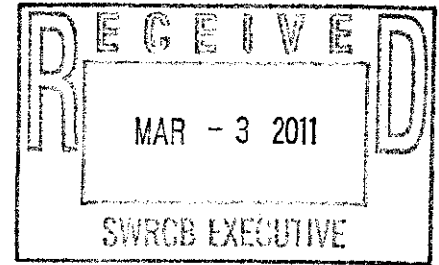




March 3, 2011



Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, Sacramento, CA 95814

Sent via electronic mail to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov).

**Subject: Comment Letter - San Francisco Bay Enterococcus Water Quality Objectives**

Dear Ms Townsend:

Thank you for the opportunity to comment on the proposed approval of Resolution No. R2-2010-0066, a Basin Plan Amendment establishing enterococcus water quality objectives for marine and estuarine waters designated for contact recreation. These objectives will lead to revisions of effluent limitations for bacteria in NPDES permits for Bay Area publicly-owned treatment works (POTWs).

Having assisted in the reissuance of a number of Bay Area POTW NPDES permits that encompass a wide variety of discharge conditions, we are concerned about the language added to Section 4.5.5.1 that would require all such permits to include applicable effluent limits from Table 4-2A. While Table 4-2A indicates which limits are applicable to a number of certain specified discharge conditions, it does not address the full range of scenarios currently accounted for in Table 3-1.

We understand that the purpose of this Basin Plan amendment is to add enterococcus water quality objectives to protect the water contact recreation beneficial use in marine and estuarine waters rather than to overhaul the Basin Plan's bacterial indicator objectives and address all beneficial uses. It appears, therefore, that eliminating the potential implementation of those objectives from Table 3-1 that are not directly addressed in Table 4-2A was most likely an oversight.

We recommend that the amendment be revised as follows in order to avoid any unintended consequences (revisions are shown in bold double underline/strike-out):

#### **4.5.5.1 LIMITATIONS FOR CONVENTIONAL POLLUTANTS**

**Table 4-2 contains effluent Effluent limitations for conventional pollutants are ~~contained in Table 4-2~~ for discharges to inland surface waters and enclosed bays and estuaries within the region.**

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Table 4-2A contains both daily maximum and longer-term effluent limitations for bacteriological indicator organisms. All NPDES permits for discharges that contain sanitary waste shall include the applicable effluent limitations from Table 4-2A. If specific discharge conditions are not addressed by Table 4-2A, water quality-based effluent limitations may be derived directly from objectives included in Table 3-1. The water quality-based effluent limitations in Table 4-2A may be adjusted to account for dilution in a manner consistent with procedures in the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (see footnotes 'a' and 'e' in Table 4-2A).

Thank you for consideration of these comments.

Sincerely,



Andy Eggleston  
Environmental Engineer

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