

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

STAFF SUMMARY REPORT: Debbie Phan
MEETING DATE: May 12, 2021

ITEM: 5C

General Waste Discharge Requirements for Discharges of Treated Filter Backwash from Drinking Water Treatment Facilities to Inland Surface Waters – Reissuance of General NPDES Permit

DISCUSSION:

This Revised Tentative Order (Appendix A) would reissue the general NPDES permit that regulates treated filter backwash discharges from drinking water treatment facilities to inland surface waters, which was last adopted in March 2016. Drinking water treatment facilities normally include coagulation/flocculation, sedimentation, filtration, and disinfection processes. Filtration is used to clarify the source water and improve taste by removing particles from the water, such as clay, silt, natural organic matter, and microorganisms. Filter backwash is generated when the filters are washed to remove accumulated solids through the use of reverse pressure and water flow. The filter backwash wastewater then flows into settling basins where the solids settle out and residual chlorine is removed, if necessary. Solids are disposed of at an off-site disposal facility. The pollutants in filter backwash wastewater consist of solids and trace contaminants present in the source and wash waters.

The Revised Tentative Order would continue to cover two dischargers: the City and County of San Francisco's for its Harry Tracy Water Treatment Plant and associated San Andreas Reservoir, and the City of Napa for its Hennessey Water Treatment Plant and associated Lake Hennessey. Both facilities discharge up to a few million gallons of treated filter backwash per day, with San Francisco discharging almost daily whereas the City of Napa discharges seasonally.

The Revised Tentative Order includes new cyanide effluent limitations for dischargers that demonstrate reasonable potential to exceed water quality objectives, and eliminates copper effluent limitations from the previous order because data no longer indicate reasonable potential for copper.

We received comments (Appendix B) on the tentative order from San Francisco. Most significantly, San Francisco objected to receiving water limitations in the tentative order that prohibit discharges causing violations of water quality standards. San Francisco has raised this same objection in its other recently-issued NPDES permits. San Francisco is concerned that these requirements create uncertainty for the discharger as to whether it is complying with the permit.

As explained in the Response to Comments (Appendix C), we disagree. The receiving water limitations are consistent with the Clean Water Act, NPDES regulations, State water quality standards, and State law, and serve as backstops in the event that the effluent limitations and other permit provisions prove to be inadequate. The same receiving water limitations appear in nearly all NPDES permits in the Region, including San Francisco's NPDES permits.

We do not believe San Francisco will bring up these issues during the hearing on this matter.

APPENDICES:

- A. Revised Tentative Order
- B. Comment Letter Received
- C. Response to Comments

Appendix A
Revised Tentative Order

Appendix B

Comment Letter Received

Comment Letter Received In accordance with Section 11546.7 of the California Government Code, an electronic version of the comment letter received has not been posted online as the letter does not meet specified accessibility standards. For an electronic copy of the comment letter, please contact Debbie Phan via email to Debbie.Phan@waterboards.ca.gov or at (510) 622-2116.

Appendix C
Response to Comments