

Neill, Ben@Waterboards

From: Mike Slaby <mslaby@pureeffect.com>
Sent: Wednesday, May 20, 2015 4:07 PM
To: Neill, Ben@Waterboards
Cc: Robert Robinson; Paul Lanhardt; Jeff Sherod
Subject: Comments -Tentative Order No. R9-2015-0013

Hello Mr. Ben Neill:

Please see the following comments regarding the Tentative Order No. R9-2015-0013, NPDES No. CAG919003.

1. We like the fact that the two permits will be consolidated into one. This will make it easier for our applicants who are not familiar with understanding the inland vs. the inland surface water/bay permits.
2. The method for expressing the potential constituents changed and it is very specific and leaves less to interpretation by using the Reasonable Potential Analysis (RPA) format.
3. We have concerns regarding the following sections of the tentative order;
 - The monitoring and reporting program requirements appear to have increased so the monthly and periodic costs associated with the sampling, analysis testing will increase; this will place an additional financial burden on enrollees in the order and result in higher costs for compliance. Is there a mechanism in place to allow a reduction in the MRP if the effluent has been in full compliance for more than 60 days?
 - In regards to the pesticides, PCB's, etc. is the board going to require analysis to the levels expressed [i.e. PCBs sum 0.00017 µg/L] ? There is a valid concern that these low levels are not achievable with current treatment methods thus an enrollee may be in violation of the maximum discharge levels if they are detected above these levels.

We observe this tentative order as a very well thought out and progressive advance into the next several years of managing groundwater and related discharges in the San Diego Region; our compliments to the authors and team at the board who developed it!

Thank you for your attention.

Best Regards,

Michael E. Slaby
Principal/Technical Sales



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