



July 12, 2006

Via Electronic Mail and Facsimile-w/o-Enclosures (510) 622-2460

Bruce Wolfe, Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612
Attn: Lila Tang

Subject: Comments on Tentative Orders reissuing East Bay Dischargers Authority (EBDA) and City of Livermore NPDES Permits

Dear Mr. Wolfe:

The City of Livermore appreciates the opportunity to comment on the Tentative Orders reissuing the EBDA and City of Livermore NPDES permits. Treated effluent from the City of Livermore and Dublin San Ramon Services District is transported via the Livermore Amador Valley Water Management Agency (LAVWMA) pipeline to the EBDA system for ultimate disposal with treated wastewater from the EBDA member agencies in the San Francisco Bay through the EBDA outfall. The City has worked closely with EBDA and DSRSD during the permit renewal process so that the permits for the three agencies would reflect the historic and ongoing common compliance monitoring practices of the permittees.

EBDA and the Bay Area Clean Water Agencies (BACWA) have submitted separate comment letters on the Tentative Order for the EBDA NPDES permit. The City of Livermore supports and incorporates by reference the comments made by EBDA and BACWA in their comment letters.

The minor changes consistent with those requested by EBDA are provided in the attached redline version of the attached Tentative Order. The City offers the following additional comments that are specific to the Tentative Order reissuing the City of Livermore NPDES permit. The City anticipates that these comments, together with those of EBDA and BACWA, will result in changes being made to the tentative order prior to issuance of the final City of Livermore NPDES permit.

Table 1 Facility Information Footnote (2)

Request that this footnote be deleted. Zone 7 is not expected to contribute groundwater reverse osmosis reject flow to the City of Livermore during the term of this permit. The footnote appears to be relevant only to DSRSD.

Table 1 Facility Information Footnote (3)

Request this be changed to Footnote (2) after deleting original Footnote (2), and add the following sentence to beginning of text: *Livermore has 12.4 mgd contractual peak wet weather capacity to convey treated wastewater to the LAVWMA storage and pumping facilities.*

The intent of this change is to clarify that the 12.4 mgd refers to conveyance capacity. As shown in Table 1, it could be misconstrued as treatment capacity. Alternatively, the City would support deleting the PWWF line item in Table 1. Peak wet weather flow information is clearly described in the Fact Sheet.

Attachment F – Fact Sheet, II.F.4. Zone 7 Water Agency Demineralization and Reject Disposal Project.

The discharge by Zone 7 of groundwater reverse osmosis reject flow to the City of Livermore is not expected to occur during the term of this permit. Request the last sentence of the last paragraph be replaced with the following sentence to reflect this: *This is not likely to occur during the term of this permit but may occur in the future depending on Zone 7 decisions regarding the need for and timing of additional demineralization capacity and where the facilities would need to be sited.*

Please call me at (925) 960-8120 if there are any questions..

Sincerely,



Darren Greenwood
Water Resources Manager
Public Works Department

cc: Dave Requa, DSRSD
Chuck Weir, EBDA
Dan McIntyre, City of Livermore
Tom Hall, EOA

Enclosures

1. Redline/Strikeout Version of Tentative Order
2. Clean version of Tentative Order