

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

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for Municipal Dischargers to
Update Total Residual Chlorine and Oil and Grease Requirements

The Regional Water Board received written comments on a tentative order distributed for public review from the following agencies:

1. Bay Area Clean Water Agencies - August 20, 2021
2. Silicon Valley Clean Water - August 20, 2021

The comments are summarized below in *italics* (paraphrased for brevity) and followed by a staff response. For the full content and context of the comment, please refer to the comment letter. To request a copy of the comment letter, see the contact information provided in Fact Sheet section V.G of the Revised Tentative Order.

Revisions are shown with ~~strikethrough~~ for deletions and underline for additions.

BAY AREA CLEAN WATER AGENCIES (BACWA)

BACWA Comment 1: *BACWA requests that we modify the facility contact description for the Sewerage Agency of Southern Marin in Fact Sheet Table F-1.*

Response: We modified the Sewerage Agency of Southern Marin facility contact in Fact Sheet Table F-1 as follows:

Mark Grushayev, ~~General Manager~~ Wastewater Treatment Plant Director,
(415) 384-4825

BACWA Comment 2: *BACWA requests that we correct the dilution factors for the Dublin San Ramon Services District and City of Livermore in Fact Sheet Table F-4.*

Response: We corrected the dilution factors for the Dublin San Ramon Services District and City of Livermore in Fact Sheet Table F-4 as follows:

Discharger	Receiving Water Type	Water Quality Objective (mg/L)	Dilution Factor	Effluent Limit (one-hour average, mg/L)
⋮	⋮	⋮	⋮	⋮
Dublin San Ramon Services District	Marine	0.013	78 <u>74</u>	0.98
Livermore, City of	Marine	0.013	78 <u>74</u>	0.98
⋮	⋮	⋮	⋮	⋮

This matches the dilution factor used to calculate the chlorine effluent limits for these two facilities as described in the Fact Sheet Section III.C.6.

BACWA Comment 3: *BACWA requests that we correct the dilution factor and chlorine effluent limits for the City of Millbrae in Table 2 and Fact Sheet Table F-4.*

Response: We corrected the one-hour average total residual chlorine effluent limit in Table 2 for the City of Millbrae as follows:

Discharger	One-hour Average (mg/L)
:	:
Millbrae, City of, and North Bayside System Unit	0.47 <u>0.48</u>
:	:

We also corrected the dilution factor and the one-hour average total residual chlorine effluent limit for the City of Millbrae in Fact Sheet Table F-4 as follows:

Discharger	Receiving Water Type	Water Quality Objective (mg/L)	Dilution Factor	Effluent Limit (one-hour average, mg/L)
:	:	:	:	:
Millbrae, City of, and North Bayside System Unit	Marine	0.013	35 <u>36</u>	0.47 <u>0.48</u>
:	:	:	:	:

These changes match the dilution factor described in Fact Sheet section III.C.2 for the City of Millbrae and update the effluent limit calculations with the correct dilution factor.

SILICON VALLEY CLEAN WATER

Silicon Valley Clean Water Comment 1: *Silicon Valley Clean Water requests that we allow it to continue its current total residual chlorine monitoring operation instead of requiring it to switch to the monitoring requirements specified in the tentative order. Silicon Valley Clean Water points out that continuously monitoring for chlorine residual at 0.00 mg/L can desensitize its chlorine electrodes, causing a reduced reaction time when chlorine is present. To meet its current permit requirements, Silicon Valley Clean Water continuously monitors for a period of 20 minutes at the top of each hour. For the remaining 40 minutes, the chlorine residual analyzers monitor chlorinated water from its chlorine contact chamber to maintain accuracy and reliability. Silicon Valley Clean Water also points out that it conducts acute toxicity analysis onsite. If chlorine residual is present in the acute toxicity flow-through sample, Silicon Valley Clean Water would need to dechlorinate prior to conducting these tests.*

Response: To provide Silicon Valley Clean Water with more time to change its total residual chlorine monitoring setup, we removed it from the tentative order. When the Water Board reissues Silicon Valley Clean Water's NPDES permit, however, it will be required to implement continuous monitoring and comply with a one-hour average total residual chlorine effluent limit consistent with the Basin Plan. In the meantime, Silicon Valley Clean Water will need to continue monitoring in accordance with its existing permit and complying with its existing total residual chlorine effluent limit of 0.0 mg/L.

Specifically, we deleted Silicon Valley Clean Water from Table 1, Table 2, Fact Sheet Table F-1, Fact Sheet Table F-3, and Fact Sheet Table F-4. We also deleted Fact Sheet Section III.C.13 (describing Silicon Valley Clean Water's mixing zone study) and renumbered the subsequent paragraphs.