WEST COUNTY AGENCY
A JOINT POWERS AGENCY
of
West County Wastewater District
and
City of Richmond Municipal Sewer District

2910 Hilltop Drive
Richmond, California 94806-1974
(510) 222-6700

March 29, 2013

Mr. Vince Christian
Water Resource Control Engineer
California Regional Water Quality Control Board,
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612
By email: Vince.Christian@waterboards.ca.gov

Subject: Comments on Tentative Order Issued for West County Agency, West County Wastewater District, City of Richmond, and Richmond Municipal Sewer District No. 1 (Reissuance of NPDES Permit No. CA0038539)

Dear Mr. Christian:

The attached comments on the Tentative Order were developed jointly by WCA, West County Wastewater District (WCWD), City of Richmond (City), and Richmond Municipal Sewer District No. 1 (RMSD). The comments are submitted by WCA on behalf of these agencies and prior to the March 29, 2013 deadline to be considered for inclusion in the final adopted permit. The most significant comments address the retention of existing total ammonia effluent limitations and considerations for assessing effluent quality if stormwater is treated at the WCWD Wastewater Treatment Plant.

Major water recycling projects are underway through a partnership between WCWD, East Bay Municipal Utility District (EBMUD), and Chevron. As a result, less combined effluent will be discharged to the San Francisco Bay and ammonia concentrations are expected to increase. A mixing zone study, completed by WCA in 2011, indicates that larger dilution credits are appropriate for demonstrating compliance with Basin Plan objectives for un-ionized ammonia. Since the existing total ammonia effluent limits are conservative, fears of violating these limits should not hinder water recycling efforts. As a result, the agencies are requesting higher concentration-based effluent limits for total ammonia (using dilution credits supported by the 2011 mixing zone study). WCWD has

agreed to participate in a pilot project to assess the feasibility of treating dry season and first flush stormwater at wastewater treatment plants. The pilot project involves WCWD, Contra Costa County and the Regional Water Board. There is hope that runoff quality can be improved by treatment and the impacts of stormwater runoff can be mitigated by its disposal at the deepwater outfall. Due to the unknown and variable quality of stormwater to be treated, there is concern that effluent limit exceedances may occur or accelerated monitoring requirements may be triggered. If this situation occurs, a process is requested to demonstrate that effluent quality was impacted by stormwater acceptance, not by improper operation of the wastewater treatment plant.

As mentioned above, WCWD is providing treated effluent to EBMUD and Chevron for use in industrial boilers and cooling towers. In the near future, almost all of WCWD's effluent will be delivered for recycling purposes saving up to 8 mgd of potable water. The City of Richmond and RMSD are investing $98.5 million over the next 5 years to reduce influent flows, prevent sanitary sewer inflows, and minimize wet weather blending. The agencies are proud of their efforts to expand water recycling, reduce water pollution, and improve infrastructure conditions. The agencies appreciate the time and considerations granted by Regional Water Board staff during development of this Tentative Order. Please contact me at (510) 222-6700 (or by email, eshlably@wcwd.org) if you have any questions on the attached comments.

Sincerely,

Bruce Shilby

FOR E.J. Shalaby
Agency Manager

Attachment – Comments on Reissuance of NPDES Permit No. CA0038539

cc: Bill Johnson, bill.johnson@waterboards.ca.gov
Lila Tang, lila.tang@waterboards.ca.gov
Chad Davisson, Chad_Davisson@ci.richmond.ca.us
Denise Conners, denisec@lwa.com

ATTACHMENT

Comments Regarding Tentative Order for West County Agency, West County Wastewater District, City of Richmond, and Richmond Municipal Sewer District No. 1

Reissuance of NPDES Permit No. CA0038539

The following comments are submitted on the Tentative Order (T.O.) released for review and comment on February 21, 2013. The comments are provided on behalf of the Dischargers: West County Agency (WCA), the West County Wastewater District (WCWD), the City of Richmond (City), and the Richmond Municipal Sewer District No. 1 (RMSD). For requested revisions to the text of the T.O., underline is shown for suggested additions, and ~~strike-out~~ is shown for suggested deletions.

1. **The RMSD Water Pollution Control Plant and the City of Richmond's wastewater collection system are operated and maintained under a long term agreement between the City and Veolia Water West Operating Services, Inc. The following changes are requested to accurately describe the contractual relationship.**

   Findings II.B.1. [page 5]

   …

   The City of Richmond and Richmond Municipal Sewer District own ~~and operate~~ the Richmond Municipal Sewer District Water Pollution Control Plant (Richmond Plant). The Richmond Municipal Sewer District facilitates the allocation of sewer use fees paid by City of Richmond residents. The City's ~~handles~~ responsibilities related to the Wastewater Enterprise include administrati~~ve~~on, financial management of the enterprise, and source control ~~responsibilities and contracts out the operations and maintenance of the sewer collection system and wastewater treatment plant~~. A private operations firm~~,~~ (Veolia Water West Operating Services, Inc.)~~,~~ ~~operates~~ is responsible, through a long-term contract, for the compliant operation and maintenance of the Richmond Plant and the City's collection system. The Richmond Plant serves a population of approximately 68,000 covering most of the incorporated area of Richmond. It has a design capacity of 16 MGD for dry weather and a hydraulic capacity of 20 MGD for wet weather conditions. The annual average daily flow in 2011 was about 8.1 MGD. Chlorinated effluents from the West County Plant and the Richmond Plant are combined and dechlorinated prior to discharge from the West County Agency Common Outfall into San Francisco Bay.

   Attachment F – Facility Description II.A.1 [page F-5]

   …

   The City of Richmond and Richmond Municipal Sewer District own ~~and operate~~ the Richmond Municipal Sewer District Water Pollution Control Plant (Richmond Plant). The Richmond Municipal Sewer District facilitates the allocation of sewer use fees paid by City of Richmond residents. The City's ~~handles~~ responsibilities related to the Wastewater Enterprise include administrati~~ve~~on, financial management of the enterprise, and source control ~~responsibilities and contracts out the operations and maintenance of the sewer collection system and wastewater treatment plant~~. A private operations firm~~,~~ (Veolia Water West Operating Services, Inc.)~~,~~ ~~operates~~ is responsible,

through a long-term contract, for the compliant operation and maintenance of the Richmond Plant and the City's collection system. The Richmond Plant serves a population of approximately 68,000 covering most of the incorporated area of Richmond. It has a design capacity of 16 MGD for dry weather and a hydraulic capacity of 20 MGD for wet weather conditions. The annual average daily flow in 2011 was about 8.1 MGD. Chlorinated effluents from the West County Plant and the Richmond Plant are combined and dechlorinated prior to discharge from the West County Agency Common Outfall into San Francisco Bay.

2. **The locations of Discharge Points 002 and 003 are not defined in the T.O. These Discharge Points represent the locations where fully treated and disinfected effluent leaves the WCWD Wastewater Treatment Plant (Discharge Point 003) and RMSD Water Pollution Control Plant (Discharge Point 002). Discharge Point 001 is the location where combined dechlorinated effluent is discharged to the Central San Francisco Bay. The following changes are requested to identify these locations.**

   Findings II.B. [pages 5-6]

   3. **Treatment Description.** The wastewater treatment processes at the West County Plant consist of bar screens, an aerated grit chamber, primary clarifiers, a roughing filter (high-rate trickling filter), an activated sludge unit, secondary clarifiers, and chlorine contact basins (Discharge Point 003). The wastewater treatment processes at the Richmond Plant consist of bar screens, grit removal chambers, primary clarifiers, activated sludge basins, secondary clarifiers, and chlorine contact basins (Discharge Point 002). Flow diagrams for the West County Plant and the Richmond Plant are shown in Attachment C. Treated wastewater from the West County Plant is transported to the Richmond Plant where it is combined with the Richmond Plant effluent, dechlorinated, and then discharged through West County Agency's common deep-water outfall into Central San Francisco Bay (Discharge Point 001).

   Attachment F – Facility Description II.A. [page F-5]

   3. **Treatment Description.** The wastewater treatment processes at the West County Plant consist of bar screens, an aerated grit chamber, primary clarifiers, a roughing filter (high-rate trickling filter), an activated sludge unit, secondary clarifiers, and chlorine contact basins (Discharge Point 003). The wastewater treatment processes at the Richmond Plant consist of bar screens, grit removal chambers, primary clarifiers, activated sludge basins, secondary clarifiers, and chlorine contact basins (Discharge Point 002). Flow diagrams for the West County Plant and the Richmond Plant are shown in Attachment C. Treated wastewater from the West County Plant is transported to the Richmond Plant where it is combined with the Richmond Plant effluent, dechlorinated, and then discharged through West County Agency's common deep-water outfall into Central San Francisco Bay (Discharge Point 001).

3. **The Basin Plan enterococcus water quality objective is based on assessing results from 5 samples collected over a 30-day period.[1] The 5/week sampling frequency included in the T.O. is excessive and should be changed to conform to the Basin Plan requirements. The Enterolert™ analytical method will be used by WCWD and the City of Richmond to quantify enterococcus concentrations and assess compliance with the effluent limitations. The Enterolert™ method quantifies results in MPN/100mL. The following changes are requested to consistently identify applicable reporting units and to specify the appropriate monitoring frequency.**

Effluent Limitations and Discharge Specifications IV.A. [page 12]

3. Enterococcus Bacteria: At Discharge Point Nos. 002 and 003, the geometric mean of the enterococcus bacteria concentration of all samples in a calendar month shall not exceed 35 MPN~~colonies~~/100 mL, with compliance measured at Monitoring Locations EFF-002, EFF-002B, and EFF-003.

Attachment E – Effluent Monitoring Requirements IV.C. [page E-5]

Table E-5. Effluent Monitoring at EFF-002 and EFF-003

Parameter	Units	Sample Type	Minimum Sampling Frequency
Enterococcus[3][4]	MPN ~~Colonies~~/100 mL	Grab	5/~~Week~~ Month

Attachment E – Effluent Monitoring Requirements IV.D. [page E-6]

Table E-6. Effluent Monitoring at EFF-002B

Parameter	Units	Sample Type	Minimum Sampling Frequency
Enterococcus	MPN ~~Colonies~~/100 mL	Grab	1/Year[4]

4. **Ammonia limits were first applied to WCA effluent in 2007, when the current NPDES permit was prepared. At that time, WCA relied on dilution modeling that was performed in 1977 after the outfall was constructed. The 1977 study reported a conservative dilution of 25:1 based on impacts to shellfish beds if they were present in shallow nearshore areas. WCA completed a mixing zone study in 2011 to assess initial dilution at the Central San Francisco Bay outfall (Discharge Point 001) under various current and potential future discharge conditions. Dilution modeling was conducted using recent effluent flowrates (2006 to 2010), the engineered outfall capacity, and permitted flowrates. The modeling also incorporated tidal velocities representative of acute and chronic flow scenarios to determine the impacts of un-ionized ammonia on the receiving water. The 2011 mixing zone study**

[1] Table 3-1, San Francisco Bay Basin Water Quality Control Plan. California Regional Water Quality Control Board, San Francisco Bay Region.

demonstrated initial dilution of 117:1 (under acute conditions) and 164:1 (under chronic conditions). The 2011 mixing zone study results are more representative of impacts from ammonia to floating/swimming organisms near the outfall. All NPDES permits issued to municipal wastewater treatment facilities since 2008 (with one exception) have incorporated a similar modeling approach to derive ammonia effluent limits. The combined effluent has complied with ammonia limits since permit adoption, but effluent quality is expected to change as planned recycled water projects are implemented and effluent composition is altered. The Dischargers request an increase in ammonia effluent limits using the dilution credits supported by the 2011 mixing zone study.

5. **Pollutant Minimization Programs are implemented by WCWD and the City of Richmond to control pollutant loadings in their respective service areas. WCA and RMSD do not have a role in conducting these programs. The following changes are requested to clarify agency responsibilities.**

   Provisions VI.C.3. [page 17]

   a. West County Wastewater District and the City of Richmond ~~Each West County Agency member agency~~ shall continue to improve ~~its~~ their existing Pollutant Minimization Programs to promote minimization of pollutant loadings to the treatment plants and therefore to the receiving waters.

6. **Approved Pretreatment Programs are implemented by WCWD and the City of Richmond to protect operations of the respective wastewater treatment plants. WCA and RMSD do not have a role in conducting these programs. The following changes are requested to clarify agency responsibilities.**

   Provisions VI.C. 4.a. [pages 19 - 20]

   (1) West County Wastewater District and the City of Richmond ~~Each West County Agency member~~ shall implement and enforce ~~its~~ their respective approved pretreatment programs in accordance with Federal Pretreatment Regulations (40 CFR 403); pretreatment standards promulgated under CWA Sections 307(b), 307(c), and 307(d); pretreatment requirements specified at 40 CFR 122.44(j) and the requirements in Attachment H, "Pretreatment Requirements". The Discharger's responsibilities include, but are not limited to, the following:

7. **The City of Richmond is designing a wet weather storage tank to, in part, reduce blending at the RMSD Water Pollution Control Plant during a 10-year, 24-hour storm event. The volume of the new storage tank has not yet been determined, but it is expected to provide storage at the Plant of at least 3 million gallons. The total storage volume will be determined after hydraulic modeling is completed. The following changes are requested to provide flexibility in T.O. requirements, reflect current project status, and accurately describe the tasks required in Table 8.**

Provisions VI.C.5.a. [page 22]

Table 8. Specific Tasks to Reduce Blending

Task	Compliance Date
8. Wet Weather Storage Project The City of Richmond and Richmond Municipal Sewer District shall install and put into service new wet weather pumping and storage facilities at the Richmond Plant, including a storage tank designed to provide wet weather storage at the Plant of ~~that holds~~ at least 3 ~~5~~ million gallons.	September 1, 2014

Attachment F – Rationale for Effluent Limitations and Discharge Specifications IV.A.3. [page F-15]

(B) There are no feasible alternatives to the bypass. In its October 2012 Utility Analysis, the City of Richmond completed a No Feasible Alternatives Analysis using the criteria identified in USEPA's draft guidance on *NPDES Permit Requirements for Peak Wet Weather Discharges from Publicly Owned Treatment Works Treatment Plant Serving Separate Sanitary Sewer Collection Systems* (December 2005). While the City of Richmond spent about $20 million repairing and replacing sewer lines over the past permit cycle, the analysis indicates that blending will still be necessary over this next permit cycle. Rather than increasing its treatment plant capacity, the City of Richmond is focusing its resources on reducing inflow and infiltration in its collection system, which in turn reduces the need to blend. The decision to take this approach was made primarily because repairing sewer lines will also reduce sanitary sewer overflows, which are a chronic problem in the City of Richmond. The City of Richmond plans to do additional pipe repair and replacement projects to reduce inflow and infiltration, and it also plans to build a wet weather ~~(5 million gallon minimum)~~ storage tank at the Richmond Plant designed, in part, to reduce blending events during a 10-year, 24-hour storm event. The new storage tank will provide at least 3 million gallons of influent storage at the Plant. These projects will cost about $98.5 million. Provision VI.C.5.a. of the Order requires specific actions for the City of Richmond to take within this coming permit cycle to reduce further the need to blend.

Attachment F – Rationale for Provisions VII.C.5.a. [page F-41]

…

Tasks 1, 2, ~~5,~~ 6, 7 ~~8, and~~ 9, and 10 require annual workplans and completion reports to repair or replace at least two miles of leaking sewer lines each year. These projects will reduce infiltration. The City of Richmond estimates that each year's projects will reduce infiltration to the collection system by about 500,000 gallons per day during the design storm wet weather event.

Task 3 requires development of a workplan for the Third Street stormwater abatement project. The goal of the project will be to reduce inflow of bay water and stormwater into the collection system by constructing tide gates on the storm sewer system at problem locations. Currently, when the tide is high during wet weather, stormwater mixed with bay water will overflow into the sanitary sewer. Task 4 requires completion of the Third Street Stormwater Abatement

Project. The City of Richmond has recently completed similar projects that it estimates has reduced inflow by 3 to 5 million gallons per day during peak wet weather events.

~~Task 4 requires completion of the Third Street Stormwater Abatement Project. It will reduce blending by about 3 to5 million gallons per day when blending.~~

Task ~~7~~ 8 requires completion of a storage tank~~s~~ construction project at the Richmond Plant. It will allow the City of Richmond to retain a portion of influent flows and reduce blending in wet weather events up to and including a 10-year, 24-hour storm event. At least 3 ~~store at least 5~~ million gallons of wastewater will be stored during wet weather and ~~to be~~ treated later when flows have receded. ~~The City of Richmond estimates that this will eliminate the need for blending when storms are smaller than a 5-year design storm.~~

Task ~~10~~ 12 requires the City of Richmond to submit a No Feasible Alternatives Analysis if it wants to continue blending during the next permit cycle. This analysis will provide the necessary information for the Regional Water Board to determine whether to allow blending during the next permit cycle.

8. **The Dischargers request an option to use either grab or 24-hr composite samples to determine ammonia effluent limit compliance. This option allows the Dischargers to conform to sampling procedures specified in the CWC Section 13267 Technical Report Order issued by the Regional Water Board (March 2, 2012). In addition, the Dischargers request removal of the requirement to collect three grab samples for each total ammonia and cyanide sampling event. The sampling process is time consuming to implement, not necessary for obtaining representative samples, and not consistent with requirements specified for other NPDES permittees. The proposed changes are indicated below.**

   Attachment E – Effluent Monitoring Requirements IV.A. [page E-3]

   Table E-3. Effluent Monitoring at EFF-001

Parameter	Units	Sample Type	Minimum Sampling Frequency
Total Ammonia, as N[~~5~~]	mg/L	Grab or C-24	1/Month
Cyanide[~~5~~]	µg/L	Grab	1/Month

~~[5] Each sampling event shall consist of a composite sample comprised of three grab samples taken at equal intervals during the sampling date, with each grab sample being collected in an appropriate container and appropriately preserved. Grab samples for ammonia and cyanide may also be composited following appropriate laboratory practices prior to analysis.~~

9. **The volume of blended effluent and partially treated effluent are measured by effluent flowmeters at the RMSD Water Pollution Control Plant (Discharge Location 002, EFF-002B). These parameters cannot be measured at the combined outfall. The following change is needed to remove the requirement for measuring blended flows at the combined outfall.**

Attachment E – Effluent Monitoring Requirements IV.B. [page E-4]

Table E-4. Effluent Monitoring at EFF-001B

Parameter	Units	Sample Type	Minimum Sampling Frequency
Flow[1],~~[2]~~	MGD	Continuous	Continuous/D

~~[2] "Flow" means the total volume of blended water discharged. "Volume of partially-treated wastewater" means the total volume of wastewater that bypassed secondary treatment.~~

10. **During chronic toxicity testing of estuarine species, the results can be confounded by the presence of ammonia in effluent samples. Effluent pH is unavoidably increased from its typical level of 7 to approximately 8 due to "salting up" of the effluent to simulate conditions required to conduct the chronic toxicity tests. Even though routine effluent monitoring may indicate total ammonia and associated un-ionized ammonia concentrations are below toxicity thresholds, un-ionized ammonia concentrations during a chronic toxicity test event can approach or exceed toxicity threshold levels due to the effect of elevated pH on un-ionized ammonia concentrations in the test solutions. Since ammonia is known to quickly disperse and degrade to a non-toxic form upon discharge to receiving waters, chronic toxicity testing protocols allow adjustments to remove the impact of ammonia during testing. The T.O. currently allows use of the biological buffer MOPs to control pH drift and ammonia toxicity. However, the MOPs buffer is often ineffective and pH drift still occurs during testing. The Dischargers request approval to use the clinoptilolite form of zeolite to remove ammonia during routine chronic toxicity testing. Research conducted by Pacific EcoRisk, Inc. and summarized in a letter to the Regional Water Board on February 27, 2013, indicates clinoptilolite is effective at ammonia removal while having a negligible effect on effluent concentrations of metals and organic contaminants. This request is based on efforts to address situations when ammonia concentrations are within effluent discharge limits but may be causing interference with toxicity testing for the mysid shrimp. The requested change is presented below.**

Attachment E – Whole Effluent Toxicity Testing Requirements V.B.1. [page E-8]

d. Methodology. Sample collection, handling, and preservation shall be in accordance with USEPA protocols. In addition, bioassays shall be conducted in compliance with the most recently promulgated test methods, as shown in Appendix E-1. These are *Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms,* currently fourth Edition (EPA-821-R-02-013), with exceptions granted the Dischargers in writing by the Executive Officer and the Environmental Laboratory Accreditation Program (ELAP). If specific identifiable substances in the discharge can be demonstrated by the Dischargers as being rapidly rendered harmless upon discharge to the receiving water, ~~the Dischargers may manually adjust the pH~~ compliance with the chronic toxicity limit may be determined after the test samples are adjusted to remove the influence of those substances. If toxicity is suspected to be caused by ammonia, the Dischargers may use pH adjustment or the clinoptilolite form of zeolite to remove ammonia prior to testing. Written acknowledgement that the Executive Officer concurs with the Discharger's demonstration and that the adjustment will not remove the influence of other substances must be obtained prior to any other such adjustment.

11. Contra Costa County, the Regional Water Board, and WCWD are undertaking a pilot project to assess the feasibility of treating dry weather and first flush stormwater flows at the WCWD Wastewater Treatment Plant (as required by the Municipal Regional Stormwater Permit, Order No. R2-2009-0074). Due to the variable nature of stormwater quality and the unknown volume requiring treatment, Dischargers are concerned about impacts to final effluent quality and possible violations of effluent limits. These impacts could occur despite proper operation of the wastewater treatment plant and should not reflect on the Discharger's compliance record. The Dischargers request a process defined in the T.O. that can be undertaken to demonstrate the violations were not caused by failures at the wastewater treatment plant and to avoid penalties or accelerated monitoring requirements . Proposed language for a permit finding to address this situation is presented below.

If WCWD accepts for treatment urban stormwater runoff redirected from a municipal separate storm sewer that is covered under the Municipal Regional Stormwater Permit (No. CA0038593), the Regional Water Board will not consider the exceedance of any effluent limitation (IV. Effluent Limitations and Discharge Specifications) to be a violation of this Order or a trigger for accelerated monitoring requirements if the Discharger demonstrates that the exceedance was not caused by operational error, lack of preventive maintenance, or careless or improper operation of the wastewater treatment plant. Such demonstration must be in writing, accompanied by supporting evidence, and must be submitted within 60 days of the Discharger becoming aware of the exceedance.

12. The following edits are needed to accurately describe the changes to effluent monitoring requirements based on the current NPDES permit.

Attachment F – Rationale for Monitoring and Reporting Requirements VI.B. [page F-36]

- ~~A n~~New Monitoring Location<u>s</u> (EFF-001B <u>and EFF-002B</u>) ~~is~~ <u>are</u> established to monitor effluent discharges during blending events at the Richmond Plant to evaluate water quality impacts during blending events. Monitoring at EFF-001B <u>and EFF-002B</u> is required consistent with Attachment G, section III.A.3.b.6.

- The frequency of effluent monitoring for endrin has been increased to <u>2/year</u> ~~monthly~~ because the discharge demonstrates reasonable potential for endrin.

13. Editorial, non-substantive changes are requested as follows:

(a) Table 4. Facility Information [page 4]

2377 Garden Tract Road
Richmond, CA 9480<u>1</u>
Contra Costa County

(b) Findings II.B.1. [page 5]

The West County Plant serves a population of approximately 9~~3~~4,000 from parts of the City of Richmond; the City of San Pablo; the communities of Tara Hills, Rollingwood, Bayview, and El Sobrante; the Crestview portion of Pinole; and some uninc orporated portions of Contra Costa County.

(c) Findings II.B.5. [page 6]

Biosolids Management. Biosolids from the Richmond Plant are thickened by dissolved air floatation, anaerobically digested, and pumped to the West County Plant for drying and disposal. At the West County Plant, primary clarifier sludge is combined with ~~thickened~~ secondary clarifier sludge that has been thickened using dissolved air floatation, anaerobically digested, and dewatered in drying beds. Dried sludge from both plants is hauled off-site for disposal at Keller Canyon Landfill, West Contra Costa Landfill, or Vasco Road Landfill.

(d) Findings II.B.6. [page 6]

Stormwater Discharge. All stormwater in contact with equipment or wastewater at each plant is collected and directed back to the headworks for treatment. The Dischargers are not covered under the statewide general NPDES permit for stormwater discharges associated with industrial activities (NPDES General Permit No. CAS000001) because the P~~p~~lants do not discharge stormwater associated with industrial activity separate from that covered by this Order.

(e) Discharge Prohibitions III.C. [page 10]

Blended wastewater is biologically treated wastewater blended with wastewater diverted around biological treatment units or advanced treatment units. Such discharges are approved under the bypass conditions stated in 40 CFR 122.41(m)(4) when (1) the peak wet weather influent flow volume at the Richmond Plant exceeds the wet weather capacity of 20.0 MGD, (2) the discharge complies with the effluent and receiving water limitations contained in this Order, and (3) the City of Richmond and Richmond Municipal Sewer District comply with Provision VI.C.5.a. Furthermore, the City of Richmond and Richmond Municipal Sewer District shall operate the Richmond Plant as designed and in accordance with the Operation & Maintenance Manual developed for the Richmond Plant. This means they shall optimize storage and use of equalization units and shall fully use the biological treatment units and advanced treatment units. The City of Richmond and Richmond Municipal Sewer District shall report incidents of blended effluent discharges in routine monitoring reports and shall monitor their discharge as specified in the MRP. Blended wastewater discharges ~~Bypasses~~ are prohibited at the West County Plant.

(f) Effluent Limitations and Discharge Specifications IV.C.1. [page 13]

~~c. Bioassays shall be performed using the most up-to-date USEPA protocols and species as specified in MRP section V.A.~~

(g) Provisions VI.C.4.c. [page 21]

Implementation of the General Collection System WDRs ~~requirements~~ for proper operation and maintenance and mitigation of sanitary sewer overflows will satisfy the corresponding federal NPDES requirements specified in Attachment D (as supplemented by Attachment G). Following notification and reporting requirements in the General Collection System WDRs will satisfy NPDES reporting requirements specified in Attachment D (as supplemented by Attachment G) for sanitary sewer overflows from the collection system upstream of the treatment plant boundaries. Attachments D and G specify reporting requirements for unauthorized discharges from anywhere within the plant downstream of the plant boundaries.

(h) Attachment E – Reporting Requirements VIII.B.2. [page E-12]

b. Annual SMR — Annual SMRs shall be due February 1 each year, covering the previous calendar year. The annual SMR shall contain the items described in Attachment G section V.C.1.f. See Provision VI.C.2 of the Order (Effluent Characterization Study and Report) for requirements to submit reports with the annual SMR.

(i) Table F-1 [page F-3]

2377 Garden Tract Road
Richmond, CA 94801
Contra Costa County

(j) Attachment F – Facility Description II.D.1. [page F-9]

In July 2010, the Richmond Plant had a mechanical failure in one of its aeration basins. The plant operators did not discover the problem right away and this resulted in the basin going septic and 3 violations of BOD/TSS limits. The problem was resolved after the equipment was repaired and the beneficial bacteria population in the basin recovered.

(k) Attachment F – Applicable Plans, Policies and Regulations III.C.1. [page F-13]

The Basin Plan beneficial uses of Central San Francisco Bay are listed below. State Water Board Resolution No. 88-63 establishes State policy that all waters, with certain exceptions, should be considered suitable or potentially suitable for municipal or domestic supply. Because of the marine influence on Central San Francisco Bay, total dissolved solids levels exceed 3,000 mg/L and thereby meet an exception to State Water Board Resolution No. 88-63. The MUN designation therefore does not apply to the receiving water.

(l) Attachment F – Rationale for Effluent Limitations and Discharge Specifications IV.C.4.c.(8)(c) [page F-32]

The limits in the previous order (AMEL of 32 ~~µ~~mg/L and MDEL of 59 ~~µ~~mg/L) are more stringent than the newly-calculated limits and are retained to avoid backsliding.

(m) Attachment F – Public Participation VIII.A. [page F-42]

The Regional Water Board notified the Dischargers and interested agencies and persons of its intent to prescribe WDRs for the discharge and provided them with an opportunity to submit written comments and recommendations. Notification was provided through the ~~Marin Independent Journal~~ Contra Costa Times.