California Regional Water Quality Control Board
San Francisco Bay Region

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for
Delta Diablo
Delta Diablo Wastewater Treatment Plant and Sanitary Sewer System
Antioch, Contra Costa County

The Regional Water Board received written comments from Delta Diablo on a tentative order distributed for public comment on June 17, 2025. Delta Diablo comment 5 requested minor editorial and formatting changes, which we incorporated into the Revised Tentative Order. Comments 1 through 4 are summarized below in *italics* (paraphrased for brevity), followed by a staff response. For the full content and context of the comments, refer to the comment letter. To request a copy of the comment letter, see the contact information provided in Fact Sheet section 7.5 of the Revised Tentative Order.

Revisions are shown with ~~strikethrough~~ for deletions and <u>underline</u> for additions. This document also contains staff-initiated minor editorial and formatting changes.

Comment 1: *Delta Diablo requests that we remove lead effluent limits, monitoring requirements, and any references to the aforementioned requirements because there is no reasonable potential for lead.*

Response: We agree and revised Table 2 as follows:

Table 1. Effluent Limitations

Parameter	Units	Average Monthly	Maximum Daily	Average Weekly	Instantaneous Minimum	Instantaneous Maximum	One-hour Average
All Discharge Conditions							
⋮							
Cyanide, Total	µg/L	18	39				
~~Lead, Total Recoverable~~	~~µg/L~~	~~13~~	~~42~~				
Dioxin-TEQ	µg/L	1.4×10^{-8}	2.8×10^{-8}				
⋮							

We revised Table E-3 as follows:

Table E-1. Effluent Monitoring

Parameter	Unit	Sample Type	Minimum Sampling Frequency	Monitoring Location [1]
All Discharge Conditions				
⋮				
Cyanide, Total [9]	µg/L	Grab	1/Month	EFF-001

Parameter	Unit	Sample Type	Minimum Sampling Frequency	Monitoring Location [1]
All Discharge Conditions				
~~Lead, Total Recoverable~~	~~µg/L~~	~~C-24~~	~~1/Month~~	~~EFF-001~~
Dioxin-TEQ	µg/L	Grab	Once	EFF-001
⋮				

We revised Fact Sheet section 4.3.3.2 (second paragraph) as follows:

> The MECs, most stringent applicable water quality criteria and objectives, and ambient background concentrations used in the analysis are presented in the following table, along with the reasonable potential analysis results (yes, no, or unknown) for each pollutant. Based on this analysis, ammonia, copper, ~~lead,~~ and cyanide were found to exhibit reasonable potential by Trigger 1 under current conditions.

We revised Fact Sheet Section 4.3.4.3 as follows:

> **WQBEL Calculations.** The following table shows the WQBEL calculations for copper, ~~lead,~~ cyanide, dichlorobromomethane, hexachlorobenzene, 4,4' DDT, and endrin in accordance with SIP section 1.4. For dioxin-TEQ and ammonia, SIP section 1.4 is used as guidance.

We revised Table F-12 as follows:

Table F-12. Monitoring Requirements Summary

Parameter [1]	Influent INF-001 [2]	Effluent EFF-001 [2]	Effluent EFF-002 [2]	Effluent EFF-003, EFF004 [2]	Effluent EFF-005 [2]	Effluent EFF-006 [2], [3]	Biosolids BIO-001 [2]
⋮							
Copper, Total Recoverable		1/Month					
~~Lead, Total Recoverable~~		~~1/Month~~					
Dioxin-TEQ		Once					
⋮							

Comment 2: *Delta Diablo requests to be allowed to perform total dissolved solids effluent monitoring instead of salinity monitoring because it does not have Environmental Laboratory Accreditation Program accreditation for salinity. Delta Diablo also requests to be allowed to collect grab samples for total dissolved solids monitoring at Monitoring Location EFF-006 when discharging reverse osmosis concentrate alone because it expects durations of this discharge scenario to be brief.*

Response: We agree and revised Table E-3 as follows:

Table E-2. Effluent Monitoring

Parameter	Unit	Sample Type	Minimum Sampling Frequency	Monitoring Location [1]
All Discharge Conditions				
⋮				
TSS [3]	mg/L	C-24	3/Week	EFF-001
~~Salinity~~ Total Dissolved Solids	~~ppt~~ mg/L	Grab or C-24 [4]	1/Month	EFF-001, EFF-006
Temperature	°C	Grab	1/Month	EFF-001, EFF-006
⋮				

We also revised Fact Sheet section 6.1.2 as follows:

> **Effluent Monitoring.** Effluent flow monitoring at Monitoring Location EFF-001 is necessary to understand Facility operations. Flow monitoring from two power plants, Corteva Agriscience – Pittsburg Operations, and the Antioch Brackish Water Desalination Project are necessary to ensure that the combined flow is accurately represented by the Discharger's most recent mixing zone analysis. Monitoring for the other parameters is necessary to evaluate compliance with this Order's effluent limitations and to conduct future reasonable potential analyses. This Order contains new effluent monitoring requirements for ~~salinity~~ total dissolved solids and temperature.

We also revised Table F-12 as follows:

Table F-12. Monitoring Requirements Summary

Parameter [1]	Influent INF-001 [2]	Effluent EFF-001 [2]	Effluent EFF-002 [2]	Effluent EFF-003, EFF004 [2]	Effluent EFF-005 [2]	Effluent EFF-006 [2], [3]	Biosolids BIO-001 [2]
⋮							
TSS	3/Week	3/Week					
~~Salinity~~ Total Dissolved Solids		1/Month				1/Month	
Temperature		1/Month				1/Month	
⋮							

Comment 3: *Delta Diablo requests that we require it to revert to monthly routine chronic toxicity monitoring only after an exceedance of the chronic toxicity MDEL or MMEL, not a single "fail" test result.*

Response: We agree and revised Monitoring and Reporting Program Table E-3 footnote 10 as follows:

> Chronic toxicity tests shall be performed in accordance with MRP Section 5.1. 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. The monitoring frequency shall immediately revert to once per month after any ~~result of "fail"~~ exceedance of the MDEL or MMEL at the instream waste concentration.

We also revised Monitoring and Reporting Program section 5.1.3.1 as follows:

> The monitoring frequency shall immediately revert to once per month after any ~~result of "fail"~~ exceedance of the MDEL or MMEL at the instream waste concentration.

We also revised Fact Sheet section 6.1.3 (fourth paragraph) as follows:

> As required by Toxicity Provisions section III.C.4.b.i(B), this Order requires that the routine chronic toxicity monitoring frequency revert to monthly if the Discharger ~~fails to comply with this Order's chronic toxicity requirements or has a chronic toxicity test result of "fail"~~ exceeds the MDEL or MMEL at the IWC.

Comment 4: *Delta Diablo requests that Fact Sheet section 2.2 (Discharge Point and Receiving Water) be revised to reflect the due date and requirements for Provision 5.3.5.8 (Outfall Inspection and Maintenance).*

Response: We agree and revised Fact Sheet section 2.2 as follows:

> **Discharge Point and Receiving Water.** The Discharger routes its final effluent to New York Slough via a 400-foot iron pipe diffuser located about 500 feet offshore, about 26 feet deep. The diffuser is outfitted with 50 ports, each with three-inch diameters, located eight feet apart and pointing in alternating directions. During the diffuser's last inspection in August 2018, several ports were reported to be blocked by sediment. The Discharger plans to re-inspect ~~and remove the sediment~~ by the end of ~~2026~~ 2029 and conduct maintenance activities as specified in the plan Provision 5.3.5.8 requires.