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April 16, 2018
File: 184030361

Attention: Michael Davies

Town of Discovery Bay Community Services District
1800 Willow Lake Road
Discovery Bay, CA 94505

Dear Mr. Davies,

Reference: Town of Discovery Bay Wastewater Discharge Permit Renewal Assistance

In response to a request from the Town of Discovery Bay Community Services District (District) Engineer, Gregory Harris of Herwit Engineering, we are providing this letter proposal for services to assist in renewing the wastewater discharge permit for the Discovery Bay Wastewater Treatment Plant (WWTP).

The WWTP is currently regulated by Waste Discharge Requirements for the Town of Discovery Bay Community Services District Discovery Bay Wastewater Treatment Plant Contra Costa County, Order R5-2014-0073 (Order), adopted by the California Regional Water Board, Central Valley Region (Regional Water Board) June 6, 2014. The Order is set to expire July 31, 2019. As such, a Report of Waste Discharge renewal application (ROWD) is required to be filed no later than February 1, 2019.

Stantec proposes to assist in the preparation of a ROWD renewal application, and negotiation of a renewed Order in accordance with the following Scope of Services.

SCOPE OF SERVICES

Stantec will conduct the WWTP Order renewal tasks described below.

Task 1. Obtain and Review Background Information

Stantec will obtain from the California Integrated Water Quality System (CIWQS) available WWTP data necessary for completion of the ROWD required forms. Stantec will also prepare and provide to the District Engineer a data request that lists additional information and data required to complete the ROWD forms. Stantec will correspond with the District Engineer, as necessary, to obtain the requested information and data. It is assumed that all WWTP monitoring data, including effluent and receiving water characterization study data, have been uploaded to CIWQS as required by the Order. This task does not include any data entry by Stantec.

Estimated Budget: **\$5,820**



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Task 2. State and EPA Forms

Using the data and information obtained under Task 1, Stantec will complete the forms required to be included with the ROWD, including State Form 200, EPA Form 1, and EPA Form 2A. Form 2A requires the reporting of summary statistics for several parameters. Stantec will use the CIWQS data obtained under Task 1 to generate the required Form 2A summary statistics. In addition, Form 2A requires the presentation of expanded testing summary statistics for all parameters monitored. As a cost saving measure, Stantec will simply refer the reader of Form 2A to CIWQS for expanded testing results. Stantec has been successful in using this streamlined approach with other dischargers to greatly reduce the hours required to complete Form 2A. Also, as a cost saving measure, Stantec will provide a summary of effluent toxicity testing results in lieu of completing the detailed toxicity testing table in Form 2A. Stantec will provide draft forms to the District for review and comment followed by final forms for submittal to the Regional Water Board.

Estimated Budget: **\$10,850**

Task 3. Reasonable Potential Analysis

Using the data obtained from CIWQS in Task 1, Stantec will conduct a Reasonable Potential Analysis (RPA) by comparing maximum effluent and receiving water concentrations (from the current Order term) to the lowest water quality objective for each constituent monitored. The purpose of this effort is to identify in advance constituents that will be required to have effluent limitations in the renewed Order. The RPA is for internal purposes and will not be submitted to the Regional Water Board with the ROWD. If any new constituents are identified as requiring effluent limitations based on this RPA, original laboratory reports will be reviewed to make sure RP was not triggered because of quality assurance data outside of acceptability limitations. If any new constituents are identified as requiring effluent limitations in the renewed Order, Stantec will discuss with the District Engineer whether generating additional new data and/or requesting a time schedule for compliance would be appropriate.

Estimated Budget: **\$4,610**

Task 4. Nitrogen Compound Analysis

The current Order was based on a regulatory approach that the Regional Water Board is no longer following fully. The nitrate plus nitrate effluent limitation approach in the current Order is expected to remain unchanged in the renewed Order. However, for consistency with current Regional Water Board policy for regulating ammonia discharges in the Central Valley, the Regional Water Board is expected to adopt effluent limitations in the renewed Order based on 1999 ammonia criteria, instead of the 2013 ammonia criteria as used in the current Order. It remains to be seen whether the use of this current ammonia policy will result in a relaxation of current final effluent limitations on ammonia. Stantec proposed to complete a special analysis of current permit-term Old River ammonia, pH, and temperature data to determine if a reasonable case can be made for increasing the low effluent limitation on ammonia contained in the current Order.

Estimated Budget: **\$3,470**



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Task 5. Mixing Zone Update Discussion

With the District needing to take the existing diffuser out of service for planned improvements, Stantec proposes to provide the Regional Water Board with a summary of the facts and the District's intent to improve the effluent diffuser. In this way, the Regional Water Board can provide guidance on how to conduct the modifications while minimizing liability potentially associated with the diffuser improvement effort.

Estimated Budget: **\$810**

Task 6. ROWD Cover Letter

Stantec will draft a cover letter for inclusion with the submittal of ROWD forms (completed under Task 2). The letter will describe proposed changes to the renewed Order and justification for proposed changes, as appropriate. The cover letter will also describe any additional attachments, beyond the forms, to be submitted with the ROWD. Using the streamlined ROWD approach described in this Scope of Services, the cover letter will, in essence, be the ROWD, with attachments. Topics for discussion in the cover letter are expected to include ammonia limitations, nitrate plus nitrite effluent limitations, and future effluent diffuser rehabilitation/replacement plans. Stantec will provide the District Engineer with a draft cover letter for review and comment followed by a final cover letter for submittal to the Regional Water Board.

Estimated Budget: **\$3,180**

Task 7. Regional Water Board Correspondence

In our experience, open lines of communication with the Regional Water Board during the Order renewal process are essential. Before, during, and after the ROWD preparation, it is common for Regional Water Board staff to request information, data, or clarification regarding WWTP details. Stantec will work with Regional Water Board staff, and the District Engineer, to respond to any request for any supplemental information or data related to renewal of the Order. Discussions with Regional Water Board staff might also include negotiations regarding renewed Order language. Such discussions often continue right up to the issuance of a Tentative Order. It is most cost effective to submit a streamlined ROWD, as described in this Scope of Services, and let the Regional Water Board request additional information rather than attempt to anticipate and address all possible Regional Water Board concerns that might arise. Correspondence with the Regional Water Board is assumed to be in the form of email and telephone conversations, not in-person meetings. If responding to Regional Water Board requests results in a substantial effort, beyond the estimated budget for this task, Stantec will be glad to provide such services under Task 7 below or under separate authorization.

Estimated Budget: **\$4,160**

Task 8. Draft Order Review and Comment

After submittal of the ROWD, the Regional Water Board will issue a Preliminary Draft Order to solicit comments from the District to correct any factual errors. Stantec will review the Preliminary Draft Order



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and provide suggested comments for submittal to the Regional Water Board by the District. After receiving District comments on the Preliminary Draft Order, the Regional Water Board will circulate a Tentative Order for public comment. Stantec will review the Tentative Order and provide suggested comments for submittal to the Regional Water Board by the District. Stantec will also attend the Regional Water Board Order adoption hearing. It is assumed that the renewed Order will not be contested, and that no presentation will be required at the hearing.

Estimated Budget: **\$6,320**

Task 9. Contingency

Services under this task will only be provided following advanced approval by the District Engineer. This contingency task is included to cover any additional unforeseen services that might be necessary during the Order renewal process, or in response to specific compliance activities that might be included in the renewed Order. Such services might include extensive negotiation and/or analysis relative to nitrogen issues, preparation of an anti-degradation analysis, or facilitating site-specific dilution study activities that might be required by the renewed Order to allow the rehabilitation or replacement of the WWTP effluent diffuser.

Estimated Budget: **\$10,000**

Summary

Stantec proposes to provide the services described in this proposal on a time and materials basis in an amount not to exceed **\$49,220**, including contingency (Task 9).

Feel free to contact us if you have any questions.

STANTEC CONSULTING SERVICES INC.

Regards,

STANTEC CONSULTING SERVICES INC.

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