



## FAIRFIELD-SUISUN SEWER DISTRICT

1010 CHADBOURNE ROAD • FAIRFIELD, CALIFORNIA 94534 • (707) 429-8930 • WWW.FSSD.COM  
GREGORY G. BAATRUP, GENERAL MANAGER

February 1, 2013

RW-100.10.10/13

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

RE: Comments Regarding Tentative Amendment of NPDES Permit Order No. R2-2009-0039 and Tentative Rescission of Cease and Desist Order No. R2-2009-0040 for the Fairfield-Suisun Sewer District, NPDES Permit No. CA0038024

Dear Mr. Christian:

Thank you for the opportunity to comment on the Tentative Amendment of NPDES Permit Order No. R2-2009-0039 and Tentative Rescission of Cease and Desist Order No. R2-2009-0040 for the Fairfield-Suisun Sewer District (District). The District appreciates your diligence and consideration in preparing the tentative documents.

Since Order Nos. R2-2009-0039 and R2-2009-0040 were adopted in April 2009, the District has continued to improve effluent water quality. As you know, the District converted the disinfection method at the Wastewater Treatment Plant (WWTP) from chlorine to ultra-violet disinfection in 2011. This change has reduced cyanide, chlorodibromomethane, and dichlorobromomethane concentrations in the effluent. In addition, the District continues to implement the cyanide control program required by Table 11 of Order No. R2-2009-0039. To date, the District has not identified any specific contributors of influent cyanide to the WWTP, nor have we received any requests to discharge cyanide to the Plant.

The documentation for addressing cyanide effluent limits for the infrequent discharges to the duck ponds and Ledgewood Creek was prepared consistent with the Cyanide Basin Plan Amendment adopted by the Regional Water Board in December 2006 and approved by USEPA in July 2008. The District appreciates the application of uniform effluent limitations for cyanide at all of the District's outfalls, which is an efficient and practical approach for implementing the necessary regulatory requirements while fully protecting receiving water quality.

The District's effluent concentrations for copper also continue to improve. Copper effluent values are currently in compliance with the final limits found in Order No. R2-2009-0039, due in part to continued copper source control activities. The District conducts a regular training program for industrial and commercial inspectors at Solano County's Department of Resource Management so they can recognize and act accordingly to potential sources and discharges of pollution encountered during inspections. The District also conducts outreach on behalf of the Fairfield-Suisun Urban Runoff Management Program, sponsors radio messages, and participates in regional copper outreach to plumbers and contractors.

Mr. Vince Christian  
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The District requests two minor modifications to the Tentative Order, to Figure 1 and Figure 2 on page F-3 in the Fact Sheet. Specifically, we request that the minimum size of Figure 1 be set to a height of 4.5 inches and a width of 6.5 inches, and that the minimum size of Figure 2 be set to a height of 2.9 inches and a width of 6.5 inches. With these minor changes, the labels within each figure should appear more clearly.

The District is committed to outstanding regulatory compliance and water quality protection, and we appreciate your attention to these comments. Please contact Meg Herston by phone at (707) 428-9109 or by email at [mherston@fssd.com](mailto:mherston@fssd.com) if you have any questions or need additional information.

Sincerely,



Greg Baatrup  
General Manager

Cc: Lila Tang, Regional Water Board  
Bill Johnson, Regional Water Board  
Monica Oakley, RMC Water & Environment