

San Francisco Bay Regional Water Quality Control Board

Order No. R2-2016-0008

**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:	March 9, 2016
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	Lori Schectel Environmental Manager (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