

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

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for Municipal Wastewater Dischargers to
Amend Monitoring and Reporting Provisions

The Regional Water Board received written comments from the Bay Area Clean Water Agencies (BACWA) on a tentative order distributed for public review. 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 4.7 of the Revised Tentative Order.

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

Comment 1: *BACWA requests that we revise cost estimates in the Fact Sheet to correct information about baseline monitoring frequencies for influent mercury, effluent mercury, and biosolids organics.*

Response: We agree and made the following changes to the Fact Sheet:

Section 3.4 Mercury and PCBs. This Order continues to reduce the effluent PCBs (as aroclors) monitoring frequency to once per permit term consistent with Order R2-2016-0008. ...

This Order reduces the effluent monitoring frequency for mercury established in Order R2-2017-0041 for major dischargers from monthly to quarterly, and for minor dischargers from quarterly to twice per year. ...

Figure F-2 shows that effluent mercury concentrations are also well below the average monthly effluent limitations in Order R2-2017-0041. ...

Because past data show a reduced monitoring frequency will be adequate to characterize mercury loads to San Francisco Bay, re-allocating the cost of effluent mercury analysis toward additional RMP studies of CECs would be a better use of resources. Based on the median laboratory costs in the ~~The BACWA Report, estimates that~~ the collective cost savings from reducing effluent mercury monitoring to once per quarter for major dischargers and twice per year for minor dischargers would be about \$123,000 ~~126,000~~ per year ~~based on the median laboratory cost.~~

Section 3.5.2 Influent Mercury. This Order establishes a consistent influent monitoring frequency for mercury of once per quarter for dischargers with pretreatment programs listed in Table 1 of the Order. This will reduce the monitoring frequency for most of these dischargers because most currently monitor once per month. However, it would

increase the required monitoring frequency for the East Bay Dischargers Authority member agencies, City of Livermore, Dublin San Ramon Services District, City of Millbrae, Cities of South San Francisco and San Bruno, City of Burlingame, and Delta Diablo.

Dischargers use influent mercury data to fulfill the following pretreatment program goals: ...

Due to the large amount of baseline information already obtained using EPA Method 245.1, the typical range for influent mercury concentrations is well-established. ... Re-allocating the cost of influent mercury analysis toward additional RMP studies of CECs would be a better use of resources. Based on the median laboratory costs in the The BACWA Report, estimates that the collective cost savings from reducing influent mercury monitoring to once per quarter would be about \$6,000 ~~13,000~~ per year ~~based on the median laboratory cost.~~

Section 3.5.4 Biosolids. This Order reduces biosolids VOCs and BNAs monitoring frequencies for dischargers with pretreatment programs identified in Table 1 of the Order. ...

Dischargers use biosolids VOCs and BNAs data to ensure that industrial loading of organic pollutants will not threaten biosolids quality. ... Based on the median laboratory costs in the BACWA Report, the estimated collective cost savings from reducing biosolids VOCs and BNAs monitoring would be about \$8,000 ~~7,000~~ per year.

3.6 Summary of Cost Savings. This Order proposes monitoring frequency reductions that would collectively save dischargers about \$228,000 ~~237,000~~ per year based on median laboratory costs and up to \$368,000 ~~377,000~~ per year if cost savings from chronic toxicity screenings are realized. The table below summarizes these savings:

Table F-4. Cost Savings from Reduced Monitoring

Parameter	Median Savings
Dioxin-TEQ	\$40,000
Effluent VOCs and BNAs	\$26,000
PCBs (as aroclors)	\$13,000
Effluent Mercury	\$126,000 <u>123,000</u>
Influent Mercury	\$13,000 <u>6,000</u>
Influent VOCs and BNAs	\$12,000
Biosolids VOCs and BNAs	\$7,000 <u>8,000</u>
Subtotal	\$237,000 <u>228,000</u>
Chronic Toxicity Screening	\$140,000

Parameter	Median Savings
Total	\$377,000 <u>368,000</u>

Comment 2: BACWA requests that we correct typographical errors and facility contact information in Table F-1.

Response: We corrected typographical errors and revised Fact Sheet Table F-1 as follows:

Discharger	Facility Contact	Mailing Address	Effluent Description	Facility Design Flow (MGD)
:	:	:	:	:
Pacifica, City of	Louis Sun, Wastewater Operation Manager, (650) 735-4662	170 Santa Maria Avenue Pacifica, CA 94044	Advanced Secondary	4.0
:	:	:	:	:
St. Helena, City of	Mark Rincon-Ibarra, Clayton Church, Acting Public Works Director, (707) 312-1208	1572 Railroad Avenue St. Helena, CA 94574	Secondary	0.50
:	:	:	:	:
Vallejo Flood and Wastewater District	Jennifer Harrington, Environmental Services Director, (707) 644-7806 (707) 652-7806	450 Ryder Street Vallejo, CA 94590	Secondary	15.5
:	:	:	:	: