CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

RESPONSE TO WRITTEN COMMENTS

Tentative Order for Alternate Monitoring Program for
Municipal Wastewater Dischargers in
San Francisco Bay Region

The Regional Water Board received written comments from the following on a tentative order distributed on December 22, 2015, for public comment. Regional Water Board staff has grouped and summarized the comments shown below in *italics* (paraphrased for brevity) and followed each with a response. For the full content and context of the comments, please refer to the comment letters.

1. Sewerage Agency of Southern Marin (SASM) (January 27, 2016)
2. City of Pinole (Pinole) (January 27, 2016)
3. City of Burlingame (Burlingame) (January 27, 2016)
4. San Francisco Estuary Institute on behalf of Steering Committee for Regional Monitoring Program (SFEI) (January 27, 2016)
5. U.S. Environmental Protection Agency (U.S. EPA) (January 28, 2016)
6. West County Agency (WCA) (January 28, 2016)
7. City of Calistoga (Calistoga) (February 1, 2016)
8. Napa Sanitary District (NSD) (February 1, 2016)
9. Las Gallinas Valley Sanitary District (LGVSD) (February 1, 2016)
10. Bay Area Clean Water Agencies (BACWA) (February 1, 2016)

Most revisions to the tentative order are shown in this document with underline <u>text</u> for additions and strikethrough ~~text~~ for deletions. This document also shows staff-initiated clarifications and corrections to discharger information.

Comment 1 (SASM, Pinole, NSD, LGVSD, BACWA): *Correct the permit required monitoring frequencies for dioxin-TEQ, EPA 608, EPA 624, and/or EPA 625, and adjust the calculated avoided costs that would to go to the RMP from monitoring reductions the tentative order would put into place.*

Response: We agree, except EPA 624 and 625 for NSD. While the effluent characterization monitoring is required only once per year, NSD's permit Attachment E section IX.A for pretreatment effluent monitoring does also currently require twice per year monitoring of VOC and BNA. Therefore, the twice per year for EPA 624/625 that was reflected in the tentative order is correct.

Please see the corrections on Revisions to Attachment C and Attachment F Tables F-2 and F-3 at the end of this document.

Comment 2 (SASM, Burlingame, WCA): *The permit monitoring frequencies for EPA 608 and/or EPA 625 used in the tentative order to calculate costs avoided are not correct because of*

monitoring required to demonstrate compliance with effluent limits for specific pollutants. SASM's and Burlingame's permits require twice per year monitoring for compliance the bis(2-hethylhexyl)phthalate effluent limit, and WCA's permit also requires twice per year monitoring for bis(2-hethylhexyl)phthalate, endrin, and heptachlor. Since bis(2-hethylhexyl)phthalate is a pollutant measured by EPA 625, and endrin and heptachlor are measured by EPA 608, there would be no reduction in costs for those methods. Thus, the costs ($426/yr for EPA 625, and $230/yr for EPA 608) should be subtracted from the total amount that would be paid to the RMP.

Response: We agree in part, but propose no change to the avoided cost calculations for EPA 608 and 625 for two reasons. First, there will be cost savings for reduced EPA 625 monitoring. Second, while we agree the actual savings for some dischargers may not be as high as shown in the tentative order, Regional Water Board staff must use simple and uniform bases for efficient and fair implementation of this regional program, which means using effluent characterization, instead of effluent limit, monitoring as the basis for the EPA 608 and 625 reductions.

Effluent characterization monitoring is different than, and separate from, effluent limit compliance monitoring. Effluent characterization monitoring is primarily for the purpose of informing the next permit reissuance by determining if effluent limits are necessary for any pollutant with established objectives (i.e., reasonable potential analysis). In contrast, effluent limit compliance monitoring is to determine if the discharge is within the limits already set in the current permit.

For EPA 625 monitoring, despite not allowing for reductions in effluent limit compliance monitoring for bis(2-hethylhexyl)phthalate, the tentative order would reduce effluent characterization monitoring. Caltest[1] indicated that it currently charges about $200 less for EPA 625 if quantification is necessary for only bis(2-hethylhexyl)phthalate. This is because the compound is extracted in the base/neutral fraction so that standards for the acid extractables would not be necessary. (The cost for EPA 608 for endrin and heptachlor would be the same because the analysis does not involve different phase extractions so all standards must be run for each batch of samples.)

While we understand that many dischargers may currently be using its EPA 625 results for both effluent characterization and effluent limit compliance purposes, under the tentative order, dischargers with effluent limits will reduce effluent limit compliance monitoring cost, by about $200 per sample, by quantifying and reporting only the results for a subset of the pollutants, namely the subset that includes the specific pollutant(s) with effluent limits. For bis(2-hethylhexyl)phthalate; this means reporting only the base/neutral pollutants results.

Concerning the second reason, fairness in implementation of this program is a factor because to include consideration of effluent limit specific monitoring would open the door to considering dischargers who perform in-house EPA analyses or have lower actual contract laboratory costs. Having to tailor cost savings for each discharger based on all these factors would be a heavy burden for Regional Water Board staff considering the small cost differences. The differences are less 5 to 10 percent of total calculated avoided costs. For example, in WCA's case, the

[1] February 3, 2016, Lila Tang telephone conversation with Todd at Caltest Analytical Laboratory, Napa.

difference is about $500 relative to the total calculated savings of over $8,800 (which mostly comes from elimination of chronic toxicity re-screening with each permit reissuance).

Finally, this is an optional program, so each discharger can choose to opt-in or not based on its own circumstances. We further note that as give-and-take, we have revised the tentative order so that a discharger who opts in by July 1, 2016, will receive coverage for the rest of 2016 without charge. And in response to Comment 6 (BACWA), we have revised the tentative order to hold steady payments to the RMP for full 5-year terms.

Comment 3 (SFEI, U.S. EPA, BACWA): *The U.S. EPA, BACWA, and Steering Committee of the Regional Monitoring Program (RMP) support the tentative order. A shift in funding, from low priority monitoring towards RMP research on emerging contaminants (including micro plastic) and other pressing water quality issues will help to scientifically inform management decisions on investments to deal with the pressing challenges of climate change, aging infrastructure, and use of stormwater and wastewater as resources. The Steering Committee requests inserting language in the order to memorialize the intended use of funds on emerging contaminants.*

Response: We agree and have added the language SFEI suggested to Provision VI.C.1.a as shown below. (Other changes shown are in response to comment 7 from BACWA and Regional Water Board staff initiated change 5 to incentivize early opt-in by agencies.)

a. Direct Analytical Laboratory Cost Savings to RMP

The Discharger shall provide to the RMP, by July 1 of each year for minimum terms consisting of 5 consecutive years[4], the amount of funds listed for the Discharger in Attachment C of this Order[1]. The cost for the Discharger once subject to the Order shall be constant over the 5-year opt-in period. The intended use of these funds is for monitoring and special studies for contaminants of emerging concern. However, the Steering Committee of the RMP shall have the authority to allocate these funds to other types of studies at its discretion. Starting in 2017, the Executive Officer is authorized, but not required, to adjust these amounts annually by April 30 ~~(to be effective for that calendar year),~~ to reflect changes in analytical costs consistent with the assumptions used for Attachment C. These adjustments may be based on changes in contract laboratory costs ~~or pegged to RMP annual cost adjustments~~. The Executive Officer shall provide a 30-day public comment period on proposed adjustments and consider comments received prior to putting proposed adjustments into effective. The adjusted costs will come into effect for the Discharger when it next opts into a new 5-year term.

[1] To qualify for this Order, ~~a~~the Discharger must commit to payments for full terms each made up of 5 consecutive years because the amounts in Attachment C are based on annualized cost savings relative the individual permits' requirements, such as for chronic toxicity re-screening once every 5-year permit term. If the Discharger opts in by paying the RMP by July 1, 2016, then the period of coverage under this Order shall be starting from the effective date (April 1, 2016) until December 31, 2021 (or 5 years plus). Opt-ins after July 1, 2016, will result in coverage from January 1 of the next calendar year for 5 years.

Comment 4 (Calistoga): *The City of Calistoga recommends a change to clarify that PCBs monitoring is required at only one of the City's three effluent monitoring stations, which the Watershed permit currently allows to alternate each year.*

Response: We agree, however upon further consideration of where monitoring would provide the most representative data for PCBs load calculations, we propose the change shown below in underline to the Watershed Permit, Table E-2. This table is inserted into Provision VI. C.4 of the tentative order.

4. PCBs Aroclors in Watershed Permit for Mercury and PCBs (NPDES Permit CA0038849)

Attachment E, section III, Tables E-1 and E-2, shall read as follows:

Table E-1. Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
Discharge point indicated in individual NPDES permits for discharge from the Discharger's wastewater treatment plant (often but not always EFF-001 or E-001)	Location as indicated in individual NPDES permits for mercury or other toxic pollutants. For C&H Sugar Company, location is EFF-002. For GenOn Delta, LLC, locations are E-001B through to and including E-001I. For San Francisco International Airport, location is EFF-001A for both its Sanitary and Industrial Plants. For Calistoga, ~~annual~~ monitoring shall occur at ~~alternate each year between~~ EFF-001 ~~and EFF-002~~.	As described in individual NPDES permits for mercury or other toxic pollutants

…

Comment 5 (BACWA): *BACWA recommends that the Regional Water Board reduce the frequency of PCB congener monitoring via Method 1668C upon reissuance of the Mercury/PCB Watershed Permit.*

Response: Comment noted. Monitoring for PCB congeners using EPA 1668 will be one of many items that will be considered as part of reissuance of the Watershed Permit.

Comment 6 (BACWA): *In January of each year, BACWA works with the RMP to submit a letter to the Regional Water Board certifying which agencies have paid their RMP dues for the previous year. BACWA recommends that the reporting deadline for participation in the Alternate Monitoring Requirements be changed to February 1 to avoid duplicative reporting.*

Response: We agree. Provision VI.C.1.b is revised as shown below:

b. Report Amount of Cost Savings Directed to the RMP

The Discharger shall, either individually or in collaboration with other dischargers, submit or cause to submit, on ~~October~~February 1 of each year, a report that shows an accounting of each Discharger's payment[2] to the RMP.

Comment 7 (BACWA): *Costs increases should be tied to increases in analytical costs, not RMP cost adjustment, and costs should be constant over the five-year opt-in period. The commercial environmental testing market is very competitive; often there is no cost increase from year-to-year, and costs sometimes even decrease. Agencies are required to opt into the Alternative Monitoring Requirement for a five-year term. When agencies are deciding whether to opt in, they need to understand the cost tradeoff for the full five-year period.*

Response: We agree and have made changes to Provision VI.C.1.a generally as BACWA suggested. See changes reflected under response to Comment 3.

Regional Water Board Staff Initiated Changes to Clarify Requirements

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1. Provision VI.B.2 for dioxin-TEQ monitoring is modified with a clarifying note below, and also to avoid legal confusion as to which "Order" is referenced. The intent is to reference the "Order" that the tentative order will become, if adopted by the Regional Water Board, and not an individual permit that is also referred to as "Order" in all permits.:

   Attachment E, section IV.A. as it pertains to effluent monitoring for Dioxin-TEQ is replaced with the following (except for Dischargers without such monitoring):

Parameter	Units[1]	Sample Type[2]	Minimum Sampling Frequency[3,4]
T h i s	~~Note this Order does not amend footnotes or monitoring frequencies for other parameters specified in individual NPDES permits (typically in Table E-3).~~		
Dioxin-TEQ	µg/L	Grab	Once per permit term

   O
   This Order puts into effect a once-per-permit-term frequency for dioxin-TEQ for all Dischargers covered by this Order. This is regardless of whether the Discharger's individual permit specifies, or does not specify, dioxin-TEQ effluent limits. Permits without dioxin-TEQ limits currently require dioxin-TEQ monitoring for the purpose of effluent characterization study to inform future permit reissuance. Once-per-permit-term monitoring satisfies both effluent characterization and effluent limit compliance monitoring. The Order also does not amend footnotes or monitoring frequencies for other parameters specified in individual NPDES permits (typically Table E-3).

[2] The Regional Water Board will consider enforcement action against a Discharger that reduces monitoring from what is required by its individual NPDES permit, or the Watershed Permit for Mercury and PCBs, but does not provide the cost savings listed in Attachment C of this Order to the RMP.

2. Provision VI.C.2.a is modified as shown below to clarify by summarizing the pollutant monitoring frequencies for dischargers that would be covered under the tentative order. The intent of these changes is to clarify by incorporating similar requirements in one place; there is no intent to add requirements.

> **...** Provision VI.C.2 of the Individual NPDES Permits **...** is replaced with the following:
>
> a. **Effluent Characterization Study and Report.** The Discharger shall continue to monitor and evaluate the discharge from the following discharge point(s) to verify that the "no" or "unknown" reasonable potential analysis conclusions of this Order[3] remain valid and to inform the next permit reissuance. Also summarized below is compliance monitoring required by this Order's[3] Attachment E (Monitoring and Reporting Program or MRP) for specific limited pollutants. The Discharger shall collect representative samples at the monitoring locations set forth below, as defined in the MRP, at no less than the frequency specified ~~below~~:
>
> | Discharge Point | Monitoring Location | Parameter | Minimum Frequency |
> |---|---|---|---|
> | Point(s) specified in Discharger's NPDES permit. | Location(s) described in Discharger's NPDES permit. | VOCs, BNAs, and chlorinated ~~P~~pesticides without effluent limits; and dioxin-TEQ. | Once per permit term. |
> | Point(s) specified in Discharger's NPDES permit. | Location(s) described in Discharger's NPDES permit. | VOC/BNA/pesticide pollutants with effluent limits, and ~~A~~all other ~~priority~~ pollutants[4] (e.g., metals, CN). | Frequency specified in Discharger's NPDES permit. |
>
> ~~The samples shall be analyzed for the p~~Priority pollutants (VOCs, BNAs, chlorinated pesticides) are listed in Attachment G, Table ~~B~~ C, and monitoring shall be in accordance with Attachment G sections III.A.1 and III.A.2.~~, except~~ As indicated above, for ~~those priority~~ other pollutants ~~with effluent limitations~~ where the MRP requires more frequent monitoring ~~because it is a limited parameter,~~ than once per permit term, the Discharger shall monitor for those specific pollutants at the frequencies specified in the MRP.~~and except f~~ For ~~those priority~~ pollutants for which there are no water quality criteria (see Fact Sheet ~~T~~table ~~F-9~~on Reasonable Potential Analysis Summary) no monitoring is required.
>
> ~~Compliance with this requirement shall be achieved in accordance with the specifications of Attachment G sections III.A.1 and III.A.2.~~
>
> Analytical methods for VOCs, BNAs, and chlorinated pesticides are capable of quantifying many priority pollutants. For purposes of determining compliance with specific effluent limitations when VOCs, BNAs, and chlorinated pesticides

monitoring is otherwise not required, the Discharger may, at its option, set its analyses to calibrate for and quantify only those pollutants with limitations.

The Discharger shall evaluate its data in a timely fashion and determine if it should include any pollutants detected as a "pollutant of concern" in the Discharger's Pollutant Minimization Program, described in Provision VI.C.3.

[3] "Order" in this context refers to the individual NPDES permits in Table 1 and not to this alternate MPR Order.

[4] For the City of Calistoga, City of St. Helena, and Town of Yountville, as required in the individual NPDES permits, the list of parameters include those listed in Basin Plan Tables 3-5 (MUN) and 3-6 (AGR), except for odor and radioactivity, and are required once per permit term.

3. Provisions VI B.3 (Pretreatment) and B.4 (PCBs) are modified as shown below to avoid legal confusion as to which "Order" is referenced. The intent is to reference the "Order" that the tentative order will become, if adopted by the Regional Water Board, and not an individual permit that is also referred to as "Order" in all permits.

Constituents	Sampling Frequency			Sample Type	
	Influent INF-001 [1]	**Effluent EFF-001** [1]	**Biosolids BIO-001**	**Influent and Effluent**	**Biosolids**[6]
VOC	*Unchanged. Refer to individual permits.*	Once per permit term	*Unchanged. Refer to individual permits.*	*Unchanged. Refer to individual permits.*	
BNA		Once per permit term			
...	~~Note this Order does not amend footnotes, and does not amend influent, biosolids, or the pretreatment monitoring frequencies for other pretreatment parameters specified in individual permits (typically Table E-5, E-6, or E-7).~~				

This Order does not amend footnotes, and does not amend influent, biosolids, or the pretreatment monitoring frequencies for other pretreatment parameters specified in individual permits (typically Table E-5, E-6, or E-7 of individual permits).

...

Parameter	Units[1]	Sample Type[2]	Minimum Sampling Frequency[3,4]
Total mercury[5]	*(Unchanged. Refer to Watershed Permit for Mercury and PCBs~~This Order does not amend mercury monitoring.~~)*		
Total PCBs (as aroclors)[7]	µg/L	Grab	~~Semi-annually for Major Dischargers~~
			~~Annually~~Once per permit term ~~for Minor Dischargers~~

PCBs (as congeners)[8]	*(Unchanged. Refer to Watershed Permit for Mercury and PCBs~~This Order does not amend PCBs as congeners monitoring.~~)*

4. Provision VI.C.1 is modified with the following additional subsection for the purpose of reporting in discharge monitoring reports (DMR):

   1. Conditions to Qualify for Coverage and Reporting Under this Order – Added Provision

   …

   c. Report Conditional Modification in Discharge Monitoring Report (DMR)

   For Dischargers covered by this Order, as necessary and appropriate in DMR forms, the Discharger should enter code 9 to indicate conditional waiver of some of the individual permit required monitoring put in place by this Order.

   The corresponding section of the Fact Sheet is also modified with the following:

   c. This Order adds language directing dischargers to use code "9" as necessary and appropriate when reporting to U.S. EPA's discharge monitoring reports (DMR) to indicate waiver of some of the individual permit required monitoring put in place by the reduced frequencies this Order.

5. Fact Sheet Provision VI.C.1.a is modified with the following additional paragraph:

   …

   The requirement for full 5-year terms is because the amounts in Attachment C are based on annualized cost savings relative the individual permits' requirements, such as for chronic toxicity re-screening once every 5-year permit term. The allowance of 5 plus years coverage if opt-in occurs by July 1, 2016, is to incentivize early initial opt-in. Subsequent opt-ins would start with January 1 of the next calendar year for 5 years because all permit monitoring frequencies are on a calendar year based.

6. Fact Sheet Table F-1 is modified to update the facility contact for City of Burlingame and to correct the permitted flow for Delta Diablo to 19.5 MGD.

Revisions to Attachment C

Discharger	Payment to RMP due July 1
American Canyon, City of	$9,726
Benicia, City of	$8,886
Burlingame, City of	$8,886
Calistoga, City of	$184
Central Contra Costa Sanitary District	$9,726
Central Marin Sanitation Agency	$9,181
Crockett Community Services District, Port Costa Sanitary Department	$184
Delta Diablo	$8,886
East Bay Dischargers Authority	$9,726
Union S.D.	$1,926
Oro Loma	$1,926
Hayward	$1,926
San Leandro	$1,926
Livermore, City of	$1,926
Dublin San Ramon Services District	$1,926
East Bay Municipal Utilities District. WWTP	$9,726
Fairfield-Suisun Sewer District	$9,726
Las Gallinas Valley Sanitary District	$7,656 ~~$8,726~~
Marin County (Paradise Cove), Sanitary District No. 5 of	$184
Marin County (Tiburon) Sanitary District No. 5 of	$3,886
Millbrae, City of	$8,886
Mt. View Sanitary District	$7,886
Napa Sanitation District	$8,496 ~~$9,726~~
Novato Sanitary District	$9,726
Palo Alto, City of	$9,726
Petaluma, City of	$8,726
Pinole, City of	$8,886 ~~$7,886~~
Rodeo Sanitary District	$8,886
San Francisco, City and County Of, San Francisco International Airport	$8,886
San Francisco (Southeast Plant), City and County of	$9,726
San Jose/Santa Clara Water Pollution Control Plant and Cities of San Jose and Santa Clara	$9,726
San Mateo, City of	$8,886
Sausalito - Marin City Sanitary District	$3,886
Sewerage Agency of Southern Marin	$4,886 ~~$3,886~~
Silicon Valley Clean Water	$9,726

Sonoma Valley County Sanitary District	**$8,886**
South San Francisco and San Bruno, Cities of	**$8,886**
St. Helena, City of	**$184**
Sunnyvale, City of	**$9,726**
US Department of Navy (Treasure Island)	**$7,466**
Vallejo Sanitation and Flood Control District	**$9,726**
West County Agency	**$8,886**
Richmond Municipal Sewer District	**$967**
West County Wastewater District	**$967**
Yountville, Town of	**$184**
TOTAL	**$290,937~~$291,237~~**

Revisions to Attachment F, Table F-2

Discharger	Order Number	Permit Dioxin-TEQ frequency (per year)	Dioxin-TEQ Frequency if Covered by Alternate MRP (per year)	Difference in Dioxin-TEQ Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from Dioxin-TEQ reduced frequency ($1,000 per test)	Permit Chronic Toxicity Re-screening frequency (per year)	Cost Savings per year from Eliminating Chronic Toxicity Re-screening ($30,000 per test)
American Canyon, City of	R2-2011-0046	2	0.2	1.8	$1,800	0.2	$6,000
Benicia, City of	R2-2014-0023	2	0.2	1.8	$1,800	0.2	$6,000
Burlingame, City of	R2-2013-0015	2	0.2	1.8	$1,800	0.2	$6,000
Calistoga, City of	R2-2016-00XX	0.2	0.2	0	$0	0	$0
Central Contra Costa Sanitary District	R2-2012-0016	2	0.2	1.8	$1,800	0.2	$6,000
Central Marin Sanitation Agency	R2-2012-0051	2	0.2	1.8	$1,800	0.2	$6,000
Crockett Community Services District, Port Costa Sanitary Dept.	R2-2013-0035	0.2	0.2	0	$0	0	$0
Delta Diablo	R2-2014-0030	2	0.2	1.8	$1,800	0.2	$6,000
East Bay Dischargers Authority	R2-2012-0004	2	0.2	1.8	$1,800	0.2	$6,000
Union S.D.							
Oro Loma							
Hayward							
San Leandro							
Livermore	R2-2012-0006						
Dublin San Ramon Services District	R2-2012-0005						
East Bay Municipal Utilities Dist. WWTP	R2-2014-0044	2	0.2	1.8	$1,800	0.2	$6,000
Fairfield-Suisun Sewer District	R2-2015-0013	2	0.2	1.8	$1,800	0.2	$6,000
Las Gallinas Valley Sanitary District	R2-2015-0021	1	0.2	0.8	$800	0.2	$6,000
Marin County (Paradise Cove), Sanitary District No. 5 of	R2-2011-0016	0.2	0.2	0	$0	0	$0
Marin County (Tiburon) Sanitary District No. 5 of	R2-2013-0027	1	0.2	0.8	$800	0.07	$2,000
Millbrae, City of	R2-2013-0037	2	0.2	1.8	$1,800	0.2	$6,000
Mt. View Sanitary District	R2-2010-0114	1	0.2	0.8	$800	0.2	$6,000
Napa Sanitation District	R2-2011-0007	~~2~~ 1	0.2	~~1.8~~ 0.8	~~$1,800~~ $800	0.2	$6,000

Revisions to Attachment F, Table F-2

Discharger	Order Number	Permit Dioxin-TEQ frequency (per year)	Dioxin-TEQ Frequency if Covered by Alternate MRP (per year)	Difference in Dioxin-TEQ Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from Dioxin-TEQ reduced frequency ($1,000 per test)	Permit Chronic Toxicity Re-screening frequency (per year)	Cost Savings per year from Eliminating Chronic Toxicity Re-screening ($30,000 per test)
Novato Sanitary District	R2-2015-0034	2	0.2	1.8	$1,800	0.2	$6,000
Palo Alto, City of	R2-2014-0024	2	0.2	1.8	$1,800	0.2	$6,000
Petaluma, City of	R2-2011-0003	1	0.2	0.8	$800	0.2	$6,000
Pinole, City of	R2-2012-0059	~~1~~ 2	0.2	~~0.8~~ 1.8	~~$800~~ $1,800	0.2	$6,000
Rodeo Sanitary District	R2-2012-0027	2	0.2	1.8	$1,800	0.2	$6,000
San Francisco, City and County Of, San Francisco International Airport	R2-2013-0011	2	0.2	1.8	$1,800	0.2	$6,000
San Francisco (Southeast Plant), City and County of	R2-2013-0029	2	0.2	1.8	$1,800	0.2	$6,000
San Jose/Santa Clara Water Pollution Control Plant and Cities of San Jose and Santa Clara	R2-2014-0034	2	0.2	1.8	$1,800	0.2	$6,000
San Mateo, City of	R2-2013-0006	2	0.2	1.8	$1,800	0.2	$6,000
Sausalito - Marin City Sanitary District	R2-2012-0083	1	0.2	0.8	$800	0.07	$2,000
Sewerage Agency of Southern Marin	R2-2012-0094	~~1~~ 2	0.2	~~0.8~~ 1.8	~~$800~~ $1,800	0.07	$2,000
Silicon Valley Clean Water	R2-2012-0062	2	0.2	1.8	$1,800	0.2	$6,000
Sonoma Valley County Sanitary District	R2-2014-0020	2	0.2	1.8	$1,800	0.2	$6,000
South San Francisco and San Bruno, Cities of	R2-2014-0012	2	0.2	1.8	$1,800	0.2	$6,000
St. Helena, City of	R2-2016-000~~X~~3	0.2	0.2	0	$0	0	$0
Sunnyvale, City of	R2-2014-0035	2	0.2	1.8	$1,800	0.2	$6,000
US Department of Navy (Treasure Island)	R2-2015-0004	1	0.2	0.8	$800	0.2	$6,000
Vallejo Sanitation and Flood Control District	R2-2012-0017	2	0.2	1.8	$1,800	0.2	$6,000

Revisions to Attachment F, Table F-2

Discharger	Order Number	Permit Dioxin-TEQ frequency (per year)	Dioxin-TEQ Frequency if Covered by Alternate MRP (per year)	Difference in Dioxin-TEQ Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from Dioxin-TEQ reduced frequency ($1,000 per test)	Permit Chronic Toxicity Re-screening frequency (per year)	Cost Savings per year from Eliminating Chronic Toxicity Re-screening ($30,000 per test)
West County Agency	R2-2013-0016	2	0.2	1.8	$1,800	0.2	$6,000
Richmond							
WCWD							
Yountville, Town of	R2-2015-0029	0.2	0.2	0	$0	0	$0
Total					~~$49,600~~**$50,600**		**$180,000**

Revisions to Attachment F, Table F-3

Discharger	Order Number	Permit EPA 608 Frequency (per year)	Difference in EPA 608 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 608 reduced frequency ($230 per test)	Permit Pretreatment EPA 624 Frequency (per year)	Permit EPA 624 Frequency (per year)	Difference in EPA 624 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 624 reduced frequency ($295 per test)	Permit Pretreatment EPA 625 Frequency (per year)	Permit EPA 625 Frequency (per year)	Difference in EPA 625 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 625 reduced frequency ($545 per test)
American Canyon, City of	R2-2011-0046	2	1.8	$414	2	1	1.8	$531	2	1	1.8	$981
Benicia, City of	R2-2014-0023	2	1.8	$414	0.2	1	0.8	$236	0.2	1	0.8	$436
Burlingame, City of	R2-2013-0015	2	1.8	$414	0.2	1	0.8	$236	0.2	1	0.8	$436
Calistoga, City of	R2-2016-00XX	1	0.8	$184		0.2	0	$0		0.2	0	$0
Central Contra Costa Sanitary District	R2-2012-0016	2	1.8	$414	2	1	1.8	$531	2	1	1.8	$981
Central Marin Sanitation Agency	R2-2012-0051	2	1.8	$414	2	1	1.8	$531	1	1	0.8	$436
Crockett Community Services District, Port Costa Sanitary Dept.	R2-2013-0035	1	0.8	$184		0.2	0	$0		0.2	0	$0
Delta Diablo	R2-2014-0030	2	1.8	$414		1	0.8	$236		1	0.8	$436
East Bay Dischargers Authority	R2-2012-0004	2	1.8	$414		2	1.8	$531		2	1.8	$981
Union S.D.		2	1.8	$414	2		1.8	$531	2		1.8	$981
Oro Loma		2	1.8	$414	2		1.8	$531	2		1.8	$981
Hayward		2	1.8	$414	2		1.8	$531	2		1.8	$981
San Leandro		2	1.8	$414	2		1.8	$531	2		1.8	$981
Livermore	R2-2012-0006	2	1.8	$414	2		1.8	$531	2		1.8	$981
Dublin San Ramon Services District	R2-2012-0005	2	1.8	$414	2		1.8	$531	2		1.8	$981
East Bay Municipal Utilities	R2-2014-0044	2	1.8	$414	2	1	1.8	$531	2	1	1.8	$981

Revisions to Attachment F, Table F-3

Discharger	Order Number	Permit EPA 608 Frequency (per year)	Difference in EPA 608 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 608 reduced frequency ($230 per test)	Permit Pretreatment EPA 624 Frequency (per year)	Permit EPA 624 Frequency (per year)	Difference in EPA 624 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 624 reduced frequency ($295 per test)	Permit Pretreatment EPA 625 Frequency (per year)	Permit EPA 625 Frequency (per year)	Difference in EPA 625 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 625 reduced frequency ($545 per test)
Dist. WWTP												
Fairfield-Suisun Sewer District	R2-2015-0013	2	1.8	$414	2	2	1.8	$531	2	2	1.8	$981
Las Gallinas Valley Sanitary District	R2-2015-0021	~~2~~ 1	~~1.8~~ 0.8	~~$414~~ $184		~~2~~ 1	~~1.8~~ 0.8	~~$531~~ $236		~~2~~ 1	~~1.8~~ 0.8	~~$981~~ $436
Marin County (Paradise Cove), Sanitary District No. 5 of	R2-2011-0016	1	0.8	$184		0.2	0	$0		0.2	0	$0
Marin County (Tiburon) Sanitary District No. 5 of	R2-2013-0027	2	1.8	$414		1	0.8	$236		1	0.8	$436
Millbrae, City of	R2-2013-0037	2	1.8	$414	0.2	1	0.8	$236	0.2	1	0.8	$436
Mt. View Sanitary District	R2-2010-0114	2	1.8	$414		1	0.8	$236		1	0.8	$436
Napa Sanitation District	R2-2011-0007	~~2~~ 1	~~1.8~~ 0.8	~~$414~~ $184	2	2	1.8	$531	2	2	1.8	$981
Novato Sanitary District	R2-2015-0034	2	1.8	$414	2	2	1.8	$531	2	2	1.8	$981
Palo Alto, City of	R2-2014-0024	2	1.8	$414	2	2	1.8	$531	2	2	1.8	$981
Petaluma, City of	R2-2011-0003	2	1.8	$414	2	0.2	1.8	$531	2	0.2	1.8	$981
Pinole, City of	R2-2012-0059	2	1.8	$414		1	0.8	$236		1	0.8	$436
Rodeo Sanitary District	R2-2012-0027	2	1.8	$414		1	0.8	$236		1	0.8	$436

Revisions to Attachment F, Table F-3

Discharger	Order Number	Permit EPA 608 Frequency (per year)	Difference in EPA 608 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 608 reduced frequency ($230 per test)	Permit Pretreatment EPA 624 Frequency (per year)	Permit EPA 624 Frequency (per year)	Difference in EPA 624 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 624 reduced frequency ($295 per test)	Permit Pretreatment EPA 625 Frequency (per year)	Permit EPA 625 Frequency (per year)	Difference in EPA 625 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 625 reduced frequency ($545 per test)
San Francisco, City and County Of, San Francisco International Airport	R2-2013-0011	2	1.8	$414		1	0.8	$236		1	0.8	$436
San Francisco (Southeast Plant), City and County of	R2-2013-0029	2	1.8	$414	2	1	1.8	$531	2	1	1.8	$981
San Jose/Santa Clara Water Pollution Control Plant and Cities of San Jose and Santa Clara	R2-2014-0034	2	1.8	$414	2	2	1.8	$531	2	2	1.8	$981
San Mateo, City of	R2-2013-0006	2	1.8	$414	0.2	1	0.8	$236	0.2	1	0.8	$436
Sausalito - Marin City Sanitary District	R2-2012-0083	2	1.8	$414		1	0.8	$236		1	0.8	$436
Sewerage Agency of Southern Marin	R2-2012-0094	2	1.8	$414		1	0.8	$236		1	0.8	$436
Silicon Valley Clean Water	R2-2012-0062	2	1.8	$414	2	1	1.8	$531	2	1	1.8	$981
Sonoma Valley County Sanitary District	R2-2014-0020	2	1.8	$414		1	0.8	$236		1	0.8	$436
South San Francisco and San Bruno, Cities of	R2-2014-0012	2	1.8	$414	0.2	1	0.8	$236	0.2	1	0.8	$436
St. Helena, City of	R2-2016-	1	0.8	$184		0.2	0	$0		0.2	0	$0

Revisions to Attachment F, Table F-3

Discharger	Order Number	Permit EPA 608 Frequency (per year)	Difference in EPA 608 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 608 reduced frequency ($230 per test)	Permit Pretreatment EPA 624 Frequency (per year)	Permit EPA 624 Frequency (per year)	Difference in EPA 624 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 624 reduced frequency ($295 per test)	Permit Pretreatment EPA 625 Frequency (per year)	Permit EPA 625 Frequency (per year)	Difference in EPA 625 Frequency btw Permit and Alternate MRP (per year)	Cost Savings per year from EPA 625 reduced frequency ($545 per test)
	000~~x~~3											
Sunnyvale, City of	R2-2014-0035	2	1.8	$414	2	2	1.8	$531	2	2	1.8	$981
US Department of Navy (Treasure Island)	R2-2015-0004	2	1.8	$414		0.5	0.3	$89		0.5	0.3	$164
Vallejo Sanitation and Flood Control District	R2-2012-0017	2	1.8	$414	2	0.2	1.8	$531	2	0.2	1.8	$981
West County Agency	R2-2013-0016	2	1.8	$414		1	0.8	$236		1	0.8	$436
Richmond					2		1.8	$531	1		0.8	$436
WCWD					2		1.8	$531	1		0.8	$436
Yountville, Town of	R2-2015-0029	1	0.8	$184		0.2	0	$0		0.2	0	$0
TOTAL (Permit only)				**$16,192** ~~**652**~~				~~**$3,511**~~ **$3,216**				~~**$6,486**~~ **$5,941**
TOTAL (Pretreatment)								**$12,862**				**$22,127**