

California Regional Water Quality Control Board San Francisco Bay Region

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for
Silicon Valley Clean Water
Wastewater Treatment Plant and its wastewater collection system,
Redwood City, San Mateo County

The Regional Water Board received written comments from Silicon Valley Clean Water (SVCW) on a draft NPDES permit (tentative order) distributed for public comment on January 12, 2023. The comments are summarized below in *italics* (paraphrased for brevity), followed by staff's response. For the full content and context of the comments, please refer to the comment letter. To request a copy of the letter, see the contact information provided in Attachment F, section 8.7, of the Revised Tentative Order.

Revisions are shown below with ~~strikethrough~~ text for deletions and underline text for additions. The Revised Tentative Order also corrects typographical errors and contains minor editorial and formatting changes to the tentative order distributed for public comment.

SVCW Comment 1

SVCW requests that we reduce the monitoring frequency for chronic toxicity from monthly to quarterly (after U.S. EPA approval of the Toxicity Provisions). SVCW points out that the lowest effluent concentration it tested during the past five years was 2.5 percent effluent, which is twice the instream waste concentration of 1.25 percent that the Tentative Order requires for compliance monitoring. SVCW does not think the results at 2.5 percent effluent are representative of toxicity at the instream waste concentration 1.25 percent. It contends that quarterly compliance monitoring, along with twice-per-year surveillance monitoring, is sufficient.

SVCW proposes an "offramp" that reduces the monitoring frequency from monthly to quarterly if no chronic toxicity test results in a "fail" at the instream waste concentration for two consecutive years.

Response

We agree and revised the tentative order. If two years of monitoring data show no "fails" at the instream waste concentration, quarterly monitoring would be appropriate.

The Toxicity Provisions specify a monthly monitoring frequency for municipal wastewater treatment plants, like SVCW, that have a design flow greater than 5.0 million gallons per day unless certain conditions are met. To reduce the monitoring frequency to quarterly, Toxicity Provisions section III.C.4.b.i(B) requires, in part, that SVCW re-analyze all chronic toxicity tests and show that no chronic toxicity test results in a "fail" at the instream waste concentration. Alternatively, if the tests were not conducted at the instream waste concentration, the Toxicity Provisions allow this analysis to be based on tests using a higher effluent concentration. SVCW found that a

few of its tests failed at 2.5 percent effluent. Therefore, in accordance with the Toxicity Provisions, the tentative order must establish monthly monitoring for chronic toxicity.

However, since the tentative order requires SVCW to conduct compliance monitoring at 1.25 percent effluent upon U.S. EPA approval of the Toxicity Provisions, SVCW will soon have updated test results using the instream waste concentration. If after two years all these tests “pass,” the monitoring frequency can be reduced from monthly to quarterly.

We revised Monitoring and Reporting Program Table E-3, footnote 12, as follows:

Chronic toxicity tests shall be performed in accordance with MRP section 5.3 as of the first day of the month following U.S. EPA approval of the Toxicity Provisions. The monitoring frequency shall be reduced to quarterly if no chronic toxicity test over the previous two years results in a “fail” at the instream waste concentration.

We revised the Monitoring and Reporting Program section 5.3.1.3.1 as follows:

Routine Monitoring. The Discharger shall conduct routine monitoring as required by Table E-3 ~~once per quarter~~ at the Instream Waste Concentration (IWC) set forth in section 4.56 of the Order and continue routine monitoring during any Toxicity Reduction Evaluation (TRE).

We also added a paragraph at the end of Fact Sheet section 7.1.3 as follows:

After two years of monitoring at the instream waste concentration of 1.25 percent, this Order reduces the routine monitoring frequency for chronic toxicity from monthly to quarterly if the Discharger reports no “fails” at the instream waste concentration. This reduction in monitoring frequency is consistent with the minimum number of compliance samples Toxicity Provisions section III.C.4.b.i(B) requires to reduce the routine monitoring frequency.

SVCW Comment 2

SVCW requests that we revise the monitoring frequencies in Fact Sheet Table F-10 for chronic toxicity to be consistent with any changes made in response to SVCW’s first comment and for mercury to be consistent with the pretreatment and biosolids monitoring requirements in Table E-6 of the tentative order.

Response

We agree. While no change is needed for chronic toxicity, we revised Fact Sheet Table F-10 as follows:

Table F-10. Monitoring Requirements Summary

Parameter ^[1]	Influent INF-001 ^[2]	Effluent EFF-001 (or EFF-001D) ^[2]	Biosolids BIO-001 ^[2]
⋮	⋮	⋮	⋮
Acute Toxicity	-	1/Year ^[4]	-
Chronic Toxicity	-	1/Quarter or 1/Month	-
Ammonia, Total	-	1/Month	-
⋮	⋮	⋮	⋮
Hexavalent Chromium	1/Month	1/Month	2/Year
Mercury	1/Quarter	1/Month-Quarter	2/Year

SVCW Comment 3

SVCW requests that we provide additional time to comply with the continuous monitoring requirements established in the tentative order for chlorine residual if U.S. EPA approves Regional Water Board Resolution R2-2020-0031. SVCW explains that it would need to purchase and install additional equipment, piping, electrical service, and automation controls. To provide adequate time to procure, install, and pilot test the new system, SVCW requests that the compliance date to meet the new requirements be the first day of the sixth month following U.S. EPA approval.

Response

We agree and revised footnote 2 in Tables 2 and 3 of the tentative order as follows:

This instantaneous maximum total residual chlorine effluent limitation shall be replaced by a one-hour average effluent limitation of 0.53 mg/L on the first day of the sixth month following U.S. EPA approval of the chlorine water quality objectives set forth in Regional Water Board Resolution R2-2020-0031.

We revised Monitoring and Reporting Program Table E-3, footnote 5, as follows:

On of the first day of the sixth month following U.S. EPA approval of the chlorine water quality objectives set forth in Regional Water Board Resolution R2-2020-0031, total residual chlorine concentrations shall be monitored continuously and recorded at a frequency of not less than every 5 minutes....

We also revised Fact Sheet section 4.2.2.4 as follows:

Total Residual Chlorine. The total residual chlorine effluent limitation is based on Basin Plan Table 4-2. This technology-based effluent limitation will be replaced by a water quality-based effluent limitation (see Fact Sheet section 4.3.4.4) on the first day of the sixth month following

U.S. EPA approval of the chlorine water quality objectives set forth in
Regional Water Board Resolution R2-2020-0031.