



Directors
Pat D. Gacoscos

Pat Kite

Anjali Lathi

Jennifer Toy

Tom Handley

Officers
Richard B. Currie
General Manager
District Engineer

David M. O'Hara
Attorney

February 27, 2008

Mr. Bruce Wolfe, Executive Office
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland CA 94612

Dear Mr. Wolfe:

Thank you for the opportunity to submit comments related to the 2007 draft of the San Francisco Bay Region Municipal Regional Stormwater NPDES Permit (MRP). In general we concur with the comments prepared by the Bay Area Clean Water Agencies (BACWA) in their letter to the Regional Board. In addition, Union Sanitary District has the following concerns/comments regarding the 2007 draft MRP:

1. C.11.f. and C.12.f – Diversion of dry weather and first flush flows to Publicly Owned Treatment Works (POTWs)

Comment: Union Sanitary District's wastewater treatment plant is a secondary waste activated treatment system that is not designed to treat un-regulated increases in heavy metals, PCB's and solids loadings that discharges from dry weather and first flush flows could add to its system. This could result in non-compliance of NPDES Permit requirements that could include plant upsets and impact the beneficial reuse of biosolids. In addition to potentially impacting the plant processes, it could likely result in increased costs of upsizing/upgrading the existing infrastructure as well as increased operation and maintenance costs.

2. C.13.b.ii – Permittees shall require installation of a sanitary sewer discharge connection for pools, spas, and fountains, including connection for filter backwash, with proper permit from the POTWs.

Concern: USD is concerned that the above referenced connections would potentially result in the increased discharge of copper and copper-based chemicals to USD's treatment plant. These discharges could cause NPDES compliance problems, including plant upsets, impact beneficial reuse of biosolids and cause discharge violations related to the receiving waters.

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While USD is committed to the safe collection, treatment and disposal of wastewater in the Tri-City Area, and to protect human health and the environment, we believe that the above referenced requirements have a potential of negatively impacting the District's ability to meet existing NPDES requirements and would likely result in increased cost of monitoring, treatment and upgrading of our infrastructure. Once again, thank you for the opportunity to provide comments relating to the draft MRP.

Sincerely,

A handwritten signature in black ink that reads "Richard B. Currie". The signature is written in a cursive style with a large initial "R" and "C".

Richard B. Currie
General Manager
District Engineer
Union Sanitary District