



May 12, 2011

Mr. Bruce Wolfe, Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Floor 14
Oakland, CA 94612

RE: Clarifications to Order R2-2011-0009, Amendment of Waste Discharge Requirements for Dischargers with Pretreatment Program Requirements

Dear Mr. Wolfe:

This letter is to clarify provisions of Order R2-2011-0009, Amendment of Waste Discharge Requirements for Dischargers with Pretreatment Program Requirements, which was adopted by the San Francisco Bay Regional Water Quality Control Board (Regional Water Board) on March 9, 2011. Section 2 (“Influent and Effluent Monitoring”) in Appendix H-4 states that:

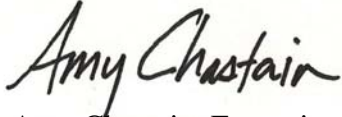
The Discharger shall monitor for the parameters using the required sampling and test methods listed in the pretreatment table of the MRP... Influent and effluent sampling locations shall be the same as those sites specified in the MRP. *The influent and effluent samples should be taken at staggered times to account for treatment plant detention time.* Appropriately staggered sampling is considered consistent with the requirement for collection of effluent samples coincident with influent Provisions samples in *Section III.A.3.a(2) of Attachment D.* (Pages H-13 – 14, emphasis added).

An April 27, 2011 email correspondence with Ms. Lila Tang, Chief of the Wastewater Control Division, clarified two aspects of this provision. First, it explained that the staggering of samples is preferred but not mandatory. This preference for staggered monitoring to account for detention time was added after the close of the Tentative Order comment deadline and the lengthy, collaborative discussions that led to the revision of Attachment H. BACWA member agencies, therefore, did not have an opportunity to adequately communicate concerns about the significant logistical challenges involved in staggered sampling or the limited information that would be generated from it. We appreciate the Regional Water Board’s recognition that the decision to conduct staggered sampling rests with each agency.

Second, the April correspondence confirmed that the reference to “Section III.A.3.a(2) of Attachment D” is a typographical error. The reference should instead read “Section III.A.3.a(2) of Attachment G,” which requires that permittees collect effluent on days coincident with influent sampling.

Please contact us immediately if we have misread or misunderstood these provisions.
Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink that reads "Amy Chastain". The signature is written in a cursive, flowing style.

Amy Chastain, Executive Director

CC:

Lila Tang, Wastewater Control Program Chief
Robert Johnson, Senior Environmental Scientist
Ben Horenstein, BACWA Executive Board Chair
James Ervin, BACWA Permits Committee Chair