



Date: September 15, 2011

To: SWRCB

Subject: **9/19-9/20/2011 BOARD MEETING (Emergency Regulations Revising the Core Regulatory Fee Schedule).**

To Whom It May Concern:

The City of Burlingame Wastewater Treatment Facility is operated under the current NPDES program with NPDES permit # CA0037788. The fiscal year budget for the City of Burlingame was approved in June 2011 for FY 2011/12 with the understanding that the operating portion of the NPDES permit would be approximately \$22,976.00. With the 4 option plan that the State Water Board is proposing, this portion of the FY budget would be deficient by approximately \$7,867 with the best case scenario if option #1 is approved. In a worst case scenario (option #4) the deficiency would equal ~\$12,091. This in and of itself spread across the 12,869 dwellings within the City of Burlingame does not seem like an issue that would necessitate the rallying of the troops, or for the State Water Board staff to spend important time reviewing. The issue is when you add all of the other proposed programs together that will affect the City of Burlingame budget not only for 2011/12 FY, but far into the future, is where the cost increase becomes "overwhelmingly staggering". As an example, the wet policy that is currently being proposed and studied by the State Water Board staff would increase the cost to perform chronic toxicity testing for the City of Burlingame WWTF from its current ~\$5,000 per year to \$60,000 per year without any false positive results that would drive up the cost for increased frequency until compliance is confirmed. Both of these costs (NPDES and Chronic Toxicity) benefit the public served in no measurable means that can be related in a cost increase for services. Now add the cost for compliance and reporting for the Municipal Storm Water Permit and the budget begins to unravel exponentially. Where does it end? Cost for the analysis of the PCB 1668C that was recently approved by the RWCQB San Francisco Bay Region, adds another \$1,300 per analysis @ 3 sampling events required. These costs must be managed within the City government with time-consuming consideration and planning. This cannot be accomplished when policy initiated by the State Water Board is implemented after the fact, and at an unacceptable percentage increase. We request that the Water Board consider another option for spreading out the rate increase over a time period that would allow municipalities to better manage the increased cost of doing business with an elected government agency. Please let me know if you have any questions concerning the statements presented in this comment letter by contacting me at 650 342-3727.

Sincerely,

A handwritten signature in black ink, appearing to read 'William E. Toci'.

William E. Toci
Plant Manger
City of Burlingame WWTF

Cc: Syed Murtuza, City of Burlingame PWD