

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

Response to Written Comments
Item No. 9

NPDES Permit Reissuance
for
Dublin San Ramon Services District,
Livermore-Amador Valley Water Management Agency, and
East Bay Dischargers Authority (EBDA)

The Regional Water Board received timely written comments from the following:

- Dublin San Ramon Services District (DSRSD), dated July 12, 2006
- U.S. Environmental Protection Agency (USEPA), dated July 12, 2006
- Bay Area Clean Water Agencies (BACWA), dated July 12, 2006
- San Francisco Baykeeper, date July 12, 2006
- Alameda County Flood Control and Water Conservation District (Zone 7), dated July 12, 2006

This Response to Comments begins with the comments (in *italics*) quoted where possible, or paraphrased for brevity. Regional Water Board staff responses follow each comment.

DSRSD Comment 1: *“DSRSD agrees with all the edits and comments raised by EBDA on their Tentative Order, and hereby incorporates all EBDA comments by reference.”*

Response: Please see the responses to EBDA comments contained in the Regional Water Board Agenda package this month for EBDA’s permit reissuance. Those responses are hereby incorporated by reference.

DSRSD Comment 2: *The permitted flow is for average dry weather design flow not weather flow.*

Response: We have made the changes requested. Please also see Response to EBDA Comment 2.

DSRSD Comment 3: *The biosolids disposal area will be covered under separate waste discharge requirements. DSRSD commits to preparing and submitting a report of waste discharge for the disposal area.*

Response: We revised the Tentative Order as suggested.

NOTE: USEPA’s other comments on the DSRSD Tentative Order are nearly identical to its comments on the EBDA Tentative Order. As these permit reissuances are on the same Regional Water Board hearing, to avoid repetition (and save paper), please refer to the Board Agenda package for the EBDA permit reissuance for Regional Water Board staff’s responses. All except USEPA Comment 6 and 7 are hereby incorporated by reference. USEPA did not make its Comment 7 on the DSRSD Tentative Order.

Below is a response to just two of all the comments from USEPA on the DSRSD Tentative Order. One is specific to DSRSD (noted here by “D”); the other involves a different response by Regional Water Board staff to USEPA Comment 6 for the EBDA Tentative Order.

USEPA Comment D1: *“Clarify that the CBOD and TSS% removal limits should be calculated using values for influent and effluent pollutant loadings (lbs/day) rather than concentration.”*

Response: We have not made the change suggested, because USEPA staff has indicated that they are considering this issue further.

USEPA Comment 6: *USEPA requires that the permit be changed to make the blending (bypasses) subject to 40 CFR 122.41(m)(4). USEPA acknowledges that the Water Board may approve an anticipated bypass at the Discharger’s facility if the provisions of 40 CFR 122.41(m)(4)(i)(A), (B) and (C) are met (the bypass is unavoidable, there were no feasible alternatives, and the discharger submits proper notice), and requires that the permit include the specific conditions under which the bypass would be approved, including specific minimum wet weather flow rates.*

Response: DSRSD does not discharge blended effluent. Therefore, we have deleted the paragraph approving blending in prohibition III.B.

NOTE: BACWA’s comment letter for the EBDA Tentative Order also applies to the DSRSD Tentative Order. As these permit reissuances are on the same Regional Water Board hearing, to avoid repetition (and save paper), please refer to the Board Agenda package for the EBDA permit reissuance for Regional Water Board staff’s responses. All these responses are hereby incorporated by reference.

NOTE: SF Baykeeper’s comments on the DSRSD Tentative Order are nearly identical to its comments on the EBDA Tentative Order. As these permit reissuances are on the same Regional Water Board hearing, to avoid repetition (and save paper), please refer to the

Board Agenda package for the EBDA permit reissuance for Regional Water Board staff's responses. All these responses are hereby incorporated by reference.

NOTE: Zone 7's comment letter for the EBDA Tentative Order also applies to the DSRSD Tentative Order. As these permit reissuances are on the same Regional Water Board hearing, to avoid repetition (and save paper), please refer to the Board Agenda package for the EBDA permit reissuance for Regional Water Board staff's responses. All these responses are hereby incorporated by reference.