



February 8, 2021

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000

VIA EMAIL: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: Proposed Approval of an Amendment to the San Francisco Bay Basin Plan to Establish Chlorine Water Quality Objectives and Water Quality-Based Effluent Limitations for Wastewater Dischargers**

Dear Ms. Townsend:

The Bay Area Clean Water Agencies (BACWA) appreciate the opportunity to provide comments on the proposed approval of the San Francisco Bay Regional Water Quality Control Board's (Regional Water Board's) amendment to the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) to add chlorine Water Quality Objectives (WQOs) and Total Residual Chlorine (TRC) Water Quality-Based Effluent Limitations (WQBELs) for wastewater discharges.

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

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

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BACWA encourages the State Water Resources Control Board to move quickly to approve this Basin Plan Amendment, as doing so will accelerate cost savings and reduction of chemical inputs to the Bay. BACWA plans to work with our Regional Water Board to encourage swift implementation of the Basin Plan Amendment once it is approved by the State Water Resources Control Board, Office of Administrative Law, and U.S. Environmental Protection Agency.

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

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Lorien Fono". The signature is fluid and cursive, with a long horizontal stroke at the end.

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

Executive Director

Bay Area Clean Water Agencies

Cc: BACWA Executive Board  
Tong Yin, San Francisco Bay Regional Water Quality Control Board  
Janet O'Hara, San Francisco Bay Regional Water Quality Control Board