

# California Regional Water Quality Control Board San Francisco Bay Region

## RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for  
Sewer Authority Mid-Coastside  
Sewer Authority Mid-Coastside Wastewater  
Treatment Plant and Intertie Pipeline System  
Half Moon Bay, San Mateo County

The Regional Water Board received comments from Sewer Authority Mid-Coastside (SAM) and the Monterey Bay National Marine Sanctuary (Sanctuary) on a draft NPDES permit (Tentative Order) distributed for public comment on January 13, 2023. The comments are summarized below in *italics* (paraphrased for brevity), followed by staff's response. For the full content and context of the comments, please refer to the comment letters. To request copies of the letters, see the contact information provided in Attachment F, section 8.7, of the Revised Tentative Order.

The Revised Tentative Order also contains minor editorial and formatting changes to the tentative order distributed for public comment.

### **Sewer Authority Mid-Coastside Comment 1**

*SAM supports adoption of the tentative order and does not request any changes.*

#### **Response**

We acknowledge SAM's support for the tentative order.

### **Monterey Bay National Marine Sanctuary Comment 1**

*The Sanctuary requests that we revise the tentative order to require SAM to contact it by phone, instead of in writing, about any violations of effluent limitations, receiving water limitations, and sludge management practices, and that we update the Sanctuary's phone number.*

*The Sanctuary also requests that we require SAM to provide a copy (by email) of the Recycled Water Project Start-Up report required by Provision 6.3.5.1.*

*Additionally, The Sanctuary requests that we revise the tentative order to require SAM to notify the Sanctuary via an emergency number for 24-hour reporting of any noncompliance incidents that occur within or affect the Monterey Bay national marine sanctuary, and email the Sanctuary follow-up reports on each incident.*

#### **Response**

We support the Sanctuary's aim to receive timely updates on any violations or operations that could adversely affect the environment. We confirmed that Sanctuary staff receive notices from the California Office of Emergency Services (CalOES), which serves as a clearinghouse for reporting unauthorized discharges and spills. To ensure efficient reporting within the first 24 hours of an emergency, we require such incidents to

be reported in this manner. We also agree that the Sanctuary should be included in any follow-up reporting of incidents that may affect the Sanctuary Therefore, we revised Provision 6.2.2 of the tentative order as follows:

**Monterey Bay National Marine Sanctuary (MBNMS).** In addition to reporting to the Regional Water Board, the Discharger shall also concurrently notify the MBNMS office in Monterey, ~~in writing~~ by phone, about any violations of this Order's effluent limitations, receiving water limitations, and sludge management practices. In addition, the Discharger shall provide, via email, copies of the Recycled Water Project Start-Up Report described in Provision 6.3.5.1 and all written reports required by Attachment D, Standard Provisions, section 5.5.1, and Attachment G, Regional Standard Provisions, section 5.5.1.2 for any incident that may affect the MBNMS. The MBNMS shall be notified ~~at the following address~~ as follows:

Permit Coordinator  
Monterey Bay National Marine Sanctuary  
99 Pacific Street, Building 455A  
Monterey, CA 93940  
~~(831) 647-4251 (650) 678-4943~~  
[mbnms.permits@noaa.gov](mailto:mbnms.permits@noaa.gov)

#### **Monterey Bay National Marine Sanctuary Comment 2**

*The Sanctuary requests that we update Attachment D, Standard Provisions, section 5.1, to require SAM to furnish any information the Sanctuary requests.*

#### **Response**

We did not change the tentative order. This requirement is based on 40 C.F.R. section 122.41(h) and Water Code sections 13267 and 13383, which specifically authorize the U.S. EPA Regional Administrator and the Water Boards to impose a duty to provide information. We cannot modify the tentative order to convey similar authority to the Sanctuary without a regulatory basis.