

Christian, Vince@Waterboards

From: Stuber, Robyn <Stuber.Robyn@epa.gov>
Sent: Friday, March 29, 2013 1:31 PM
To: Christian, Vince@Waterboards
Cc: Stuber, Robyn; BJohnson@waterboards.ca.gov; Smith, DavidW
Subject: U.S. EPA comments on draft NPDES permit for West County Agency Common Outfall (NDPES No. CA0038539)

Dear Mr. Christian,

We have reviewed the draft permit for the West County Agency Common Outfall (Tentative Order No. R2-2013-XXXX, NPDES No. CA0038539) and have two issues of concern which should be addressed before the final permit is issued.

The first is the addition of a calendar month averaging period for the five-sample median total coliform WQBEL, similar to that currently proposed for the enterococcus bacteria WQBEL.

We support the special provisions of section VI.C.5.a (specific tasks to reduce blending); however, to guide the collection system tasks in Table 8, we ask that the following language be added: Collection system work must implement all feasible alternatives to reduce blending resulting from all I&I peak flows in the collection system.

With these recommended changes, we support reissuance of the permit as proposed. If you have questions regarding these comments, please contact me or my manager, David Smith (415-972-3464).

Sincerely,

Robyn Stuber,
Environmental Scientist

Robyn Stuber

NPDES Permits Office | 415.972.3524
U.S. EPA Region IX | 75 Hawthorne Street (WTR-5) | San Francisco, CA 94105