



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Service
Monterey Bay National Marine Sanctuary
299 Foam Street
Monterey, CA 93940

STATE OF CALIFORNIA
CENTRAL COAST WATER BOARD

Received

MAR 26 2007

895 Aerovista Place, Ste. 101
San Luis Obispo, CA 93401-7800

March 22, 2007

Roger Briggs
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

SUBJECT: Comments on San Simeon Community Services District,
San Luis Obispo County, under NPDES Permit No. CA0005274

Dear Mr. Briggs:

The Monterey Bay National Marine Sanctuary has reviewed a draft of the National Pollutant Discharge Elimination System (NPDES) Permit No. CA0005274 for the San Simeon Community Services District wastewater facility located in San Simeon, California. The Sanctuary reviewed the draft NPDES permit under its authority defined at 15 CFR Sections 922.49 and 922.134 (b), and procedures defined in Section V.E. of the memorandum of Agreement on water quality protection within the Sanctuary (June 1992).

The permit authorizes the San Simeon Community Services District and the local sewerage entity of Hearst San Simeon State Historical Monument to discharge an average of 0.2 million gallons per day of dry weather flow and an average of 0.45 MGD of peak wet weather flow of secondary treated wastewater into the National Marine Sanctuary. Issuance of this NPDES permit, proposed under Central Coast Regional Water Quality Control Board (RWQCB) under NPDES Permit No. CA0005274, is essentially a continuation of discharging operations at the permittee's wastewater treatment plant.

It appears from the Fact Sheet (Page F-6) under section "D. Compliance Summary" which presents a summary of all spills, effluent limitation violations and failures to report required data that this discharger has had approximately ninety-one instances of non-compliance over the previous five-year permitting cycle. This level of non-compliance and spill violations is unacceptable and positive steps to remedy the situation should be identified in the permit. The staff report indicates "that all of the spill violations have occurred as a result of an aging force main from the San Simeon State Park Hearst Castle Visitor Center that conveys wastewater to the treatment facility". However, section "E. Planned Changes" (page F-9) indicates that no changes are proposed at the facility during the term of this permit. This apparent oversight seems perplexing. MBNMS staff asks that the discharger investigate and develop a plan for upgrading their aging systems to ensure the protection of the quality of nearshore marine waters in the MBNMS.

Item No. 23 Attachment 3
May 10-11, 2007 Meeting
San Simeon CSD WWTP-Reissue
NPDES Permit

MBNMS-2007-006

We expect that the San Simeon Community Services District recognizes the need for, and value of, a healthy marine ecosystem, as both the MBNMS and the RWQCB facilitate multiple uses of the marine ecosystem that are compatible with resource protection (including wastewater management). Properly managing a wastewater facility is a necessary element of sound coastal stewardship, and is necessary to ensure that essential recreational uses, such as surfing, kayaking, boating, whale watching, fishing, research and beach walking are not compromised. Therefore we request that the discharger begin the process of investigating necessary upgrades and prepare a plan and timeline for doing so.

It should be noted that the regulations for the Monterey Bay National Marine Sanctuary at 15 CFR Part 922.132 prohibit discharges from within the boundaries of the MBNMS. Discharges occurring outside the MBNMS that subsequently enter and injure Sanctuary resources or qualities are similarly prohibited. In order to protect the health of the MBNMS, we request that the Regional Board amend the draft permit (under Section E, page D-7) to require that the permittee also immediately notify our office at 888-902-2778 of any spills that are likely to enter ocean waters.

Assuming that our comments are implemented into the draft Order, and on the basis of conditions defined in the draft permit the Sanctuary does not object to the issuance of this NPDES permit [15 CFR section 922.49(e)]. Please send a copy of the signed permit to the Sanctuary office after the Regional board adopts it at the May 11, 2007 public hearing.

Thank you for the opportunity to review the NPDES permit. If you have any questions regarding our comments please contact Ms. Deirdre Hall in the MBNMS office by phone at 831-647-4207 or via email at deirdre.hall@noaa.gov. Thank you for your cooperation with the Monterey Bay National Marine Sanctuary.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Grimmer', written in a cursive style.

KAREN GRIMMER
Acting Superintendent

cc: D. Bizot, NMSP