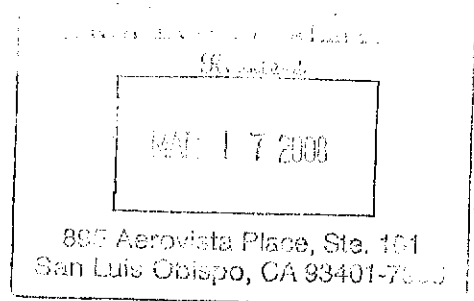


March 13, 2008



California Regional Water Quality Control Board  
Central Coast Region  
Attn. Mr. David LaCaro  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401-7906

**Subject: Review of Waste Discharge Requirements SSD**

Staff at Summerland Sanitary District has performed a review of the copy Waste Discharge Requirements that was sent to us in February. This includes the National Pollution Discharge Elimination System (NPDES), No.-CA0048054, the fact sheets and all attached documents. We appreciate the opportunity to review these items and the willingness of the RWQCB to allow us to comment and bring up concerns and recommendations.

We are pleased with the overall content of the NPDES but do have the following concerns:

- As part of the sampling requirement schedule, there are certain constituents that we are required to sample on a 'once every 6-days' basis. This creates a hardship for us as we contract these samples out to a certified laboratory. The sample pickup rotation is MON-WED-FRI as the laboratory contracts with several agencies up and down the coast and this rotation seems to work the best for all involved.

Since we are on this three day a week rotation, a once every 6-day sampling requirement would mean one of three things: 1) we would have to set up our laboratory to be able to conduct the analysis of these samples which would be a very costly undertaking, especially for a small agency such as ours, as well as hire more staff to perform the analysis; 2) we would have to hand deliver the samples to the laboratory, about a 1 ½ - 2 hour round trip; or 3) pay the laboratory to send up a person to pick up the samples- another costly undertaking.

Past sampling history shows that our influent and effluent does not change in make up on a daily basis and stays relatively the same throughout the year. In short, we are requesting a change in sampling of these constituents to 'once per week' (preferably Monday), or something similar to better suit our day-to-day operation. Thank you.

Item No. 16 Attachment No. 2  
May 9, 2008 Meeting  
Summerland WWTP

- We are requesting a change of due date for our annual summary report. The new NPDES report will reflect that it will be due by the last day in January or February 1<sup>st</sup>. What would be ideal is to have an additional month to prepare the report. It is our understanding that it is common to have these reports due by end of January or February 1<sup>st</sup> but that puts a tremendous amount of pressure on meeting deadlines in not only preparation but also in making sure we have all the information in from contract labs, etc. By giving us additional time, we can take time making sure the data is not only entered correctly but that it makes sense to all who will review it. The annual summary report is an extremely important document and reflects the overall operation of a facility. It would seem like additional time in preparation would be beneficial to all involved. We are requesting that the annual summary report due date be pushed back to February 28<sup>th</sup> or March 1<sup>st</sup> of each year.  
On somewhat of the same subject, we would also like to see the due date of our monthly reports changed to 'the first day of the second calendar month, following the month of sampling'. Currently we have to send in the monthly reports by the '20<sup>th</sup> of each month following the month of sampling'.

Thank you for your consideration, we look forward to hearing back from you on these matters.

Respectfully submitted,

  
James A. McManus  
General Manager