

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

STAFF SUMMARY REPORT: Robert Schlipf
MEETING DATE: October 12, 2021

ITEM: 5A

Municipal Wastewater Dischargers – Amendment of NPDES Permits to Update Total Residual Chlorine and Oil and Grease Requirements

DISCUSSION:

This Revised Tentative Order (Appendix A) would amend municipal wastewater dischargers' individual NPDES permits to update effluent limits and monitoring requirements for total residual chlorine and to remove effluent limits and monitoring requirements for oil and grease.

At the November 2020 Board meeting, the Board amended the Basin Plan to establish chlorine water quality objectives and replace technology-based total residual chlorine effluent limitations with water quality-based effluent limitations. The Basin Plan amendment also removed the requirement for municipal wastewater treatment plants with secondary or advanced secondary treatment to have effluent limits for oil and grease. This blanket permit amendment would implement those changes.

By moving from a technology-based effluent limit for total residual chlorine set as an instantaneous maximum of 0.0 mg/L to a water quality-based effluent limit set as an one-hour average, we expect municipal wastewater dischargers to reduce over-application of sodium bisulfite to neutralize total residual chlorine. This change in practice will reduce regionwide chemical costs for municipal wastewater dischargers by about \$1.2 million per year.

Except for small and intermittent discharges, the Revised Tentative Order would also require continuous monitoring for total residual chlorine. This requirement will improve process control and ensure that municipal wastewater dischargers continuously evaluate compliance with the one-hour average effluent limit.

We received comments (Attachment B) 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 change is that we removed Silicon Valley Clean Water from the Revised Tentative Order, which provides it more time to change its total residual chlorine monitoring setup. In the meantime, Silicon Valley Clean Water must continue to comply with the technology-based effluent limitations in its current permit. 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