

Sanitary District No.5 of Marin County
PO Box 227
Tiburon CA 94920

March 5, 2014

Mr. Robert Schlipf
Water Resource Control Engineer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

VIA EMAIL: robert.schlipf@waterboards.ca.gov

Subject: Comments on Tentative Order for Municipal Wastewater Discharges of Nutrients to San Francisco Bay, NPDES Permit

Dear Mr. Schlipf:

Sanitary District No. 5 of Marin County (District) serves the Town of Tiburon, City of Belvedere, and some incorporated areas of Marin County. The District provides collection, treatment, and disposal of wastewater produced by 3,500 households and commercial businesses within its service area. The District operates two wastewater treatment plants, the Tiburon Wastewater Treatment Plant and the Paradise Cove Wastewater Treatment Plant. Both of the District's facilities will be regulated under the Tentative Order for Municipal Wastewater Discharges of Nutrients to San Francisco Bay. The District supports the collaborative efforts undertaken to develop the Tentative Order and the comments submitted by the Bay Area Clean Water Agencies (BACWA).

The District requests twice per year effluent monitoring frequency for the Tiburon Wastewater Treatment Plant, based on the facility's design flowrate and low effluent discharge volume over the last 5 years. The Tentative Order's Monitoring and Reporting Program (Table E-3) requires once per month effluent sampling for Major Municipal Dischargers (Flow < 10 mgd, ≥ 1 mgd). According to U.S. EPA guidance, major/minor status is determined by the permitting authority but a Major Facility is one that has a design flow of 1 mgd or greater or a service population of 10,000 or greater. ¹ The Tiburon Wastewater Treatment Plant has been designated a Major Facility by the Regional Water Board but the design flowrate is 0.98 mgd and the facility serves a population of approx. 8,600. As a result, it doesn't match the categories defined in the Tentative Order. Effluent discharges from the Tiburon Wastewater Treatment exceed 1 mgd only during large storm events. Over the past 5 years, the annual average daily flowrate was always less than 0.67 mgd and discharges greater than 1 mgd occurred on only 94 days, or 5% of the time. The impacts of the small effluent flowrates are predicted to be inconsequential and on the order of impacts expected from a Minor Facility. To clarify requirements and make the frequency commensurate with impacts from a Minor Facility, the District is requesting twice per year effluent

¹ "Delegation of Updates to Major/Minor Lists," Memo from James F. Pendergast (EPA Permits Division) to Regional Water Management Division Directors, February 6, 1995.

monitoring. Historical effluent flowrates from the Tiburon Wastewater Treatment Plant (2009 to 2013) are presented in the following table.

Calendar Year	Average Annual Daily Flowrate (mgd)	# of Days ≥ 1.0 mgd	Peak Daily Flowrate (mgd)
2009	0.61	18	2.18
2010	0.67	33	2.24
2011	0.63	20	2.35
2012	0.60	23	2.56
2013	0.52	0	0.83

The reduced monitoring requirements (from monthly to 2/year) will save the District approximately \$11,000 in analytical costs (over the 5-year permit term) and significant staff time that would otherwise be devoted to sample collection and handling. The funds and staff resources are needed to support the District’s ongoing capital projects, which include upgrade of the Tiburon Wastewater Treatment Plant, re-purposing of existing facilities to attenuate peak wet weather inflows, and implementing the sewer rehabilitation plan. The suggested change to the Monitoring and Reporting Program (page E-3) is indicated below with underline shown for the additional language needed.

Table E-3. Minimum Sampling Frequency

Discharger Type	Minimum Sampling Frequency ^(1,2,3,4)
Major municipal discharger (Flow ≥ 10 mgd)	Twice per month
Major municipal discharger (Flow < 10 mgd)	Once per month
Minor municipal discharger (Flow < 1 mgd)	Twice per year

Footnotes:

(4) For the Marin Sanitary District No. 5 Tiburon Wastewater Treatment Plant, monitoring shall occur twice per year.

Thank you for considering the District’s comments. Please contact me at 415-435-1501 ext. 106 or trubio@sani5.org if you have any questions or need any additional information.

Sincerely,



Tony Rubio
 Wastewater Facilities Manager
 Sanitary District No. 5 of Marin County