

California Regional Water Quality Control Board San Francisco Bay Region

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for
City of Burlingame Wastewater Treatment Plant,
Burlingame, San Mateo County

The Regional Water Board received written comments from the City of Burlingame on a draft NPDES permit (tentative order) distributed for public comment on May 12, 2023. The comments are summarized below in *italics* (paraphrased for brevity), followed by staff's response. For the full content and context of the comments, 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 are shown below with ~~strikethrough~~ text for deletions and underline text for additions. The Revised Tentative Order also corrects typographical errors and contains minor editorial and formatting changes to the tentative order distributed for public comment.

Comment 1

Burlingame requests that we revise Monitoring and Reporting Program Table E-3, footnote 7, to allow for reduced chronic toxicity monitoring if the required species sensitivity screening does not show toxicity at the instream waste concentration.

Response

We agree and revised the tentative order. If the species sensitivity screening finds no "fails" at the instream waste concentration, quarterly monitoring would be appropriate. To reduce the monitoring frequency to quarterly, Toxicity Provisions section III.C.4.b.i(B) requires, in part, that Burlingame show that no chronic toxicity test results in a "fail" at the instream waste concentration. Since the tentative order requires Burlingame to conduct a species sensitivity screening within 18 months of the effective date of the Order, Burlingame will soon have updated test results for a marine species. Burlingame's current test species resides in freshwater. Because Burlingame plans to conduct the species sensitivity screening with marine species due to the salinity of the receiving water, the results of the species sensitivity screening will be more relevant for establishing the appropriate monitoring frequency.

We revised Monitoring and Reporting Program Table E-3, footnote 7, as follows:

Chronic toxicity tests shall be performed in accordance with MRP section 5.3 as of the first day of the month following U.S. EPA approval of the Toxicity Provisions. The monitoring frequency shall be reduced to quarterly if no chronic toxicity test over the previous two years results in a "fail" at the instream waste concentration or if no chronic toxicity test

during the species sensitivity screening (required by MRP Appendix E-1, section 2.1.1) results in a “fail” at the instream waste concentration.

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

After two years of monitoring at the instream waste concentration of 1.3 percent or after the species sensitivity screening, this Order reduces the routine monitoring frequency for chronic toxicity from monthly to quarterly if the Discharger reports no “fails” at the instream waste concentration. This reduction in monitoring frequency is consistent with the minimum number of compliance samples Toxicity Provisions section III.C.4.b.i(B) requires to reduce the routine monitoring frequency.

Comment 2

Burlingame requests that we update the person listed as authorized to sign and submit reports in Fact Sheet Table F-1.

Response

We agree. We revised Fact Sheet Table F-1 as follows:

Table F-1. Facility Information

WDID	2 417005001
⋮	⋮
Facility Contact, Title, Phone, and Email	Manuel Molina, General Manager (650) 425-0062 manuel.molina@veolia.com
Authorized Person to Sign and Submit Reports	Syed Murtuza, Public Works Director, <u>Manuel Molina, General Manager</u> (650) 425-0062
Mailing Address	501 Primrose Road Burlingame, CA 94010
⋮	⋮
Date of Last Inspection	May 12, 2022

Comment 3

Burlingame requests that we correct the discharge point number in Fact Sheet Table F-4.

Response

We agree and revised Fact Sheet Table F-4 as follows:

Table F-4. Beneficial Uses

Discharge Point	Receiving Water	Beneficial Uses
001 <u>002</u>	Lower San Francisco Bay	Industrial Service Supply (IND) ⋮ Navigation (NAV)