



# AVILA BEACH COMMUNITY SERVICES DISTRICT

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August 28, 2009

Central Coast Regional Water Quality Control Board  
Attn: Mr. Peter von Langen  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

Re: NPDES No. CA0047830, Order No. R3-2009-0055

Dear Mr. von Langen,

Enclosed are Avila Beach Community Service District's (ABCSD's) comments regarding the draft Waste Discharge Requirements (WDRs) for the Avila Beach Wastewater Treatment Facility (WWTP), Order No. R3-2009-0055, NPDES No. CA0047830. ABCSD's comments are organized by page number and section.

## Section II: Findings

II.A, Page 6 and F.II.A, Page F-4: ABCSD requests that Port San Luis Harbor District (Port) remain a co-permittee under the NPDES Permit. While it is true that the Port's collection system is now permitted under the State Water Resources Control Board's General Permit No. 2006-0003-DWQ, the Port remains responsible for the character (volume, type, and concentration) of waste added to the collection system and treated at the WWTP.

① As such ABCSD requests that the first sentence on page 6 be changed to read "Avila Beach Community Services District and Port San Luis Harbor District (hereinafter Discharger) are currently discharging...."

## Section IV: Effluent Limitations and Discharge Specifications

② V.A.1.e, Page 21: The Receiving Water Limit for pH contains extra requirements from those contained in the 2005 Ocean Plan (pH shall be within the range of 7.0 and 8.5 at all times). ABCSD requests removal of the additional limitations.

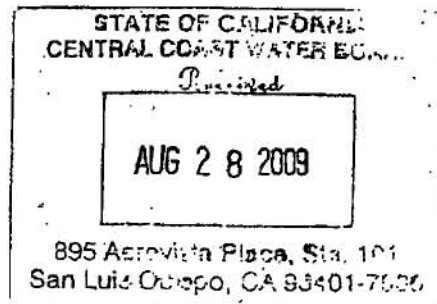
## Attachment D-1 – Central Coast Water Board Standard Provisions (January 1985)

③ I.E.8, Page D-15 and Attachment E, X.B.5.d, Page E-17: These sections contain the requirement to submit an Annual Report (due January 30<sup>th</sup> of each calendar year) and an Annual Self Monitoring Report (due February 1<sup>st</sup> of each calendar year) respectively. ABCSD requests that these reports be combined into one Annual Report due on January 30<sup>th</sup> of each calendar year.

## Attachment E – Monitoring and Reporting Program

## Section V: Whole Effluent Toxicity Testing Requirements

④ V.B, Page E-7: ABCSD determined during a prior NPDES permit cycle that the most sensitive species in the determination of Chronic Toxicity are urchins. ABCSD requests that the screening period to measure Chronic Toxicity against a fish, a plant, and an invertebrate species for three tests be eliminated.



Item No. 18  
October 23, 2009 Meeting  
Avila Beach Comm Services  
District  
Attachment 2

**Attachment F – Facts**


**Section VI: Rationale for Monitoring and Reporting Requirements**

⑤

VI.D.1, Page F-32: ABCSD requests that the requirement to perform benthic sediment and benthic biota monitoring and reporting between July and October of 2012 be removed from the draft permit. ABCSD WWTP is classified as a minor discharger and the installation of the new diffuser increased the rate of the discharged treated wastewater from 10:1 (seawater, effluent) to 151:1. ABCSD additionally is faced with budgetary constraints that would make the implementation of this proposed monitoring very difficult, especially considering the additional taxes taken from ABCSD due to the suspension of State Proposition 1A.

Thank you for your consideration of the above comments. Please note that we have provided additional minor comments via e-mail on this date. We appreciate you and your staff's assistance with this renewal of ABCSD's NPDES Permit. If you have any questions, please contact myself or Heather Billing of my staff at (805) 544-4011.

Sincerely,



John Wallace  
General Manager