

**ITEM: 8**

**Amendment of Monitoring and Reporting Provisions for Municipal Wastewater Dischargers –  
Amendment of NPDES Permits**

**DISCUSSION:**

This Revised Tentative Order (Appendix A) would amend many municipal wastewater dischargers' individual NPDES permits and the Mercury and PCBs Watershed permit (Order R2-2017-0041) to reduce influent, effluent, and biosolids monitoring requirements for select pollutants. This would increase consistency across permits and eliminate unnecessary monitoring. This Revised Tentative Order would also require municipal wastewater dischargers to provide supplemental funding to the Regional Monitoring Program for Water Quality in San Francisco Bay to support additional studies of constituents of emerging concern.

In 2016, the Board established an alternate monitoring program for municipal wastewater dischargers that allowed dischargers the option of reduced monitoring if they applied the cost savings to study constituents of emerging concern. As a result, most dischargers took advantage of the opportunity and about \$290,000 per year was reallocated toward higher priority monitoring. The Revised Tentative Order would update this program. First, it would simplify it by eliminating the ability to opt in or out. Most dischargers already opted in. Second, it would further reduce monitoring requirements where possible. The most significant change would be reduced effluent mercury monitoring, which is reasonable because mercury loads from municipal wastewater dischargers are about 80 percent below their collective allocation in the San Francisco Bay Mercury TMDL. This change somewhat offsets foreseeable increased expenses associated with species sensitivity screenings the State Water Board is requiring through its new toxicity regulations. Finally, the Revised Tentative Order would require municipal dischargers to fund studies of constituents of emerging concern. Dischargers have pledged about \$320,000 per year for such studies.

We received comments (Attachment B) from the Bay Area Clean Water Agencies on a tentative order circulated for public review. We prepared a response to the comments (Appendix C) that explains revisions reflected in the Revised Tentative Order. The most significant changes correct cost information about monitoring reductions. We expect this item to be uncontested.

**APPENDICES:**

- A. Revised Tentative Order
- B. Comments
- C. Response to Comments

Appendix A  
Revised Tentative Order

# Appendix B

## Comments

In accordance with Section 11546.7 of the California Government Code, an electronic version of the comment received has not been posted online as it does not meet specified accessibility standards. For an electronic copy of the comment, please see the contact information provided in Fact Sheet section V.G of the Revised Tentative Order.

Appendix C  
Response to Comments