



Central Contra Costa Sanitary District

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September 12, 2007

Via E-mail (bwolfe@waterboards.ca.gov)
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Mr. Bruce Wolfe, Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear Mr. Wolfe:

COMMENTS ON THE TENTATIVE ORDER ISSUING SAN FRANCISCO BAY MERCURY WATERSHED PERMIT (CA0038849)

Central Contra Costa Sanitary District (CCCSD) appreciates the opportunity to comment on the Tentative Order (TO) for the Mercury Watershed Permit. CCCSD provides wastewater collection and treatment for approximately 450,000 people in Central Contra Costa County. CCCSD is dedicated to providing excellent customer service at reasonable rates and to meeting all applicable safety and environmental regulations. CCCSD is a member of Bay Area Clean Water Agencies (BACWA) and supports the comments submitted by BACWA in a separate letter.

CCCSD supports the watershed approach to the wasteload allocations and the subsequent watershed permit to implement the mercury total maximum daily load (TMDL). The Mercury Watershed Permit regulates both municipal and industrial wastewater dischargers in a manner that is fair and equitable. The Mercury Watershed Permit, for the most part, is consistent with the mercury TMDL, approved by the State Water Resources Control Board on July 17, 2007. The one exception is the addition of enforceable concentration limits summarized in Table 6.

These enforceable concentration limits were not in the TMDL, and require another level of control over and above the aggregate allocations. The inclusion of the enforceable concentration limits adds a third tier to the compliance approach for mercury. CCCSD

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does not object to the inclusion of the enforceable concentration limit, but hopes that the focus will remain on the attainment of the aggregate allocations.

CCCSD also supports the use of the monthly average effluent limit (MAEL) and daily maximum effluent limit (DMEL) concentration triggers for investigative action. By having trigger levels, CCCSD can investigate and possibly fix the cause of the elevated mercury level without endangering the water body.

To summarize, CCCSD fully supports the concepts presented in Mercury Watershed Permit as presented in the Draft TO. CCCSD has included additional comments, which are primarily editorial, as an attachment to this letter.

If you have any questions, please contact me at 925-229-7284.

Sincerely,



Douglas J. Craig
Director of Plant Operations

DJC/RS:pk/dk

Attachment

cc: B. Dhaliwal
A. Farrell
A. Grieb
M. LaBella
M. Penney
T. Pilecki
T. Potter
R. Schmidt
B. Than

ATTACHMENT 1: ADDITIONAL CCCSD COMMENTS

1. **Page 26 VI. Compliance Determination**
 - A. General.

Please replace “the reporting level (RL)” with “the minimum level (ML), as shown in Table 7.” Please note that “RL” and “ML” are not synonymous terms. The “RL” is laboratory specific and can vary from time to time. The “ML,” on the other hand, is state implementation Policy (SIP)/RWQCB adopted value (compliance level), is the same for all dischargers and is fixed for at least the permit’s duration or until the SIP is amended. Therefore, “ML” is more appropriate in regulatory determination.

2. **Attachment A – Definitions**

Page A-1 Fourth paragraph, which states, “Detected but not quantified (DNQ) are those sample results less than the RL...”
Please replace “the RL” with “the ML.”

Page A-1 Eighth paragraph, which states, “Minimum Level”
Please add the following sentence at the end of the paragraph: “The ML is shown in Table 7.”

Page A-2 Third paragraph, which states, “Reporting Level”
Please delete this paragraph. The language is redundant.

3. **Attachment E – Monitory and Reporting Program**

Page E-2 1.C – Minimum Levels
Please delete the paragraph starting with “According to the SIP” and ending with “calibration purpose.” The language is redundant since the ML is specified in the table that follows paragraph C.

Page E-5
See statement, “Reporting of ML or RL.”
Please delete “RL.”