San Francisco International Airport

March 14, 2013

Mr. Derek Whitworth
SF Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: NPDES Permits No. CA0038318

Dear Mr. Whitworth:

Attached to this letter are the comments the San Francisco International Airport has with respect to proposed NPDES Permit No. CA0038318 which covers discharges of treated wastewater from the Mel Leong Treatment Plant into San Francisco Bay. The comments are self-explanatory and are submitted within the deadline of March 15th to elicit your response. Any of our previous comments or suggested corrections sent in earlier were of a preliminary nature.

If you have any questions regarding the issues addressed above, please call Mr. Bill Zolan of my staff at (650) 821-8359.

Very truly yours,

Peter Acton
Maintenance Director
Facilities Maintenance

Attachments
PA:BZ:jc

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Comment 1: page 5, B Facility description and Discharge Location, 2. Collection System, second paragraph referring to de-icing.
For de-icing activities we believe that "infrequently" would better reflect the actual state of affairs. De-icing is becoming somewhat more common with a number of carriers expressing interest in setting up facilities to carry out the process. At SFO, de-icing is more like de-frosting and not a large volume of de-icing materials are used. Usually it is used only during brief cold snaps that last a few days at most. Records are kept of who, when, volumes, and final deposition of de-icing material recaptured.

Comment 2: page 13, Table 6. Conventional and Non-Conventional Pollutant Effluent Limitations.
There appears to be requirement for a TSS effluent removal rate requirement of 85% when industrial waste influent exceeds 45 mg/L. We believe this is an error, confused with the BOD_5 use of 45 mg/L and contradicts statements in the Fact Sheet. We propose that wording changes be made to Footnote (3) in Table 6 to clarify the conditions when the 85% removal rate would go into effect, i.e. only when sanitary waste is routed to the Industrial Wastewater Plant for treatment.

Comment 3: pages 13-14, Table 7 Toxic Pollutant Effluent Limitations.
To clarify that cyanide in the discharged effluent is to be monitored post-dechlorination at monitoring station EFF-002, we propose a footnote to this effect be added to this Table 7.

Comment 4: page E-6, Whole Effluent Acute Toxicity Bioassay Testing.
Current practice is to allow pH control (within the range of 6.5 to 6.7) of the testing effluent to eliminate un-ionized ammonia toxicity from terminating the test prior to 96 hours. Without this allowance we cannot determine if there are other toxins in the effluent which could be hazardous to aquatic life. We propose that a statement, specifically allowing continued pH control, be added to this section.

Comment 5: pages E-6 and F-36, Storngylocentrotus is the incorrect spelling for purple sea urchin.
The correct spelling is Strongylocentrotus

Comment 6: page E-7, Methodology, section d
The reference to one which includes the 72-Hour echinoderm development test as presented in Table E-1, "Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, currently third edition (EPA-821-R-02-014" is inappropriate. The correct reference should be "Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to West Coast Marine and Estuarine Organisms." EPA/600/R-95-136."

Comment 7: page.E-7 Section e and page E-18, Whole Effluent Toxicity Screening Tests.
On the advice of our biologists we propose a 15% dilution be added to Whole Effluent Chronic Bioassay test dilution series.

Comment 8 page E-19, Appendix E-2, Table AE-1 Critical Life Stage Toxicity Tests for Estuarine Waters, Echinoderms – Urchins Sand dollar.
The test duration time should be corrected from 1 hour to 72 hours.

Comment 9: page F-10 Part D. Compliance Summary
We propose the phrase "and at all times when the influent concentration is 45 mg/L or higher" be eliminated because it is inconsistent with the earlier sections establishing that the 85% removal rate requirement only goes into effect when the Industrial Wastewater Treatment Plant processes Sanitary Waste.

Comment 10: page F-18, Bacterial Limitations. # 2)
We propose that the units of measurement be changed to "colony forming units"/100ml from "most probable number" per 100 ml. to be consistent with the earlier sections of the Order establishing effluent limits.

Comment 11: page F-36, 6. Whole Effluent Chronic Toxicity.
It is stated that chronic toxicity testing frequency is once a year in contrast to the requirement for testing twice per year in Table E-4 Effluent 001 Monitoring, on page E-4.

Johnson, Bill@Waterboards

From: Stuber, Robyn <Stuber.Robyn@epa.gov>
Sent: Wednesday, March 13, 2013 3:59 PM
To: Johnson, Bill@Waterboards
Subject: US EPA comments on draft permit for SFIA (NPDES No. CA0038318)

Hi Bill and Derek.

I've reviewed the public noticed fact sheet and proposed prohibitions and effluent limits in the SFIA draft permit. I have two supporting comments on the bases for the permit's effluent limits, as described in the fact sheet.

In 1989, EPA promulgated backsliding regulations for BPJ technology-based effluent limits at 40 CFR 122.44(l). In addition to your citation of the statutory basis (CWA section 401(o)(2)(A)), it would be helpful to also cite the regulatory basis for backsliding from the BPJ effluents limits for BOD/TSS percent removal at the industrial treatment plant (40 CFR 122.44(l)(2)(i)(A)).

Regarding backsliding, the permit's approach to evaluating backsliding from statistically calculated WQBELs interprets the statutory requirements (CWA section 402(o)(2) and 303(d)(4)) as applying to the most stringent existing WQBELs. We support this approach which directly compares newly calculated individual WQBELs against the corresponding individual WQBELs in the previous permit. If a backsliding exception is not met, then the WQBEL from the previous permit is retained in the reissued permit if it is more stringent than the newly calculated limit. In this manner, the goal of anti-backsliding to reduce over time the total amount of pollution discharged, except when a permit-specific backsliding exception is met, is achieved. We support this approach for future permits.

Please contact me if you have questions regarding these comments.

Robyn