-7.*

Response

We agree and revised the Fact Sheet Table F-7 as follows:

Table F-7. Reasonable Potential Analysis

CTR No.	Pollutants	C or Governing Criterion or Objective (µg/L)	MEC or Minimum DL (µg/L) ^{[1][2]}	B or Minimum DL (µg/L) ^{[1][2]}	RPA Results ^[3]
1	Antimony	4,300	0.42	0.34	No
∴	∴	∴	∴	∴	∴
16	2,3,7,8-TCDD	1.4E-08	<2.5E-6	6.50E-09	No
	Dioxin TEQ	1.4E-08	<2.3E-5	4.70E-08	Yes ^[8]
17	Acrolein	780	<1.7	<0.5	No
∴	∴	∴	∴	∴	∴
64	Benzo(k)Fluoranthene	0.049	<0.05	0.00093	No
65	Bis(2-Chloroethoxy)Methane	No Criteria	<4.5	<4.0 <u><0.3</u>	U
66	Bis(2-Chloroethyl)Ether	1.4	<3.5	<0.3	No
∴	∴	∴	∴	∴	∴
74	Dibenzo(a,h)Anthracene	0.049	<0.15	0.00067	No
75	1,2-Dichlorobenzene	17,000	<0.27	<0.3 <u><0.27</u>	No
76	1,3-Dichlorobenzene	2,600	<0.18	<0.3 <u><0.18</u>	No
77	1,4-Dichlorobenzene	2,600	<0.18	<0.3 <u><0.18</u>	No
78	3,3 Dichlorobenzidine	0.077	<25	<0.0002	No
∴	∴	∴	∴	∴	∴
126	Toxaphene	0.0002	<0.3	<0.3	No