

**North San Mateo County Sanitation District
2006 NPDES Permit Renewal - NPDES NO. CA0037737**

**Formal Comments on Tentative Order
September 18, 2006**

Comments by the North San Mateo County Sanitation District on its Tentative Order NPDES permit are shown below; roughly in the order they appear in the permit. In presenting its comments the district has utilized WORD's "tracked changes" program in which a strikeout/underline format is used to remove/add proposed language /example. For ease of review, staff notes the specific sections within the Tentative Order, followed by numerically ordered comments then actual suggested modifications to the Tentative Order itself. It is hoped that the exchange of ideas presented remains consistent with the expectations associated with the public comment period.

Deleted: (example)

Section II. Findings

1. Technical accuracy and clarification.

B. Facility Description. The Discharger owns and operates a sanitary sewage treatment plant and the sewage collection system serving City of Daly City, portions of San Mateo County, the Town of Colma, San Francisco County Jail, and the Westborough Water District within the City of South San Francisco. The treatment system, which consists of screening, compacting, primary sedimentation with flow equalization and secondary clarification, degritting, gravity and air floatation thickening, anaerobic digestion, dewatering and a tertiary treatment system for recycled water, provides secondary treatment of domestic wastewater from the service area. Flow equalization is operated when necessary. A portion of the effluent receives tertiary treatment for water reclamation projects on a seasonal basis. The combined service population is approximately 120,000. Approximately 180 miles of sanitary sewer lines and eight lift stations convey domestic sewage to the facility. Treated wastewater is discharged through the Vista Grande Tunnel structure and a 27" force main located at Fort Funston in San Francisco County. Final discharge is through a submerged diffuser extending 2,500 feet from the shoreline and terminating at a depth of approximately 32 feet (-32 MLLW) (Discharge Point 001, see table on cover page) to the Pacific Ocean, a water of the United States. Attachment B provides a map of the area around the facility. Attachment C provides a flow schematic of the facility.

Deleted: on Ocean Beach

2. While the District is appreciative of the intent to follow a standardized permit template, the sentence does not appear to be applicable to this permit and therefore should be deleted from the finding and is consistent with recently adopted Bay Area Permits.

F. Technology-based Effluent Limitations. Title 40 of the Code of Federal Regulations, at section 122.44(a) requires that permits include applicable

technology-based limitations and standards. This Order includes technology-based effluent limitations based on Secondary Treatment Standards at Part 133. A detailed discussion of the technology-based effluent limitations development is included in the Fact Sheet (Attachment F).

Deleted: The Regional Water Board has considered the factors listed in Water Code section 13241 in establishing these requirements

- The State’s Drinking Water Policy would not apply to Ocean Receiving Waters and is not applicable to the discharge permitted by this Order and therefore should be deleted and is consistent with recently adopted Bay Area Permits*

H. Water Quality Control Plans. The Regional Water Board adopted a Water Quality Control Plan for the San Francisco Bay Region (hereinafter Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for the Pacific Ocean and other receiving waters addressed through the plan. Beneficial uses applicable to the coast areas in the San Francisco Bay Region are as follows:

Deleted: In addition, the Basin Plan implements State Water Resources Control Board (State Water Board) Resolution No. 88-63, which established state policy that all waters, with certain exceptions, should be considered suitable or potentially suitable for municipal or domestic supply

Table 5. Basin Plan Beneficial Uses

Discharge Point	Receiving Water Name	Beneficial Use(s)
001	Pacific Ocean	Water contact recreation, non-contact water recreation; industrial service supply; navigation; marine habitat; shellfish harvesting; ocean, commercial and sport fishing; and preservation of rare and endangered species.

Requirements of this Order implement the Basin Plan.

The State Water Board adopted a *Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Water and Enclosed Bays and Estuaries of California* (Thermal Plan) on May 18, 1972, and amended this plan on September 18, 1975. This plan contains temperature objectives for coastal waters. Requirements of this Order implement the Thermal Plan.

- Deletion of template language that is conclusive and not applicable to the Ocean Plan and subsequently is not applicable to this permit. Specifically, this permit contains effluent limits based on Table A in the Ocean Plan, which includes limits that are, in fact, more stringent than federal requirements. Total chlorine residual and bacteria limits contained in the District’s permit are water quality based limits and not technology based effluent limits.*

K. Stringency of Requirements for Individual Pollutants. Individual pollutant restrictions consist of technology-based restrictions and water quality-based effluent limitations. The technology-based effluent limitations consist of restrictions on carbonaceous biochemical oxygen demand, total suspended solids,

Deleted: This Order contains restrictions on individual pollutants that are no more stringent than required by the federal CWA.

settleable solids, oil and grease, turbidity, and pH. WQBELs have been scientifically derived to implement water quality objectives that protect beneficial uses. Both the beneficial uses and the water quality objectives have been approved pursuant to federal law and are the applicable federal water quality standards. The scientific procedures for calculating the individual WQBELs are based on the Ocean Plan, which was approved by USEPA on February 14, 2006. All beneficial uses and water quality objectives contained in the Ocean Plan were approved under state law and submitted to and approved by USEPA prior to May 30, 2000. Any water quality objectives and beneficial uses submitted to USEPA prior to May 30, 2000, but not approved by USEPA before that date, are nonetheless “applicable water quality standards for purposes of the CWA” pursuant to section 131.21(c)(1).

Deleted: total chlorine residual and total coliform bacteria

Deleted: Restrictions on these pollutants are specified in federal regulations as discussed in the Fact Sheet (Attachment F), and the permit’s technology-based pollutant restrictions are no more stringent than required by the CWA.

5. *Minor edit for clarity.*

L. Antidegradation Policy. Section 131.12 requires that the state water quality standards include an antidegradation policy consistent with the federal policy. The State Water Board established California’s antidegradation policy in State Water Board Resolution No. 68-16. Resolution No. 68-16 incorporates the federal antidegradation policy where the federal policy applies under federal law. Resolution No. 68-16 requires that existing quality of waters be maintained unless degradation is justified based on specific findings. The Regional Water Board’s Basin Plan implements, and incorporates by reference, both the state and federal antidegradation policies. As discussed in detail in the Fact Sheet (Attachment F) the permitted discharge is consistent with the antidegradation provision of 40 CFR Section 131.12 and State Water Board Resolution No. 68-16.

Deleted: Collectively, this Order’s restrictions on individual pollutants are no more stringent than required to implement the technology-based requirements of the CWA and the applicable water quality standards for purposes of the CWA.

Deleted:

Deleted: s

6. *The federal anti-backsliding provisions restrict the ability to issue effluent limits that are less stringent than previous limits. However, the regulations do not prohibit backsliding.*

M. Anti-Backsliding Requirements. Sections 402(o)(2) and 303(d)(4) of the CWA and federal regulations at title 40, Code of Federal Regulations section 122.44(1) restrict backsliding in NPDES permits. These anti-backsliding provisions require effluent limitations in a reissued permit to be as stringent as those in the previous permit, with some exceptions where limitations may be relaxed. As discussed in detail in the Fact Sheet (Attachment F) the permitted discharge is consistent with the anti-backsliding provisions.

Deleted:

Deleted: prohibit

Deleted: All effluent limitations in this Order are at least as stringent as the effluent limitations in the previous Order.

7. *Proposed language provides clarification regarding amendments to the MRP and is consistent with language in recently adopted Bay Area permits.*

N. Monitoring and Reporting. Section 122.48 requires that all NPDES permits specify requirements for recording and reporting monitoring results. Water Code sections 13267 and 13383 of the CWC authorize the Regional Water Board to require technical and monitoring reports. The Monitoring and Reporting Program

establishes monitoring and reporting requirements to implement federal and State requirements. This Monitoring and Reporting Program is provided in Attachment E. [The MRP may be amended by the Executive Officer pursuant to USEPA regulation 40 CFR 122.62, 122.63 and 124.5](#)

8. *With the exception of subsection IV.C., the other sections referred to in the tentative order are not applicable to the permitted discharge. The reference to section VI.C. appears to be in error as this section contains re-opener provisions which should not be subject to any enforcement provisions pursuant to state or federal law.*

P. Provisions and Requirements Implementing State Law. The provision/requirement in subsection IV.C of this Order are included to implement state law only. These provisions/requirements are not required or authorized under the federal CWA; consequently, violations of these provisions/requirements are not subject to the enforcement remedies that are available for NPDES violations.

Deleted: s

Deleted: s

Deleted: s

Deleted: IV.B,

Deleted: , and V.B, and VI.C.

9. *Minor edit for clarity.*

Q. Notification of Interested Parties. The Regional Water Board has notified the Discharger and interested agencies and persons of its intent to prescribe Waste Discharge Requirements for the discharge and has provided them with an opportunity to submit their written comments and recommendations. Details of notification are provided in the Fact Sheet [\(Attachment F\)](#) of this Order.

10. *Minor edit for clarity.*

R. Consideration of Public Comment. The Regional Water Board, in a public meeting, heard and considered all comments pertaining to the discharge. Details of the Public Hearing are provided in the Fact Sheet [\(Attachment F\)](#) of this Order.

Section IV. Effluent Limitations and Discharge Specifications

11. *Multiple comments on Table 6 footnotes as detailed below.*
- o *Table 6, Footnote 1. It is understood that the Ocean Plan requires mass limits for Table B WQO; however, clarification regarding applicability of mass limits during wet weather events is unclear. Based on the equation, and using a worst case scenario any time the plant flow is above 8 mgd and a chlorine residual excursion occurs that is roughly at, but does not exceed, the effluent limit the mass limits would then be exceeded. In addition, the footnote states the calculation of weekly and monthly limits although the table shows 6-month median and maximum daily. The District requests*

detailed clarification on the application of mass limits envisioned under this permit.

- *Table 6, Footnote 2 – To ensure that the expiration of the suspended total chlorine residual effluent limitation is consistent with the expiration of the interim effluent limitation for enterococcus, similar language has been added.*
- *Table 6, Footnote 2 –Remaining paragraph. Clarifying language that addresses the determination of compliance when on-line, continuous monitoring systems are used. This language is consistent with other recently adopted Bay Area permits.*

Table 6. Effluent Limitations

Parameter	Units	Effluent Limitations ^[1]					
		Average Monthly	Average Weekly	Average Daily	6-month Median	Maximum Daily	Instantaneous Maximum
Carbonaceous Biochemical Oxygen Demand 5-day @ 20°C	mg/L	25	40	50	--	--	--
	--	--	--	--	--	--	--
Total Suspended Solids	mg/L	30	45	60	--	--	--
	--	--	--	--	--	--	--
Oil and Grease	mg/L	25	40	--	--	--	75
	--	--	--	--	--	--	--
Settleable Solids	ml/L	1.0	1.5	--	--	--	3.0
Total Chlorine Residual ^[2]	mg/L	--	--	--	0.14	0.57	4.3
	kg/day	--	--	--	4.2	17	--
Turbidity	NTU	75	100	--	--	--	225
Chronic Toxicity ^[3]	TU _c	--	--	--	--	71	--

Parameter	Units	Effluent Limitations ^[1]					
		Average Monthly	Average Weekly	Average Daily	6-month Median	Maximum Daily	Instantaneous Maximum

[1] Mass emission limitations are based on a peak dry weather capacity of 8 mgd. Mass effluent limitations shall be calculated by averaging the reported daily values over the relevant number of days for the monitoring interval.

Deleted: Weekly and monthly

Deleted: m

[2] The Total Chlorine Residual effluent limit is suspended for the duration of the Beneficial Uses Survey/Dilution Study Period described in Section VI.C.5 (Other Special Provisions). The suspension of the total chlorine residual effluent limit shall expire no later than April 30, 2009. Requirement defined as below the limit of detection in standard test methods defined in the latest edition of *Standard Methods for the Examination of Water and Wastewater*. The Discharger may elect to use a continuous on-line monitoring system(s) for measuring flows, chlorine residual and sodium bisulfite (or other dechlorinating chemical) dosage (including a safety factor) and concentration to prove that chlorine residual exceedances are false positives. If convincing evidence is provided, Regional Water Board staff may conclude that these false positive chlorine residual exceedances are not violations of this permit limitation.

[3] Expressed as Chronic Toxicity Units (TU_c)

TU_c = 100/NOEC where:

NOEC (No Observed Effect Concentration) is expressed as the maximum percent effluent or receiving water that causes no observable effect on the test organism as determined by the result of a critical life state toxicity test listed in Appendix III of the Ocean Plan (2005) adopted and effective February 14, 2006.

12. *It is understood that the major initiative toward receiving water beneficial uses is predicated on impacts to public health associated with SWRCB-Water Contact Standards (REC 1). As such, it is deemed appropriate to then focus on preferred methods associated in furthering that public interest, and therefore the consistent use of standards associated with Enterococcus Bacteria as contained in most recent amendments to the California Ocean Plan adopted on February 14, 2006. Using this as a basis, the effluent limitation for this permit would be calculated by using the California Ocean Plan equation for the calculation of effluent limitations (see Section III. C of Ocean Plan). Along with the most useful standards based on current information, Enterococcus is the preferred and standard method used for ascertaining public health and safety. It is thought that meeting the enterococcus standard contained in the Ocean Plan would also address the fecal and total standards as well. The modifications do not violate anti-backsliding provisions as the methodology used to calculate the limitations have changed. The calculation method now provides a basis for the limitations and is consistent with the 2005 California Ocean Plan. (Section III.C)*

d. Enterococcus Bacteria: The treated wastewater, prior to discharge, shall not exceed the calculated geometric mean or single sample maximum using the effluent limits equation specified in Section III.C. of the California Ocean Plan to values specified in Section II.B.1.a. (1) iii in the California Ocean Plan.

Deleted: Total Coliform

Deleted: a geometric mean value of 2,400 MPN/100 ml for any five consecutive samples. No single sample may exceed 24,000 MPN/100 ml.

13. *Revised in keeping with the Beneficial Uses Survey/Dilution Study objectives.*

e. **Interim Enterococcus Bacteria Limit:** Effluent Limitation A.1.d (Enterococcus Bacteria) shall be suspended during the Beneficial Uses survey/dilution study period defined in Section VI.C.5 (Other Special Provisions). During the study period, the discharger shall comply with total and fecal coliform requirements specified in Receiving Water Limitations V.A.1.c. These interim limits shall expire no later than April 30, 2009.

Deleted: Total Coliform

Deleted: Total Coliform

Deleted: and V.A.3.

Section V. Receiving Water Limitations

14. *Editorial and addition of Enterococcus Bacteria consistent with the 2005 California Ocean Plan*

A. Surface Water Limitations

Receiving water limitations are based on water quality objectives contained in the Ocean Plan and are a required part of this Order. Compliance shall be determined from samples collected at stations representative of the area within the waste field where initial dilution is completed.

1. Within a zone bounded by the shoreline and a distance of 1,000 feet from the shoreline or the 30-foot depth contour, whichever is further from the shoreline, and in areas outside this zone used for water contact standards, as determined by the Regional Water Board, the following bacteriological objectives shall be maintained throughout the water column:

Deleted: sports

- a. Samples of water from each sampling station shall have a concentration of total coliform organisms less than 1,000 per 100 ml (1,000 MPN) provided that not more than 20 percent of samples at any sampling station, in a 30-day period, exceeds 1,000 MPN, and provided further that no single sample when verified by a repeat sample taken within 48 hours shall exceed 10,000 MPN.
- b. The fecal coliform concentration based on a minimum of not less than 5 samples for any 30-day period shall not exceed a geometric mean of 200 MPN nor shall more than 10 percent of the total samples during any 60-day period exceed 400 MPN.

- c. The enterococcus concentration based on a minimum of not less than 5 samples for any 30-day period shall not exceed a geometric mean of 35 MPN nor shall more than 10 percent of the total samples during any 60-day period exceed 104 MPN (Dilution notwithstanding).

Formatted: Bullets and Numbering

15. *Minor edit for clarity. There is no Chapter IV in the Ocean Plan. Was this a reference associated with Chapter II, Table B?*

A. Surface Water Limitations

11. The concentration of substances set forth in Chapter II, Table B of the Ocean Plan in marine sediments shall not be increased to levels that would degrade indigenous biota.

Deleted: v

Section VI. Provisions

16. *Minor edits for clarity and language to provide clarification with regards to the impact of violating duplicative requirements. This language is consistent with other recently adopted Bay Area permits.*

A. Standard Provisions

2. **Regional Water Board Standard Provisions.** The Discharger shall comply with all applicable items of the *Standard Provisions and Reporting Requirements for NPDES Surface Water Discharge Permits, August 1993* ([Standard Provisions, Attachment G](#)), including any amendments thereto. Where provisions or reporting requirements specified in this Order are different from equivalent or related provisions or reporting requirements given in the Standard Provisions, the specifications of this Order shall apply. [Duplicative requirements in the federal Standard Provisions in VI.A.1, above \(Attachment D\) and the regional Standard Provisions \(Attachment G\) are not separate requirements such that violation of a duplicative requirement constitutes two separate violations.](#)

Deleted: ,

17. *Suggest replacing with reference to standard provisions for consistency with other permits. This language is consistent with other recently adopted Bay Area permits.*

B. Monitoring and Reporting Program Requirements

The Discharger shall comply with the MRP, and future revisions thereto, in Attachment E of this Order. [The Discharger shall also comply with the requirements contained in Self-Monitoring Program, Part A, August 1993 \(Attachment G\).](#)

Deleted: The MRP includes monitoring for conventional, non-conventional, and toxic pollutants in influent, effluent, and receiving water, as well as requirements to record observations made on the site of the POTW and within the collection system

18. *The permit provision contains language stating that the Water Board may consider amending this Order based on the results of the Beneficial Uses Survey/Dilution Study. We suggest adding new section in "b" as a re-opener clause in this section as well as to make sure that the permit provisions are consistent with each other.*

C. Special Provisions

2. **Reopener Provisions.** The Regional Water Board may modify or reopen this Order prior to its expiration date in any of the following circumstances:

a. If present or future investigations demonstrate that the discharge governed by this Order will, or cease to, have adverse impacts on water quality and/or beneficial uses of the receiving waters.

b. If the Beneficial Uses Survey/Dilution Study as required by this order demonstrates that a permit condition(s) associated with the study should be modified.

Formatted: Bullets and Numbering

c. As new or revised WQOs come into effect for surface waters of the State (whether statewide, regional, or site-specific.) In such cases, effluent limitations in this Order will be modified as necessary to reflect updated WQOs.

d. If translator or other water quality studies provide a basis for determining that a permit condition(s) should be modified.

e. An administrative or judicial decision on a separate NPDES permit or WDR that addresses requirements similar to this discharge; and

f. As authorized by law.

The Discharger may request permit modification based on c, d, e and f above. The Discharger shall include in any such request an antidegradation and antibacksliding analysis.

Deleted: b

Deleted: e

19. Minor edits for clarity

Formatted

4. Special Provisions for Municipal Facilities (POTWs Only)

a. Sludge Practices

(1) For sludge management, the Discharger shall comply with all requirements of 40 CFR Part 503.

(2) The Discharger shall not allow sludge material to be deposited in or leach to waters of the State. Sludge treatment, storage, and disposal or reuse shall not create a nuisance, such as objectionable odors or flies, or result in groundwater contamination.

(3) Sludge that is disposed of in a municipal solid waste landfill must meet the requirements of 40 CFR Part 258. In the annual

self-monitoring report, the Discharger shall include the amount of sludge disposed of, and the landfill to which it was sent.

- (4) This Order does not authorize permanent on-site storage or disposal of sludge. A Report of Waste Discharge shall be filed and the site brought into compliance with all applicable regulations prior to commencement of any such activities.
- (5) The Discharger shall submit an annual report postmarked by February 15 of each year, for the period covering the previous calendar year to the USEPA and the Regional Water Board containing reuse information and other information pertaining to sludge, as required by 40 CFR Part 503.

Deleted: at

20. *We suggest adding the new language from EBDA permit as agreed upon between Regional Board and BACWA and as discussed with staff at our meeting on August 16.*

Formatted

Formatted

Formatted

4. Special Provisions for Municipal Facilities (POTWs Only)

b. Sanitary Sewer Overflows and Sewer System Management Plan

The Discharger's collection system is part of the facility that is subject to this Order. As such, the Discharge must properly operate and maintain its collection system (Attachment D, Standard Provisions - Permit Compliance, subsection I.D). The Discharger must report any noncompliance (Attachment D, Standard Provision - Reporting, subsections V.E.1 and V.E.2), and mitigate any discharge from the Discharger's collection system in violation of this Order (Attachment D, Standard Provisions - Permit Compliance, subsection I.C). The General Waste Discharge Requirements for Collection System Agencies (Order No. 2006-0003 DWQ) has requirements for operation and maintenance of collection systems and for reporting and mitigating sanitary sewer overflows. While the Discharger must comply with both the General Waste Discharge Requirements for Collection System Agencies (General Collection System WDR) and this Order, the General Collection System WDR more clearly and specifically stipulates requirements for operation and maintenance and for reporting and mitigating sanitary sewer overflows. Implementation of the General Collection System WDR requirements for proper operation and maintenance and mitigation of spills will satisfy the corresponding federal NPDES requirements specified in this Order. Following reporting requirements in the General Collection System WDR will satisfy NPDES reporting requirements for sewage spills. Compliance with these requirements will also satisfy the federal NPDES requirements specified in this Order. Furthermore, the Discharger shall comply with the schedule for development of sewer system

management plans (SSMPs) as indicated in the letter issued by the Regional Water Board on July 7, 2005, pursuant to Water Code Section 13267. Until the statewide on-line reporting system becomes operational, the Discharger shall report sanitary sewer overflows electronically according to the Regional Water Board's SSO reporting program.

21. Multiple comments on Section VI.C. 5, Other Special Provisions, as detailed below.

- **Editorial. Small “a” not needed.**
- **First paragraph. The permit interim limits contain references to the “study period” as the time period for which limits are suspended. Thus, this study provision should clarify that the entire schedule is intended to be the study period. Defines receiving water objectives to be met.**
- **Schedule. The permit interim limit provisions contain a final date of April 30, 2009. However, this schedule ends with the Final Report submittal on October 31, 2008. It appears that the Regional Board was building into the schedule time for review and action by the Regional Board prior to expiration of the interim/suspension of the final effluent enterococcus and total chlorine residual limits. In order to ensure that time is allowed and that the District does not have to begin disinfection prior to the Board’s review of the Study results, we have added Regional Board review times into the schedule. This is intended to address potential unintended consequences in the future and to clarify expectations.**
- **Last paragraph. As currently drafted, the Regional Board’s action is limited to adopting new limits. We recommend revising the language to give the Regional Board maximum flexibility on future actions. In addition, clarifying language has been inserted describing circumstances should study not proceed.**

5. Other Special Provisions

Beneficial Uses Survey/Dilution Study: The Discharger shall conduct a Beneficial Uses Survey/Dilution Study in accordance with the schedule below ([otherwise referred to as the “Study Period”](#)) unless modified with the approval of the Executive Officer, and in accordance to Chapter II.B. [1.a.\(1\) iii](#) of the Ocean Plan.

Formatted: Bullets and Numbering

Submit Draft Survey/Monitoring Proposal By:	February 28, 2007
Revise Draft per Executive Officer’s comments and submit Final Survey/Monitoring Plan By:	April 30, 2007
Submit Final Report to the Executive Officer	October 31, 2008
Executive Officer Review of Final Report and Potential	

The purpose of the Beneficial Uses Survey/Dilution Study is to identify where the beneficial uses established by the Ocean Plan exist or could exist that could be affected by the discharge; and to determine appropriate bacteriological effluent limits based on Ocean Plan receiving water objectives and dilution or attenuation between the discharge and existing or potential beneficial uses. Bacteriological limits proposed in the Final Report should be compared to the existing bacteria effluent limit in this Order.

Deleted: total coliform

Note that the Water Board may consider amending this Order to adopt new or revised permit conditions based on the results of the Study. In the event that the Discharger and Regional Board are unable to agree, for whatever reason, on the terms associated with study components (not to exceed April 30, 2009), interim limits as proposed are eliminated, and Discharger shall comply with the bacteria limits specified in the Order. In addition, the total chlorine residual effluent limits would no longer be suspended.

Deleted: limits

Section VII. Compliance Determination

- 22. *The term “reportable” pollutants do not accurately identify the pollutants that are subject to minimum levels in the Ocean Plan.*

Compliance with the effluent limitations contained in Section IV of this Order will be determined as specified below:

A. General

Compliance with effluent limitations for pollutants identified on Chapter II, Table B of the California Ocean Plan shall be determined using sample reporting protocols defined in the MRP and Attachment A of this Order. For purposes of reporting and administrative enforcement by the Regional and State Water Boards, the Discharger shall be deemed out of compliance with effluent limitations if the concentration of the Table B pollutant in the monitoring sample is greater than the effluent limitation and greater than or equal to the reported Minimum Level (ML).

Deleted: reportable

Deleted: reportable

- 23. *The Six Month median language does not reflect the latest revisions to the compliance determination provisions that are provided above. We have included them here. This language is consistent with other recently adopted Bay Area permits.*

I. Six-month Median Effluent Limitation.

If the median of daily discharges over any 180-day period exceeds the six-month median effluent limitation for a given parameter, this will represent a single violation though the Discharger will be considered out of compliance for each day of that 180-day period for that parameter. The next assessment of compliance will occur after the next sample is taken. If only a single sample is taken during a given 180-day period and the analytical result for that sample exceeds the six-month median, the Discharger will be considered out of compliance for the 180-day period. For any 180-period during which no sample is taken, no compliance determination can be made for the six-month median limitation. The Discharger will only be considered out of compliance for days when the discharge occurs. For any six-month period during which no sample (daily discharge) is taken, no compliance determination can be made for that six-month period.

Attachment E: Monitoring and Reporting Program (MRP)

II. Monitoring Locations

24. *Also refer to comments under Section VIII.A. Receiving water monitoring stations have been revised to be consistent with NSMCSD monitoring station locations.*

The Discharger shall establish the following monitoring locations to demonstrate compliance with the effluent limitations, discharge specifications, and other requirements in this Order:

Table 1. Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description (include Latitude and Longitude when available)
Influent	A-001	At any point in the treatment facilities headworks at which all waste tributary to the system is present and preceding any phase of treatment, and exclusive of any return flows or process side streams.
Effluent	E-001	At any point in the treatment facilities between the point of discharge and the point at which all waste tributary to the outfall is present (may be the same as E-001D)
	E-001D ⁽¹⁾	At any point in the treatment facilities at which point adequate contact with the disinfectant is assured.
Receiving Waters ⁽²⁾	Fixed Sampling Locations	
	DCRSWO-001	37 43 32, -122 30 78
	DCRSWO-002	37 42 48, -122 30 78
	DCRSWSL-003	1/4 MS
	DCRSWSL-004	1/2 MS
	DCRSWSL-5	1/4 MN

- Deleted: 2
- Deleted: 1
- Deleted: .00
- Deleted: 4
- Deleted: 31
- Deleted: 20
- Deleted: 37.80
- Deleted: 4
- Deleted: 30.00
- Deleted: 4
- Deleted: . 37 42 42.00
- Deleted: . . -122 35 42.00
- Deleted: 6
- Deleted: . 37 40 00.00
- Deleted: . . -122 32 15.00
- Deleted: 02
- Deleted: . 37 42 13.80
- Deleted: . . -122 34 30.00

	DCRSWSL-6	1/2 MN	Deleted: 028... [1]
			Deleted: RSW-031 [2]
			Deleted: Randomized Sampling
			Deleted: R1 [3]
			Deleted: R2 [4]
			Deleted: R3 [5]
			Deleted: R4 [6]
			Deleted: R5 [7]
			Deleted: R6 [8]
			Deleted: R7 [9]
			Deleted: R8 [10]
			Deleted: R9 [11]
			Deleted: R10 [12]
			Deleted: R11 [13]
			Deleted: R12 [14]
			Deleted: R13 [15]
			Deleted: R14 [16]
			Deleted: R15 [17]
			Deleted: R16 [18]
			Deleted: R17 [19]
			Deleted: R18 [20]
			Deleted: R19 [21]
			Deleted: R20 [22]
			Deleted: R21 [23]
			Deleted: R22 [24]
			Deleted: R23 [25]
			Deleted: R24 [26]
			Deleted: R25 [27]
			Deleted: R26 [28]
			Deleted: R27 [29]
			Deleted: R28 [30]
			Deleted: R29 [31]
			Deleted: R30 [32]
			Deleted: R31 [33]
			Deleted: R32 [34]
			Deleted: R33 [35]
			Deleted: R34 [36]
			Deleted: R35 [37]
			Deleted: R36 [38]
			Deleted: R37 [39]
			Deleted: R38 [40]
			Deleted: R39 [41]
			Deleted: R40 [42]
Overflows And Bypasses	OV-1 through OV-n ^[3,4]	Points in the collection system including manholes, pump stations, or any location where overflows and bypasses occur.	

- [1] Monitoring at this location is not required during the term of the Beneficial Uses Survey/Dilution Study Period described in this Order, Section VI.C.5 (Other Special Provisions).
- [2] Receiving water monitoring for DCRWSO1&2 are conducted through a coordinated effort with the City of San Francisco at these locations. Sampling will be conducted annually in the fall during the period when sediments are least disturbed and may show the highest concentrations of contaminants. Deleted: is
- [3] A map and description of each known overflow or bypass location shall accompany the annual report for each calendar year.
- [4] Each occurrence of an overflow or bypass shall be reported to the Regional Water Board in accordance with the reporting requirements specified in Section X.

III. Influent Monitoring Requirements

25. *Several comments to Table 2 and footnotes as noted below:*
- o *Table 2, kg/day references. It is not necessary to monitor these constituents in kg/day because there are no limits for influent monitoring constituents based on this unit.*
 - o *Table 2, Oil & Grease.. According to Method 1664, samples must be collected as grab samples.*
 - o *Footnote 1. Not required for the above constituents*
 - o *Footnote 3. Consistent with language in other tables*

A. Monitoring Location A-001

1. The Discharger shall monitor influent to the facility at A-001 as follows:

Table 2. Influent Monitoring

Parameter	Units ^[1]	Sample Type ^[2]	Minimum Sampling Frequency	Required Analytical Test Method ^[3]
Flow	Mgd	Continuous	--	--
CBOD ₅ ^[4]	mg/L	C-24	1X / Week	405.1
TSS ^[5]	mg/L	C-24	2X / Week	160.2
Oil & Grease	mg/L	grab	1X / Quarter	1664

- Deleted: kg/day
- Deleted: kg/day
- Deleted: kg/day
- Deleted: C-24

[1] Unit Abbreviations:

mgd = million gallons per day
 mg/L = milligrams per liter

Deleted: kg/day = kilograms per day

[2] Sample Type Abbreviations:

C-24 = 24-hour composite

[3] Or other equivalent test method as specified in 40 CFR 136

[4] 5-Day Carbonaceous Biochemical Oxygen Demand at 20° C

[5] Total Suspended Solids

IV. Effluent Monitoring Requirements

26. Several comments to Table 3 and footnotes as noted below:

- **Table 3. Oil & Grease. To be consistent with current requirements and frequency of influent requirements. Compliance has not been an issue.**
- **Table 3. Chronic Toxicity. Remove the reference to 96 hr as current chronic toxicity tests vary in length from 48 hrs to 7 days.**
- **Table 3. All applicable standard observations. Delete. Intended for observations, not samples.**
- **Table 3, Footnote 3. Minor edit**
- **Table 3, Footnote 5. Current language references suspension of the limit in other sections of the order and MRP, however, this section should also suspend the monitoring requirement.**
- **Table 3, Footnote 5. This language is consistent with other recent Bay Area adopted permits.**

A. Monitoring Location E-001

1. The Discharger shall monitor treated effluent at E-001 at as follows. If more than one analytical test method is listed for a given parameter, the Discharger must select from the listed methods and corresponding Minimum Level:

Table 3. Effluent Monitoring E-001

Parameter	Units ^[1]	Sample Type ^[2]	Minimum Sampling Frequency	Required Analytical Test Method ^[3]
Flow Rate	mgd	Continuous	Continuous	---
CBOD ₅	mg/L	C-24	1X / Week	405.1
TSS	mg/L	C-24	2X / Week	160.2
Settleable Solids	mg/L	C-24	2X / Week	160.5
Oil & Grease	mg/L	Grab	1X / <u>Quarter</u>	1664

Deleted: Month

Parameter	Units ^[1]	Sample Type ^[2]	Minimum Sampling Frequency	Required Analytical Test Method ^[3]
Turbidity	NTU	C-24	1X / Day	180.1
Chronic Toxicity ^[4]	TUc	C-24	1X / Quarter	821-R-02-012
Ammonia Nitrogen	mg/L, kg/day	Grab	2X / Month	350.3
PH	pH units	Grab	1X / Day	150.1 or 9040
Dissolved Oxygen	mg/l, % saturation	Grab	1X / Day	---
Total Chlorine Residual ^[5]	mg/L	Grab	2X / Hour	---
Temperature	°C	Grab	1X / Day	---
Sulfides (if DO < 5.0 mg/l) Total and Dissolved	mg/L	Grab	1X / Day	376.2
All Applicable Standard Observations ^[6]	---	---	1X / Day	---
Heptachlor	µg/l	C-24	1X / Quarter ^[7]	608
Priority Pollutants ^[8]	µg/l	C-24	1X / Year	^[9]

Deleted: 96-hr

Deleted: Grab

Parameter	Units ^[1]	Sample Type ^[2]	Minimum Sampling Frequency	Required Analytical Test Method ^[3]
-----------	----------------------	----------------------------	----------------------------	--

- [1] Unit Abbreviations:
 mg/L = milligrams per liter
 kg/day = kilograms per day
 µg/l = micrograms per liter
 NTU = Nephelometric Turbidity Units
 % Saturation = percent saturation of dissolved oxygen in water
 MPN/100 ml = Most Probable Number per 100 milliliters
 °C = degree centigrade

- [2] Sample Type Abbreviations:
 Continuous = Measured continuously, and recorded and reported daily
 C-24 = 24-hour composite
 Grab = Grab sample

[3] Or other equivalent test method as specified in 40 CFR 136

Deleted: o

[4] TU_c shall be measured using the critical life stage toxicity tests specified in Appendix III of the Ocean Plan.

[5] The total chlorine residual effluent monitoring will be suspended during the Beneficial Uses Survey/Dilution Study Period described in this Order, Section VI.C.5 (Other Special Provisions). When applicable, the Discharger may record discrete readings from the continuous monitoring every hour on the hour, and report, on a daily basis, the maximum concentration observed following dechlorination. Total chlorine dosage (mg/day) shall be recorded on a daily basis.

Deleted: limit

[6] Discharger shall record standard observations of effluent, including color, presence of sheen or foam, etc.

[7] If four consecutive effluent samples are non-detect (ND) for heptachlor, effluent monitoring for heptachlor shall be reduced to 1X / year, as for all other priority pollutants. If, at any time, monitoring detects the presence of heptachlor, the sampling frequency shall revert to 1X/ quarter.

[8] All pollutants listed in Table B of the Ocean Plan (2005), except chronic toxicity, total chlorine residual and heptachlor as noted above.

[9] As specified in Appendix III of the Ocean Plan (2005).

27. *This provision refers to monitoring requirements. The table & the footnote are revised to be clear as to what is required.*

B. Monitoring Location E-001-D

1. The Discharger shall monitor treated effluent at E-001-D as follows. If more than one analytical test method is listed for a given parameter, the Discharger must select from the listed methods and corresponding Minimum Level:

Table 4. Effluent Monitoring E-001-D

Parameter	Units ^[1]	Sample Type ^[2]	Minimum Sampling Frequency	Required Analytical Test Method ^[3]
<u>Enterococcus</u> ^[4]	MPN/100 ml	Grab	1X / Week	1600 Series
Total Chlorine Residual ^[4]	mg/L	Grab	2X / Hour	---
<p>[1] <u>Unit Abbreviations:</u> mg/L = milligrams per liter MPN/100 ml = Most Probable Number per 100 milliliters</p> <p>[2] <u>Sample Type Abbreviations:</u> Grab = Grab sample</p> <p>[3] or other equivalent test method as specified in 40 CFR 136</p> <p>[4] The <u>Enterococcus</u> and Total Chlorine Residual effluent <u>monitoring</u> will be suspended during the Beneficial Uses Survey/Dilution Study Period described in this Order, Section VI.C.5 (Other Special Provisions).</p>				

Deleted: Total Coliform

Deleted: Total Coliform

Deleted: limits

V. Whole Effluent Toxicity Testing Requirements

28. *Suggested language to ensure for maximum species flexibility to address issue of availability.*

A. Chronic Toxicity Effluent Monitoring Program

1. The Discharger shall conduct critical life stage chronic toxicity tests on 24-hour composite 100 percent effluent samples in accordance with Appendix III of the Ocean Plan; and using EPA's Short Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, Third Edition, October 2002 (EPA/821/R-02-014); and/or EPA's Short-Term Methods for Estimating Chronic Toxicity of Effluent and Receiving Waters to West Coast Marine and Estuarine Organisms, August, 1995 (EPA/600/R-95-136).

Deleted: either

Deleted: /

29. *Consistency with test methods called for in Section V.A of the MRP*

B. Quality Assurance

2. If either the reference toxicant test or effluent test does not meet all test acceptability criteria (TAC) as specified in the test methods manuals (EPA/821/R-02-014 and EPA/600/R-95-136), then the Discharger must re-sample and re-test at the earliest time possible.

Deleted: EPA/600/4-91/002 and

Deleted: -

VIII. Receiving Water Monitoring Requirements - Surface Water and Groundwater

30. *Receiving water monitoring stations have been revised to be consistent with NSMCSD monitoring locations and the portion that is part of the coordinated effort with San Francisco. The requirement to monitor for priority pollutants is especially onerous and should be removed considering that there is already a requirement to monitor for such constituents in our final effluent (E-001/E-001D).*

Finally, the Pacific Ocean is not indicative of the plant effluent. The intent of the monitoring proposed is to obtain background data of the receiving water and it is our understanding that any monitoring results are intended for those purposes only and are not limits intended for compliance purposes.

A. Monitoring Locations

1. The Discharger shall monitor the Pacific Ocean at fixed monitoring locations [DCRSWO-001](#) and [DCRSWO-002](#) as follows:

Table 5. Receiving Water Monitoring Requirements

Parameter	Units ^[1]	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method ^[2]
Ammonia Nitrogen	mg/L	Grab	1X / Year	350.3
PH	pH Units	Grab	1X / Year	150.1 or 9040
Dissolved Oxygen	mg/L, % saturation	Grab	1X / Year	--
Temperature	°C	Grab	1X / Year	--
Fecal Coliform	MPN/100 ml	Grab	1X / Year	1600 Series
Salinity	ppt	Grab	1X / Year	--

[1] Unit Abbreviations:
 mg/L = milligrams per liter
 µg/l = micrograms per liter
 % Saturation = percent saturation of dissolved oxygen in water
 MPN/100 ml = Most Probable Number per 100 milliliters
 °C = degree centigrade
 ppt = parts per thousand

[2] or other equivalent test method as specified in 40 CFR 136

Deleted: ,
 Deleted: , RSW-4, RSW-6, RSW-25, RSW-28, RSW-31, and randomized monitoring at points R-1 through R-40

Deleted: Priority Pollutants
 Deleted: µg/L
 Deleted: 1X / Year
 Deleted: --
 Deleted: Grab

The purpose of the receiving water monitoring in to obtain background data and is not intended for compliance purposes.

IX. Other Monitoring Requirements

31. *Editorial. Small “a” not needed.*

C. Beneficial Uses Survey/Dilution Study

▼ The Discharger shall conduct monitoring for the Beneficial Uses Survey/Dilution Study in accordance with the Study’s Monitoring Plan.

Deleted: a.

Attachment F: Fact Sheet

32. *Again, while appreciative of the desire to adhere to a standardized template format for permits, the language proposed does not apply to the Fact Sheet and therefore should be removed. As the preceding paragraph states, the fact sheet includes a summary of the legal requirements and the technical rationale as basis for the Order.*

Fact Sheet Opening paragraphs

As described in Section II of this Order, this Fact Sheet includes the legal requirements and technical rationale that serve as the basis for the requirements of this Order.

▼ 33. Changed for technical accuracy

Deleted: This Order has been prepared under a standardized format to accommodate a broad range of discharge requirements for Dischargers in California. Only those sections or subsections of this Order that are specifically identified as “not applicable” have been determined not to apply to this Discharger. Sections or subsections of this Order not specifically identified as “not applicable” are fully applicable to this Discharger.¶

II. FACILITY DESCRIPTION

A. Description of Wastewater and Sludge Treatment or Controls

The Discharger owns and operates the North San Mateo County Sanitation District Wastewater Treatment Plant, which provides secondary treatment of domestic wastewater from the City of Daly City, portions of San Mateo County, the Town of Colma, San Francisco County Jail, and the Westborough Water District within the City of South San Francisco. A portion of the effluent receives tertiary treatment for water reclamation projects. The combined service population is approximately 120,000. Approximately 180 miles of sanitary sewer lines and eight lift stations convey domestic sewage to the facility. Treated wastewater is discharged to the Pacific Ocean through the Vista Grande Tunnel structure and a 27” force main located at Fort Funston in San Francisco County. Final discharge is through a submerged diffuser extending 2,500 feet from the shoreline and terminating at a depth of approximately 32 feet (-32 MLLW). An initial dilution ratio of 70:1 is achieved.

Deleted: seven

Deleted: on Ocean Beach

The treatment system includes bar screens, a micro screen and compactor, primary clarifiers, equalization basins, aeration tanks, secondary clarifiers, and a chlorine contact chamber. The treatment system may be operated using sodium hypochlorite for chlorination and sodium bisulfate for dechlorination. Disinfection by chlorination and dechlorination was suspended in 2001 to enable the facility to conduct a bacteriological assessment study as required by Order No. 00-017. Chlorination and dechlorination are suspended during the Beneficial Uses Survey/Dilution Study pursuant to the terms of this Order. Tertiary treatment provides up to 2.77 MGD of recycled water for uses such as, but not limited to golf courses, median strips and parks. The tertiary treatment system includes alum injection followed by sand filtration, disinfection, gypsum injection and a 1.4 million gallon (mg) storage basin. Solids are directed to a degritter, gravity and air floatation thickeners, and an anaerobic digester prior to being dewatered by centrifuge and hauled off site for disposal.

Deleted: dual media

The treatment plant has a peak dry weather treatment capacity of 8 MGD and a peak wet weather capacity of 25 MGD. The facility discharges an annual average flow of 6.85 MGD.

B. Discharge Points and Receiving Waters

Treated wastewater is discharged to the Pacific Ocean through the Vista Grande Tunnel structure and a 27" force main located at Fort Funston in San Francisco County. Final discharge is through a submerged diffuser extending 2,500 feet from the shoreline and terminating at a depth of approximately 32 feet (-32 MLLW). An initial dilution ratio of 70:1 is achieved.

Deleted: on Ocean Beach

III. Applicable Plans, Policies, and Regulations

34. *These changes are consistent with the rationale detailed previously in the Order.*

C. State and Federal Regulations, Policies, and Plans

5. Stringency of Requirements for Individual Pollutants. Individual pollutant restrictions consist of technology-based restrictions and water quality-based effluent limitations. The technology-based effluent limitations consist of restrictions on certain pollutants as specified in federal regulations and discussed in the Fact Sheet (Attachment F). Water quality-based effluent limitations (WQBELs) have been scientifically derived to implement water quality objectives that protect beneficial uses. Both the beneficial uses and the water quality objectives have been approved pursuant to federal law and are the applicable federal water quality standards. The scientific procedures for calculating the individual water quality-based effluent limitations are based on the Ocean Plan, which was approved by USEPA on February 14,

Deleted: This Order contains restrictions on individual pollutants that are no more stringent than required by the federal CWA.

Deleted: The permit's technology-based pollutant restrictions are no more stringent than required by the CWA.

2006. All beneficial uses and water quality objectives contained in the Ocean Plan were approved under state law and submitted to and approved by USEPA prior to May 30, 2000. Any water quality objectives and beneficial uses submitted to USEPA prior to May 30, 2000, but not approved by USEPA before that date, are nonetheless “applicable water quality standards for purposes of the CWA” pursuant to section 131.21(c)(1).

Deleted: Collectively, this Order’s restrictions on individual pollutants are no more stringent than required to implement the technology-based requirements of the CWA and the applicable water quality standards for purposes of the CWA.

6. Antidegradation Policy. Section 131.12 requires that the state water quality standards include an antidegradation policy consistent with the federal policy. The State Water Board established California’s antidegradation policy in State Water Board Resolution No. 68-16. Resolution No. 68-16 incorporates the federal antidegradation policy where the federal policy applies under federal law. Resolution No. 68-16 requires that existing water quality be maintained unless degradation is justified based on specific findings. The Regional Water Board’s Basin Plan implements, and incorporates by reference, both the state and federal antidegradation policies. The permitted discharge is consistent with the antidegradation provision of [40 CFR Section 131.12](#) and State Water Board Resolution No. 68-16.

Deleted: s

7. Anti-Backsliding Requirements. Sections 402(o)(2) and 303(d)(4) of the CWA and federal regulations at title 40, Code of Federal Regulations, section 122.44(l) [restrict](#) backsliding in NPDES permits. These anti-backsliding provisions require that effluent limitations in a reissued permit must be as stringent as those in the previous permit, with some exceptions in which limitations may be relaxed. [The permitted discharge is consistent with the anti-backsliding provision.](#)

Deleted: prohibit

Deleted: All effluent limitations in this Order are at least as stringent as the effluent limitations in the previous Order.

35. *Edited for technical accuracy*

D. Impaired Water Bodies on CWA 303(d) List

The Pacific Ocean at [Fort Funston](#) is not on the 303(d) list as an impaired water body.

Deleted: Ocean Beach

IV. Rationale For Effluent Limitations and Discharge Specifications

36. *It is understood that the major initiative toward receiving water beneficial uses is predicated on impacts to public health associated with SWRCB-Water Contact Standards (REC 1). As such, it is deemed appropriate to then focus on*

preferred methods associated in furthering that public interest, and therefore the consistent use of standards associated with Enterococcus Bacteria as contained in most recent amendments to the California Ocean Plan adopted on February 14, 2006. Using this as a basis, the effluent limitation for this permit would be calculated by using the California Ocean Plan equation for the calculation of effluent limitations (see Section III. C of Ocean Plan). Along with the most useful standards based on current information, Enterococcus is the preferred and standard method used for ascertaining public health and safety. It is thought that meeting the enterococcus standard contained in the Ocean plan would also address the fecal and total standards as well. The modifications do not violate anti-backsliding provisions as the methodology used to calculate the limitations have changed. The calculation method now provides a basis for the limitations and is consistent with the 2005 California Ocean Plan. (Section III.C)

B. Technology-Based Effluent Limitations

8. **Total Coliform Bacteria.** Limitations for total coliform bacteria from Order No. 00-017 are modified by this Order. These modifications do not violate anti-backsliding provisions as the methodology used to calculate the limitations have changed to provide a basis for the limitations and to be consistent with the 2005 California Ocean Plan (Section III.C).

Deleted: retained

However, the bacteria effluent limitation is suspended during the Beneficial Uses Survey/Dilution Study Period described in this Order, Section VI.C.5 (Other Special Provisions).

Deleted: total coliform

37. *Table 6 does not include the chlorine residual limit. Therefore, the mass limit footnote does not apply. Also, the rows for mass limits are not necessary as there are not mass limits for these constituents in the permit. As we stated previously, the District is concerned about the application of the peak dry weather capacity flow rate to wet weather events and has requested specific clarification.*

Table 6. Summary of Effluent Limitations

Parameter	Units	Effluent Limitations					
		Average Monthly	Average Weekly	Average Daily	6-month Median	Maximum Daily	Instantaneous Maximum
Carbonaceous Biochemical Oxygen Demand 5-day @ 20°C	mg/L	25	40	50	--	--	--
Total Suspended Solids	mg/L	30	45	60	--	--	--

Deleted: ⁽¹⁾

Parameter	Units	Effluent Limitations					
		Average Monthly	Average Weekly	Average Daily	6-month Median	Maximum Daily	Instantaneous Maximum
Oil and Grease	mg/L	25	40	--	--	--	75
Settleable Solids	ml/L	1.0	1.5	--	--	--	3.0
Turbidity	NTU	75	100	--	--	--	225
Chronic Toxicity ^[1]	TU _c	--	--	--	--	71	--

Deleted: ^[1]

Deleted: ²

Deleted: [1] - Mass emission limitations are based on a peak dry weather capacity of 8 mgd. Weekly and monthly mass effluent limitations shall be calculated by averaging the reported daily values over the relevant number of days for the monitoring interval.

Deleted: 2

[1] Expressed as Chronic Toxicity Units (TU_c)

TU_c = 100/NOEC where:

NOEC (No Observed Effect Concentration) is expressed as the maximum percent effluent or receiving water that causes no observable effect on the test organism as determined by the result of a critical life state toxicity test listed in Appendix III of the Ocean Plan (2005) adopted and effective February 14, 2006.

38. *These changes are consistent with the rationale detailed previously in the Order.*

c. **Enterococcus Bacteria:** The treated wastewater, prior to discharge, shall not exceed a the calculated geometric mean or single sample maximum using the effluent limits equation specified in Section III.C. of the California Ocean Plan to values specified in Section II.B.1. (a) 1.iii in the California Ocean Plan.

Deleted: Total Coliform

Deleted: geometric mean value of 2,400 MPN/100 ml for any five consecutive samples. No single sample may exceed 24,000 MPN/100 ml.

39. *Changes to "d" as detail below.*

- o *Editorial*
- o *Language added for clarity.*
- o *Deleted as there is no section "b"*
- o *Revised in keeping with Beneficial Uses Survey/Dilution Study objectives.*

d. **Interim Enterococcus Bacteria Limit:** Effluent Limitation IV.A.1.e in the order (IV.c in this fact sheet)(Enterococcus Bacteria) shall be suspended during the Beneficial Uses Survey/Dilution Study period as proposed in this Order, Section VI.C.5. During the study period, the discharger shall comply with Enterococcus requirements specified in Receiving Water Limitations, Section V.A.1.c, of this Order.

Deleted: <#>Interim Effluent Limitations¶

Deleted: Total Coliform

Deleted: Total Coliform

Deleted: .b

Deleted: Coliform

Deleted: s

Deleted: and V.A.3

40. *Table 7 Reasonable Potential Analysis Results. Editorial change (removed bold format from Table). There is no strikeout/underline formatting for this type of editorial change).*

C. Water Quality-Based Effluent Limitations (WQBELs)

41. Clarification regarding applicability of mass limits.

4. WQBEL Calculations-last paragraph

A mass emission limitation, as required by the Ocean Plan [for Table B Water Quality Objectives](#), is also calculated in this Order, and is calculated using a peak dry weather capacity of 8 mgd and a conversion factor of 3.78

42. Changes as noted below.

- *Replaced the number used for the calculation for instantaneous mass (end values do not change) The correction is as noted. Nevertheless, clarification regarding applicability of mass limits during wet weather events is unclear. Based on the equation, and using a worst case scenario any time the plant flow is above 8 mgd and a chlorine residual excursion occurred that was roughly at the limit the mass limits would be exceeded.*
- *Clarity*
- *Because the chlorine limit is suspended the fact sheet needs to provide an appropriate justification. We have provided suggested language for this purpose.*

Formatted

6. Total Chlorine Residual

The effluent limitations for total chlorine residual are based on the following Ocean Plan water quality objectives:

Pollutant	Units	6-month Median	Daily Maximum	Instantaneous Maximum
Total Chlorine Residual	µg/L	2	8	60

Using the equation, $C_e = C_o + D_m (C_s - C_s)$, effluent limitations for total chlorine residual are calculated:

- 6-month median: $C_e = 2 + 70 (2 - 0.0) = 142 \text{ µg/L (0.14 mg/L)}$
- Daily maximum: $C_e = 8 + 70 (8 - 0.0) = 568 \text{ µg/L (0.57 mg/L)}$
- Instantaneous maximum: $C_e = 60 + 70 (60 - 0.0) = 4260 \text{ µg/L (4.3 mg/L)}$

Deleted: 2

Deleted: 2

Mass emission limitations, as required by the Ocean Plan [for Table B Water Quality Objectives](#), are also included in this Order, and are calculated using a peak dry weather capacity of 8 mgd and a conversion factor of 3.78:

6-month median: 0.14 mg/L * 8.0 mgd * 3.78 = 4.2 kg/day
Daily maximum: 0.57 mg/L * 8.0 mgd * 3.78 = 17 kg/day

The concentration and mass limits for total chlorine residual are being suspended in the Order to allow the Discharger to conduct a Beneficial Uses Survey/Dilution Study. As part of the Beneficial Uses Survey and Dilution Study, the Discharger will not disinfect the effluent with chlorine. Because chlorine will not be used during this period, there is no need to maintain a chlorine residual effluent limit.

V. Rationale for Receiving Water Limitations

43. *There are 18 receiving water limitations contained in the Order and a minor editorial change.*

A. Surface Water

1. Receiving Water Limitations V.A.1 through V.A.18 (conditions to be avoided). These limitations are retained from Order 00-017 and are based on the narrative/numerical objectives and implementation provisions contained in Section III of the Ocean Plan.

Deleted: 15

Deleted: 3

VI. Rationale for Monitoring and Reporting Requirements

44. *Edited to reflect accuracy*

B. Effluent Monitoring

1. Effluent monitoring requirements for the following pollutants are retained from the previous Order: flow, CBOD₅, TSS, settleable solids, oil and grease, turbidity, ammonia nitrogen, sulfides, and total coliform (now enterococcus) bacteria.

45. *The changes are consistent with the rationale detailed previously on the Order*

D. Receiving Water Monitoring

Surface Water. The MRP retains most monitoring requirements at monitoring locations DCRSWO-001 and DCRSWO-002 that are specific to NSMCSD; however, specific monitoring requirements for toxic pollutants are not included in the MRP.

Deleted: ,

Deleted: , RSW-4, RSW-6, RSW-25, RSW-28, RSW-31, and R-1 through R-40

VII. Rationale for Provisions

46. *Editorial and Language added for clarity. As currently proposed, the language is conclusive and suggests that the Study can only be used to adopt different effluent limits. Until the Study is completed, the Regional Board should retain*

its flexibility to amend all permit conditions associated with and based on the results of the study and not just effluent limits.

5. Other Special Provisions

Beneficial Uses Survey/Dilution Study. In its application for renewed waste discharge requirements, the Discharger requested elimination of bacteria effluent limitations. A provision of Order 00-017 required the Discharger to conduct a bacteriological assessment study to ascertain whether effluent that has not been disinfected will be sufficiently protective of receiving water quality objectives for water contact. Data provided by the discharger demonstrates compliance with water contact bacteria objectives contained in the Ocean Plan and near compliance with Ocean Plan water quality objective for shellfish harvesting. The Regional Water Board has agreed to suspend the bacteria effluent limit while a Beneficial Uses Survey/Dilution Study is conducted to determine existing and potential beneficial uses that may be affected by the discharge and the dilution achieved where those existing and potential beneficial uses may occur. The data generated during the extended study period may be used to revise permit conditions for bacteria if the results show that revised permit conditions would be protective of applicable beneficial uses and Ocean Plan water quality objectives.

Formatted: Bullets and Numbering

Deleted: borderline compliance or

Deleted: s

Deleted: , but does not conclusively prove that disinfection is unnecessary.

Deleted: total coliform

Deleted: to calculate a revised water-quality based effluent limit

Deleted: total coliform

Deleted: a


Deleted: limit

Attachment G: Regional Board Attachments

47. *This provision specifically excludes and therefore does not apply to Ocean Dischargers.*

The following documents are part of this Order but are not physically attached due to volume. They are available on the Internet at:

<http://www.waterboards.ca.gov/sanfranciscobay/Download.htm>.

- Self-Monitoring Program, Part A (August 1993)
- Standard Provisions and Reporting Requirements, August 1993
- Regional Water Board Resolution No. 74-10
- 

Deleted: August 6, 2001 Regional Water Board staff letter, "Requirement for Monitoring of Pollutants in Effluent and Receiving Water to Implement New Statewide Regulations and Policy"

Page 14: [1] Deleted	croyer 028	9/18/2006 11:46:00 AM
Page 14: [1] Deleted	croyer 37 41 54.00	9/18/2006 11:46:00 AM
Page 14: [1] Deleted	croyer -122 34 28.80	9/18/2006 11:46:00 AM
Page 14: [2] Deleted	croyer RSW-031	9/18/2006 11:46:00 AM
Page 14: [2] Deleted	croyer 37 43 28.80 -122 34 01.80	9/18/2006 11:46:00 AM
Page 14: [3] Deleted	croyer R1	8/28/2006 2:18:00 PM
Page 14: [3] Deleted	croyer 37 52 04.77 -122 38 28.60	8/28/2006 2:18:00 PM
Page 14: [4] Deleted	croyer R2	8/28/2006 2:18:00 PM
Page 14: [4] Deleted	croyer 37 51 06.14 -122 36 00.87	8/28/2006 2:18:00 PM
Page 14: [5] Deleted	croyer R3	8/28/2006 2:18:00 PM
Page 14: [5] Deleted	croyer 37 51 04.65 -122 38 50.77	8/28/2006 2:18:00 PM
Page 14: [6] Deleted	croyer R4	8/28/2006 2:18:00 PM
Page 14: [6] Deleted	croyer 37 50 53.96 -122 40 45.11	8/28/2006 2:18:00 PM
Page 14: [7] Deleted	croyer R5	8/28/2006 2:18:00 PM
Page 14: [7] Deleted	croyer 37 50 15.84 -122 37 12.27	8/28/2006 2:18:00 PM
Page 14: [8] Deleted	croyer R6	8/28/2006 2:18:00 PM
Page 14: [8] Deleted	croyer 37 50 11.61 -122 35 41.45	8/28/2006 2:18:00 PM
Page 14: [9] Deleted	croyer R7	8/28/2006 2:18:00 PM
Page 14: [9] Deleted	croyer 37 49 40.86 -122 39 18.05	8/28/2006 2:18:00 PM
Page 14: [10] Deleted	croyer R8	8/28/2006 2:18:00 PM
Page 14: [10] Deleted	croyer 37 49 19.20 -122 41 25.50	8/28/2006 2:18:00 PM
Page 14: [11] Deleted	croyer	8/28/2006 2:18:00 PM

R9

Page 14: [11] Deleted	croyer	8/28/2006 2:18:00 PM
37 48 31.68	-122 37 29.76	
Page 14: [12] Deleted	croyer	8/28/2006 2:18:00 PM
	R10	
Page 14: [12] Deleted	croyer	8/28/2006 2:18:00 PM
37 47 48.31	-122 29 57.44	
Page 14: [13] Deleted	croyer	8/28/2006 2:18:00 PM
	R11	
Page 14: [13] Deleted	croyer	8/28/2006 2:18:00 PM
37 47 10.02	-122 30 46.18	
Page 14: [14] Deleted	croyer	8/28/2006 2:18:00 PM
	R12	
Page 14: [14] Deleted	croyer	8/28/2006 2:18:00 PM
37 47 07.88	-122 36 57.88	
Page 14: [15] Deleted	croyer	8/28/2006 2:18:00 PM
	R13	
Page 14: [15] Deleted	croyer	8/28/2006 2:18:00 PM
37 46 39.77	-122 34 22.04	
Page 14: [16] Deleted	croyer	8/28/2006 2:18:00 PM
	R14	
Page 14: [16] Deleted	croyer	8/28/2006 2:18:00 PM
37 46 29.37	-122 38 38.38	
Page 14: [17] Deleted	croyer	8/28/2006 2:18:00 PM
	R15	
Page 14: [17] Deleted	croyer	8/28/2006 2:18:00 PM
37 46 23.73	-122 32 08.26	
Page 14: [18] Deleted	croyer	8/28/2006 2:18:00 PM
	R16	
Page 14: [18] Deleted	croyer	8/28/2006 2:18:00 PM
37 45 39.83	-122 37 04.52	
Page 14: [19] Deleted	croyer	8/28/2006 2:18:00 PM
	R17	
Page 14: [19] Deleted	croyer	8/28/2006 2:18:00 PM
37 45 33.87	-122 38 55.98	
Page 14: [20] Deleted	croyer	8/28/2006 2:18:00 PM
	R18	
Page 14: [20] Deleted	croyer	8/28/2006 2:18:00 PM
37 45 24.69	-122 33 44.13	
Page 14: [21] Deleted	croyer	8/28/2006 2:18:00 PM
	R19	
Page 14: [21] Deleted	croyer	8/28/2006 2:18:00 PM
37 45 00.01	-122 39 56.01	

Page 14: [22] Deleted	croyer R20	8/28/2006 2:18:00 PM
Page 14: [22] Deleted 37 44 46.38	-122 35 55.51 croyer	8/28/2006 2:18:00 PM
Page 14: [23] Deleted	croyer R21	8/28/2006 2:18:00 PM
Page 14: [23] Deleted 37 43 43.07	-122 31 11.61 croyer	8/28/2006 2:18:00 PM
Page 14: [24] Deleted	croyer R22	8/28/2006 2:18:00 PM
Page 14: [24] Deleted 37 43 04.34	-122 38 42.51 croyer	8/28/2006 2:18:00 PM
Page 14: [25] Deleted	croyer R23	8/28/2006 2:18:00 PM
Page 14: [25] Deleted 37 42 59.44	-122 32 47.41 croyer	8/28/2006 2:18:00 PM
Page 14: [26] Deleted	croyer R24	8/28/2006 2:18:00 PM
Page 14: [26] Deleted 37 42 56.50	-122 34 15.08 croyer	8/28/2006 2:18:00 PM
Page 14: [27] Deleted	croyer R25	8/28/2006 2:18:00 PM
Page 14: [27] Deleted 37 42 41.24	-122 36 28.29 croyer	8/28/2006 2:18:00 PM
Page 14: [28] Deleted	croyer R26	8/28/2006 2:18:00 PM
Page 14: [28] Deleted 37 42 33.84	-122 31 08.82 croyer	8/28/2006 2:18:00 PM
Page 14: [29] Deleted	croyer R27	8/28/2006 2:18:00 PM
Page 14: [29] Deleted 37 42 15.49	-122 34 55.24 croyer	8/28/2006 2:18:00 PM
Page 14: [30] Deleted	croyer R28	8/28/2006 2:18:00 PM
Page 14: [30] Deleted 37 41 35.66	-122 32 11.82 croyer	8/28/2006 2:18:00 PM
Page 14: [31] Deleted	croyer R29	8/28/2006 2:18:00 PM
Page 14: [31] Deleted 37 41 20.89	-122 36 06.47 croyer	8/28/2006 2:18:00 PM
Page 14: [32] Deleted	croyer R30	8/28/2006 2:18:00 PM

Page 14: [32] Deleted	croyer	8/28/2006 2:18:00 PM
37 40 55.35	-122 33 29.05	
Page 14: [33] Deleted	croyer	8/28/2006 2:18:00 PM
	R31	
Page 14: [33] Deleted	croyer	8/28/2006 2:18:00 PM
37 40 56.18	-122 37 43.15	
Page 14: [34] Deleted	croyer	8/28/2006 2:18:00 PM
	R32	
Page 14: [34] Deleted	croyer	8/28/2006 2:18:00 PM
37 39 31.65	-122 33 41.41	
Page 14: [35] Deleted	croyer	8/28/2006 2:18:00 PM
	R33	
Page 14: [35] Deleted	croyer	8/28/2006 2:18:00 PM
37 39 14.63	-122 32 04.75	
Page 14: [36] Deleted	croyer	8/28/2006 2:18:00 PM
	R34	
Page 14: [36] Deleted	croyer	8/28/2006 2:18:00 PM
37 38 02.91	-122 32 27.99	
Page 14: [37] Deleted	croyer	8/28/2006 2:18:00 PM
	R35	
Page 14: [37] Deleted	croyer	8/28/2006 2:18:00 PM
37 37 42.23	-122 36 40.08	
Page 14: [38] Deleted	croyer	8/28/2006 2:18:00 PM
	R36	
Page 14: [38] Deleted	croyer	8/28/2006 2:18:00 PM
37 37 34.73	-122 33 53.51	
Page 14: [39] Deleted	croyer	8/28/2006 2:18:00 PM
	R37	
Page 14: [39] Deleted	croyer	8/28/2006 2:18:00 PM
37 37 00.97	-122 36 55.75	
Page 14: [40] Deleted	croyer	8/28/2006 2:18:00 PM
	R38	
Page 14: [40] Deleted	croyer	8/28/2006 2:18:00 PM
37 36 52.15	-122 35 28.81	
Page 14: [41] Deleted	croyer	8/28/2006 2:18:00 PM
	R39	
Page 14: [41] Deleted	croyer	8/28/2006 2:18:00 PM
37 36 32.16	-122 32 01.35	
Page 14: [42] Deleted	croyer	8/28/2006 2:18:00 PM
	R40	
Page 14: [42] Deleted	croyer	8/28/2006 2:18:00 PM
37 36 16.73	-122 33 03.03	

