SAUSALITO-MARIN CITY SANITARY DISTRICT

#1 EAST ROAD • SAUSALITO, CALIFORNIA 94965
OFFICE 415.332.0244 • PLANT 415.332.0240 • FAX 415.332.0453

October 2, 2012

VIA EMAIL: To: vchristian@waterboards.ca.gov
cc: bwolfe@waterboards.ca.gov; ltang@waterboards.ca.gov; wjohnson@waterboards.ca.gov; moakley@rmcwater.com

Mr. Vince Christian
San Francisco Bay Regional Water Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Comments Regarding Tentative Order Reissuing the NPDES Permit (CA0038067) for the Sausalito-Marin City Sanitary District

Dear Mr. Christian:

Thank you for the opportunity to comment on the Tentative Order for the reissuance of the NPDES Permit for the Sausalito-Marin City Sanitary District. We would particularly like to thank you and your staff for your diligence and care in preparing this document. Our detailed comments can be found in the attached document.

Thank you for consideration of these comments. Please let me know if you have any questions or would like additional information.

Sincerely,

Robert A. Simmons
General Manager

cc: Bruce Wolfe, Regional Water Board
Lila Tang, Regional Water Board
Bill Johnson, Regional Water Board
Monica Oakley, RMC Water and Environment

Sausalito-Marin City Sanitary District
Comments Regarding Tentative Order for Renewal of NPDES Permit

October 2, 2012

Sausalito-Marin City Sanitary District (SMCSD) appreciates the opportunity to submit the following comments on the Tentative Order (TO) reissuing the National Pollutant Discharge Elimination System (NPDES) Permit No. CA0038067 for the discharge of treated wastewater to Central San Francisco Bay. The sections being commented on are shown in roughly the same order as they first appear in the TO. Due to variations in formatting, page numbers listed are approximate.

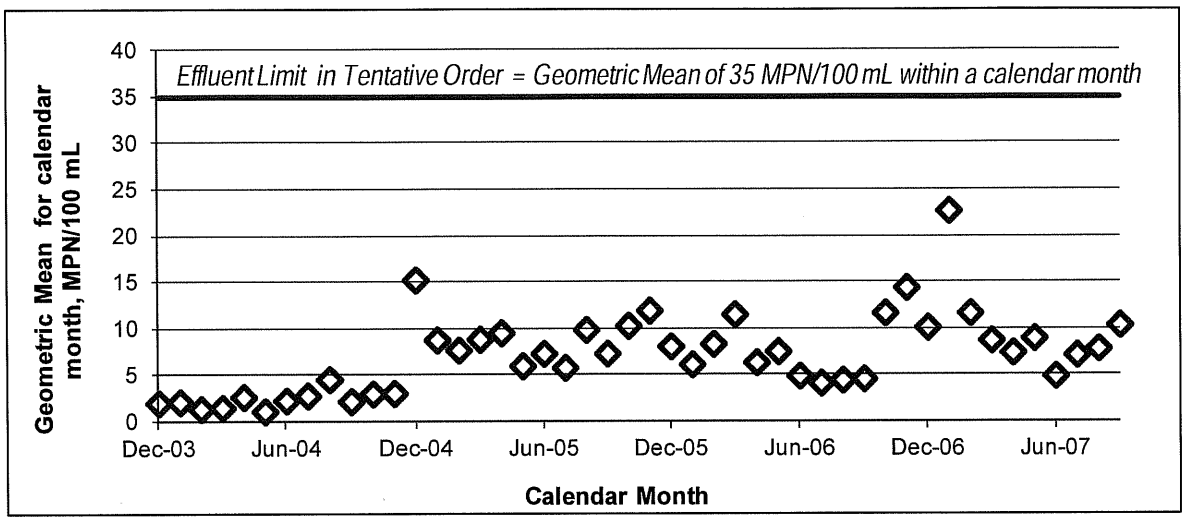
1. **SMCSD requests that the effluent limitation for fecal coliform bacteria reflect water quality objectives for both water contact recreation and shellfish harvesting, and that the monitoring frequency for enterococcus be reduced.**

The tentative order includes two types of bacteriological effluent limitations: a limit for fecal coliform based on the shellfish harvesting beneficial use with an allowance for dilution (median of 140 MPN/100 mL, and 90th percentile of 430 MPN/100 mL), and a limit for enterococcus based on the water contact recreation beneficial use (geometric mean of 35 MPN/100 mL). In lieu of two separate limits, SMCSD would prefer a single limit for fecal coliform the reflects both the shellfish harvesting beneficial use with an allowance for dilution, and the water contact beneficial use with no allowance for dilution. The fecal coliform water quality objective for water contact recreation is identified in Table 3-1 of the *San Francisco Bay Basin Water Quality Control Plan* (Basin Plan) as a geometric mean of 200 MPN/100 mL and a 90th percentile of 400 MPN/100 mL.

SMCSD believes that it is redundant to include two bacteriological effluent limitations based on the water contact recreation beneficial use, and would prefer that the effluent limitation for enterococcus be removed. However, if the Regional Water Board plans to include an enterococcus limit in the permit, SMCSD requests that the regular monitoring frequency for enterococcus of five times per week be reduced to twice per year so long as SMCSD demonstrates full compliance with the enterococcus effluent limitation.

A reduced frequency for enterococcus monitoring is consistent with the recently renewed NPDES permits for both the Rodeo Sanitary District (Order No. R2-2012-0027) and Central Marin Sanitation Agency (Order No. R2-2012-0051). Furthermore, the effluent monitoring of enterococcus that SMCSD has conducted in the past demonstrates consistent compliance with the water quality objective of 35 MPN/100 mL. Historical geometric mean enterococcus counts by calendar month, based on a minimum sample size of 14, are shown below in **Figure 1.**

Figure 1: Enterococcus Bacteria in SMCSD Effluent at Monitoring Point M-001



Requested revisions to the effluent limitations and monitoring and reporting program are shown below.

(Page 9)

3. Fecal Coliform Bacteria: The median of the fecal coliform bacteria density of all discharge samples collected at Discharge Point No. 001 within each calendar month shall not exceed 140 MPN/100 mL, the geometric mean shall not exceed 200 MPN/100 mL, and the 90th percentile shall not exceed ~~430~~ 400 MPN/100 mL.

(Pages E-3 and E-4)

Table E-3. Effluent Monitoring at EFF-001

Parameter	Units	Sample Type	Minimum Sampling Frequency
Flow[1]	MGD	Continuous	Continuous/D
pH	Standard Units	Grab	1/Day
Dissolved Oxygen	mg/L	Grab	1/Day
Total Ammonia, as N	mg/L	C-24	1/Month
CBOD (5-day @ 20°C) [2]	mg/L	C-24	2/Week
Total Suspended Solids[2]	mg/L	C-24	2/Week
Oil and Grease[3]	mg/L	Grab	1/Quarter
Fecal Coliform[4]	MPN/100 mL	Grab	3/Week
Enterococcus[4]	Colonies/100 mL	Grab	~~5/Week~~2/Year[5]
Chlorine, Total Residual[6] ~~[5]~~	mg/L	Continuous	Continuous
Acute Toxicity[7] ~~[6]~~	% Survival	C-24	1/Month
Chronic Toxicity[8] ~~[7]~~	TU_c	C-24	1/Year
Copper	µg/L	C-24	1/Month

Parameter	Units	Sample Type	Minimum Sampling Frequency
Zinc	µg/L	C-24	1/Month
Cyanide	µg/L	Grab	1/Month
Chlorodibromomethane	µg/L	Grab	2/Year
Bis(2-Ethylhexyl)Phthalate	µg/L	Grab	2/Year
Dioxin-TEQ	µg/L	Grab	1/Year

Unit Abbreviations:

mg/L = milligrams per liter
TUc = chronic toxicity units
mg/L as N = milligrams per liter as nitrogen
µg/L = micrograms per liter

Sampling Frequency:

Continuous/D = measured continuously, and recorded and reported daily
1/Week = Once per week
2/Week = Twice per week
3/Week = Three times per week
1/Day = Once per day
1/Month = Once per month
1/Quarter = Once per quarter
1/Year = Once per year
2/Year = Twice per year

[1] For effluent flows, the following information shall be reported monthly:

- Daily average flow (MGD)
- Monthly average flow (MGD)
- Maximum daily flow (MGD)
- Minimum daily flow (MGD)

[2] The percent removal for CBOD and TSS shall be reported for each calendar month in accordance with Effluent Limitation IV.A.1. Samples for CBOD and TSS shall be collected simultaneously with influent samples.

[3] Each oil and grease sampling and analysis event shall be conducted in accordance with USEPA Method 1664.

[4] When replicate analyses are made of an enterococcus or fecal coliform sample, the reported result shall be the geometric mean of the replicate sample.

[5] Enterococcus bacteria shall be monitored twice per year at a minimum. The samples shall be collected in two different calendar months during the higher recreational water contact season (June to October). If the enterococcus effluent limitation is exceeded, the Discharger shall conduct 5/Month accelerated sampling for at least three consecutive months. If full compliance is demonstrated throughout the three-month period, the Discharger may return to the 2/Year sampling frequency.

[6] [5] Effluent chlorine residual concentrations shall be monitored continuously or, at a minimum, every hour. The Discharger shall report for each day the maximum residual chlorine concentration observed following dechlorination. However, if monitoring continuously, the Discharger shall report for each day the maximum residual chlorine concentration based only on discrete readings from the continuous monitoring taken every hour on the half hour. The Discharger shall retain continuous monitoring readings for at least three years. The Regional Water Board reserves the right to use other continuous monitoring data for discretionary enforcement.

[7][6] Acute bioassay tests shall be performed in accordance with section V.A of this MRP.

[8][7] Critical life stage toxicity tests shall be performed and reported in accordance with the Chronic Toxicity Requirements specified in section V.B of this MRP.

2. SMCSD requests that requirements associated with the Effluent Characterization Study and Report be clarified with respect to reporting and investigating increases in concentrations of priority pollutants.

SMCSD requests that the annual evaluation of potential increases in priority pollutant concentrations be limited to significant increases, rather than any increase, based on anticipated, routine inter-annual variability. Likewise, SMCSD requests that any investigation into the cause of increases in concentration also be limited to cases where there is a significant increase compared to previous data. This approach is consistent with recently renewed NPDES permits for the Central Contra Costa Sanitary District (Order No. R2-2012-0016) and the Vallejo Sanitation and Flood Control District (Order No. R2-2012-0017).

SMCSD also requests that the annual reporting requirement be revised to more closely match the requirements listed in the 'Study Elements' section. The 'Study Elements' section requires SMCSD to conduct a source investigation only in cases where there is an observed increase in a priority pollutant concentration, so the annual report should only include this information in applicable cases.

The requested revisions are shown below.

(Page 13)

a. Study Elements

...

The Discharger shall evaluate on an annual basis if concentrations of any of these priority pollutants <u>significantly</u> increase over past performance. The Discharger shall investigate the cause of <u>such</u> ~~any~~ increase. The investigation may include, but need not be limited to, an increase in monitoring frequency, monitoring of internal process streams, and monitoring of influent sources. The Discharger shall establish remedial measures addressing any increase resulting in Reasonable Potential to cause or contribute to an excursion above applicable water quality objectives. This requirement may be satisfied through identification of the constituent as a "pollutant of concern" in the Discharger's Pollutant Minimization Program, described in Provision VI.C.3.

(Page 14)

b. Reporting Requirements

...

ii. Annual Reporting

The Discharger shall provide a summary of the annual data evaluation and source investigation<u>, if applicable,</u> in the annual self-monitoring report.

3. **SMCSD requests modifications to Table 8, *Specific Tasks to Reduce Blending*, to (a) allow greater flexibility, (b) remove infeasible tasks related to the tributary collection systems, and (c) align the proposed tasks with current District practices.**

(a) SMCSD requests greater flexibility in its efforts to achieve further reductions in blending. Blended effluent is a very small fraction of the total volume discharged from the SMCSD treatment plant to San Francisco Bay. Over the period 2007-2011, blended effluent represented approximately 0.12% of the total volume discharged, and all discharges of blended effluent were in compliance with applicable permit effluent limitations. SMCSD continues to refine plans for the improvement projects identified in the March 28, 2012 Utility Analysis to further reduce the need for blending in the most efficient and cost-effective way. To support that goal, SMCSD requests that the work plans identified in Tasks 1 and 4 of Table 8 not be completely constrained to match the projects described in the Utility Analysis.

Although most projects are likely to remain unchanged from the Utility Analysis, the work plans submitted for Tasks 1 and 4 will identify the preferred alternatives based on current information. As Tasks 1 and 4 are currently written, no projects identified in the Utility Analysis could be changed or removed from the work plan, which SMCSD believes does not allow for sufficient flexibility to implement an alternative solution. For example, recently in response to both public and permitting agency concerns, the District had to modify the plan described in the Utility Analysis to install a portable engine-driven pump during the winter season at the Main Street Sewer Pump Station to address required back-up pumping and peak weather flows. The suggested change to Tasks 1 and 4 would provide the District with needed flexibility to write a work plan that differs from the Utility Analysis, provided any modifications achieve the same objectives or reflect forces beyond SMCSD's control, such as delays in permitting or significant cost increases. The District is happy to discuss any modifications with Regional Water Board staff as the work proceeds.

(b) SMCSD requests that the requirement to estimate the reduction in blending for tributary collection system improvement projects on an annual basis be removed. Estimates of reduction in blending volume require a large amount of historical flow monitoring data for the entire tributary collection systems, and these data are not available to SMCSD. Therefore, this task is not technically feasible. Furthermore, even if the tributary agencies were able to make such flow monitoring data available, anticipated reductions in blending are likely to be small in any given year, and below the threshold of statistically robust estimation.

(c) SMCSD requests modifications to Table 8 that align the proposed tasks with current District practices. SMCSD requests that the compliance dates for Tasks 1 and 4 match one another, since collection system and treatment plant improvements are considered through an integrated process, rather than separately. To more evenly spread tasks over the permit term, SMCSD proposes that Task 6 have an earlier compliance date than proposed in the draft permit.

SMCSD already tracks collection system and treatment plant improvements for USEPA based on an annual cycle beginning each October. Therefore, SMCSD expects that the progress reports

for Tasks 2, 3, 5, and 7 will reflect this annual cycle. SMCSD requests that Regional Water Board staff indicate that this approach is acceptable.

The requested revisions for comments 3(a), 3(b), and 3(c) are shown below.

(Pages 18-19)

a. Specific Tasks to Reduce Blending

The Discharger shall implement the following tasks to reduce blending:

Table 8. Specific Tasks to Reduce Blending

Task	Compliance Date
1. **Marin City Collection System Improvement Workplan.** The Discharger shall submit a workplan for rehabilitation of prioritized gravity sewers and manholes owned and operated by the Discharger within the Marin City collection system to be performed during the permit term. The improvements shall include, but not be limited to, the projects identified in the Discharger's March 28, 2012, Utility Analysis; any modifications from the Utility Analysis will achieve the same objectives and/or reflect forces beyond the Discharger's control. The workplan shall estimate the anticipated reduction in blending volume and number of blending events to result from the improvements.	~~June 1, 2013~~ January 1, 2014
2. **Progress Reports on Marin City Collection System Improvement Projects.** The Discharger shall report the number and length of Marin City sewer mains, gravity sewer interceptors, and collection system pump station repaired or replaced during the previous year. The Discharger shall also report projects to be completed in the coming year.	Annually with Annual Self-Monitoring Report due February 1, starting February 1, 2014
3. **Progress Reports on Tributary Collection System Agency Collection System Improvement Projects.** The Discharger shall request information from tributary collection system agencies regarding the number and length of sewer mains, gravity sewer interceptors, and collection system pump stations repaired or replaced during the previous year. The Discharger shall also request information regarding projects to be completed in the coming year, and ~~The Discharger shall~~ report the information it receives ~~and estimate any anticipated reduction in blending volume and number of blending events to result from the improvements~~.	Annually with Annual Self-Monitoring Report due February 1, starting February 1, 2014

Task	Compliance Date
4. Treatment Plant Improvements Workplan. The Discharger shall submit a workplan for treatment plant improvement projects to reduce blending to be completed during the permit term. The improvements shall include, but not be limited to, the projects identified in the Discharger's March 28, 2012, Utility Analysis; any modifications from the Utility Analysis will achieve the same objectives and/or reflect forces beyond the Discharger's control. The workplan shall estimate the anticipated reduction in blending volume and number of blending events to result from the improvements.	January 1, 2014
5. Progress Reports on Treatment Plant Improvements. The Discharger shall report on the status of treatment plant improvement projects completed during the previous year. The Discharger shall also report on the status of projects to be completed in the coming year.	Annually with Annual Self-Monitoring Report due February 1, starting February 1, 2014
6. Private Sewer Lateral Ordinance Development. For the Marin City collection system, the Discharger shall develop proposed revisions to its sewer use ordinance to require inspection of private sewer laterals for homeowners upon change of property ownership. The Discharger shall submit the proposed revisions to its Board of Directors for consideration. The Discharger shall also encourage the tributary collection system agencies to develop similar sewer use ordinances.	~~June 28, 2014~~ June 1, 2013
7. Private Sewer Lateral Ordinance Status. The Discharger shall report the status of proposed lateral inspection ordinances within its service area.	Annually with Annual Self-Monitoring Report due February 1, starting February 1, 2014
8. No Feasible Alternatives Analysis (Utility Analysis). If the Discharger seeks to continue to bypass peak wet weather flows around the secondary treatment units based on 40 CFR 122.41(m)(4)(i)(A)-(C), it shall conduct a Utility Analysis that contains all elements described in USEPA's proposed guidance *NPDES Permit Requirements for Peak Wet Weather Discharges from Publicly Owned Treatment Works Treatment Plants Serving Separate Sanitary Sewer Collection Systems* (December 2005, or the most recent version). In addressing these elements, the Utility Analysis shall specifically contain an alternatives analysis for blending reduction to evaluate strategies to further reduce blending through capital improvements. The analysis shall account for tributary collection system agency efforts to reduce infiltration and inflow to the extent that information is available. The Discharger shall select a preferred alternative strategy based on factors including, but not limited to, the need to blend (considering the effectiveness of the collection system and treatment plant improvement projects), the alternative's foreseeable impact on the need to blend, and the alternative's estimated cost relative to the Discharger's ability to finance the cost. (One means to assess a community's ability to fund wet weather improvements is to consult USEPA's CSO Guidance for Financial Capability Assessment and Schedule Development, EPA Publication Number 832-B-97-004.) The Utility Analysis shall include a feasible timeline for steps leading to implementation of the preferred alternative strategy.	With Report of Waste Discharge due July 1, 2017

4. SMCSD requests that the requirement to conduct chronic toxicity screening to identify the most sensitive test species allow for collaboration with other local dischargers.

SMCSD successfully completed its most recent chronic toxicity screening program in conjunction with the Sewerage Agency of Southern Marin and the Sanitary District No. 5 of Marin County, as previously approved by Regional Water Board staff. Based on this experience, SMCSD requests that the permit include language allowing such collaboration for future chronic toxicity screening. The requested addition, which matches language in the current NPDES permit for Sanitary District No. 5 of Marin County (Order No. R2-2008-0057), is shown below.

(Page E-16)

II. Chronic Toxicity Screening Phase Requirements

A. The Discharger shall perform screening phase monitoring:

1. 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. 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. <u>The discharger has the option of completing the screening phase monitoring on its own or in conjunction with other local dischargers.</u>

5. SMCSD requests that the numeric effluent limitation violation of February 6, 2012 be removed from the permit, as it is erroneous.

SMCSD reported a weekly average carbonaceous biochemical oxygen demand violation for the week ending February 11, 2012, based on the average of two samples collected earlier that week. As reported in SMCSD's self-monitoring report for February 2012, the reported concentration for the sample collected on February 6, 2012 was 51 mg/L, while the reported concentration for the sample collected on February 7, 2012 was 34 mg/L. These values correspond to a *single* violation of the weekly numeric effluent limitation violation, not two violations. The requested corrections to Table F-4 and its explanatory text are shown below.

(Page F-7)

Table F-4. Numeric Effluent Limitation Violations

Date of Violation	Exceeded Parameter	Units	Effluent Limitation	Reported Concentration
2/11/2012	Weekly Average Carbonaceous Biochemical Oxygen Demand	mg/L	40	43
~~2/6/2012~~	~~Weekly Average Carbonaceous~~	~~mg/L~~	~~40~~	~~42~~

	~~Biochemical Oxygen Demand~~			
11/20/2010	Instantaneous Maximum Total Residual Chlorine	mg/L	0.0	5.3
3/31/2009	Monthly Average Total Suspended Solids	mg/L	30	30.7
2/20/2008	5-Sample Median Total Coliform Bacteria	MPN/100 ml	240	273
12/21/2007	5-Sample Median Total Coliform Bacteria	MPN/100 ml	240	325
12/20/2007	5-Sample Median Total Coliform Bacteria	MPN/100 ml	240	325
11/21/2007	5-Sample Median Total Coliform Bacteria	MPN/100 ml	240	716
11/20/2007	5-Sample Median Total Coliform Bacteria	MPN/100 ml	240	716
11/19/2007	5-Sample Median Total Coliform Bacteria	MPN/100 ml	240	716
11/16/2007	5-Sample Median Total Coliform Bacteria	MPN/100 ml	240	406
11/15/2007	5-Sample Median Total Coliform Bacteria	MPN/100 ml	240	281
11/12/2007	5-Sample Median Total Coliform Bacteria	MPN/100 ml	240	281
10/31/2007	Monthly Average Total Suspended Solids	mg/L	30	43
10/31/2007	Monthly Average Carbonaceous Biochemical Oxygen Demand	mg/L	25	28
10/6/2007	Weekly Average Total Suspended Solids	mg/L	45	59

(Page F-8)

These improvements have reduced the number of effluent violations in recent years. Only <u>two</u> ~~three~~ occurred since March 2009.

6. SMCSD requests that the permit fact sheet contain more complete information about planned changes, to reflect project constraints.

SMCSD can only complete the planned changes listed in the fact sheet if environmental review is successfully completed and project approval is granted by the National Park Service, which owns the land where the improvements will occur. SMCSD requests that this significant project constraint be included in the fact sheet, so that the plans are properly placed in context for the reader. The requested revisions are shown below.

(Page F-9)

E. Planned Changes

In 2011, the Discharger began a multi-year program to repair or replace approximately 15,000 feet of gravity sewer pipelines within the Marin City collection system. This represents about 50% of the total length of gravity sewers within Marin City. The Discharger also plans to complete the following improvements to the headworks, and primary and secondary treatment systems, pending approval from the land owner, the National Park Service ~~that includes~~:

7. SMCSD requests that the blending summary include an additional statement that the discharge of blended effluent was in compliance with applicable permit limits.

The fact sheet contains information about SMCSD's discharge of blended effluent. To avoid possible misinterpretation of the summarized Total Suspended Solids (TSS) data, SMCSD requests that this section explicitly state that the discharge was in compliance with applicable permit limits. Specifically, the monthly average for March 2009 of 31 mg/L, which is included in both Table F-4 (Numeric Effluent Violations) and F-7 (Effects of Blending on Total Suspended Solids Concentrations), exceeded the monthly effluent limitation of 30 mg/L. However, this monthly average would have exceeded 30 mg/L even if blending had not occurred; as noted on page F-7 of the draft permit, the violation was caused by equipment problems in the sludge processing units.

The requested revision is shown below.

(Page F-10)

Total suspended solids concentrations were higher during blending events than when not blending. However, blending events are rare, and are typically of short duration and small volume, so the overall effects of increased pollutant loadings to San Francisco Bay are small. About 200 pounds per year of suspended solids are discharged during blending events, including the suspended solids in the fully treated effluent during blending and in the bypass flow. This compares to 50,000 pounds per year for all the Discharger's discharges. All discharges of blended effluent were in compliance with applicable numeric effluent limitations for total suspended solids. The effects of blending on total suspended solids concentrations are summarized in the table below. The Discharger did not monitor other pollutants when blending.

8. SMCSD requests that the fact sheet description of improvement projects state that current planning provides estimates, not guaranteed values, for reductions in blending.

The list of projects that will be completed during the permit term may vary slightly from that submitted in the March 28, 2012 Utility Analysis, as noted above in comment #2 and reflected by requested revisions to Tasks 1 and 4 of Table 8. The reductions in blending provided with the Utility Analysis are planning-level estimates only, and are subject to change depending on the actual projects implemented. To reflect this uncertainty, SMCSD requests the minor revisions shown below.

(Pages F-13 and F-14)

(B) There are no feasible alternatives to the bypass. In its March 28, 2012 Utility Analysis, the Discharger completed a No Feasible Alternatives Analysis using the criteria identified in USEPA's draft guidance on *NPDES Permit Requirements for Peak Wet Weather Discharges from Publicly Owned Treatment Works Treatment Plant Serving Separate Sanitary Sewer Collection Systems* (December 2005). The Discharger plans to complete during this permit term upgrades to the Plant and to provide storage for peak flows. These planned upgrades are estimated to cost $22.8 million and ~~will~~ are estimated to reduce the frequency of blending events to about 1.5 times per year (from the current 5 times per year), the duration to about 4.2 hours per year, and the volume to about 100,000 gallons per year. The Discharger also expects its satellite collection agencies to continue to rehabilitate their collection systems. This should further reduce blending by reducing inflow and infiltration. Provision VI.C.5.a of the Order requires specific actions for the Discharger take within this coming permit cycle to reduce further the need to blend.

9. SMCSD requests that the description about ammonia as a nutrient identify the concern as a regional issue.

SMCSD requests that the title for this section clearly identify that the "concern with nutrients" is a regional issue, not an issue specific to SMCSD. The title may be misinterpreted to mean that SMCSD's effluent is the source of the "growing concern" or is causing a nuisance in the receiving water, neither of which is the case; SMCSD's nutrient loading to the receiving water has not significantly increased. Furthermore, as acknowledged in the text below, the effort to address nutrient loading on a regional basis is still in the information-gathering phase. The requested revisions are shown below.

(Page F-30)

(e) Regional ~~Growing~~ Concern with Ammonia as a Nutrients. As described above and in section IV.C.4.b, Dilution Credit, a translated Basin Plan un-ionized ammonia objective and a conservative estimate of actual initial dilution were used to calculate the total ammonia effluent limitations. In the future, the Regional Water Board may grant less dilution credit or change the ammonia limitations in other ways to address ~~growing~~ concerns about nutrients in the receiving water. Currently, a region-wide effort is underway to study and evaluate potential effects. This effort, which is referred to as the San Francisco Bay Nutrient Strategy, includes developing a nutrient assessment framework that can be used to calculate water quality-based effluent limits for nutrients. The Regional Water Board, through its Executive Officer, has also required wastewater dischargers, including this Discharger, to monitor nutrients, including ammonia, in their influent and effluent. This information will be used to compare nutrient loads from wastewater discharges to loads from other sources, to support modeling and evaluation of load reduction scenarios, and to determine the need for additional wastewater treatment to address nutrients.

10. SMCSD requests that the monitoring requirements summary be corrected to include all applicable permit requirements.

SMCSD requests that Table F-12 reflect the requirement for annual monitoring of all other priority pollutants, as stated in section VI.C.2.a. of the permit. The requested change is shown below.

SMCSD also requests that the monitoring requirement for enterococcus reflect the minimum monitoring frequency requested in comment #1, above.

(Page F-37)

Table F-12. Monitoring Requirements Summary

Parameter	Influent INF-001	Effluent EFF-001	Effluent EFF-001b	Receiving Water
Flow	Continuous /D	Continuous/D	--	--
CBOD	2/Week	2/Week	1/Year	--
TSS	2/Week	2/Week	1/Day	--
Oil and Grease	--	1/Quarter	--	--
pH	--	1/Day	1/Year	Support RMP
Chlorine Residual	--	Continuous	Continuous	
Acute Toxicity	--	1/Month	--	Support RMP
Chronic Toxicity	--	1/Year	--	Support RMP
Fecal Coliform	--	3/Week	1/Day	Support RMP
Enterococcus	--	~~5/Week~~ 2/Year	1/Year	Support RMP
Copper	--	1/Month	1/Year	Support RMP
Cyanide	2/Year	1/Month	1/Year	Support RMP
Zinc	--	1/Month	1/Year	Support RMP
Total Ammonia	--	1/Month	1/Year	Support RMP
Dissolved Oxygen	--	1/Day	--	Support RMP
Chlorodibromomethane	--	2/Year	1/Year	Support RMP
Bis(2-ethylhexyl)phthalate	--	2/Year	1/Year	Support RMP
Dioxin-TEQ	--	1/Year	--	Support RMP
All other priority pollutants	--	1/Year	--	Support RMP