

California Regional Water Quality Control Board San Francisco Bay Region

STAFF-INITIATED CHANGES

In the Tentative Order for
Fairfield-Suisun Wastewater Treatment Plant and sanitary sewer system,
Fairfield, Solano County

The Revised Tentative Order reflects the following staff-initiated changes. Revisions are shown with underlined text for additions and ~~strike through~~ text for deletions.

Change 1

We updated the coordinates of Discharge Points 001, 002, 003, and 005 in Table 1 as follows:

Table 1. Discharge Locations

Discharge Point	Effluent Description	Discharge Point Latitude (North-South)	Discharge Point Longitude (East-West)	Receiving Water
001	Advanced Secondary Treated Municipal Wastewater	38.2092° <u>38.2090°</u>	-122.0581° <u>-122.0581°</u>	Boynton Slough
002	Advanced Secondary Treated Municipal Wastewater	38.2144° <u>38.2141°</u>	-122.0556° <u>-122.0663°</u>	Duck Pond 1
003	Advanced Secondary Treated Municipal Wastewater	38.2097°	-122.0581° <u>-122.0592°</u>	Duck Pond 2
005	Advanced Secondary Treated Municipal Wastewater	38.2333° <u>38.2336°</u>	-122.0589° <u>-122.0590°</u>	Ledgewood Creek
006	Advanced Secondary Treated Municipal Wastewater	38.2117°	-122.0731°	Boynton Slough

Change 2

We updated the Discharger's sanitary sewer system information in Fact Sheet section 2.1.2 as follows:

Sanitary Sewer System. The Fairfield-Suisun Sewer District sanitary sewer system consists of approximately ~~68~~ 71 miles of gravity sewer mains (12 inches in diameter or greater), 15 miles of pressure sewer mains, and ~~12~~ 14 pump stations. The plant also treats wastewater from three satellite sanitary sewer systems, consisting of sewer lines less than

12 inches in diameter, owned and maintained by the City of Fairfield, City of Suisun City, and Travis Air Force Base.

Change 3

We revised Fact Sheet section 3.2 to clarify that the CEQA exemptions that apply to adopting an NPDES permit also apply to state-only requirements, as follows:

California Environmental Quality Act (CEQA). Under Water Code section 13389, this action to adopt an NPDES permit is exempt from the provisions of the California Environmental Quality Act (CEQA), Public Resources Code division 13, chapter 3 (commencing with § 21100). ~~This Order includes two provisions—Provision 5.3.4.2.1 and Attachment G Provision 1.9.1 are state law requirements that—under Water Code section 13389. However, the are retained from the previous order imposed these requirements. To the extent Water Code section 13389 does not apply to these state law requirements—As such, retaining them—these requirements~~ is not a project subject to CEQA because they will not cause a direct or indirect physical change in the environment (Public Resources Code §§ 21065, 21080).

Change 4

We revised Fact Sheet section 4.3.4.2 to remove references to receiving water limitations in accordance with the U.S. Supreme Court's ruling in *City and County of San Francisco, California v. Environmental Protection Agency* (2025) 145 S.Ct. 704:

- 4.3.4.2.5. **Produce undesirable or nuisance aquatic life.** The mixing zones will not produce undesirable or nuisance aquatic life. Cyanide and chronic toxicity are not biostimulatory substances, so they will not cause growth of aquatic nuisance species. ~~Additionally, this Order imposes receiving water limitations that prohibit bottom deposits or aquatic growths to the extent that such deposits or growths cause nuisance or adversely affect beneficial uses.~~
- 4.3.4.2.6. **Result in floating debris, oil, or scum.** The effluent discharged receives advanced secondary treatment and does not contain floating debris, oil, or scum. The treatment plant is equipped with scum baffles to collect and dispose of oils, grease, debris, and scum. ~~In addition, this Order imposes receiving water limitations that prohibit floating debris, oil, or scum at any place and at any time.~~
- 4.3.4.2.7. **Produce objectionable color, odor, taste, or turbidity.** The mixing zones will not produce objectionable color, odor, taste, or turbidity because the effluent receives advanced secondary treatment and is disinfected prior to discharge. Advanced secondary treatment generally addresses

objectionable odor, taste, and turbidity through the biological degradation of organic compounds and clarification. ~~In addition, this Order imposes receiving water limitations that prohibit alteration of color or turbidity in receiving waters beyond natural background levels.~~ The Discharger conducts regular effluent monitoring that includes standard observations to ensure that objectionable color, odor, and turbidity are not present.

- 4.3.4.2.8. **Cause objectionable bottom deposits.** The discharged effluent receives advanced secondary treatment, which biologically degrades and removes suspended particles that could contribute to receiving water bottom deposits. ~~Moreover, this Order imposes receiving water limitations that prohibit bottom deposits or aquatic growths to the extent that such deposits or growths cause nuisance or adversely affect beneficial uses.~~

We also revised Fact Sheet section 6.1.4 to remove references to receiving water limitations as follows:

- 6.1.4. **Receiving Water Monitoring.** Receiving water monitoring is necessary to evaluate compliance with this Order's ~~receiving water limitations~~ and to support future reasonable potential analyses. The Discharger is also required to continue participating in the Regional Monitoring Program, which involves collecting data on pollutants and toxicity in San Francisco Bay water, sediment, and biota.

Change 5

We removed repetitive wording and an extraneous sentence from Fact Sheet section 5.3.3 as follows:

This provision is based on Basin Plan section 4.13.2 and SIP section 2.4.5. ~~section 2.4.5. The Discharger submits an annual pollution prevention report under NPDES Permit CA0037869 that includes copper and cyanide action plans based on Basin Plan sections 7.2.1.2 and 4.7.2.2.~~

Change 6

We corrected the effluent monitoring frequency of dioxin-TEQ in, and added receiving water monitoring frequencies for pH, temperature, and total ammonia to, Fact Sheet Table F-9:

Table F-9. Monitoring Requirements Summary

Parameter ^[1]	Influent INF-001 ^[2]	Effluent EFF-001D ^[2]	Effluent EFF-001 and EFF-005 ^[2]	Effluent EFF-002 and EFF-003 ^[2]	Biosolids BIO-001 ^[2]	Receiving Water ^[2]
:	:	:	:	:	:	:
pH	-	Continuous/D	-	-	-	<u>-2/Year</u>
Turbidity	-	Continuous/D or 1/Day	-	-	-	-
Temperature	-	Continuous/D or 1/Day	-	-	-	<u>-2/Year</u>
Dissolved Oxygen	-	Continuous/D or 1/Day	-	-	-	2/Year
Ammonia, Total	-	1/Month	-	-	-	<u>-2/Year</u>
Copper, Total Recoverable	-	1/Month	-	-	-	-
Cyanide, Total	1/Month	1/Month	-	-	2/Year	-
Dioxin-TEQ	-	<u>2/Year Once</u>	-	-	-	-
:	:	:	:	:	:	:

Change 7

We corrected non-substantive typographical errors throughout the Revised Tentative Order.