

ITEM: 6D

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. If the Board reissues the Sewerage Agency of Southern Marin and Sausalito-Marín City Sanitary District permits (Items 6B and 6C) before considering this Revised Tentative Order, this Revised Tentative Order would amend these updated permits too (highlighted in yellow in the proposed order).

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. On October 12, 2021, the Board adopted a blanket permit amendment to implement the Basin Plan amendment. The permit amendment was to become effective upon U.S. EPA's approval of the Basin Plan amendment. On June 5, 2023, the Regional Water Board withdrew its request for U.S. EPA approval of the Basin Plan amendment's chlorine water quality objectives because U.S. EPA indicated that the proposed objectives may not protect threatened or endangered species. This Revised Tentative Order would update chlorine and oil and grease requirements based on existing Regional Water Board authority. To ensure that threatened and endangered species are protected, the Revised Tentative Order limits the spatial extent of mixing zones relative to size of the receiving water bodies. It also requires each municipal wastewater discharger to implement a Chlorine Process Control Plan to target a chlorine residual of 0.0 mg/L at the discharge point. This will ensure that chlorine will typically not be present in the discharge and, if chlorine is detected, the duration and spatial extent of any chlorine would be limited.

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 implemented as a one-hour average, we expect municipal wastewater dischargers to reduce over-application of sodium bisulfite to neutralize total residual chlorine. This change in practice would reduce chemical costs for municipal wastewater dischargers by about \$2 million per year and reduce greenhouse gas emissions generated during the manufacturing and delivery of dechlorination chemicals.

With few exceptions (e.g., intermittent discharges), the Revised Tentative Order would require continuous monitoring for total residual chlorine. This requirement would improve process control and ensure that municipal wastewater dischargers continuously evaluate compliance with the one-hour average effluent limit and continue to protect aquatic life from chlorine discharges.

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 revisions are information corrections that did not substantively change any requirements. 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

For an electronic copy of the comments, please contact Robert Schlipf via email at Robert.Schlipf@waterboards.ca.gov or at (510) 622-2478.

Appendix C
Response to Comments