



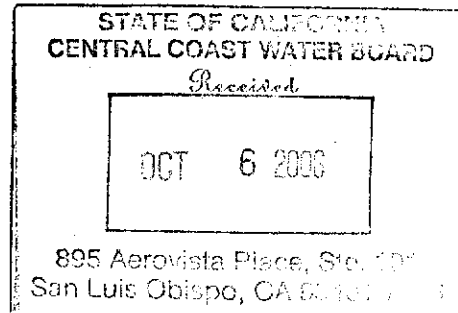
Montecito Sanitary District

1042 Monte Cristo Lane
Santa Barbara, CA 93108
General Manager: Diane M. Gabriel

A Public Service Agency

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October 5, 2006



Mr. Roger W. Briggs, Executive Officer
CA RWQCB
895 Aerovista Place, Suite #101
San Luis Obispo, CA 93401-7906

SUBJECT: Waste Discharge Order No. R3-2006-0084
NPDES Permit No. CA0047899

[COMMENTS LETTER]

Dear Mr. Briggs,

This letter is to provide you with comments on the subject Tentative Order proposed for the Montecito Sanitary District Wastewater Treatment Facility (WDID 3 420107001).

Upon review of the Tentative Order, Montecito Sanitary District Staff have the following comments for your review and consideration:

In Section IV, Effluent Monitoring Requirements, a monitoring schedule of July 2007, June 2008, May 2009, April 2010, and March 2011 is being proposed. The tentative order states that "the Annual Effluent Monitoring shall be collected during dry weather conditions". The District's existing permit requires the Annual Effluent Monitoring to take place in August every year. We have not experienced any wet weather issues with performing the Annual Effluent Sampling in August. We also see no wet weather issues with performing the Annual Effluent Sampling in May, June or July. Upon review of the District's historic rainfall records we find March and April as months of significant rainfall in our area. This could pose a problem in obtaining accurate dry weather sampling conditions. The District would appreciate your consideration of changing the proposed Annual Effluent Monitoring schedule to the following historically dry weather months: September 2007, August 2008, July 2009, June 2010 and May 2011.

In Table IX-1, Minimum Biosolids Monitoring, sampling is required for Priority Pollutants in August 2011. If it is the intention of the Regional Board to have the results of these tests for review and consideration prior to the issuance of the District's next tentative order (2011-2016), it would seem appropriate for the month of the required sampling to be changed to earlier in the year, possibly to May 2011 to coincide with the District's proposed month for Annual Effluent Monitoring.

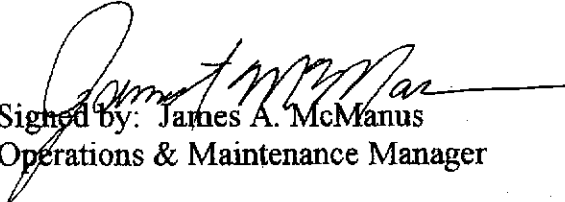
Board of Directors • Charles C. Arnold • Deirdre M. Cannata • Judith M. Ish
Item No. 10 Attachment No. 2
Dec. 1, 2006 Meeting
Montecito Sanitary District

Mr. Roger W. Briggs
CA RWQCB
Re: Waste Discharge Order No. R3-2006-0084
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Lastly, we would appreciate your consideration to revise not only for the Biosolids Monitoring, but the Toxicity, Benthic Biota and Ocean Bottom Sediment Sampling, to coincide with the Annual Effluent Monitoring month for that particular year. This will be more productive and efficient when working with our contract laboratories. Additionally, it would prove to be beneficial in the analysis of the various sampling results, enabling "cause and effect" determinations to be made.

We appreciate your consideration of our comments and requests. Please feel free to contact me if you have any questions.

Sincerely,


Signed by: James A. McManus
Operations & Maintenance Manager

On behalf of: *Diane M. Gabriel, P.E.*
General Manager / District Engineer