

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT (Lila Tang)
MEETING DATE: March 9, 2016

ITEM: 5A

SUBJECT: **Alternate Monitoring Program for Municipal Wastewater Dischargers to Support the Regional Monitoring Program in the San Francisco Bay Region – Issuance of NPDES Monitoring Program**

CHRONOLOGY: Not previously considered

DISCUSSION: This item would establish an alternate monitoring program for municipal wastewater treatment permittees in the San Francisco Bay Region. This would be an opt-in program that allows for reduction in discharge monitoring from that currently required by each permittee's individual permit. Cost savings would go to fund additional studies on emerging pollutants and other priority issues by the San Francisco Bay Regional Monitoring Program (RMP). If all permittees opt-in, the total additional annual funds for the RMP would be about \$290,000.

The reduced monitoring would be for most organic priority pollutants and chronic toxicity sensitive species re-screening. Over a decade (in some cases three decades) of effluent monitoring has either yielded non-detect values or only occasional detections for the organic priority pollutants. Any changes to the species used for chronic toxicity based on re-screening have not changed the discharge or other management decisions.

We received ten comment letters and made revisions where appropriate. The two most substantive comments relate to the amount to be paid to the RMP to qualify for reduced monitoring. The first comment comes from a few permittees who request their amounts be lowered because of effluent limit compliance monitoring that would not be reduced. We propose not accommodating this request to maintain a fair and simple basis for how the amounts to be paid to the RMP are calculated for all permittees. The second substantive comment, which we do propose accommodating, relates to the Bay Area Clean Water Agencies' request to hold constant the payment amount for a permittee's full five-year opt-in term.

All revisions are described in the responses to comments (Appendix C) and reflected in the attached Revised Tentative Order (Appendix A). We expect this item to be uncontested.

**RECOMMEN-
DATION:** Adoption of Revised Tentative Order

APPENDIX: A. Revised Tentative Order
B. Comments
C. Response to Comments

Appendix A
Revised Tentative Order

San Francisco Bay Regional Water Quality Control Board

REVISED TENTATIVE ORDER

**ALTERNATE MONITORING AND REPORTING REQUIREMENTS FOR
MUNICIPAL WASTEWATER DISCHARGERS
FOR THE PURPOSE OF ADDING SUPPORT TO THE
SAN FRANCISCO BAY REGIONAL MONITORING PROGRAM (RMP)**

The following discharger is subject to the alternative monitoring and reporting requirements set forth in this Order provided it directs 100 percent of its avoided analytical laboratory costs to supplement the RMP consistent with Provision VI.C.1 of this Order:

Table 1. Discharger Information

Discharger	Dischargers and NPDES permits subject to this Order are specified in Attachment B, and Table 1A of NPDES permit CA0038849 (Watershed Permit for Mercury and PCBs). Facilities information is specified in the respective individual NPDES permits.
Facility Name	
Facility Address	
CIWQS Place Number	

Table 2. Discharge Locations

Discharge Point	Effluent Description	Discharge Point Latitude	Discharge Point Longitude	Receiving Water
Discharge locations are specified in the individual NPDES permits listed in Table 1.				

Table 3. Order Information

This Order was adopted by the Regional Water Quality Control Board on:	TBD
This Order shall become effective starting on:	April 1, 2016
This Order shall remain in effect until rescission by the Board or its Executive Officer. When the Regional Water Board reissues the NPDES permits referenced in Table 1, this Order shall apply to the new order(s) unless the reissuance order(s) specifically indicate otherwise. Note that the alternate monitoring requirements in this Order do not affect other requirements in Attachment E (Monitoring and Reporting Program) of the individual permits referenced in Table 1 except for the requirements specifically described herein.	

I, Bruce H. Wolfe, Executive Officer, do hereby certify that this Order with all attachments is a full, true, and correct copy of the Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on the date indicated above.

Bruce H. Wolfe, Executive Officer

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I. FACILITY INFORMATION

Information describing the facilities subject to this Order is summarized in the orders listed in Table 1.

II. FINDINGS

The California Regional Water Quality Control Board, San Francisco Bay Region (Regional Water Board), finds the following:

- A. Legal Authorities.** This Order serves as amendment of WDRs that were adopted pursuant to California Water Code article 4, chapter 4, division 7 (commencing with § 13260). This Order also modifies permits issued pursuant to federal Clean Water Act (CWA) section 402 and regulations adopted by U.S. EPA and Water Code chapter 5.5, division 7 (commencing with § 13370).
- B. Purpose of this Order.** This Order reduces the discharge monitoring frequencies for certain parameters conditioned upon the Dischargers applying 100 percent of their cost savings (Attachment C) from avoided laboratory analytical costs to fund studies that would not otherwise be conducted by the San Francisco Bay Regional Monitoring Program for Toxic Pollutants and Trace Substances (RMP) were it not for the funds from the reduced discharge monitoring. The additional studies funded by this cost savings are necessary to provide monitoring data representative of the Dischargers' impacts on receiving waters.
- C. Background and Rationale.** The Regional Water Board developed this Order based on information the Bay Area Clean Water Agencies, on behalf of the Dischargers, submitted on October 29, 2015, which requested reduction in monitoring, and other available information. The Fact Sheet (Attachment F) contains background information and rationale for this Order and is hereby incorporated into and constitutes findings for this Order. Attachments B and C are also incorporated into this Order.
- D. Notification of Interested Parties.** The Regional Water Board notified the Dischargers and interested agencies and persons of its intent to establish alternate monitoring and reporting requirements in WDRs and provided an opportunity to submit comments and recommendations.
- E. Consideration of Public Comment.** The Regional Water Board, in a public meeting, heard and considered all comments pertaining to this Order.

THREFORE, IT IS HEREBY ORDERED that, pursuant to the provisions of Water Code division 7 (commencing with § 13000) and regulations adopted thereunder, and the provisions of the CWA and regulations and guidelines adopted thereunder, if a Discharger listed in Table 1 supplements the RMP consistent with Provision VI.C.1 of this Order, then the alternate discharge monitoring requirements of this Order (Provisions VI.B and VI.C.2) are effective for that Discharger, unless future permit reissuance orders specifically indicate otherwise.

III. DISCHARGE PROHIBITIONS

This Order does not amend discharge prohibitions.

IV. DISCHARGE SPECIFICATIONS

This Order does not amend discharge specifications.

V. RECEIVING WATER LIMITATIONS

This Order does not amend receiving water limitations.

VI. PROVISIONS

A. Federal and Regional Standard Provisions

This Order does not amend the federal and regional Standard Provisions in attachments D and G of the permits listed in Table 1.

B. Monitoring and Reporting Program Requirements

This Order establishes alternate Monitoring and Reporting Program (MRP) specifications of the NPDES permits for those Dischargers who comply with Provision Vi.C.1 of this Order, as described below:

1. Chronic Toxicity Re-screening in Individual NPDES Permits Listed in Table 1

a. Attachment E, section V.B.1.b, second paragraph, shall read as follows (except minor Dischargers without such section):

B. Whole Effluent Chronic Toxicity

1. Monitoring Requirements

... *(Subsection B.1.a is not amended)*

b. **Test Species.** ... *(First paragraph in individual permit that specifies a routine monitoring test species remains the same.)*

The Discharger shall conduct a screening chronic toxicity test as described in Appendix E-1, or as described in applicable State Water Board plan provisions that become effective after adoption of this Order, following any significant change in the nature of the effluent. ~~If there is no significant change in the nature of the effluent, the Discharge shall conduct a screening test and submit the results with its application for permit reissuance.~~

... *(Subsection B.1.c is not amended)*

b. Attachment E, Appendix E-1, section II.A, shall read as follows (except minor Dischargers without such section):

A. The Discharger shall perform screening phase monitoring:

- ~~1. S~~ subsequent to any significant change in the nature of the effluent discharged through changes in sources or treatment, except those changes resulting from reductions in pollutant concentrations attributable to source control efforts, ~~or~~
- ~~2. Prior to permit reissuance. S~~ Representative screening phase monitoring data shall be included in the NPDES permit application for reissuance. ~~The information shall be as recent as possible, but may be based on screening phase monitoring conducted within 5 years before the permit expiration date.~~

2. Dioxin-TEQ Monitoring in Individual NPDES Permits Listed in Table 1

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}
...			
Dioxin-TEQ	µg/L	Grab	Once per permit term

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 a 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 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).

3. VOC and BNA Pretreatment Monitoring in Individual NPDES Permits with Required Pretreatment Programs Listed in Table 1

Attachment E, section VII, as it pertains to required pretreatment monitoring for Dischargers with required Pretreatment Programs for volatile organic compounds (VOC) and base neutral and acid extractable organic compounds (BNA), is replaced with the following:

Constituents	Sampling Frequency			Sample Type	
	Influent INF-001 ^[1]	Effluent EFF-001 ^[1]	Biosolids BIO-001	Influent and Effluent	Biosolids ^[6]
VOC	<i>Unchanged. Refer to individual permits.</i>	Once per permit term	<i>Unchanged. Refer to individual permits.</i>	<i>Unchanged. Refer to individual permits.</i>	
BNA		Once per permit term			
...					

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).

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 <u>EFF-001 or E-001</u>)	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 <u>alternate each year between EFF-001 and EFF-002.</u>	As described in individual NPDES permits for mercury or other toxic pollutants

Table E-2. Monitoring Requirements

Parameter	Units ¹	Sample Type ²	Minimum Sampling Frequency ^{3,4}
Total mercury ⁵	<i>(Unchanged. Refer to Watershed Permit for Mercury and PCBs)</i>		
Total PCBs (as aroclors) ⁷	µg/L	Grab	Semi annually for Major Dischargers <u>Annually Once per permit term for Minor Dischargers</u>
PCBs (as congeners) ⁸	<i>(Unchanged. Refer to Watershed Permit for Mercury and PCBs)</i>		

C. Special Provisions

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

a. Direct Analytical Laboratory Cost Savings to RMP

The Discharger shall provide to the RMP, by September 30 of each year for minimum terms consisting of 5 consecutive years, the amount of funds listed for the Discharger in Attachment C of this Order¹. 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

¹ To qualify for this Order, 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 to 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 September 30, 2016, then the period of coverage under this Order shall start from the effective date (April 1, 2016) until December 31, 2021 (or 5 years plus). Opt-ins after September 30, 2016, will result in coverage from January 1 of the next calendar year for 5 years.

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 reflect changes in analytical costs consistent with the assumptions used for Attachment C. These adjustments may be based on changes in contract laboratory costs. The Executive Officer shall provide a 30-day public comment period on proposed adjustments and consider comments received prior to putting proposed adjustments into effect. The adjusted costs will come into effect for the Discharger when it next opts into a new 5-year term.

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 a report each year that shows an accounting of each Discharger’s payment² to the RMP for coverage under this Order. The report is due on the same date as the letter certifying the Discharger’s annual payment in support of RMP receiving water monitoring (currently on February 1).

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.

2. Effluent Characterization Study and Report (VOC, BNA, Chlorinated Pesticides) – Modified Provision

This Order replaces Provision VI.C.2 of the individual NPDES permits listed in Table 1, for Dischargers that comply with Provision C.1 of this Order, with the following (except for any receiving water characterization the permit requires):

2. Special Studies and Additional Monitoring

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 Order³ remain valid and to inform the next permit reissuance. Also summarized below is compliance monitoring required by this Order’s³ 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:

<u>Discharge Point</u>	<u>Monitoring Location</u>	<u>Parameter</u>	<u>Minimum Frequency</u>
Point(s) specified in Discharger’s NPDES permit.	Location(s) described in Discharger’s NPDES permit.	VOCs, BNAs, and chlorinated pesticides without effluent limits; and dioxin-TEQ.	Once per permit term.

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.

³ “Order” in this context refers to the individual NPDES permits in Table 1 and not to this alternate MPR Order.

<u>Discharge Point</u>	<u>Monitoring Location</u>	<u>Parameter</u>	<u>Minimum Frequency</u>
Point(s) specified in Discharger’s NPDES permit.	Location(s) described in Discharger’s NPDES permit.	VOC/BNA/pesticide pollutants with effluent limits; and all other pollutants ⁴ (e.g., metals, CN).	Frequency specified in Discharger’s NPDES permit.

Priority pollutants (VOCs, BNAs, chlorinated pesticides) are listed in Attachment G, Table C, and monitoring shall be in accordance with Attachment G sections III.A.1 and III.A.2. As indicated above, for other pollutants where the MRP requires more frequent monitoring than once per permit term, the Discharger shall monitor for those specific pollutants at the frequencies specified in the MRP. For pollutants for which there are no water quality criteria (see Fact Sheet table on Reasonable Potential Analysis Summary), no monitoring is required.

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 pesticide 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.

b. Reporting Requirements

The Discharger shall submit the data with the application for permit reissuance and indicate which pollutants, if any, were added to its “pollutant of concern” list for the Pollutant Minimization Program.

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.

ATTACHMENT B – DISCHARGERS AND INDIVIDUAL NPDES PERMITS

Discharger	NPDES Permit No.	Existing Order No. ¹	Expiration Date ¹	Pretreatment Program Required
American Canyon, City of	CA0038768	R2-2011-0046	8/31/16	Yes
Benicia, City of	CA0038091	R2-2014-0023	7/31/19	Yes
Burlingame, City of	CA0037788	R2-2013-0015	6/30/18	Yes
Calistoga, City of	CA0037966	R2-2016-0013	5/1/21	
Central Contra Costa Sanitary District	CA0037648	R2-2012-0016	3/31/17	Yes
Central Marin Sanitation Agency	CA0038628	R2-2012-0051	7/31/17	Yes
Crockett Community Services District, Port Costa Sanitary Department	CA0037885	R2-2013-0035	11/30/18	
Delta Diablo	CA0038547	R2-2014-0030	9/30/19	Yes
East Bay Dischargers Authority	CA0037869	R2-2012-0004	2/28/17	
Union Sanitary District				Yes
Oro Loma and Castro Valley Sanitary Districts				Yes
Hayward, City of				Yes
San Leandro, City of				Yes
Dublin San Ramon Services District	CA0037613	R2-2012-0005	2/28/17	Yes
Livermore, City of	CA0038008	R2-2012-0006	2/28/17	Yes
East Bay Municipal Utility District WWTP	CA0037702	R2-2015-0018	6/30/20	Yes
Fairfield-Suisun Sewer District	CA0038024	R2-2015-0013	4/30/20	Yes
Las Gallinas Valley Sanitary District	CA0037851	R2-2015-0021	6/30/20	
Marin County (Paradise Cove), Sanitary Dist. No. 5 of	CA0037427	R2-2011-0016	5/31/16	
Marin County (Tiburon), Sanitary Dist. No. 5 of	CA0037753	R2-2013-0027	9/30/18	
Millbrae, City of	CA0037532	R2-2013-0037	1/31/19	Yes
Mt. View Sanitary District	CA0037770	R2-2010-0114	12/31/15	
Napa Sanitation District	CA0037575	R2-2011-0007	3/31/16	Yes
Novato Sanitary District	CA0037958	R2-2010-0074	6/30/15	Yes
Palo Alto, City of	CA0037834	R2-2014-0024	7/31/19	Yes
Petaluma, City of	CA0037810	R2-2011-0003	2/28/16	Yes
Pinole, City of	CA0037796	R2-2012-0059	9/30/17	
Rodeo Sanitary District	CA0037826	R2-2012-0027	5/31/17	
San Francisco, City and County of, San Francisco International Airport	CA0038318	R2-2013-0011	6/30/18	
San Francisco (Southeast Plant), City and County of	CA0037664	R2-2013-0029	9/30/18	Yes
San Jose/Santa Clara Water Pollution Control Plant and Cities of San Jose and Santa Clara	CA0037842	R2-2014-0034	10/31/19	Yes
San Mateo, City of	CA0037541	R2-2013-0006	4/30/18	Yes
Sausalito-Marin City Sanitary District	CA0038067	R2-2012-0083	12/31/17	
Sewerage Agency of Southern Marin	CA0037711	R2-2012-0094	1/31/18	
Silicon Valley Clean Water	CA0038369	R2-2012-0062	9/30/17	Yes
Sonoma Valley County Sanitary District	CA0037800	R2-2014-0020	6/30/19	
South San Francisco and San Bruno, Cities of	CA0038130	R2-2014-0012	5/31/19	Yes
St. Helena, City of	CA0038016	R2-2016-0003	2/28/21	
Sunnyvale, City of	CA0037621	R2-2014-0035	10/30/19	Yes
US Department of Navy, Treasure Island	CA0110116	R2-2015-0004	3/31/20	

Discharger	NPDES Permit No.	Existing Order No.¹	Expiration Date¹	Pretreatment Program Required
Vallejo Sanitation and Flood Control District	CA0037699	R2-2012-0017	3/31/17	Yes
West County Agency (West County Wastewater District and City of Richmond Municipal Sewer District)	CA0038539	R2-2013-0016	6/30/18	Yes
Yountville, Town of	CA0038121	R2-2015-0029	7/31/20	

¹ These order numbers and expiration dates are for reference only. Permit amendment orders are not listed. When the Regional Water Board reissues these permits, the provisions of this Order shall apply to the new order(s) unless the new order(s) specifically indicate otherwise.

ATTACHMENT C – PAYMENT TO RMP TO QUALIFY FOR COVERAGE

Discharger	Payment to RMP due September 30
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
<i>Union S.D.</i>	\$1,926
<i>Oro Loma</i>	\$1,926
<i>Hayward</i>	\$1,926
<i>San Leandro</i>	\$1,926
<i>Livermore</i>	\$1,926
<i>Dublin San Ramon Services District</i>	\$1,926
East Bay Municipal Utilities District WWTP	\$9,726
Fairfield-Suisun Sewer District	\$9,726
Las Gallinas Valley Sanitary District	\$7,656
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	\$7,656
Novato Sanitary District	\$9,726
Palo Alto, City of	\$9,726
Petaluma, City of	\$7,656
Pinole, City of	\$8,886
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

Discharger	Payment to RMP due September 30
San Mateo, City of	\$8,886
Sausalito - Marin City Sanitary District	\$3,886
Sewerage Agency of Southern Marin	\$4,886
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
<i>Richmond Municipal Sewer District</i>	\$967
<i>West County Wastewater District</i>	\$967
Yountville, Town of	\$184
TOTAL	\$289,027

ATTACHMENT F – FACT SHEET

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ATTACHMENT F – FACT SHEET

This Fact Sheet includes the legal requirements and technical rationale that serve as the basis for the requirements of this Order. As described in section II.B of the Order, the Regional Water Board incorporates this Fact Sheet as its findings supporting the issuance of the Order.

I. PERMIT INFORMATION

The following table summarize information related to the facilities covered by this Order as of the date of adoption of this Order:

Table F-1. Facility Information

Discharger	Facility Contact, Title, and Phone Number	Mailing Address	Effluent Description	Facility Permitted Flow (mgd)
American Canyon, City of	Stacey Ambrose Wastewater Systems Manager (707) 647-4525	151 Mezzetta Court American Canyon, CA 94503	Advanced Secondary	2.5
Benicia, City of	Jeff Gregory Wastewater Treatment Plant Superintendent (707) 746- 4790	615 East 5 th Street Benicia, CA 94510	Secondary	4.5
Burlingame, City of	Manuel Molina Plant Manager (650) 342-3727	501 Primrose Burlingame, CA 94010	Secondary	5.5
Calistoga, City of	Mike Kirn Public Works Director (707) 942-2828	414 Washington Street Calistoga, CA 94515	Advanced Secondary	0.84
Central Contra Costa Sanitary District	Curt Swanson Director of Operations (925) 229-7336	5019 Imhoff Place Martinez, CA 94553	Secondary	53.8
Central Marin Sanitation Agency	Robert Cole Environmental Services Manager (415) 459-1455	1301 Anderson Drive San Rafael, CA 94901	Secondary	10
Crockett Community Services District	Michael Kirker Port Costa Dept. Manager (510) 787-2992	Crockett Community Services District, Port Costa Sanitary Department P.O. Box 578 Crockett, CA 94525	Secondary	0.033
Delta Diablo	Gary W. Darling General Manager (925) 756-1920	2500 Pittsburg-Antioch Highway Antioch, Ca 94509	Secondary	19.5
East Bay Dischargers Authority: EBDA Common Outfall	Michael S. Connor General Manager (510) 278-5910	2651 Grant Avenue San Lorenzo, CA 94580	Secondary	107.8
Hayward Water Pollution Control Facility				
San Leandro Water Pollution Control Plant				

Discharger	Facility Contact, Title, and Phone Number	Mailing Address	Effluent Description	Facility Permitted Flow (mgd)
Oro Loma/Castro Valley Sanitary Districts Water Pollution Control Plant				
Raymond A. Boege Alvarado Wastewater Treatment Plant				
Dublin San Ramon Services District Wastewater Treatment Plant				
City of Livermore Water Reclamation Plant				
East Bay Municipal Utility District Main Wastewater Treatment Plant	Kurt H. Haunschild Manager of Wastewater Treatment (510) 287-1407	EBMUD WW Treatment P.O. Box 24055, MS 59 Oakland, CA 94623	Secondary	120
Fairfield-Suisun Sewer District	Greg Baatrup General Manager (707) 429-8930	1010 Chadbourne Road Fairfield, CA 94534	Advanced Secondary	23.7
Las Gallinas Valley Sanitary District	Mark Williams District Manager (415) 472-1734	300 Smith Ranch Rd San Rafael, CA 94903-1929	Secondary	2.92
Marin County (Paradise Cove), Sanitary District No. 5 of	Tony Rubio Chief Plant Operator (415) 435-1501	P.O. Box 227 Tiburon, CA 94920	Secondary	0.04
Marin County (Tiburon), Sanitary District No. 5 of	Tony Rubio Chief Plant Operator (415) 435-1501	2001 Paradise Drive Tiburon, CA 94920	Secondary	0.98
Millbrae, City of	Joseph Magner Superintendent (650) 259-2388	621 Magnolia Avenue Millbrae, CA 94030	Secondary	3
Mt. View Sanitary District	Michael D. Roe District Manager (925) 228-5635 ext. 32	P. O. Box 2757 Martinez, CA 94553	Advanced Secondary	3.2
Napa Sanitation District	Tim Healy General Manager (707) 258-6000	P.O. Box 2480 Napa, CA 94558	Secondary	15.4
Novato Sanitary District	Beverly James Manager-Engineer (415) 892-1694 x111	500 Davidson Street Novato, CA 94945	Secondary	7.05
Palo Alto, City of	Ken Torke Environmental Compliance Manager (650) 329-2243	2501 Embarcadero Way, Palo Alto, CA 94303	Advanced Secondary	39
Petaluma, City of	Leah Walker Environmental Services Manager (707) 776-3777	3890 Cypress Drive Petaluma, CA 94954	Secondary	6.7
Pinole, City of	Ron Tobey Plant Manager (510) 724-8963	2131 Pear Street, Pinole, CA 94564	Secondary	4.06
Rodeo Sanitary District	Steven S. Beall Engineer-Manager (510) 799-2970	800 San Pablo Avenue Rodeo, CA 94572	Secondary	1.14

Discharger	Facility Contact, Title, and Phone Number	Mailing Address	Effluent Description	Facility Permitted Flow (mgd)
San Francisco (San Francisco International Airport), City and County of	Peter Acton Utilities Manager (650) 821-5400	P.O. Box 8097 San Francisco, CA 94128	Secondary	2.2
San Francisco (Southeast Plant), City and County of	Tommy Moala Assistant General Manager of Wastewater (415) 554-2465	525 Golden Gate Avenue, 13th Floor San Francisco, CA 94102	Secondary	150
San Jose/Santa Clara, Cities of	James Ervin Acting Environmental Compliance Officer (408) 945-5124	700 Los Esteros Road San Jose, CA 95134	Advanced Secondary	167
San Mateo, City of	Ramon Towne Interim Director of Public Works (650) 522-7300	330 West 20 th Avenue San Mateo, CA 94403	Secondary	15.7
Sausalito-Marín City Sanitary District	Kevin Beneda General Manager (415) 331-4711	P.O. Box 39 Sausalito, CA 94966-0039	Secondary	1.8
Sewerage Agency of Southern Marin	Mark Grushayev General Manager (415) 388-2402	26 Corte Madera Ave. Mill Valley, CA 94941	Secondary	3.6
Sonoma Valley County Sanitary District	Pam Jeane Deputy Chief Engineer (707) 521-1864	Sonoma County Water Agency 404 Aviation Blvd. Santa Rosa, CA 95403	Secondary	3
Silicon Valley Clean Water	Daniel Child Manager (650) 591-7121	1400 Radio Road Redwood City, CA 94065	Secondary	29
South San Francisco and San Bruno, Cities of	Brian Schumacker Plant Superintendent (650) 877-8555	South San Francisco- San Bruno Water Pollution Control Plant 195 Belle Air Road South San Francisco, CA 94080	Secondary	13
St. Helena, City of	Steven Palmer Public Works Director (707) 967-2792	1480 Main Street, St. Helena, CA 94574	Secondary	0.5
Sunnyvale, City of	Melody Tovar Division Manager (408) 730-7808	Sunnyvale Water Pollution Control Plant P.O. Box 3707 Sunnyvale, CA 94088-3707	Advanced Secondary	29.5
U.S. Department of Navy (Treasure Island)	Patricia A. McFadden BRAC Field Team Leader San Francisco Bay Area (415) 743-4720	Navy BRAC PMOW 410 Palm Avenue, Bldg 1, Suite 161 Treasure Island, San Francisco, CA 94130-1807	Secondary	2
Vallejo Sanitation and Flood Control District	Melissa Morton District Manager (707) 644-8949 X211	450 Ryder Street Vallejo, CA 94590	Secondary	15.5

Discharger	Facility Contact, Title, and Phone Number	Mailing Address	Effluent Description	Facility Permitted Flow (mgd)
West County Agency (West County Wastewater District and City of Richmond Municipal Sewer District)	E.J. Shalaby District Manager (510) 222-6700	2910 Hilltop Drive Richmond, CA 94806	Secondary	28.5
Yountville, Town of	Donald Moore Utility Oper. Manager (707) 944-2988	6550 Yount Street Yountville, CA 94599	Advanced Secondary	0.55

- A.** The Regional Water Board issued waste discharge requirements that serve as National Pollutant Discharge Elimination System (NPDES) permits for the dischargers listed in Table 1 (hereinafter, Dischargers). These Dischargers own and operate municipal wastewater treatment facilities as described in their individual permits. Treated wastewater is discharged to San Francisco Bay and its tributaries, which are waters of the United States within the San Francisco Bay Region.

The Regional Water Board also issued NPDES permit CA0038849 (currently Order No. R2-2012-0096) implementing the total maximum daily load requirements for mercury and PCBs from wastewater dischargers (including the Dischargers in this Order) to San Francisco Bay and its tributaries.

- B.** By Resolution No. 92-043, the Regional Water Board directed its Executive Officer to implement a regional monitoring plan in collaboration with permitted dischargers pursuant to Water Code sections 13267 and 13383. The goal was to replace individual receiving water monitoring requirements with a comprehensive regional monitoring program (RMP). The guiding principal of the RMP is to collect data and communicate information about water quality in the San Francisco Estuary in support of management decisions to restore and protect beneficial uses of the region's waters.

The RMP is guided by a Memorandum of Understanding (MOU) between the Regional Water Board and the San Francisco Estuary Institute (SFEI), first approved in 1996. To meet permit requirements, participating dischargers pay annual fees to the RMP. The fees are in accordance with a budget allocation approved by the Executive Officer. The RMP provides an open forum for a wide range of participant groups and other interested parties to discuss contaminant issues, prioritize science needs, and monitor potential impacts of discharges on the Bay.

The MOU established that the Regional Water Board and SFEI form a Steering Committee to work on issues such as allocation of future RMP costs, participation in study proposal review and selection, and evaluation of the effectiveness of the RMP. In 2015, this Steering Committee finalized a charter describing the governance structure and decision making process for the RMP. The 2015 charter establishes the process for SFEI's development of annual work plans and budgets and charges the Steering Committee with final approval of those work plans and budgets.

Historically, SFEI and others have identified more water quality issues meriting study than the Regional Water Board's cost allocations can support.

- C.** In October 2015, the Bay Area Clean Water Agencies, on behalf of the Dischargers, proposed reduction of monitoring frequencies for certain parameters so that 100 percent of the Dischargers' cost savings from the reductions can be directed to supplement additional RMP studies.

II. FACILITIES DESCRIPTION

A. Description of Wastewater Treatment

Wastewater treatment is described in the individual permits listed in Attachment B.

B. Discharge Points and Receiving Waters

Discharge points and receiving waters are identified in the individual permits listed in Attachment B.

III. APPLICABLE PLANS, POLICIES, AND REGULATIONS

The requirements in the Order are based on the requirements and authorities described below:

A. Legal Authorities

This Order amends WDRs issued pursuant to California Water Code article 4, chapter 4, division 7 (commencing with § 13260). This Order also modifies NPDES permits pursuant to federal regulations adopted by U.S. EPA and Water Code chapter 5.5, division 7 (commencing with § 13370).

B. California Environmental Quality Act (CEQA)

Under Water Code section 13389, this action to modify an NPDES permit is exempt from the provisions of the California Environmental Quality Act, Public Resources Code division 13, chapter 3 (commencing with § 21100).

C. San Francisco Bay Region Water Quality Control Plan (Basin Plan)

The Regional Water Board adopted the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan), which designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan. Requirements in this Order implement the Basin Plan. Specifically, this Order is consistent with section 6.1 (Regional Monitoring Program) of the Basin Plan and does not alter Dischargers' obligations under section 6.5 compliance monitoring conducted to ensure each Discharger's activities comply with their respective permit(s).

D. Anti-Backsliding

CWA sections 402(o) and 303(d)(4) and 40 C.F.R. section 122.44(l) restrict backsliding in NPDES permits. These anti-backsliding provisions require that effluent limitations in a reissued permit be as stringent as those in the previous permit, with some exceptions in which limitations may be relaxed. No effluent limitations are changed and no impacts to receiving waters will occur as a result of this Order, which only amends monitoring

requirements.

IV. RATIONALE FOR DISCHARGE PROHIBITIONS AND SPECIFICATIONS

This Order does not amend discharge prohibitions and specifications.

V. RATIONALE FOR RECEIVING WATER LIMITS

This Order does not amend receiving water limits.

VI. RATIONALE FOR PROVISIONS

A. Standard Provisions

This Order does not amend the federal and regional Standard Provisions in attachments D and G of the permits listed in Attachment B.

B. Rationale for Alternate Monitoring and Reporting Provisions

Pursuant to 40 C.F.R. section 122.48, NPDES permits must specify requirements for recording and reporting monitoring results. 40 C.F.R. section 122.44(i) specifies monitoring requirements to assure compliance with permit limitations. Water Code section 13383, and 40 C.F.R. sections 122.41(h) and (j), authorize the Regional Water Board to require technical and monitoring reports. This Order establishes alternate monitoring and reporting requirements that implement these federal and State requirements.

- 1. Eliminate Permit Reissuance Trigger for Chronic Toxicity Re-screening.** The alternate monitoring requirements described in VI.B.1 of this Order eliminate one of the two triggers for a chronic toxicity re-screening required in Attachment E of each major Discharger's individual permit. The purpose of re-screening is to determine the most sensitive species for routine testing. The trigger retained requires re-screening after change in the nature of the discharge such as from significant treatment modification or addition of a significant industrial source. The trigger eliminated would have also required re-screening with each permit reissuance.

Chronic toxicity screenings started in the late-1980s with the Regional Water Board's Effluent Toxicity Characterization Program. Regular re-screenings for all major Dischargers occurred with every 5-year permit term starting in the mid-1990s. This means that there is over two decades of information on what species are most sensitive. The Dischargers report that their current cost for each re-screening is from \$24,000 to \$30,000 (with only one Discharger reporting a cost of \$35,000). Assuming the upper-end cost of \$30,000 per screening, the total cost is \$180,000 per year for all the major Dischargers. While there remains some benefit to verifying that future monitoring will use the most sensitive species, the "significant change" trigger will continue to help capture which is the most sensitive species. Moreover, the high cost of

each re-screening, balanced against the opportunity and potential benefits from advancing knowledge to inform future management decisions through additional RMP studies, justifies directing those funds instead to the RMP at this time.

- 2. Reduce Frequency of EPA 1613 (Dioxin-TEQ).** The alternate monitoring requirements described in provision VI.B.2 of this Order reduce the required monitoring frequencies for testing with EPA method 1613 for 2,3,7,8-tetrachlorinated dibenzo-p-dioxin and its 17 dioxin and furan congeners (together referred to as dioxin-TEQ). The Dischargers have monitored using EPA 1613 since the mid-1990s. The data show that all the congeners are non-detect except for minute and occasional hepta-congeners detects, and more typically octa-congeners. These are the least toxic of dioxin-TEQ, less toxic than other congeners by one hundred to one thousand fold. The primary sources of these dioxin-TEQ values in Bay Area municipal wastewater are food and human waste and laundry grey water. These ubiquitous sources are not likely to change.

There is no regulatory minimum for effluent limit compliance monitoring; however, the Regional Water Board has generally required once per year as the minimum based on the 40 C.F.R. section 122.44(i)(2) requirement to report no less than annually. The Regional Water Board has reduced monitoring frequencies since the mid-1990s. The current individual permit required frequencies for EPA 1613 range from once per permit for minor Dischargers (without effluent limits) up to twice per year for the largest major Discharger. While this Order does not refute the reasonableness of these already minimal frequencies for determining compliance with effluent limitations, the estimated savings is \$49,600 per year if frequencies are reduced to the level set forth in this Order assuming the upper end of \$1,000 per test. The Dischargers report that the current cost ranges from \$600 up to \$1,000 for each analysis. Therefore, the wealth of past data for the discharges together with the high cost of each analysis, balanced against the opportunity and potential benefit from advancing knowledge to inform future management decisions through additional RMP studies, justify directing those funds instead to the RMP at this time.

- 3. Reduce Frequency of EPA 624 (VOC) and 625 (BNA) in Pretreatment Monitoring.** The alternate monitoring requirements described in provision VI.B.3 of this Order reduce the required effluent monitoring frequencies for EPA methods 624 (volatile organics) and 625 (base neutral acid extractable organics) for most major Dischargers. The Pretreatment Program requires treatment and control of pollutants from industrial sources that discharge to the sanitary sewer system. Its purposes are to (1) prevent pass-through and upset of municipal wastewater treatment facilities, and (2) protect wastewater workers. The purpose of pretreatment monitoring then is to determine the effectiveness of the program and if additional measures, such as changes to local ordinances, are necessary. Except for a few pollutants, these 624 and 625 scans of effluent often result in non-detects. The exceptions are rare, and, when they occur, they trigger permit effluent limits for the detected pollutant. This is further discussed in section C.2, below.

There is no regulatory minimum for pretreatment monitoring; the permit required

frequencies have declined since inception of the Pretreatment Program in the 1980s. Frequencies currently range from once per permit for the smallest pretreatment Dischargers to twice per year for the largest major Discharger. These are minimal and reasonable to provide verification that there is no change in the nature of the discharges that warrants change to pretreatment ordinances. The cost for each EPA 624 is from \$143 to \$295; for EPA 625, from \$360 to \$545. Assuming the upper end of \$840 per 624/625 test, the estimated cost savings for all the Pretreatment Program Dischargers from this alternate monitoring frequency would be about \$35,000 per year. Therefore, the marginal benefit from continuing to verify mostly non-detect levels, balanced against the opportunity and potential benefit from advancing knowledge to inform future management decisions through additional RMP studies, justifies directing those funds instead to the RMP at this time.

4. **Reduce Frequency of EPA 608 (PCBs aroclors).** The alternate monitoring requirements described in provision VI.B.4 of this Order reduce the required monitoring frequencies for testing with EPA method 608. EPA method 608 measures PCBs aroclors (and chlorinated pesticides). Every sample taken by the Dischargers since 2002 has resulted in non-detects for PCBs aroclors. (On rare occasion, results have shown detectable quantities of a few chlorinated pesticides, which upon further monitoring are at non-detect levels.)

There is no regulatory minimum for effluent limit compliance monitoring; however, the Regional Water Board has generally required once per year as the minimum based on the 40 C.F.R. section 122.44(i)(2) requirement to report no less than annually. The current Watershed Permit for Mercury and PCBs-required frequencies for EPA 608 range from once per year for minor Dischargers up to twice per year for major Dischargers. While this Order does not refute the reasonableness of these frequencies for determining compliance with effluent limitations, the estimated savings is \$16,650 per year with the reduced frequencies set forth in this Order assuming an upper end of \$230 per test. This is based on the Dischargers report that their current cost is about \$145 to \$230 for each analysis. Therefore, with the wealth of past data for the discharges since 2002 showing all non-detects for PCBs aroclors, balanced against the opportunity and potential benefit from advancing knowledge to inform future management decisions through additional RMP studies, justify directing those funds instead to the RMP at this time.

C. Rationale for Special Provisions

1. Conditions to Qualify for Coverage Under this Order

- a. This Order adds a requirement to pay a specified amount to the RMP to qualify for the reduced monitoring in this alternate monitoring program Order to supplement RMP studies. The supplemental RMP studies are necessary to provide data representative of the Dischargers' impact on receiving waters.

The date of payment is based on typical discharger budget cycles and the invoice timeframe for regular RMP annual fees. The amounts are based on

estimated analytical cost savings by each Discharger shown in Tables F-2 and F-3 using the following assumptions:

- Upper end of typical contract laboratory cost.
- Difference in monitoring frequencies between that required by the permits listed in Table 1 and that allowed by this Order.

The requirement for full 5-year terms is because the amounts in Attachment C are based on annualized cost savings relative to 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 September 30, 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 calendar year-based.

The Order also authorizes the Executive Officer to make annual ministerial adjustments to the amounts using the same assumptions as described in this Order. The adjustments would be in a timeframe that accommodates the Dischargers' budget cycles. Occasional adjustments are appropriate to ensure consistency with the purpose and intent of this Order, which is to apply 100 percent of the Dischargers' analytical cost savings to supplement RMP studies.

- b. This Order adds a requirement to report annually the payments made to the RMP. This reporting is necessary and reasonable to ensure compliance with the basis for the monitoring reductions allowed by this Order.
- c. This Order adds language that provides guidance to 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.

2. Reduce Frequency of EPA 624, 625, 608 (Other Priority Pollutant Scans)

For qualifying Dischargers, Provision C.2 of this Order reduces the frequency of other priority pollutant scans using EPA 624 (volatile organics), 625 (base neutral and acid extractable organics), and 608 (chlorinated pesticides, in addition to PCBs aroclors noted above), and related reporting, for most Dischargers to once per permit term. The Regional Water Board has required these scans starting in 2002, shortly after the State Implementation Policy was adopted. The purpose of the effluent characterization is to verify that the priority pollutants in the discharges have no reasonable potential to cause exceedance of water quality criteria and to inform future permit reissuances. In effect, this Order puts into place once per permit term priority pollutant scans for all Dischargers covered by this Order.

Except for a few pollutants, 624/625/608 scans often result in non-detects. The exceptions are rare, and, when they occur, they trigger permit effluent limits for the detected pollutant. Effluent limits, in turn, would trigger pollutant-specific monitoring at a more appropriate frequency in the MRP of the individual permit. This is the

reason why the alternate monitoring frequencies in this Order do not affect the pollutant-specific MRP monitoring frequencies typically in Table E-2 and/or E-3 of individual permits¹.

With the reduction in frequency, this Order also puts into place a commensurate reduction in reporting, from reporting annually to reporting just once with each application for permit reissuance.

The modifications put into effect by Provision C.2 makes the monitoring frequencies for EPA 624/625/608 consistent with the reductions put into effect by provisions VI.B.3 and 4, and are thus based on the same rationale. The estimated cost savings from this alternate monitoring frequency would be about another \$10,000 per year.

VII. RATIONALE FOR MONITORING AND REPORTING PROGRAM (MRP)

See above discussion in section VI.B.

VIII. PUBLIC PARTICIPATION

The Regional Water Board considered the adoption of the alternate monitoring and reporting requirements in this Order. As a step in the adoption process, Regional Water Board staff developed a tentative order and encouraged public participation in the adoption process.

A. Notification of Interested Parties. The Regional Water Board notified the Dischargers and interested agencies and persons of its intent to establish alternate monitoring and reporting requirements for the Dischargers and provided an opportunity to submit written comments and recommendations. Notification was provided by transmitting electronic copies of the tentative order to the Dischargers and other interested parties and by publishing a notice in the Recorder. The public had access to the agenda and any changes in dates and locations through the Regional Water Board website at www.waterboards.ca.gov/sanfranciscobay.

B. Written Comments. Interested persons were invited to submit written comments concerning the tentative order as explained through the notification process. Comments were due either in person or by mail at the Regional Water Board office at 1515 Clay Street, Suite 1400, Oakland, CA 94612, to the attention of **Lila Tang**. For full staff response and Regional Water Board consideration, the written comments were due at the Regional Water Board office by **5:00 p.m.** on Monday, **February 1, 2016**.

¹ Individual permit monitoring frequencies, typically more frequent than once per permit, are appropriate for effluent limited pollutants to ensure compliance with limits even for those pollutants that are only occasionally detected. While this Order allows for once per permit monitoring for PCBs aroclors and dioxin-TEQ, which are effluent limited, PCBs aroclors have never been detected in municipal wastewater effluent and monitoring (more frequent than once per permit) continues for PCBs congeners using EPA 1668. For dioxin-TEQ, there is a greater wealth of data (since 1990), the sources are ubiquitous, and the cost per analysis is an order of magnitude higher.

C. Public Hearing. The Regional Water Board held a public hearing on the tentative order during its regular meeting at the following date, time, and location:

Date: **March 9, 2016**
Time: 9:00 a.m.
Location: Elihu Harris Building
1515 Clay Street, 1st Floor Auditorium
Oakland, CA 94612

Contact: Lila Tang, (510) 622-2425, lila.tang@waterboards.ca.gov

Interested persons were invited to attend. At the public hearing, the Regional Water Board heard testimony pertinent to the tentative order. For accuracy of the record, important testimony was requested to be in writing.

Dates and venues change. The Regional Water Board web address is <http://www.waterboards.ca.gov/sanfranciscobay>, where one could access the current agenda for changes in dates and locations.

D. Reconsideration of Waste Discharge Requirements. Any aggrieved person may petition the State Water Board to review the Regional Water Board decision regarding the final Order. The State Water Board must receive the petition at the following address within 30 calendar days of the Regional Water Board action:

State Water Resources Control Board
Office of Chief Counsel
P.O. Box 100, 1001 I Street
Sacramento, CA 95812-0100

For instructions on how to file a petition for review, see http://www.waterboards.ca.gov/public_notices/petitions/water_quality/wqpetition_instr.shtml.

E. Information and Copying. Supporting documents and comments received are on file and may be inspected at the address above at any time between 9:00 a.m. and 5:00 p.m., except noon to 1 p.m., Monday through Friday. Copying of documents will be at the requester's expense and may be arranged by calling (510) 622-2300.

F. Register of Interested Persons. Any person interested in being placed on the mailing list for information regarding this matter or NPDES permits in general should contact the Regional Water Board, reference the matter, and provide a name, address, and phone number.

G. Additional Information. Requests for additional information or questions regarding this Order should be directed to Lila Tang at (510) 622-2425 or lila.tang@waterboards.ca.gov.

Table F-2. Cost Savings from Chronic Toxicity Re-screening and Dioxin-TEQ

Discharger	Individual Permit 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
<i>Union S.D.</i>							
<i>Oro Loma</i>							
<i>Hayward</i>							
<i>San Leandro</i>							
<i>Livermore</i>	R2-2012-0006						
<i>Dublin San Ramon Services District</i>	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	1	0.2	0.8	\$800	0.2	\$6,000
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	2	0.2	1.8	\$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	2	0.2	1.8	\$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	R2-2016-0003	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
West County Agency	R2-2013-0016	2	0.2	1.8	\$1,800	0.2	\$6,000
<i>Richmond</i>							
<i>WCWD</i>							
Yountville, Town of	R2-2015-0029	0.2	0.2	0	\$0	0	\$0
Total					\$50,600		\$180,000

Table F-3. Cost Savings from EPA 608, 624, and 625 Monitoring Reductions

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 Dist. WWTP	R2-2014-0044	2	1.8	\$414	2	1	1.8	\$531	2	1	1.8	\$981
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	1	0.8	\$184		1	0.8	\$236		1	0.8	\$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	1	0.8	\$184	1	1	0.8	\$236	1	1	0.8	\$436
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	1	0.8	\$184	1	0.2	0.8	\$236	1	0.2	0.8	\$436
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
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	R2-2016-0003	1	0.8	\$184		0.2	0	\$0		0.2	0	\$0
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)				\$15,962				\$3,216				\$5,941
TOTAL (Pretreatment)								\$12,272				\$21,037

Appendix B

Comments

January 27, 2016

Ms. Lila Tang
 Supervising WRC Engineer
 California Regional Water Quality Control Board,
 San Francisco Bay Region
 1515 Clay Street, Suite 1400
 Oakland, CA 94612
 By email: Lila.Tang@waterboards.ca.gov

Subject: Comments on Alternate Monitoring and Reporting Requirements for Municipal Wastewater Dischargers for the Purpose of Adding Support to the San Francisco Estuary Regional Monitoring Program (RMP)

Dear Ms. Tang:

The Sewerage Agency of Southern Marin (SASM) is submitting the following comments on the Alternate Monitoring and Reporting Requirements (Tentative Order) issued on December 22, 2015.

The current SASM NPDES permit (Order No. R2-2012-0094) requires twice per year monitoring for Dioxin-TEQ and bis(2-ethylhexyl) phthalate. The Tentative Order (Table F-2) incorrectly identifies Dioxin-TEQ as an annual monitoring requirement for SASM. The Tentative Order (Table F-3) incorrectly identifies EPA 625 as an annual monitoring requirement for SASM. Since EPA 625 is utilized to assess compliance with bis(2-ethylhexyl) phthalate effluent limitations, SASM must conduct EPA 625 monitoring more frequently than specified in Special Provision C.2.a. (Effluent Characterization Study and Report). When the correct monitoring frequencies are utilized to calculate SASM's contribution to the Regional Monitoring Program, the result is \$4,450 per year [$\$4,450 = \$3,886$ (Tentative Order) - $\$436$ (EPA 625) + $\$1,000$ (Dioxin-TEQ)].

The following revisions to the Tentative Order are suggested.

Attachment C – Payment to RMP to Qualify for Coverage

Discharger	Payment to RMP due July 1
Sewerage Agency of Southern Marin	\$3,886 <u>\$4,450</u>

Table F-2. Cost Savings from Chronic Toxicity Re-Screening and Dioxin-TEQ

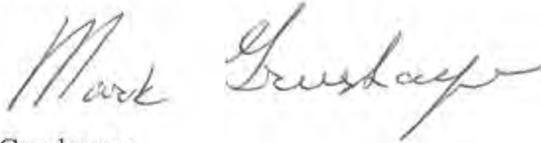
Discharger	Order No.	Permit Dioxin-TEQ Frequency (per year)	Difference in Dioxin-TEQ Frequency (per year)	Cost Savings per Year from Dioxin-TEQ Reduced Frequency
Sewerage Agency of Southern Marin	R2-2012-0094	4 2	0-8 <u>1.8</u>	\$800 <u>\$1,800</u>

Table F-3. Cost Savings from EPA 608, 624, and 625 Monitoring Reductions

Discharger	Order No.	Permit EPA 625 Frequency (per year)	Difference in EPA 625 Frequency (per year)	Cost Savings per year from EPA 625 Reduced Frequency
Sewerage Agency of Southern Marin	R2-2012-0094	1	1	\$436 <u>\$0</u>

Please contact me at (415) 388-2401 (or by email, mgrushayev@cityofmillvalley.org) if you have any questions or need additional information.

Sincerely,



Mark Grushayev
WWT Manager

Cc: Nimisha Patel, npatel@cityofmillvalley.org



CITY OF PINOLE

PINOLE-HERCULES WATER POLLUTION CONTROL PLANT

11 Tennent Avenue
Pinole, CA 94564

Phone: (510) 724-8963
FAX: (510) 724-9069

January 27, 2016

Ms. Lila Tang
Supervising WRC Engineer
California Regional Water Quality Control Board,
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612
By email: Lila.Tang@waterboards.ca.gov

Subject: Comments on Alternate Monitoring and Reporting Requirements for Municipal Wastewater Dischargers for the Purpose of Adding Support to the San Francisco Estuary Regional Monitoring Program (RMP)

Dear Ms. Tang:

The City of Pinole (City) is submitting the following comments on the Alternate Monitoring and Reporting Requirements (Tentative Order) issued on December 22, 2015.

The current NPDES permit for the Pinole-Hercules Water Pollution Control Plant (Order No. R2-2012-0059) requires twice per year monitoring for Dioxin-TEQ. The Tentative Order (Table F-2) incorrectly identifies Dioxin-TEQ as an annual monitoring requirement. When the correct monitoring frequency is utilized to calculate the City's contribution to the Regional Monitoring Program, the result is \$8,886 per year [\$8,886 = \$7,886 (Tentative Order) + \$1,000 (Dioxin-TEQ)].

The following revisions to the Tentative Order are suggested.

Attachment C – Payment to RMP to Qualify for Coverage

Discharger	Payment to RMP due July 1
Pinole, City of	\$7,886 <u>\$8,886</u>

Table F-2. Cost Savings from Chronic Toxicity Re-Screening and Dioxin-TEQ

Discharger	Order No.	Permit Dioxin-TEQ Frequency (per year)	Difference in Dioxin-TEQ Frequency (per year)	Cost Savings per Year from Dioxin-TEQ Reduced Frequency
Pinole, City of	R2-2012-0059	4 <u>2</u>	0.8 <u>1.8</u>	\$800 <u>\$1,800</u>

Please contact me at (510) 724-8964 (or by email, rtobey@ci.pinole.ca.us) if you have any questions or need additional information.

Sincerely,



Ron Tobey
Plant Operations Manager

cc: Al Petrie



The City of Burlingame

PUBLIC WORKS DEPARTMENT
TEL: (650) 558-7230
FAX: (650) 685-9310

CITY HALL - 501 PRIMROSE ROAD
BURLINGAME, CALIFORNIA 94010-3997
FAX: (650) 696-1598

CORPORATION YARD
(650) 558-7670

January 27, 2016

Ms. Lila Tang
Supervising WRC Engineer
California Regional Water Quality Control Board,
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612
By email: Lila.Tang@waterboards.ca.gov

Subject: Comments on Alternate Monitoring and Reporting Requirements for Municipal Wastewater Dischargers for the Purpose of Adding Support to the San Francisco Estuary Regional Monitoring Program (RMP)

Dear Ms. Tang:

The City of Burlingame (City) is submitting the following comments on the Alternate Monitoring and Reporting Requirements (Tentative Order) issued on December 22, 2015.

The current NPDES permit for the Burlingame Wastewater Treatment Facility (Order No. R2-2013-0015) requires twice per year monitoring for bis(2-ethylhexyl) phthalate. The Tentative Order (Table F-3) incorrectly identifies EPA 625 as an annual monitoring requirement. Since EPA 625 is utilized to assess compliance with bis(2-ethylhexyl) phthalate effluent limitations, the City must conduct EPA 625 monitoring more frequently than specified in Special Provision VI.C.2.a. (Effluent Characterization Study and Report). When the correct monitoring frequency is utilized to calculate the City's contribution to the Regional Monitoring Program (RMP), the result is \$8,450 per year [$\$8,450 = \$8,886$ (Tentative Order) - $\$436$ (EPA 625)].

The following revisions to the Tentative Order are suggested to correctly document the City's RMP contribution and new facility contact.

Attachment C – Payment to RMP to Qualify for Coverage

Discharger	Payment to RMP due July 1
Burlingame, City of	\$8,886 <u>\$8,450</u>

Table F-1. Facility Information

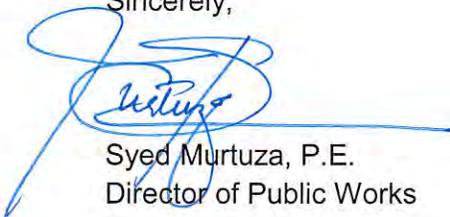
Discharger	Facility Contact, Title, and Phone Number	Mailing Address	Effluent Description	Facility Permitted Flow (mgd)
Burlingame, City of	William Toei Manuel Molina Plant Manager (650) 342-3727	501 Primrose Burlingame, CA 94010	Secondary	5.5

Table F-3. Cost Savings from EPA 608, 624, and 625 Monitoring Reductions

Discharger	Order No.	Permit EPA 625 Frequency (per year)	Difference in EPA 625 Frequency (per year)	Cost Savings per year from EPA 625 Reduced Frequency
Burlingame, City of	R2-2013-0015	4	0.8	\$436 <u>\$0</u>

Please contact me at (650) 558-7230 (or by email, smurtuza@burlingame.org) if you have any questions or need additional information.

Sincerely,



Syed Murtuza, P.E.
Director of Public Works

cc: Manuel Molina, Veolia Environment North America
Art Morimoto, Assistant Public Works Director



SAN FRANCISCO ESTUARY INSTITUTE

4911 Central Avenue, Richmond, CA 94804 • p 510-746-7334 • f 510-746-7300 • www.sfei.org

January 27, 2016

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

Re: TENTATIVE ORDER
ALTERNATE MONITORING AND REPORTING REQUIREMENTS FOR
MUNICIPAL WASTEWATER DISCHARGERS
FOR THE PURPOSE OF ADDING SUPPORT TO THE
SAN FRANCISCO ESTUARY REGIONAL MONITORING PROGRAM (RMP)

Dear Ms. Tang:

Thank you for the opportunity to comment on the subject Order. I am submitting these comments on behalf of the Steering Committee of the Regional Monitoring Program for Water Quality in San Francisco Bay (RMP). The Steering Committee approved this letter at its meeting on January 19, 2016.

The RMP strongly supports the proposed Order. The RMP has a long history of producing high quality data to inform management decisions. Yet, RMP funding has not kept up with inflation. Each year, the Program is unable to fund high quality proposals for important monitoring or special studies. The proposed Order would shift resources from unnecessary monitoring to RMP studies. Through strong governance and planning, these funds will be well-spent and will produce valuable results.

During the development of this Order, there was general agreement among the Bay Area Clean Water Agencies (BACWA), the Regional Board, and the RMP that the supplemental funding would be used by the RMP for research on contaminants of emerging concern. The nexus between this Order and emerging contaminants is that the optimal use of monitoring resources should be to determine potential future risks to water quality and aquatic life. Early detection of potential risks is the primary objective of emerging contaminants research.

Therefore, in order to document this intent, without encroaching upon the authority of the RMP Steering Committee to make fiscal decisions, we recommend the following change Section 3(1)(a) of the Order:

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, the amount of funds listed for the Discharger in Attachment C of this Order. ***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. (deleted text in ~~strike~~through, added text in ***bold italics***)

Thank you for your consideration of these comments on the proposed Order. The RMP looks forward to expanding our collaboration with the Regional Board and BACWA to collect data and communicate information about water quality in San Francisco Bay in support of management decisions.

Sincerely,



Philip Trowbridge, Manager
Regional Monitoring Program for Water Quality in San Francisco Bay



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

January 28, 2016

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

Re: Draft Tentative Order Regarding Alternative Monitoring for San Francisco Bay
Municipal Wastewater Dischargers

Dear Ms. Tang:

Thank you for the opportunity to comment on the Water Board's draft Tentative Order on an "Alternate Monitoring Program for Municipal Wastewater Dischargers in San Francisco Bay Region." We support the Water Board's adaptive management approach in considering using its NPDES permit authority to make the best use of limited funds invested to meet permit requirements, and to do so in coordination with the discharger community.

The proposed Order would provide flexibility to shift permittee resources away from conducting monitoring that we collectively have deemed as low priority, and instead apply the funding to Region Monitoring Program (RMP) studies that we agree are high priority, namely research on contaminants of emerging concern. This approach furthers one of the founding principles of the RMP, which was to replace individual receiving water monitoring requirements with a comprehensive approach to collecting data and communicating results to better support management decisions for improving water quality in San Francisco Bay. The pressing challenges of climate change, aging infrastructure, and the shift to using stormwater and wastewater as valuable water sources have increased the management questions that need scientific answers before large investments can be made with confidence. We support the direction to have these special studies related to microplastics, brine disposal, alternative flame retardants, and other potential emerging contaminants be designed and approved through the RMP process.

We look forward to continued coordination with Board staff, as well as SFEI and the RMP Steering Committee, in support of the best science for improving the San Francisco Estuary.

Sincerely,

A handwritten signature in black ink, appearing to read "David Smith".

David Smith, Manager
NPDES Permits Section

WEST COUNTY AGENCY



A Joint Powers Agency of West County Wastewater District
and City of Richmond Municipal Sewer District

January 28, 2016

Ms. Lila Tang
Supervising WRC Engineer
California Regional Water Quality Control Board,
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612
By email: Lila.Tang@waterboards.ca.gov

Subject: Comments on Alternate Monitoring and Reporting Requirements for Municipal Wastewater Dischargers for the Purpose of Adding Support to the San Francisco Estuary Regional Monitoring Program (RMP)

Dear Ms. Tang:

West County Agency (WCA) is submitting the following comments on the Alternate Monitoring and Reporting Requirements (Tentative Order) issued on December 22, 2015.

The current NPDES permit for WCA (Order No. R2-2013-0016) requires twice per year monitoring for bis(2-ethylhexyl) phthalate, endrin, and heptachlor. The Tentative Order (Table F-3) incorrectly includes WCA's EPA 625 and EPA 608 permit-required monitoring under the reduced monitoring provisions. Since EPA 625 and EPA 608 are utilized to assess compliance with bis(2-ethylhexyl) phthalate, endrin, and heptachlor effluent limitations, WCA must conduct the monitoring more frequently than specified in Special Provision IV.C.2.a. (Effluent Characterization Study and Report). When the correct monitoring frequencies are utilized to calculate WCA's contribution to the Regional Monitoring Program, the result is \$8,036 per year [$\$8,036 = \$8,886$ (Tentative Order) - $\$436$ (EPA 625) - $\$414$ (EPA 608)].

The following revisions to the Tentative Order are suggested.

Attachment C – Payment to RMP to Qualify for Coverage

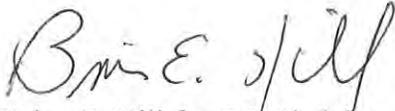
Discharger	Payment to RMP due July 1
West County Agency	\$8,886 <u>\$8,036</u>

Table F-3. Cost Savings from EPA 608, 624, and 625 Monitoring Reductions

Discharger	Order No.	Permit EPA 608 Frequency (per year)	Difference in EPA 608 Frequency (per year)	Cost Savings per year from EPA 608 Reduced Frequency	Permit EPA 625 Frequency (per year)	Difference in EPA 625 Frequency (per year)	Cost Savings per year from EPA 625 Reduced Frequency
West County Agency	R2-2013-0016	2	1.8	\$414 <u>\$0</u>	1	0.8	\$436 <u>\$0</u>

Please contact me at (510) 222-6700 (or by email, eshalaby@wcwd.org) if you have any questions or need additional information.

Sincerely,



Brian E. Hill for E.J. Shalaby
Agency Manager

cc: Ryan Smith, City of Richmond
Aaron Winer, Veolia Water

CITY OF CALISTOGA

Public Works Department
414 Washington Street • Calistoga, CA 94515
Telephone 707-942-2828
Fax 707-942-9472
www.ci.calistoga.ca.us



February 1, 2016

Ms. Lila Tang
Supervising WRC Engineer
California Regional Water Quality Control Board,
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612
By email: Lila.Tang@waterboards.ca.gov

Subject: Comments on Alternate Monitoring and Reporting Requirements for Municipal Wastewater Dischargers for the Purpose of Adding Support to the San Francisco Estuary Regional Monitoring Program (RMP)

Dear Ms. Tang:

The City of Calistoga (City) is submitting the following comments on the Alternate Monitoring and Reporting Requirements (Tentative Order) issued on December 22, 2015.

Under the Mercury and PCBs Watershed Permit (Order No. R2-2012-0096), the City is required to monitor for PCBs on an annual basis. The monitoring location is alternated each year between Outfall 001 (EFF-001) and Outfall 002 (EFF-002) when discharging.

The City is considering restructuring an existing outfall from its 20 million gallon effluent storage pond for discharge of tertiary treated effluent to the Napa River (Outfall 003). Conditions for approval of Outfall 003 operation and EFF-003 monitoring are specified in the City's Tentative Order NPDES Permit (scheduled for adoption at the March 9, 2016 Regional Water Board hearing). A revision to the Alternate Monitoring and Reporting Program is recommended to clarify that monitoring of PCBs for Calistoga is required at only one effluent monitoring location. A suggested revision is shown below as *italicized, underlined* text.

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

Parameter	Units ¹	Sample Type ²	Minimum Sampling Frequency ^{3,4}
Total mercury ⁵	<i>(This Order does not amend mercury monitoring.)</i>		
Total PCBs (as aroclors) ⁷	µg/L	Grab	Semi-annually for Major Dischargers
			<u>Annually Once per permit term for Minor Dischargers</u> <u>For Calistoga, the once per permit term monitoring shall alternate between EFF-001, EFF-002, and EFF-003 (when discharging).</u>

PCBs (as congeners)⁸

*(This Order does not amend PCBs as congener monitoring, except for Calistoga.)
For Calistoga, the once per permit term monitoring shall alternate between
EFF-001, EFF-002, and EFF-003 (when discharging).*

Please contact me at (707) 942-2789 (or by email, drayner@ci.calistoga.ca.us) if you have any questions or need additional information.

Sincerely,



Derek Rayner, P.E.
Deputy Director

Cc: Ben Zacharia, bzacharia@ci.calistoga.ca.us
Denise Connors, denisec@lwa.com



Dedicated to Preserving the Napa River for Generations to Come

February 1, 2016

Transmitted via email to ltang@waterboards.ca.gov

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

SUBJECT: Comments on Tentative Order for Alternate Monitoring Program

Dear Ms. Tang:

Thank you for the opportunity to comment on the tentative order for an alternate monitoring program for municipal wastewater dischargers in the San Francisco Bay region. The Napa Sanitation District provides wastewater collection and treatment services to over 75,000 ratepayers in the City of Napa and surrounding unincorporated areas. The District treats an average of 9 million gallons of wastewater each day, with an active recycled water program.

We appreciate that the Regional Water Board is interested in putting our limited funds to the best possible use in the region. Overall, we support the development of this alternate monitoring program. However, the calculation of the payment to the Regional Monitoring Program (RMP) to qualify for coverage in Attachment C and Tables F-2 and F-3 are incorrect for the Napa Sanitation District.

In particular, the District only discharges for a maximum of six months per year, and so sampling of dioxin, volatile organic compounds (VOCs), base/neutral/acid extractables (BNAs), and polychlorinated biphenyl (PCB) aroclors are only applicable once per year. As a result, the value assigned to the Napa Sanitation District should be \$7,656 instead of \$9,726. The corrected calculation is shown on the attached table.

Thank you again for the opportunity to comment on this tentative order. Please contact me if you have any questions. Thank you.

Sincerely,



Timothy B. Healy, PE
General Manager/District Engineer

cc: Dyan Whyte
Lila Tang
Monica Oakley

Tang, Lila@Waterboards

From: Ray Goebel <rpgoebel@eoainc.com>
Sent: Monday, February 01, 2016 9:53 AM
To: Tang, Lila@Waterboards
Cc: Mel Liebmann; Sahar Golshani
Subject: Draft NPDES Monitoring Program for Muni Dischargers in SF Bay Region - Correction for LGVSD

Lila:
For Las Gallinas Valley Sanitary District, Table F3 of the Fact Sheet shows two samples per year for EPA 608, 624, and 625. The actual permit-specified priority pollutants monitoring frequency for LGVSD (which typically only discharges 5-6 months/yr) is once/yr - see Provision VI.C.2.a of Order R2-2015-0021. The results from annual monitoring are used to characterize the effluent discharged at discharge points 001 and 002, as the same effluent is discharged at both locations.

Ray

FYA

From: Tang, Lila@Waterboards [<mailto:Lila.Tang@waterboards.ca.gov>]
Sent: Tuesday, December 22, 2015 2:44 PM
To: Alex Ameri (alex.ameri@hayward-ca.gov); Ben Horenstein; Bhavani Yerrapotu; Bill Zolan; Brad Underwood; Brian Schumacker; Chastain, Amy; Craig Justice (craig@smcsd.net); Dale McDonald; Daniel Child; Daniel Gallagher (gallagher@dsrsd.com); Darren Greenwood (dggreenwood@ci.livermore.ca.us); Dean Wilson (dwilson@sanleandro.org); Dembiczak, Christian; E. J. Shalaby (eshalaby@wcwd.org); Gary Darling; James Allen (james.allen@cityofpaloalto.org); James Ervin (James.Ervin@sanjoseca.gov); Jason Warner (jwarner@oroloma.org); Jeff Gregory; Joe Magner; Kepke, Jacqueline; Lena Cox; Lilia Corona; Lorien Fono (lfono@pmengineers.com); Mark Grushayev (mgrushayev@cityofmillvalley.org); Mark Williams; Meg Herston; Melissa Morton; Labella, Melody@centralsan.org; Melody Tovar (mtovar@sunnyvale.ca.gov); Mike Connor (mconnor@ebda.org); nallen@mvsd.org; Pagano, Laura; Patricia McFadden; Peter Lee; Roa, Amanda; Robert Cole (rcole@cmsa.us); Ron Tobey; Sandeep Karkal; Stacey Ambrose; Steven Beall (bealls@rodeosan.org); smurtuza@burlingame.org; Tim Grillo (tim_grillo@unionsanitary.com); Tim Healy; Tommy Moala; Tony Rubio; Wendy Gjestland; william.toci@veoliawaterna.com; Lori Schetel; Mark.Costanzo@flysfo.com; spalmer@cityofsthelena.org; Kirn, Michael; manager@town.crockett.ca.us; dmoore@yville.com
Cc: Smith, Davidw@epamail.epa.gov; Johnson, Bill@Waterboards; Mumley, Thomas@Waterboards; Wolfe, Bruce@Waterboards; Conners, Denise; Schlipf, Robert@Waterboards; Williams, David@ @bacwa.org; Ian Wren (ian@baykeeper.org)
Subject: Draft NPDES Monitoring Program for Municipal Wastewater Dischargers in SF Bay Region

Attached a draft NPDES monitoring program (tentative order) for municipal wastewater dischargers to the San Francisco Bay and its tributaries that would allow for reduction in discharge monitoring for organic priority pollutants and chronic toxicity sensitive species re-screening. Permittees' cost savings from the reduced frequencies would go to fund additional studies that would not otherwise be conducted by the San Francisco Estuary Regional Monitoring Program were it not for the funds from the avoided costs.

The **deadline for receipt of comment is on Monday February 1, 2016**. Comments must be sent to the **attention of Lila Tang**. The Board will hear comments on the tentative order during a **meeting starting at 9:00 a.m. on March 9, 2016**, in the auditorium of the Elihu Harris Building, 1515 Clay Street, Oakland. The Board will hear oral testimony but will not accept written comments after the deadline.

Attached also is the notice of public hearing. If you have questions, please contact Lila Tang at ltang@waterboards.ca.gov or (510) 622 2425.

Ray Goebel, P.E.
Vice President - Operations
EOA, Inc.
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Oakland, CA 94612
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email: rpgoebel@eoainc.com



February 1, 2016

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

VIA EMAIL: ltang@waterboards.ca.gov

Subject: Alternate Monitoring and Reporting Requirements for Municipal Wastewater Dischargers for the Purpose of Adding Support to the San Francisco Estuary Regional Monitoring Program

Dear Ms. Tang:

The Bay Area Clean Water Agencies (BACWA) appreciates the opportunity to comment on the Tentative Order for the Alternate Monitoring and Reporting Requirements (Alternate Monitoring Requirements) for Municipal Wastewater Dischargers for the Purpose of Adding Support to the San Francisco Estuary Regional Monitoring Program (Tentative Order). BACWA is a joint powers agency whose members own and operate publicly-owned treatment works (POTWs) and sanitary sewer systems that collectively provide sanitary services to over 6.5 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 supports the concept captured by the Tentative Order of reallocating resources from low-value effluent testing to the Regional Monitoring Program (RMP). The RMP has faced declining funding in recent years, and is in need of additional support to address important questions about water quality in the San Francisco Bay, which will in turn inform policy decisions.

The Tentative Order proposes reductions in monitoring frequencies for testing via EPA Methods 608 (PCBs as arochlors, and chlorinated pesticides), 624 (volatile organic compounds), 625 (base neutral acids), and 1613 (dioxins) for agencies that seek coverage under the Alternate Monitoring Requirements. BACWA's member agencies collect hundreds of effluent samples annually, in aggregate, to monitor constituents via EPA Methods 608, 624, and 625. These constituents posed a water quality concern decades ago before they were incorporated into the California Toxics Rule. In recent years, most of these constituents have rarely been detected in effluent, and when they are detected, they are at levels much lower than would pose a water quality concern. As described in the Tentative Order, the Regional Water Board has decades of data on dioxins via EPA Method 1613 on which to base any future management decisions. POTW funds are much better used to support emerging contaminants research through the RMP than continuing routine monitoring of historical pollutants in effluent.

Besides reducing monitoring via the tests listed above, the Tentative Order eliminates the requirement for routine chronic toxicity sensitive species screening for agencies seeking coverage under the Alternate Monitoring Requirements. Sensitive species screening for chronic toxicity testing is extremely expensive at approximately \$30,000 per screen, and does not yield useful information in most cases. If there is no change in effluent quality, then any change in the most sensitive species will be due to the inherent noise in the test, not actual changes in effluent toxicity.

As noted in the Tentative Order, the analytical costs identified therein represent the upper end of the range of actual costs. BACWA notes that the surcharge for most agencies will be greater than what they would be actually be spending on analytical testing. This is particularly true for agencies that do many of these analyses in their in-house laboratories. Nevertheless, BACWA recognizes the value of using consistent figures for all agencies, and the benefit of maximizing funding to the RMP via this mechanism. Additionally, the surcharge will be partially offset by staff time not spent on sample collection and data management.

Besides our general comments described above, BACWA has the following specific recommendations pertaining to the Tentative Order:

- 1. PCB Congener monitoring should be reduced upon reissuance of the Mercury/PCB Watershed Permit**

While BACWA supports the approach of strategically trading decreased effluent monitoring for increased RMP funding, as described in the Tentative Order, we urge the Regional Water Board to continue to scrutinize the routine testing requirements to ensure that they represent the best expenditure of public funds. When the Mercury/PCB Watershed Permit is reissued in 2017, the Regional Water Board will have ten years of PCB congener data via the unpromulgated Method 1668C. Each of these tests costs approximately \$1,000, and the informational value of these tests is outweighed by their high cost. **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.**

- 2. The Regional Water Board should work with agencies to ensure the Tentative Order captures the correct monitoring frequencies.**

Several of our member agencies have mentioned anecdotally to BACWA staff that the monitoring frequencies for individual POTWs listed in Tables F-2 and F-3 of the tentative order are incorrect. Since the current monitoring frequencies are used to calculate the level of funding to be transferred to the RMP, it is essential that they be correctly represented. Our member agencies will contact the Regional Water Board individually to supply the correct frequencies. **BACWA recommends that the Regional Water Board work with individual agencies to ensure that their current monitoring frequencies listed in the Tentative Order are correct.**

- 3. The reporting deadline for the Alternate Monitoring Requirements should be harmonized with agencies' Annual Reports**

The Tentative Order currently requires that “*The Discharger shall, either individually or in collaboration with other dischargers, submit or cause to submit, on October 1 of each year, a report that shows an accounting of each Discharger’s payment to the RMP.*” 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. This letter is submitted in January so that it may be incorporated by reference into agencies’ Annual Reports. **BACWA recommends that the reporting deadline for participation in the Alternate Monitoring Requirements be changed to February 1 to avoid duplicative reporting.**

4. 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.

In Section VI.C.1.a (page 5) the Tentative Order states that adjustments to the surcharge paid to the RMP may be “*based on changes in contract laboratory costs or pegged to RMP annual cost adjustments*”. By being pegged to annual RMP cost adjustments, POTWs who opt in to the Alternate Monitoring Requirements may then spend more than continuing with the existing tests, which usually don’t increase in cost substantially. The commercial environmental testing market is very competitive; often there is no cost increase from year-to-year, and costs sometimes even decrease. For example, the cost for dioxin by EPA Method 1613 has been stable at \$1,000 for the past six to seven years, and no increases are expected for the next three to four years.

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. It is unfair to increase the costs for agencies after they commit to a certain surcharge amount. Therefore, any cost increases that are implemented by the Executive Officer should not go into effect for an agency until they opt into the subsequent five-year term.

BACWA recommends that Section VI.C.1.a be edited as follows:

The Discharger shall provide to the RMP, by July 1 of each year for minimum terms consisting of 5 consecutive years, the amount of funds listed for the Discharger in Attachment C of this Order. The costs shall be constant for an agency over the five-year opt-in period. 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 as surveyed by BACWA 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 new costs will come into effect for agencies when they next opt into a new five-year term.

In addition to the comments herein, BACWA has reviewed the letter submitted by SFEI recommending that the following language be added to Section VI.C.1.a in the TO: *The intended use of these funds is for monitoring and special studies for contaminants of emerging concern.*

Alternate Monitoring Requirements TO Comments

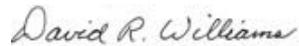
February 1, 2016

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However, the Steering Committee of the RMP shall have the authority to allocate these funds to other types of studies at its discretion.” BACWA has no objections to this addition.

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

Respectfully Submitted,

A handwritten signature in cursive script that reads "David R. Williams".

David R. Williams
Executive Director
Bay Area Clean Water Agencies

cc: BACWA Board
Amanda Roa, BACWA Permits Committee Chair

Appendix C
Response to Comments

**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 for public comment on December 22, 2015. 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 the Steering Committee for the 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 text 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 go to the RMP from monitoring reductions the tentative order would put into place.*

Response: We agree. The substance and rationale for the changes requested by NSD also apply to the City of Petaluma, so similar revisions for Petaluma were incorporated. Specifically, NSD referenced a permit provision that waived monitoring during a six-month dry period that coincided with the months when the permit also prohibited discharge. Please see 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 with 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. Caltest¹ 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 their 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 pollutant 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 than 5 to 10 percent of total calculated avoided costs. For example, in WCA's case, the difference is about \$500 relative to the total calculated savings of over \$8,800 (which mostly comes from elimination with each permit reissuance the requirement to re-screen for the most sensitive chronic toxicity species).

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

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 September 30, 2016, will receive coverage for the rest of 2016 included with its first 5-year opt-in period (2017 through 2021). And in response to Comment 6 (BACWA), we have revised the tentative order to hold steady the amount to be paid the RMP for a full 5-year term even if actual contract analytical costs increase during that period.

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 7 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~~September 30 of each year for minimum terms consisting of 5 consecutive years⁴, the amount of funds listed for the Discharger in Attachment C of this Order¹. 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, at 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 to 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 September 30, 2016, then the period of coverage under this Order shall start from the effective date (April 1, 2016) until December 31, 2021 (or 5 years plus). Opt-ins after September 30, 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 <u>EFF-001 or E-001</u>)	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, <u>annual</u> -monitoring shall <u>occur at alternate each year between EFF-001 and EFF-002.</u>	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 the 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 1 of each year,~~ a report

each year that shows an accounting of each Discharger’s payment² to the RMP for coverage under this Order. The report is due on the same date as the letter certifying the Discharger’s annual payment in support of RMP receiving water monitoring (currently on February 1).

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 for Accuracy and to Clarify Requirements

1. The tentative order’s title and Finding II.B are revised as shown below:
 ... San Francisco ~~Bay~~Estuary-Regional Monitoring Program ...
2. Finding II.C is revised to correct the date, from December 4 to October 29, 2015, when the Bay Area Clean Water Agencies first formally submitted a request to reduce monitoring.
3. 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}
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

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.

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 a 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 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).

4. 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 Order³ remain valid and to inform the next permit reissuance. Also summarized below is compliance monitoring required by this Order's³ 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~~:

<u>Discharge Point</u>	<u>Monitoring Location</u>	<u>Parameter</u>	<u>Minimum Frequency</u>
Point(s) specified in Discharger's NPDES permit.	Location(s) described in Discharger's NPDES permit.	VOCs, BNAs, and chlorinated P pesticides <u>without effluent limits, and dioxin-TEQ.</u>	Once per permit term.
Point(s) specified in Discharger's NPDES permit.	Location(s) described in Discharger's NPDES permit.	VOC/BNA/pesticide <u>pollutants with effluent limits, and</u> A ll other <u>priority-pollutants⁴ (e.g., metals, CN).</u>	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 ~~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 pesticide 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.

- 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	<i>Unchanged. Refer to individual permits.</i>	Once per permit term	<i>Unchanged. Refer to individual permits.</i>	<i>Unchanged. Refer to individual permits.</i>	
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	<i>(Unchanged. Refer to Watershed Permit for Mercury and PCBs This Order does not amend mercury monitoring.)</i>		
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	<i>(Unchanged. Refer to Watershed Permit for Mercury and PCBs This Order does not amend PCBs as congeners monitoring.)</i>		

6. 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 that provides guidance to 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.

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

...

The date of payment is based on typical discharger budget cycles and the invoice timeframe for regular RMP annual fees.

...

The requirement for full 5-year terms is because the amounts in Attachment C are based on annualized cost savings relative to 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 September 30, 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 calendar year-based.

8. Fact Sheet Table F-1 is modified to update the facility contact for City of Burlingame and the address for the San Francisco Public Utility Commission's ultra-green office building and to correct the permitted flow for Delta Diablo to 19.5 MGD and other typographical errors.

Revisions to Attachment C

Discharger	Payment to RMP due July 1 <u>September 30</u>
American Canyon, City of	\$9,726
Benicia, City of	ity of
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
<i>Union S.D.</i>	\$1,926
<i>Oro Loma</i>	\$1,926
<i>Hayward</i>	\$1,926
<i>San Leandro</i>	\$1,926
<i>Livermore, City of</i>	\$1,926
<i>Dublin San Ramon Services District</i>	\$1,926
East Bay Municipal Utilities District WWTP	\$9,726
Fairfield-Suisun Sewer District	\$9,726
Las Gallinas Valley Sanitary District	\$8,726 \$7,656
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	\$9,726 \$7,656
Novato Sanitary District	\$9,726
Palo Alto, City of	\$9,726
Petaluma, City of	\$8,726 \$7,656
Pinole, City of	\$7,886 \$8,886
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	\$3,886 \$4,886
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
<i>Richmond Municipal Sewer District</i>	\$967
<i>West County Wastewater District</i>	\$967
Yountville, Town of	\$184
TOTAL	\$289,027 \$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	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Benicia, City of	R2-2014-0023	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Burlingame, City of	R2-2013-0015	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Calistoga, City of	R2-2016-00XX	0.2	<u>0.2</u>	0	\$0	0	\$0
Central Contra Costa Sanitary District	R2-2012-0016	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Central Marin Sanitation Agency	R2-2012-0051	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Crockett Community Services District, Port Costa Sanitary Dept.	R2-2013-0035	0.2	<u>0.2</u>	0	\$0	0	\$0
Delta Diablo	R2-2014-0030	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
East Bay Dischargers Authority	R2-2012-0004	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
<i>Union S.D.</i>							
<i>Oro Loma</i>							
<i>Hayward</i>							
<i>San Leandro</i>							
<i>Livermore</i>	R2-2012-0006						
<i>Dublin San Ramon Services District</i>	R2-2012-0005						
East Bay Municipal Utilities Dist. WWTP	R2-2014-0044	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Fairfield-Suisun Sewer District	R2-2015-0013	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Las Gallinas Valley Sanitary District	R2-2015-0021	1	<u>0.2</u>	0.8	\$800	0.2	\$6,000
Marin County (Paradise Cove), Sanitary District No. 5 of	R2-2011-0016	0.2	<u>0.2</u>	0	\$0	0	\$0
Marin County (Tiburon) Sanitary District No. 5 of	R2-2013-0027	1	<u>0.2</u>	0.8	\$800	0.07	\$2,000
Millbrae, City of	R2-2013-0037	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Mt. View Sanitary District	R2-2010-0114	1	<u>0.2</u>	0.8	\$800	0.2	\$6,000
Napa Sanitation	R2-2011-0007	<u>2</u>	<u>0.2</u>	1.8 <u>0.8</u>	\$1,800 <u>\$800</u>	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)
District							
Novato Sanitary District	R2-2015-0034	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Palo Alto, City of	R2-2014-0024	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Petaluma, City of	R2-2011-0003	1	<u>0.2</u>	0.8	\$800	0.2	\$6,000
Pinole, City of	R2-2012-0059	1 <u>2</u>	<u>0.2</u>	0.8 <u>1.8</u>	\$800 <u>\$1,800</u>	0.2	\$6,000
Rodeo Sanitary District	R2-2012-0027	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
San Francisco, City and County Of, San Francisco International Airport	R2-2013-0011	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
San Francisco (Southeast Plant), City and County of	R2-2013-0029	2	<u>0.2</u>	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	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
San Mateo, City of	R2-2013-0006	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Sausalito - Marin City Sanitary District	R2-2012-0083	1	<u>0.2</u>	0.8	\$800	0.07	\$2,000
Sewerage Agency of Southern Marin	R2-2012-0094	1 <u>2</u>	<u>0.2</u>	0.8 <u>1.8</u>	\$800 <u>\$1,800</u>	0.07	\$2,000
Silicon Valley Clean Water	R2-2012-0062	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
Sonoma Valley County Sanitary District	R2-2014-0020	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
South San Francisco and San Bruno, Cities of	R2-2014-0012	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
St. Helena, City of	R2-2016-000 <u>3</u>	0.2	<u>0.2</u>	0	\$0	0	\$0
Sunnyvale, City of	R2-2014-0035	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
US Department of Navy (Treasure Island)	R2-2015-0004	1	<u>0.2</u>	0.8	\$800	0.2	\$6,000
Vallejo Sanitation and Flood Control	R2-2012-0017	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000

Revisions to Attachment F, Table F-2

Discharger	Order Number	Permit Dioxin-TEQ frequency (per year)	<u>Dioxin-TEQ Frequency if Covered by Alternate MRP (per year)</u>	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)
District							
West County Agency	R2-2013-0016	2	<u>0.2</u>	1.8	\$1,800	0.2	\$6,000
<i>Richmond</i>							
<i>WCWD</i>							
Yountville, Town of	R2-2015-0029	0.2	<u>0.2</u>	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

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)
East Bay Municipal Utilities Dist. WWTP	R2-2014-0044	2	1.8	\$414	2	1	1.8	\$531	2	1	1.8	\$981
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 <u>1</u>	1.8 <u>0.8</u>	\$414 <u>\$184</u>		2 <u>1</u>	1.8 <u>0.8</u>	\$531 <u>\$236</u>		2 <u>1</u>	1.8 <u>0.8</u>	\$981 <u>\$436</u>
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 <u>1</u>	1.8 <u>0.8</u>	\$414 <u>\$184</u>	2 <u>1</u>	2 <u>1</u>	1.8 <u>0.8</u>	\$531 <u>\$236</u>	2 <u>1</u>	2 <u>1</u>	1.8 <u>0.8</u>	\$981 <u>\$436</u>
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 <u>1</u>	1.8 <u>0.8</u>	\$414 <u>\$184</u>	2 <u>1</u>	0.2	1.8 <u>0.8</u>	\$531 <u>\$236</u>	2 <u>1</u>	2 <u>1</u>	1.8 <u>0.8</u>	\$981 <u>\$436</u>
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	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	R2-2016-0003	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)
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)				\$16,652 <u>\$15,962</u>				\$3,511 <u>\$3,216</u>				\$6,486 <u>\$5,941</u>
TOTAL (Pretreatment)								\$12,862 <u>\$12,272</u>				\$22,127 <u>\$21,037</u>