

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 91-030

AMENDMENT OF WASTE DISCHARGE REQUIREMENTS, ORDER 89-101

NPDES NO. CA0037664

CITY AND COUNTY OF SAN FRANCISCO
SOUTHEAST WATER POLLUTION CONTROL PLANT

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter the Board) finds that:

1. On June 21, 1989, the Board adopted Order No. 89-101 (NPDES permit CA0037664), reissuing waste discharge requirements to the City and County of San Francisco (hereinafter the discharger) for its Southeast water pollution control plant.
2. The Southeast plant provides secondary treatment for an average dry weather flow of 67 million gallons per day (mgd) and discharges effluent to San Francisco Bay via a deepwater outfall off Pier 80 (Army Street Terminal).
3. The Board's Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) allows dischargers to request alternate effluent limits for any of the pollutants listed in Table IV-1 within six months of the effective date of the 1986 Basin Plan amendments. Dischargers may request alternate limits based on cost-impact (1.a.) or site-specific criteria (1.b.). The discharger requested an alternate limit for cyanide during this period (1.a. option), and submitted a study plan in March 1988. Work was in progress at the time of the NPDES permit reissuance.
4. Order No. 89-101 establishes an effluent limit of 25 ug/l for cyanide (B.6.j.) and an interim effluent limit of 60 ug/l (B.6.j. - footnote 5). The former is based on the Basin Plan (Table IV-1) and the latter is based on the Southeast plant's recent performance. Provision E.4 requires the discharger to propose an alternate limit for cyanide by February 1, 1990, and to meet either this alternate limit or the 25 ug/l limit by July 1, 1990.
5. The Basin Plan requires dischargers seeking alternate limits (1.a. option) to "... demonstrate that all sources of the toxic pollutant are being controlled through application of

all reasonable treatment and source control measures."

6. The discharger proposed an alternate limit of 60 ug/l for cyanide in a May 1990 report to the Board. The report's conclusions are summarized below. During the period 1987 through 1989, effluent cyanide concentrations exceeded 25 ug/l 37% of the time and exceeded 60 ug/l only 6% of the time. Only 7% of the cyanide loading comes from industries regulated by the discharger's pre-treatment program; the remainder comes from unregulated industry (or commercial) and domestic sources. The plant's outfall achieves a minimum initial dilution of 30:1, so that an effluent limit of 60 ug/l assures no acute toxicity (based on EPA saltwater criterion of 2 ug/l).
7. The discharger's report does not contain enough information to support a conclusion that all reasonable source control is being applied for cyanide, as required by the Basin Plan. With only 7% of the cyanide loading coming from regulated industry, the discharger needs to investigate unregulated sources, both industrial and non-industrial. Further, the Basin Plan allows a maximum of 10:1 dilution credit. The Table IV-1 effluent limit for cyanide (25 ug/l) is based on analytical detection limitations, and is already more than 10 times the EPA saltwater criterion for cyanide.
8. The Southeast plant can meet an interim effluent limit below 60 ug/l. When unrepresentative 1987 data is removed from the data set, effluent cyanide concentrations are at or below 50 ug/l approximately 95% of the time. This result is based on 1989-90 effluent data, including more frequent monitoring after the June 1990 permit reissuance.
9. This action to amend an NPDES permit is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code (CEQA) pursuant to Section 13389 of the California Water Code.
10. The discharger and interested persons have been notified of the Board's intent to amend waste discharge requirements for the existing discharge, and have been provided with the opportunity for a public hearing and the opportunity to submit their written views and recommendations.
11. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED that, in order to meet the provisions contained in Division 7 of the Water Code and regulations adopted thereunder and the provisions of the Clean Water Act as amended and regulations and guidelines adopted thereunder, Order No. 89-101 is amended as follows:

A. Note (5) to effluent limit B.6.j. is revised to read:

The interim effluent limit for cyanide shall be 50 ug/l (daily maximum) - see Provision E.4.

B. Provision E.4. is revised to read:

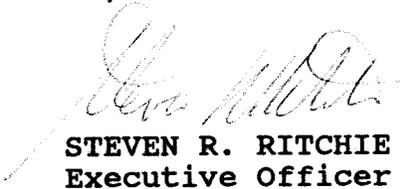
Alternate Effluent Limit for Cyanide

Task

Deadline

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| a. | Submit a study plan acceptable to the Executive Officer to determine sources of cyanide in plant influent. The study should include a mass balance by category (e.g. residential, commercial) and identify additional, feasible source control measures. These may include waste minimization measures. | May 1, 1991 |
| b. | Submit a report containing study results, including a schedule for implementation of feasible source control measures and an alternate effluent limit based on those measures. | July 1, 1992 |
| c. | Comply with the effluent limit for cyanide in B.6.j. of Order 89-101 or an alternate effluent limit approved by the Board. | January 1, 1993 |

I, Steven R. Ritchie, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on March 20, 1991.


STEVEN R. RITCHIE
Executive Officer