

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION**

**RESPONSE TO WRITTEN COMMENTS**

**ON THE REISSUANCE OF WASTE DISCHARGE REQUIREMENTS FOR:**

Seafirth Estates Company and Property Owners within the Seafirth Estates Subdivision,  
Seafirth Estates Wastewater Treatment Plant and its Sewage Collection System  
Tiburon, Marin County  
NPDES Permit No. CA0038393

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**I. Dion Cominos, Seafirth Board of Directors, Seafirth Estate Company –  
November 10, 2006**

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*Note: The format of this staff response begins with a brief introduction of the party's comments, followed with staff's response. Interested persons should refer to the original letters to ascertain the full substance and context of each comment.*

**I. Dion Cominos, Seafirth Board of Directors, Seafirth Estate Company (Seafirth)**

Seafirth Comment 1

*Seafirth requests deferring monitoring requirements for flow, influent BOD and TSS, chlorine residual, and total coliform because the Seafirth plant lacks the equipment to conduct this type of monitoring. Seafirth requests additional changes to be consistent with the previous permit and/or to maintain monitoring costs within their operational budget, these additional changes are reducing the pH and acute toxicity monitoring.*

Response 1

We agree with this request, and the Tentative Order has been changed accordingly. Monitoring for flow, influent BOD and TSS, chlorine residual, and total coliform are deferred until completion of treatment plant upgrades. In addition, pH monitoring is reduced from weekly to monthly, and acute toxicity is required using one species instead of two species.

Seafirth Comment 2

*Seafirth requests modifying Provision 10 to allow time to secure the funding for conversion of Seafirth into a pump station, and the installation of a pressure line to Paradise Cove.*

Response 2

We agree with this request, and the Tentative Order has been changed accordingly. The Revised Tentative Order includes a modified Provision 10 allowing Seafirth to pursue installation of a pump station and pressure line instead of treatment plant upgrades. On November 7<sup>th</sup>, we met with Mr. Don Miller of Seafirth Estate Company, and Mr. Bonner Buhler, Plant Manager to discuss Seafirth's projected timeline for pump station conversion and treatment plant upgrades. At that time, Seafirth expressed a preference to convert the treatment plant to a pump station instead of purchasing a new package treatment plant to comply with new permit conditions.