

Hg OFFSET POLICY

Deadline: 2/28/07 5pm



IRONHOUSE SANITARY DISTRICT

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February 28, 2007

Song Her
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

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Subject: Written comments on the December 2006 Informational Document for the Public Scoping Meeting for Proposed State Policy for Water Quality Control, San Francisco Bay, Sacramento-San Joaquin River Delta and Tributaries Mercury Discharge Offset Policy.

Dear Ms. Her:

Ironhouse Sanitary District (ISD) appreciates the opportunity to comment on the subject informational document. ISD on January 16, 2007, certified a Final Supplemental Environmental Impact Report for Upgrade and Expansion of ISD's current wastewater facilities. The project ISD is implementing involves construction of a new wastewater treatment with discharge of treated effluent on up to approximately 510 acres on Jersey Island along with a new surface water discharge into the San Joaquin River off the north shore of Jersey Island.

ISD is currently an indirect discharger into the San Joaquin River as treated effluent currently applied on Jersey Island percolates into the ground, combines with groundwater that flows to interceptor ditches that drain to a pump station on the north side of the island. The pump station pumps the drain water into the San Joaquin River.

ISD offers the following comments on the subject informational document:

1. New surface water dischargers should be allowed to participate in the offset policy to allow compliance with effluent limits, both TMDL derived and otherwise.
2. Current permitted in-direct dischargers into surface waters should be provided a mercury allocation for the existing discharge.

Sincerely,
IRONHOUSE SANITARY DISTRICT

Jennifer M. Skjel
Jennifer M. Skjel
District Engineer