



August 20, 2021

Robert Schlipf
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

VIA EMAIL: Robert.Schlipf@waterboards.ca.gov

Subject: Comments on Tentative Order Amending Waste Discharge Requirements to Update Total Residual Chlorine and Oil & Grease Requirements for Municipal Wastewater Dischargers

Dear Robert Schlipf:

The Bay Area Clean Water Agencies (BACWA) appreciate the opportunity to provide comments on the San Francisco Bay Regional Water Quality Control Board's (Regional Water Board's) Tentative Order amending Waste Discharge Requirements to update Total Residual Chlorine and Oil & Grease requirements for municipal wastewater dischargers.

BACWA is a joint powers agency whose members own and operate publicly-owned treatment works and sanitary sewer systems that collectively provide sanitary services to over 7.1 million people in the nine-county San Francisco Bay Area. BACWA members are public agencies, governed by elected officials and managed by professionals who protect the environment and public health. BACWA closely collaborated with Regional Water Board staff during development of the Basin Plan Amendment (Resolution R2-2020-0031) now being implemented by the Tentative Order, and strongly supports its adoption.

The proposed permit amendment will reduce the need for BACWA members to dose effluent with dechlorinating agents such as sodium bisulfite prior to discharging to receiving waters, providing an environmental benefit. Historically, BACWA members have used an overdosing strategy to guarantee compliance with effluent limitations for chlorine, which were expressed as an instantaneous maximum. The previous limitations did not allow consideration of time averaging or dilution in the receiving water. The new proposed WQBELs allow consideration of both factors, allowing BACWA members to save up to \$1.2M per year on sodium bisulfite purchases. The change will also allow BACWA members to reduce loading of sodium bisulfite into San Francisco Bay and its tributaries, benefiting water quality and the environment.

BACWA has three minor comments on the Fact Sheet of the Tentative Order, as outlined below:

1. Modify the Facility Contact description for Sewerage Agency of Southern Marin within Table F-1, as indicated below:

[Page F-2]

Table F-1. Facility Information

Discharger	Facility Contact	Mailing Address	Effluent Description	Facility Design Flow (MGD)
...				
Sewerage Agency of Southern Marin	Mark Grushayev, General Manager <u>Wastewater Treatment Plant Director</u> , (415) 384-4825	26 Corte Madera Avenue Mill Valley, CA 94941	Secondary	3.6
...				

2. Correct the dilution factors for Dublin San Ramon Services District and the City of Livermore listed in Table F-4, as shown below. The dilution factors should be 74 for all agencies using the East Bay Dischargers Authority deep water outfall, as noted on page F-9 of the Tentative Order. This group of dischargers shares the same outfall, so dilution conditions are identical among them.

[Pages F-6 and F-7]

Table F-4. Water Quality Based Effluent Limits for Total Residual Chlorine

Discharger	Receiving Water Type	Water Quality Objective (mg/L)	Dilution Factor	Effluent Limit (one-hour average, mg/L)
...				
East Bay Dischargers Authority	Marine	0.013	74	0.98
...				
Dublin San Ramon Services District	Marine	0.013	78 74	0.98
Livermore, City of	Marine	0.013	78 74	0.98
...				

3. Correct the dilution factors and chlorine effluent limitations for the City of Millbrae in Table 2 and Table F-4, as shown below. The dilution factors and chlorine effluent limitations for the City of Millbrae should be the same as those listed for the other North Bayside System Unit dischargers, as noted on pages F-8 and F-9 of the Tentative Order. This group of dischargers shares the same outfall, so dilution conditions are identical among them.

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Table 2. Total Residual Chlorine Effluent Limits

Discharger	One-hour Average (mg/L)
...	
Burlingame, City of, and North Bayside System Unit	0.48
...	
Millbrae, City of, and North Bayside System Unit	0.47 <u>0.48</u>
...	
San Francisco, City and County of (San Francisco International Airport), and North Bayside System Unit	0.48
...	
South San Francisco and San Bruno, cities of, and North Bayside System Unit	0.48
...	

[Pages F-6 to F-8]

Table F-4. Water Quality Based Effluent Limits for Total Residual Chlorine

Discharger	Receiving Water Type	Water Quality Objective (mg/L)	Dilution Factor	Effluent Limit (one-hour average, mg/L)
...				
Burlingame, City of, and North Bayside System Unit	Marine	0.013	36	0.48
...				
Millbrae, City of, and North Bayside System Unit	Marine	0.013	35 <u>36</u>	0.47 <u>0.48</u>
...				
San Francisco, City and County of (San Francisco International Airport), and North Bayside System Unit	Marine	0.013	36	0.48
...				
South San Francisco and San Bruno, Cities of, and North Bayside System Unit	Marine	0.013	36	0.48

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We appreciate your attention to our comments. Please do not hesitate to contact us with any questions or concerns.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Lorien Fono". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lorien Fono, Ph.D., P.E.

Executive Director

Bay Area Clean Water Agencies

cc: BACWA Executive Board