



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEANIC SERVICE
Monterey Bay National Marine Sanctuary
P.O. Box 100
Monterey, California 93941

March 17, 2009

Roger W. Briggs, Executive Officer
Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

SUBJECT: Comments on Reissuance of NPDES/WDR Permit (No. CA0049417) for the Ragged Point Inn, San Luis Obispo County, California

Dear Mr. Briggs:

The Monterey Bay National Marine Sanctuary has reviewed a draft National Pollutant Discharge Elimination System (NPDES) Permit, No. CA0049417, for the Ragged Point Inn's wastewater treatment plant. The Sanctuary reviewed the draft NPDES permit under its authority defined at 15 CFR Sections 922.49 and 922.134(b), and procedures defined in Section V.E of the Memorandum of Agreement on water quality protection within the Sanctuary (June 1992). Consideration of the permit is scheduled for the Central Coast Regional Water Quality Control Board's (RWQCB) public meeting on May 8, 2009.

The Ragged Point Inn owns and operates a private wastewater treatment facility serving a resort that consists of a hotel, a restaurant, a gas station with public restrooms and a small retail shopping area, as well as employee housing. Wastewater flow varies depending on the number of guests at the hotel and customers of the restaurant, gas station and shops. This operation is currently discharging up to 0.015 MGD of treated wastewater from the Ragged Point Inn Wastewater Treatment Facility to the Pacific Ocean within the Monterey Bay National Marine Sanctuary.

Re-issuance of this RWQCB NPDES permit will continue coverage for this discharge. As stated in the Draft NPDES permit, the treatment system consists of a comminutor (grinder/macerator), a flow equalization tank, extended aeration package treatment plant with secondary clarification and a tertiary treatment system consisting of filtration followed by ozone disinfection. The design flow capacities of the package plant and tertiary treatment system are 0.015 MGD. Disinfected tertiary effluent is discharged to the Pacific Ocean and the MBNMS via a discharge to the cliff face (Discharge Point 001) and to land via a surface drip irrigation system (Discharge Point 002). The discharge of undisinfectated secondary treated wastewater to land via the surface drip irrigation system is also allowable under the RWQCB NPDES permit.


MBNMS staff appreciate the efforts this discharger has made over the past few years, and are pleased that irrigation replaces ocean discharge as the primary method of wastewater disposal.

In order to better understand and protect the health of the MBNMS, we request that the RWQCB include language in the Draft permit that would require the Discharger to also submit annual reports to the MBNMS office (to the attention of: Permit Coordinator).

On the basis of the conditions defined in the draft permit, the MBNMS does not object to the re-issuance of this NPDES permit [15 CFR Section 922.49(e)]. Please send a copy of the signed permit to the Sanctuary office after the Regional Board adopts it at the May 8, 2009 public meeting.

Thank you for the opportunity to comment on the draft NPDES permit and proposed RWQCB order for the Ragged Point Inn wastewater treatment plant discharge. If you have any questions on the Sanctuary's comments, please contact Deirdre Hall by phone at (831) 647-4207 or via email at deirdre.hall@noaa.gov.

Sincerely,


PAUL MICHEL
Superintendent

cc: J. Ramey, Ragged Point Inn

