

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

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for
Sausalito-Marín City Sanitary District Wastewater Treatment Plant and its Wastewater
Collection System
Sausalito, Marin County

The Regional Water Board received written comments from Sausalito-Marín City Sanitary District on a tentative order distributed for public comment on October 9, 2023. The comments are summarized below in *italics* (paraphrased for brevity) and followed by a staff response. For the full content and context of the comments, please refer to the comment letter. To request a copy of the comment letter, see the contact information provided in Fact Sheet section 8.5 of the Revised Tentative Order.

Revisions are shown with ~~striketrough~~ for deletions and underline for additions. This document also contains staff-initiated revisions in addition to those arising from the response to comments.

COMMENT AND RESPONSE

Comment: *The District requests that Provision 6.3.5.1, Table 3, Task 4, Construct Marin City Pump Station Rehabilitation Project, be revised from requiring full completion of the project to instead requiring completion of the project's design and commencement of construction. The District says, while it anticipates completion of the project in 2028, it cannot guarantee that unforeseen circumstances will not cause delays in the construction timeline.*

Response: We revised Provision 6.3.5.1, Table 3, Task 4, Construct Marin City Pump Station Rehabilitation Project, as follows:

Construct Marin City Pump Station Rehabilitation Project. The Discharger shall complete the design phase and begin construction of the Marin City Pump Station Rehabilitation Project, which will increase the pump station's capacity and replace aging pipes.

STAFF-INITIATED CHANGES

In addition to minor editorial and formatting changes, we clarified some language to correct typographical errors.

We revised Provision 6.3.5.3, Table 5, Cyanide Action Plan, Task 2, as follows:

Implement Cyanide Control Program. Implement a control program to minimize cyanide discharges consisting, at a minimum, of the following elements...

...If the plant influent cyanide concentration exceeds 11 µg/L, the Discharger shall collect a follow-up sample within 5 days of becoming aware of the laboratory results. If the results of the follow-up sample also exceed 11 7.0 µg/L, then a “significant cyanide discharge” is occurring.

We revised Fact Sheet Table F-2, Previous Effluent Limitations and Monitoring Data as follows:

Table F-2. Previous Effluent Limitations and Monitoring Data

Parameter	Units	Average Monthly Limit	Average Weekly Limit	Maximum Daily Limit	Other Limit	Average	Highest Daily Value
Carbonaceous Biochemical Oxygen Demand, 5-day @ 20°C (CBOD)	mg/L	25	40	-	-	13	30
Total Suspended Solids (TSS)	mg/L	30	45	-	-	12	61 [1]
CBOD percent removal	%	85 (minimum)	-	-	-	93	88 [2]
TSS percent removal	%	85 (minimum)	-	-	-	96	91 [2]
Oil and Grease	mg/L	10	-	20	-	ND	1.8
pH	standard units	-	-	-	6.0 - 9.0 [3]	7.1	6.3 – 8.7 [4]
Chlorine, Total Residual	mg/L	-	-	-	0.0 [5]	0	0
Copper	µg/L	50	-	79	-	11	29
Cyanide	µg/L	18	-	41	-	2.8	10
Zinc	µg/L	500	-	670	-	62	136
Bis (2-ethylhexyl) phthalate	µg/L	55	-	100	-	0.68 [6]	1.8
Chlorodibromomethane	µg/L	340	-	680	-	7.2 [6] [7]	59
Dioxin-TEQ	µg/L	1.4 x 10 ⁻⁸	-	2.8 x 10 ⁻⁸	-	9.1 x 10 ⁻¹¹	9.1 x 10 ⁻¹¹
Total Ammonia	mg/L as N	180	-	380	-	17	43
Enterococcus	CFU/100 mL	-	-	-	35 [7] [8]	24	1200
Fecal Coliform	MPN/100 mL	140 [8] [7]	-	-	400 [9]	ND	17,000 [10]

Parameter	Units	Average Monthly Limit	Average Weekly Limit	Maximum Daily Limit	Other Limit	Average	Highest Daily Value
Acute Toxicity	% survival	-	-	-	Not less than 90% (11-sample median), Not less than 70% (11-sample 90 th percentile)	70 ^[11]	95 ^[12]

Footnotes:

- ^[1] This result did not violate the Discharger’s effluent limits because this is the highest daily value of Total Suspended Solids (TSS) that the Discharger reported, but the Discharger’s TSS effluent limits are average monthly and average weekly effluent limits. The Discharger did not violate its average weekly or average monthly TSS effluent limits during the previous order term.
- ^[2] Lowest percent removal on a monthly basis.
- ^[3] Instantaneous minimum and instantaneous maximum.
- ^[4] Range of lowest to highest pH values.
- ^[5] Instantaneous maximum.
- ^[6] Average of data set, with non-detect results set to half of the minimum detection limit.
- ^[7] Monthly geometric mean.
- ^[8] Monthly median.
- ^[9] Monthly 90th percentile.
- ^[10] This result did not violate the Discharger’s effluent limits because its fecal coliform effluent limits in the previous order were expressed as a monthly median and monthly 90th percentile. This result is the highest daily fecal coliform result that the Discharger reported during the previous order term. The Discharger did not violate its monthly median and monthly 90th percentile fecal coliform effluent limits during the previous order term.
- ^[11] Lowest 11-sample 90th percentile survival.
- ^[12] Lowest 11-sample median percent survival.

We revised Fact Sheet section 4.3.4.6, Enterococcus Bacteria, as follows:

Enterococcus Bacteria. The enterococcus effluent limitations are based on the *Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California – Part 3, Bacteria Provisions and a Water Quality Standards Variance Policy...*

...This calculation results in a six-week rolling geometric mean enterococcus effluent limitation of 290 MPN/100 mL and a limitation of no more than 10 percent of enterococcus samples in a calendar month exceeding 1,100 ~~4,200~~ MPN/100mL.

We revised Fact Sheet Table F-10, Monitoring Requirements Summary, as follows:

Table F-10. Monitoring Requirements Summary

Parameter ^[1]	Influent INF-001 ^[2]	Effluent EFF-001 ^[2]	Effluent EFF-001b (blending) ^[2]	<u>SUR-001 Toxicity Surveillance</u> ^[2]
Flow	Continuous/D	Continuous/D	Continuous/D	=
CBOD	1/Week	1/Week	1/Year ^[3]	=

Parameter ^[1]	Influent INF-001 ^[2]	Effluent EFF-001 ^[2]	Effluent EFF-001b (blending) ^[2]	<u>SUR-001 Toxicity Surveillance</u> ^[2]
TSS	1/Week	1/Week	1/Day	=
Cyanide	2/Year	1/Month	1/Year ^[3]	=
pH	-	1/Day or Continuous/D	1/Day or Continuous/D	=
Enterococcus Bacteria	-	2/Week 3/Week	1/Day	=
Total Residual Chlorine	-	Continuous/D	Continuous/D	=
Ammonia, Total	-	1/Month	1/Year ^[3]	=
Copper	-	1/Month	1/Year ^[3]	=
Zinc	-	1/Month	1/Year ^[3]	=
Chlorodibromomethane	-	2/Year	1/Year ^[3]	=
Chronic Toxicity – <u>Routine</u>	-	2/Year	-	=
Chronic Toxicity – <u>Surveillance</u>	=	=	=	<u>2/Year</u>
Dioxin-TEQ	-	Once	-	=
Selenium	-	Once	-	=
Priority Pollutants ^[4]	-	Once	-	=
Volume of partially-treated wastewater	-	-	1/Blending Event	=
Duration of blending event	-	-	1/Blending Event	=