



Central Contra Costa Sanitary District

Protecting public health and the environment

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ELAINE R. BOEHME
Secretary of the District

VIA EMAIL: veronica.cuevas@waterboards.ca.gov

COMMENTS ON TENTATIVE NPDES PERMITS FOR WHITTIER NARROWS AND POMONA WATER RECLAMATION FACILITIES

Dear Ms. Cuevas,

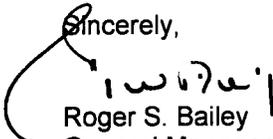
Central Contra Costa Sanitary District (CCCSD) provides wastewater collection and treatment for approximately 470,000 residents in central Contra Costa County. On a typical day we convey and treat approximately 40 million gallons wastewater before discharging to Suisun Bay, where it ultimately flows to San Francisco Bay.

CCCSD does not routinely submit comments on permitting actions in regions outside the San Francisco Bay Area. However, CCCSD believes it important to record our concerns with the toxicity monitoring and compliance elements in the two Tentative Orders (TO) for Whittier Narrows and Pomona Water Reclamation Facilities which are dramatically different from the toxicity standards being developed by the State Board through the development of the statewide Toxicity Plan. CCCSD supports the comments being submitted by CASA and BACWA on this aspect of the TOs.

CCCSD has been working with other wastewater dischargers throughout California and State Board staff to develop a viable statewide Toxicity Plan that achieves the objective of consistency with monitoring for, and responding to, potential whole effluent toxicity in wastewater discharges. The toxicity program elements in the TOs are not consistent with the State Board's Toxicity Plan elements and would not be acceptable for statewide implementation. CCCSD believes the process initiated by the State Board in which significant state and stakeholder resources have been invested needs to be completed before significant changes to the toxicity program elements of wastewater dischargers' permits are processed.

Thank you for the opportunity to comment on this important aspect of the TOs being considered. Please contact me at (925) 229-7386 or rbailey@centralsan.org if you have any questions or would like to discuss.

Sincerely,


Roger S. Bailey
General Manager

cc: CCCSD Board of Directors
Bruce Wolfe, SF Bay RWQCB
Tom Mumley, SF Bay RWQCB
Rik Rasmussen, SWRCB
Dave Williams, BACWA
Bobbi Larson, CASA
Jean-Marc Petit