

**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. Napa Sanitation District - August 25, 2023
2. Bay Area Clean Water Agencies (BACWA) – September 29, 2023

The comments are summarized below in *italics* (paraphrased for brevity) and followed by staff's 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. This document also contains staff-initiated changes.

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

**Napa Sanitation District Comment 1:** *Napa Sanitation District requests that we correct its mailing address in Fact Sheet Table F-1.*

**Response:** We corrected Napa Sanitation District's mailing address in Fact Sheet Table F-1 as follows:

1515 ~~Siseo~~ Soscol Ferry Road Napa, CA 94558

**BACWA Comment 1:** *BACWA supports adoption of the Tentative Order and indicates that by including water quality-based effluent limits for chlorine that consider initial dilution and a one-hour averaging period instead of an instantaneous maximum, its members would no longer need to overdose with sodium bisulfite to ensure that chlorine limits are met. This change would provide environmental benefits from reduced sodium bisulfite usage and save BACWA members about \$2 million per year on sodium bisulfite purchases.*

**Response:** Based on this comment, we updated the cost savings stated in the fourth paragraph of Fact Sheet section IV.B as follows:

Assuming that there will be small increases in chlorine observable near discharge outfalls, they would be consistent with the maximum benefit to the people of the state because they will reduce the use and discharge of dechlorination chemicals, which generate greenhouse gas emissions

during manufacturing and delivery, place oxygen demands on receiving waters when discharged, and unnecessarily generate additional costs for dischargers. The excess use of dechlorination chemicals costs Dischargers up to \$1.2 million per year (Bay Area Clean Water Agencies, September 29, 2023~~August 20, 2021~~).

## **STAFF INITATED CHANGES**

American Canyon does not use chlorine to disinfect treated wastewater and should not have been included in the Tentative Order. Therefore, we deleted references to American Canyon from Table 1, Table 2, Fact Sheet Table F-1, and Fact Sheet Table F-4.