



September 29, 2023

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

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

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

Dear Robert Schlipf:

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

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

The proposed NPDES Permit Amendment will reduce the need for BACWA members to dose effluent with dechlorinating agents such as sodium bisulfite prior to discharging to receiving waters, providing an environmental benefit. Historically, BACWA members have used an overdosing strategy to guarantee compliance with effluent limitations for chlorine, which were expressed as an instantaneous maximum. The previous limitations did not allow consideration of time averaging or dilution in the receiving water. The Tentative Order's new water quality-based effluent limitations allow consideration of both factors, allowing BACWA members to save an estimated \$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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We look forward to coordinating with your staff and our member agencies on the implementation of this NPDES Permit Amendment, as agencies work to comply with their new monitoring and reporting requirements. In the meantime, do not hesitate to contact us with any questions or concerns.

Respectfully Submitted,



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

Executive Director

Bay Area Clean Water Agencies

Cc: BACWA Executive Board