



November 15, 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 Monitoring & Reporting Requirements for Municipal Wastewater Dischargers and Supporting the San Francisco Bay Regional Monitoring Program's Studies for Constituents of Emerging Concern (CECs)

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 Monitoring and Reporting Requirements for Municipal Wastewater Dischargers and amending the 2016 Alternate Monitoring and Reporting Program for Municipal Wastewater Dischargers (Order No. R2-2016-0008, "2016 Order").

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 Tentative Order, and recommends its adoption.

BACWA strongly supports the concept captured by the Tentative Order of continuing to reallocate resources from low-value effluent testing to the Regional Monitoring Program (RMP), a concept first captured in the 2016 Order. BACWA also supports modification of the 2016 Order to include reduced monitoring of influent and biosolids. The RMP has faced funding challenges in recent years, and the Tentative Order will provide the RMP additional support to address important questions about water quality in the San Francisco Bay, which will in turn inform policy decisions. BACWA has several minor comments on the Tentative Order, as outlined below.

1. Revise cost estimates in the Fact Sheet to correct tabulation errors.

BACWA's May 2021 *Proposed Evolution of the 2016 Alternate Monitoring & Reporting Program to Add Support to the Regional Monitoring Program*, cited in the Tentative Order, incorporated incorrect information about baseline monitoring frequencies for influent mercury,

effluent mercury, and biosolids organics, as follows:

- For influent mercury, several agencies were assumed to perform monthly influent monitoring for mercury, when the actual required frequency in some individual NPDES permits is once per year or less. These agencies are identified in the markup below. Most of the agencies perform monitoring more frequently than is required, but only the required (not the actual) monitoring frequency was used to revise the cost estimates.
- For effluent mercury, four dischargers with dry season discharge prohibition (Las Gallinas Valley Sanitary District, Calistoga, St. Helena, and Yountville) were erroneously assumed to sample more frequently than is actually required. Sampling is not required when there is no discharge during the dry season.
- For biosolids, the City of Petaluma's July 2021 permit was updated with new monitoring requirements after BACWA's original cost estimate was prepared in May 2021.

As a result of BACWA's errors, the cost estimate in the Fact Sheet of the Tentative Order also requires a slight correction. Although the total estimated cost savings are slightly reduced, the cost savings (estimated to be between \$228,000/year and \$368,000/year) continue to be the same order of magnitude as the planned contribution to CECs special studies (\$320,00/year). The wide range is attributable to savings from chronic toxicity species screening studies, which are unlikely to be attained for several years after the Statewide Toxicity Provisions go into effect. The new provisions will trigger screening studies by many dischargers, as noted in Section 3.1 of the Fact Sheet (page F-5 of the Tentative Order).

The requested changes are shown below. BACWA will update the May 2021 report to reflect these changes and will provide a copy to Regional Water Board staff for reference.

[Pages F-6 to F-8]

- 3.4 Mercury and PCBs.** ... Based on the median laboratory costs in the The BACWA Report ~~estimates that,~~ the collective cost savings from reducing effluent mercury monitoring to once per quarter for major dischargers and twice per year for minor dischargers would be about ~~\$126,000~~ \$123,000 per year ~~based on the median laboratory cost.~~

[Pages F-8 to F-9]

- 3.5.2 Influent Mercury.** This Order establishes a consistent influent monitoring frequency for mercury of once per quarter for dischargers with pretreatment programs listed in Table 1 of the Order. This will reduce the monitoring frequency for most of these dischargers because most currently monitor once per month. However, it would increase the required monitoring frequency for the East Bay Dischargers Authority, City of Livermore, Dublin San Ramon Services District, City of Millbrae, Cities of South San Francisco and San Bruno, City of Burlingame and Delta Diablo.

...

Based on the median laboratory costs in the The BACWA Report ~~estimates that,~~ the collective cost savings from reducing influent mercury monitoring to

once per quarter would be about ~~\$13,000~~ \$6,000 per year based on the ~~median laboratory cost~~.

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3.5.4. Biosolids. ... Based on the median laboratory costs in the BACWA Report, the estimated collective cost savings from reducing biosolids VOCs and BNAs monitoring would be about ~~\$7,000~~ \$8,000 per year.

3.6 Summary of Cost Savings. This Order proposes monitoring frequency reductions that would collectively save dischargers about ~~\$237,000~~ \$228,000 per year based on median laboratory costs and up ~~\$377,000~~ \$368,000 per year cost savings from chronic toxicity screenings are realized. The table below summarizes these savings:

Table F-4. Cost Savings from Reduced Monitoring

Parameter	Median Savings
Dioxin-TEQ	\$40,000
Effluent VOCs and BNAs	\$26,000
PCBs (as aroclors)	\$13,000
Effluent Mercury	\$126,000 <u>\$123,000</u>
Influent Mercury	\$13,000 <u>\$6,000</u>
Influent VOCs and BNAs	\$12,000
Biosolids VOCs and BNAs	\$7,000 <u>\$8,000</u>
Subtotal	\$237,000 <u>\$228,000</u>
Chronic Toxicity Screening	\$140,000
Total	\$377,000 <u>\$368,000</u>

2. Correct minor typographical errors.

BACWA requests correction of the minor typographical errors shown below. The City of Pacifica is not subject to the order and should be removed from Table F-1.

[Page 1 – Title of Tentative Order]

AMENDMENT OF MONITORING AND REPORTING REQUIREMENTS
FOR MUNICIPAL WASTEWATER DISCHARGERS AND
AMENDMENT OF ALTERNATE MONITORING AND REPORTING PROGRAM
FOR MUNICIPAL WASTEWATER DISCHARGE**RS**
FOR THE PURPOSE OF SUPPORTING THE
SAN FRANCISCO BAY REGIONAL MONITORING PROGRAM

[Page F-1]

Table F-1. Facility Information

Discharger	Facility Contact	Mailing Address	Effluent Description	Facility Design Flow (MGD)
⋮				
Pacifica, City of	Louis Sun, Wastewater Operation Manager, (650) 735-4662	170 Santa Maria Avenue Pacifica, CA 94044	Advanced-Secondary	4.0
⋮				
St. Helena, City of	Clayton Church, Acting <u>Mark Rincón-Ibarra</u> Public Works Director, (707) 312-1208	1572 Railroad Avenue St. Helena, CA 94574	Secondary	0.50
Vallejo Flood and Wastewater District	Jennifer Harrington, Environmental Services Director, (707) 644-7806 <u>707-652-7806</u>	450 Ryder Street Vallejo, CA 94590	Secondary	15.5
⋮				

BACWA appreciates the opportunity to comment on this Tentative Order and thanks you for considering our concerns.

Respectfully Submitted,



Lorien Fono, Ph.D., P.E.
Executive Director
Bay Area Clean Water Agencies

cc: BACWA Executive Board
Chris Dembiczak, BACWA Permits Committee Chair
Michael Dunning, BACWA Pretreatment Committee Chair
Nicole Van Aken, BACWA Laboratory Committee Chair