

California Regional Water Quality Control Board San Francisco Bay Region

RESPONSE TO WRITTEN COMMENT AND STAFF-INITIATED CHANGES

On the Tentative Order for
City of San Mateo and Estero Municipal Improvement District
Water Quality Control Plant and Collection System
San Mateo, San Mateo County

The Regional Water Board received a comment from the City of San Mateo on a Tentative Order distributed for public comment on August 14, 2023. The comment is summarized below in *italics* (paraphrased for brevity), 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 letter, see the contact information provided in Attachment F, section 8.7, of the Revised Tentative Order.

Revisions to the Tentative Order are shown with underlined text for additions and ~~strikethrough~~ text for deletions. The Revised Tentative Order also contains staff-initiated changes.

City of San Mateo

Comment

The City of San Mateo requests that we adjust the deadline to conduct a chronic toxicity species sensitivity screening from 18 months after the permit effective date to 18 months after the new treatment plant comes online. During the first months following the permit effective date, the City will be bringing various new treatment units online while still operating its current plant. The City prefers not to conduct the species sensitivity screening, which spans over a year, during the transition because the results would not be representative of the new plant's discharge.

Response

We agree and revised Monitoring and Reporting Program (Attachment E), Appendix E-1, section 2.1.1, as follows:

The Discharger shall conduct species sensitivity screening and submit a technical report that identifies the most sensitive test species within 18 months of the effective date of this Order if the Discharger has not previously conducted a species sensitivity screening as specified in Toxicity Provisions section III.C.2 treatment plant upgrades coming online (see Provision 6.3.5.4 of this Order).

We also revised the last paragraph of Fact Sheet section 7.1.3 as follows:

The MRP (Attachment E), Appendix E-1, section 2.1.21, requires a new toxicity screening that satisfies the minimum screening requirements stated in Toxicity Provisions III.C.2.a within 18 months of the ~~effective date of this Order~~ treatment plant upgrades coming online (see Provision 6.3.5.4 of this Order). The Toxicity Provisions require that data be analyzed using the TST, and the test species include one vertebrate, one invertebrate, and one aquatic plant/alga from Table 1 of Toxicity Provisions section III.B.2. The Toxicity Provisions species screening requirements are summarized in the MRP, Appendix E-2.

Staff-Initiated Changes

Change 1

To ensure adequate bacteria surveillance in the absence of fecal coliform monitoring, we increased the *Enterococcus* bacteria monitoring frequency from four times per year during the high-recreation season to five times per month. This frequency is consistent with the Discharger’s past fecal coliform bacteria monitoring frequency. As such, we revised Attachment E Table E-3 as follows:

Table E-3. Effluent Monitoring

Parameter	Unit	Sample Type	Minimum Sampling Frequency
⋮	⋮	⋮	⋮
Chlorine, Total Residual	mg/L	Continuous or Grab	Continuous/D or 1/Day ^{[6][7]}
<i>Enterococcus</i> Bacteria ^[8]	CFU/100mL ^[9]	Grab	4/Year ^[49] <u>5/Month</u>
Chronic Toxicity – Routine ^[44] [10]	“pass” or “fail” and % effect [42] [11]	C-24	2/Year
⋮	⋮	⋮	⋮

Footnotes:

⋮

^[9] Results may be reported as either Most Probable Number (MPN)/100 mL if the laboratory method used provides results in MPN/100 mL or Colony Forming Units (CFU)/100 mL if the laboratory method used provides results in CFU/100 mL.

~~^[49] The four samples shall be collected in different calendar months during the higher recreational water contact season (June to October). If the enterococcus effluent limitation is exceeded, the Discharger shall conduct sampling five times per month for at least three consecutive months. If full compliance is demonstrated after the three month period, the Discharger may return to the 4/Year sampling frequency.~~

~~^[44] [10]~~ Refer to MRP section 5.1.3.1.

⋮

~~^[46] [15]~~ The Discharger shall collect C-24 samples for metals.

We also revised Fact Sheet Table F-11 as follows:

Table F-11. Monitoring Requirements Summary

Parameter ^[1]	Influent INF-001 ^[2]	Effluent EFF-001, EFF-001D, or SUR-001 ^[2]	Biosolids BIO-001 ^[2]
⋮	⋮	⋮	⋮
Chlorine, Total Residual	-	Continuous/D or 1/Hour	-
<i>Enterococcus</i> Bacteria	-	4/Year ^[3] <u>5/Month</u>	-
Routine Chronic Toxicity	-	2/Year	-
⋮	⋮	⋮	⋮

Footnotes:

^[1] The Discharger must also comply with the monitoring requirements in the Mercury and PCBs Watershed Permit (NPDES Permit CA0038849) and the Nutrients Watershed Permit (NPDES Permit CA0038873).

^[2] The MRP defines these monitoring locations and sampling frequencies.

^[3] ~~The four samples shall be collected in different calendar months during the higher recreational water contact season (June to October). If the enterococcus effluent limitation is exceeded, the Discharger shall conduct sampling five times per month for at least three consecutive months. If full compliance is demonstrated after the three month period, the Discharger may return to the 4/Year sampling frequency.~~

Change 2

We made non-substantive editorial and formatting changes.