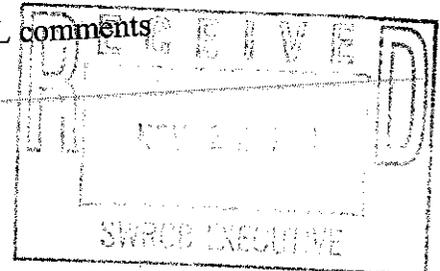


commentletters - POLICY FOR TOXICITY ASSESSMENT AND CONTROL comments

From: Phil Deblasio <pdeblasio@ci.anderson.ca.us>
To: <commentletters@waterboards.ca.gov>
Date: Monday, November 22, 2010 10:13 AM
Subject: POLICY FOR TOXICITY ASSESSMENT AND CONTROL comments
CC: 'Jeff Kiser' <jkiser@ci.anderson.ca.us>



Submitting comments on the below section 5. Monitoring Frequency.

5. Monitoring Frequency

NPDES wastewater and point source WDR dischargers that are continuous dischargers and discharge at a rate equal to or greater than one million gallons per day shall conduct one chronic toxicity test every calendar month for the duration of the permit. NPDES wastewater and point source WDR dischargers that are non-continuous dischargers that discharge at a rate equal to or greater than one million gallons per day shall conduct one chronic toxicity test every calendar month for the duration of the permit, but only during each period of discharge. NPDES wastewater and point source WDR dischargers that are continuous dischargers that discharge at a rate less than one million gallons per day shall conduct one chronic toxicity test per three-month period for the duration of the permit. NPDES wastewater and point source WDR dischargers that are non-continuous dischargers that discharge at a rate less than one million gallons per day shall conduct one chronic toxicity test per three-month discharge period, rounding up whenever the discharge period is not a multiple of three. If required, acute toxicity monitoring shall be conducted at intervals determined by the applicable Water Board.

1. Is the one million gallons per day a dry weather calculation? And if so what if the City reduces its dry weather flow with I&I projects to below 1 MDG, should not the test frequency be changed, regardless of the backsliding policy?
2. The City of Anderson has never fail an acute or chronic bio-assay in the ten years that I have been here. The acute is done quarterly and the chronic is annually. So it seems a bit extreme to increase our chronic to monthly, if anything, maybe quarterly for flows under 5 million. We will, in my opinion continue to pass both, and the funds that are being used for this testing could be put to better use for I&I projects and other CIP projects. So the City, even though in all probability will continue passing these test in the future and considering the anti-backsliding policy puts the City and taxpayer on the hook for these unnecessary cost in lab fees, in our case for years to come.
3. Does the Regional Board have the authority when drafting permits to determine test frequency considering past test results and the nature of our influent?

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