

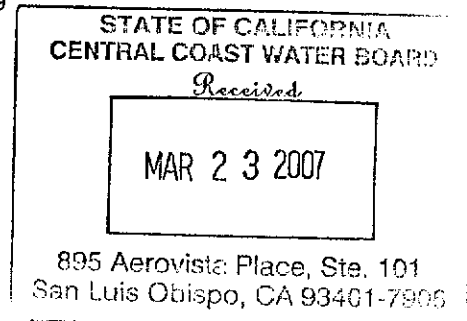
San Simeon Community Services District



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(805) 927-4778 Fax (805) 927-0399

March 22, 2007

Mr. Roger W. Briggs
Executive Officer
Central Coast Water Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA. 93401



Reference: Tentative Draft Waste Discharge Requirements Order No. R3-2007-0024, NPDES Permit No. CA0005274.

Dear Mr. Briggs:

On February 20, 2007 the San Simeon Community Service District (SSCSD) received from the Water Board the tentative draft waste discharge requirements (WDR) and draft NPDES permit. We have considered these revisions to the extent possible, and have found that most of the revisions made by the Water Board are sound, consistent with our analyses, and helpful.

In preparing these comments, we have conferred with ECO Resources, who is the facility operator. The substance of these comments, moreover, reflects the collective experience and judgment of plant operating personnel who have extensive experience with the types of equipment, facilities and operating conditions which exist at the San Simeon Facility.

The Tentative Draft WDR and NPDES permit, which was transmitted by the Central Coast Water Board to the SSCSD on February 15, 2007 states on its cover "The Discharge by the San Simeon Community Service District and the Local Sewering Entity of Hearst San Simeon State Historical Monument" is subject to waste discharge requirements as set forth in this order. The necessity to name the State Historical Monument as part of and within the SSCSD's discharge permit is being questioned. We recommend removing references to the State Historical Monument from the permit as they are considered a "user" similar to that of other entities within the community of San Simeon. The specific references mentioned above are:

- 1) On the cover page
- 2) Page 4, I. Facility Information, Table 4, Facility Information
- 3) Page F3, I. Permit Information, Table F-1, Facility Information


Item No. 23 Attachment 2
May 10-11, 2007 Meeting
San Simeon CSD WWTP-Reissue
NPDES Permit

In addition we request that references to spills found on Fact Sheet, page F6, D. Compliance Summary, Table F-5, Compliance Summary, caused by the force main, pumping station, or holding tank maintained by the State Historical Monument are removed from the Order. As stated on page F-9 of the Fact Sheet the spills were caused by a force main owned and operated by the State of California Department of Parks and Recreation.

The Monitoring and Reporting Program (MRP), on Page E-4, IV. Effluent Monitoring Requirements, A. Monitoring Location EFF-001, Table E-3. requires that Daily Flow will be monitored at EFF-001. The facility currently has the designed capability to monitor influent flow which the Water Board has found acceptable over the course of the existing permit. We recommend a modification to the draft permit to allow for influent monitoring as an acceptable method for providing the Daily Flow Parameter found in Table E-3 mentioned above.

SSCSD appreciates the opportunity to submit these comments. We would welcome the opportunity to meet with you or any of your staff to discuss any aspect of these comments or the proposed permit documents.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charles Grace', followed by a horizontal line extending to the right.

Charles Grace
General Manager
San Simeon Community Service District

CC: San Simeon Board of Directors
Rob Schultz, San Simeon Council