

VOLUME 1-1

LETTER OF TRANSMITTAL

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December 2, 2002

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SUBJECT: Submittal and Executive Summary of Application for the
NPDES Permit

REFERENCE: Existing Permit No. CA0110604

This application reflects the decision of our Board of Directors to withdraw its 301(h) waiver and achieve the secondary treatment standard at the earliest possible date. The application is drafted in accordance with the directives contained in Resolution 02-14 adopted by the OCSD Board of Directors:

A RESOLUTION OF THE BOARD OF DIRECTORS OF ORANGE
COUNTY SANITATION DISTRICT ESTABLISHING THE POLICY
FOR LEVEL OF TREATMENT OF WASTEWATER DISCHARGED
INTO THE OCEAN

BE IT RESOLVED by the Orange County Sanitation District Board of Directors that it is the District's policy to treat all wastewater discharges into the ocean to secondary treatment standards, thereby providing for continued public safety, marine ecosystem protection and water reclamation opportunities.

NOW, THEREFORE, the Board of Directors of Orange County Sanitation District,

DOES HEREBY RESOLVE, DETERMINE, AND ORDER:

Section 1: District staff is directed to immediately proceed with the planning, design, and implementation of treatment methods that will allow the agency to meet Federal Clean Water Act secondary treatment standards.

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Section 2: District staff shall prepare and adopt a plan of work for facilities to meet secondary treatment standards, and submit the necessary documentation to EPA and the State of California, with the expressed purpose of eliminating a waiver under Section 301(h) of the Federal Clean Water Act.

Section 3: District staff is directed to expeditiously negotiate permit terms and conditions that will accomplish the inter-related goals of achieving secondary treatment standards, eliminating the need for a Section 301(h) Clean Water Act permit, and minimizing the risk of enforcement liability during the transition period from the present effluent standards to secondary treatment standards.

PASSED AND ADOPTED at a regular meeting held July 17, 2002.

Submitted herewith are the original and one copy of the Orange County Sanitation District's application for renewal of its National Pollutant Discharge Elimination System (NPDES) Permit. The District will no longer operate under the provisions of Section 301(h) of the Clean Water Act and will voluntarily move to operate under the provisions of existing federal regulations for secondary treatment and the California Ocean Plan. An electronic copy with all documents in portable document format (PDF) is included for your convenience.

This action signals a monumental change in our NPDES permit as directed by our Board of Directors on July 17, 2002 when they voted 13 to 12 to move expeditiously to meet the secondary treatment standard. As the largest holder of a 301(h) permit, this action triggers a new direction for OCSD. We are the first large agency to electively forego the renewal of a waiver from secondary treatment. This major change in operating philosophy will require cooperation from regulators and the public as we move forward to negotiate the terms and conditions of the next permit. We understand that the regulators seek to work with OCSD in a cooperative, non-punitive manner. Our discussions to-date have occurred in that spirit of cooperation and we look forward to successfully completing the negotiations in the near future.

The renewal application has been completed and submitted by the statutory deadline of December 8, 2002, 180 days in advance of the expiration of our current permit. Our staff and consultants will be available to assist in the review process, and we will provide a timely response to any supplemental information requests from your staff. We respectfully urge EPA and the
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California Regional Water Quality Control Board, Santa Ana Region (RWQCB), to maintain close contact with our staff throughout your review so that we can answer questions that arise during the course of your evaluation. We hope that the renewal application can be expeditiously reviewed by EPA and the RWQCB and that a new NPDES Permit renewal containing interim limits that can be achieved during the transition period as the District plans, designs, constructs and commissions additional secondary treatment facilities to meet the 30 mg/L and 85% removal standards for both biochemical oxygen demand and total suspended solids.

SUMMARY

This submittal letter serves a dual purpose. It formally transmits our application to EPA Region 9, the RWQCB, and the State Water Resources Control Board (SWRCB). This letter also provides you with an Executive Summary of the application. The application seeks to provide the regulatory agencies with complete information sufficient to issue the permit on its technical merits.

COMMITMENT TO WASTEWATER AND WATERSHED EXCELLENCE

In response to the decision by OCSD's Board of Directors to upgrade the level of wastewater treatment and meet the secondary treatment standard, the staff has committed to maintain its high level of excellence in wastewater treatment and watershed protection throughout the process. This will include optimizing the existing wastewater treatment facilities to achieve significantly higher biochemical oxygen demand and total suspended solids removal during the interim period. This treatment ramp-up phase is discussed in detail in the Operational Plan found in Appendix Q. The District is further committed to maintain its high rate of compliance with all state and federal laws and regulations controlling wastewater treatment discharges including the industrial pretreatment program, effluent limits, and the prevention and response to sanitary sewer overflows.

Finally, OCSD remains committed to its watershed and water reclamation activities, most notably the Groundwater Replenishment System (GWRS). The GWRS project is scheduled to come online near the end of the permit period,

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and more details about the project are found in Appendix O. OCSD will continue its involvement in numerous other watershed activities. One important new activity is the urban runoff program designed to prevent pathogen-laden dry-weather urban runoff flows from reaching high-use recreational waters. This program and others are discussed in detail in Appendix R.

LEGACY OF THE CLEAN WATER ACT 301(h) WAIVER PROGRAM

Clean Water Act Historical Perspective

In 1972, the U. S. Congress amended the Federal Water Pollution Control Act requiring all publicly owned treatment works (POTWs) to achieve, by July 1, 1977, secondary treatment as defined by the U. S. Environmental Protection Agency (EPA). This landmark legislation, known as the Clean Water Act (CWA), included many other provisions that were aimed at providing a national baseline for states to follow in regulating wastewater discharges. These provisions included a national permitting requirement (National Pollutant Discharge Elimination System, NPDES program) that can be administered by individual states with oversight by EPA, a national industrial pretreatment program, and an enforcement scheme containing stringent fines for violations.

Secondary Treatment Defined

In 1973, EPA defined secondary treatment in terms of four parameters - biochemical oxygen demand (BOD), suspended solids (TSS), pH, and fecal coliform bacteria. EPA established minimum removal requirements of 85% for both BOD and TSS with an effluent quality of 30 milligrams per liter (mg/L) or better on a monthly average (the 30/30 rule) in the final effluent to be discharged. (Note: exceptions would be granted for certain dischargers who had oxidation ponds or trickling filters to meet a minimum of 45 mg/L for BOD and TSS). Later that year, the fecal coliform bacteria criterion was deleted from the standard.

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Ocean Dischargers Ask for Exceptions Based on Water Quality Justification

With the enactment of the CWA and requirement for secondary treatment, a number of municipalities, primarily from the West Coast, argued before both the Congress and EPA that secondary treatment of municipal estuarine and ocean discharges is not necessary to protect the marine environment or to assure the attainment and maintenance of water quality or beneficial uses in ocean waters. The argument was based on the pollutant parameters being used to define secondary treatment (BOD and TSS).

These parameters are important for freshwater ecology where the discharge of oxygen-demanding wastes and sedimentation of suspended solids degrades the quality of enclosed water bodies or rivers which receive excessive waste loads. In estuaries and the ocean, organics and fine solids are rapidly assimilated and dispersed by strong currents and the much greater assimilative capacity. The agencies successfully argued that, where local conditions existed to provide for adequate assimilation of wastewater discharged from outfalls, secondary treatment was not needed and should be exempted from the Act on a site-specific basis.

As a result of evidence and testimony presented before Congress, the CWA was amended in 1977, adding section 301(h), which provides that

“the Administrator of EPA, upon application by a POTW and with the concurrence of the State, may issue an NPDES permit which modifies EPA’s secondary treatment requirements if the applicant: (1) discharges into certain ocean and estuarine waters; and (2) demonstrates, to the satisfaction of the administrator, that the modification will not result in any increase in the discharge of toxic pollutants or otherwise impair the integrity of the receiving waters.”

Testimony to Congress included scientists from Scripps Institution of Oceanography in La Jolla, California and numerous other experts who had been studying wastewater discharge effects on the ocean. Also, the largest contingent of POTWs seeking the legislative relief were from California which had already adopted a comprehensive state regulatory program, The Water

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Pollution Control Plan for Ocean Waters of California (California Ocean Plan). The California Ocean Plan regulated toxic constituents in wastewater rather than the effluent concentrations of organic nutrients in wastewater (BOD) by established receiving water objectives for maintaining ambient levels of dissolved oxygen. Suspended solids requirements were established at a 75% removal rate or that which could be achieved by advanced primary treatment (versus the 85% removal required by EPA).

California's legislation and research into water quality protection was a key factor in helping Congress decide to enact Section 301(h) of the Clean Water Act in 1977. The congressional amendment was enacted after an evaluation of the merits requiring secondary treatment for ocean dischargers when the circumstances of discharge provided sufficient distance, depth, and dilution to protect the environment with primary, chemically-enhanced primary treatment or a blend of primary and secondary treatment.

One-Time Application for 208 Dischargers Nationwide

EPA finalized the rules and regulations for applying for a 301(h)-modified NPDES permit in 1979 and allowed a one-time application for a site-specific permit based on local environmental conditions for dischargers which were not already providing secondary treatment. Each POTW which applied had to prepare a comprehensive application containing specific information responding to a detailed set of criteria and questions published in the Federal Register. By the application filing deadline in the fall of 1979, 208 applications were received by EPA. California had the most applicants with 69, of which 45 came from dischargers within the San Francisco Bay estuary.

The Orange County Sanitation District was among those agencies originally applying as did most of the ocean dischargers who were providing less-than secondary treatment and were meeting the requirements of the COP.

Intensive Technical Review Narrows the Field of Applicants

An intensive technical review of the original applications was initiated by EPA with the assistance of contract consultants with expertise in various aspects of marine science (oceanography, biology, hydraulic modeling, fisheries, etc.).

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The review process, record of decision, public noticing and subsequent public hearings (for those applicants who received Tentative Approval) took years. Of the original applicants, only a handful (now numbering 37) were eventually granted 301(h)-modified permits which are still being maintained. Of the 208 applications that EPA received, some 40 were revised and resubmitted. After review, two-thirds of the applications were denied. Some of these denied were revised and resubmitted. Final decisions resulted in the approval of less than fifty of the original applications. Some 65 applications were voluntarily withdrawn.

Orange County Sanitation District 301(h)-modified NPDES Permit History

OCSD was among those original applications which received final approval and were issued permits. OCSD (previously operating as the County Sanitation Districts of Orange County) received its first 301(h) waiver permit in 1985. This original permit was subsequently renewed (based on a 1989 renewal application) in 1998 for the statutory five year period. Under the provisions of this permit, an intensive ocean monitoring program is conducted along with monitoring of influent and effluent for toxic and conventional pollutants. Provisions of the permit have required the District to conduct a non-industrial source control program and a more intensive industrial pre-treatment program to make sure toxic pollutant levels in the effluent meet removal rates equivalent to secondary treatment.

Year 2003 Renewal Process

As part of the decision whether to file for renewal of its 301(h) modified NPDES permit, the District conducted an update to its 1999 Strategic Plan and Program Environmental Impact Report which reviewed various treatment options, their costs, and environmental impacts. An intensive public outreach program was included in this effort. In the end, the Board of Directors voted to move expeditiously to meet the federal secondary treatment standard and end participation in the 301(h) waiver program. However, as indicated in the Strategic Plan Update, it was anticipated that achieving full secondary standards could take as long as 11 years for planning, design, construction, and start-up operations. Meanwhile, staff has initiated a program to optimize the performance of existing facilities to achieve the highest quality effluent quality in the interim.

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Legal Dilemma Faced by OCSD

At the time 301(h) regulations were developed, there was no provision for positive incentives in the NPDES permitting program to encourage agencies to voluntarily decide to give up a waiver permit and move to the secondary treatment standard. Once out from under the shield of that provision of the CWA, non-compliance with the provisions of secondary treatment becomes automatic under a new permit, and the situation requires an interim compliance mechanism to assure continued compliance.

EXISTING DISCHARGE – THIS APPLICATION

Our application for a new NPDES permit is comprehensive in nature. Coincident with the thirtieth anniversary of the Clean Water Act, OCSD is electing to move toward the 30/30 standard. As we embark on a major capital improvement program to upgrade to the higher level of treatment interim effluent permit limits must be developed. We have demonstrated our treatment facilities capabilities in an Interim Operational Plan (Appendix Q) that covers the next five years. During this period, we will be upgrading some existing secondary treatment facilities, and this will impact our effluent quality.

In addition, we are partners in a major regional wastewater reclamation project with the Orange County Water District known as the Groundwater Replenishment System. This \$470 million project is now in design, and if it moves ahead on schedule, is scheduled to be online by 2007. At that time, up to 100 million gallons a day of secondary effluent will be diverted for advanced treatment. Part of the process will be reverse osmosis treatment that will generate concentrates which will be high in salts and ammonia-nitrogen. This process stream may be suitable for direct blending with the final effluent for ocean disposal. We will be seeking consideration in our permit for accommodation of this project in our new NPDES Permit.

Our comprehensive permit application consists of two volumes. Volume 1 is the basic application using the standard NPDES forms and a demonstration of compliance with the requirements of Section 403(c) of the Clean Water Act. We have also provided an Antidegradation Analysis which may be helpful to the two regulatory agencies involved in demonstrating that our proposed discharge will be protective of beneficial uses and water quality.

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Volume 2 contains supporting information in 18 Appendices designated as A through S. Appendix A contains supporting information on compliance and beneficial use protection that is consistent with what has historically been provided to support our NPDES permit application. This information provides some historical perspective during the transition period as we move to 30/30 standards. Appendix B describes our existing treatment facilities and ocean disposal facilities, while Appendix C describes what facility improvements and operational plans we will be undertaking in the next five years to move to 30/30 standards.

Appendix D provides a comprehensive overview of our receiving water monitoring results during the current NPDES permit (issued in 1998). This also includes information on marine mammals, birds, and endangered species which are not included in our monitoring program but of importance to our own water quality protection goals.

Appendix E consists of a Beneficial Use Assessment which provides quantification of the beneficial uses identified in our present permit and provides some very interesting data on the economic value of offshore fisheries, the participation in various activities dependent upon the marine environment, and an assessment of how beneficial uses are being protected.

Our staff has spent a great deal of effort reviewing the existing NPDES permit and what they have learned during the past four years implementing its provisions. Based on these insights and experience, we have proposed revisions for the next permit which we believe are in the public interest and make more sense in assuring smooth implementation of the next permit. These revisions are shown in a mark-up of the existing permit in Appendix G. The existing permit, including the recent modifications associated with the District's disinfection program, and monitoring program have been included for reference as Appendix F.

Toxic pollutant reduction has been a hallmark of the District's wastewater management program, and Appendix (H) highlights the quality of our effluent and describes our award-winning source control program.

Effluent toxicity and ammonia management are of increasing interest to our management efforts as concentrations have increased during the current drought and our treatment facilities are optimized. Our efforts to identify

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solutions to managing nitrogen and minimizing toxicity are described in Appendix J.

Prior to making its landmark decision in July, the District undertook a public outreach and planning update program to update its 1999 Strategic Plan. This effort evaluated alternatives for treatment, updated their environmental impacts and costs and solicited community input on what direction our agency should take in the future. These efforts are summarized in the comprehensive staff report to our Board of Directors which is presented as Appendix K.

The California Ocean Plan, the State's water quality management plan which sets baseline standards for all ocean discharges, is contained in Appendix L. The amount of dilution provided for our treated effluent is an important consideration in assuring that water quality standards are met and that beneficial uses are protected. Also, the determination of initial dilution is important to the implementation of the California Ocean Plan water quality standards. Appendix M contains a detailed analysis of initial dilution calculations based on our ocean monitoring data and historical and projected flows.

There are several important water supply projects under development in our service area in which the District is a partner or that may have an impact on the District's operations. Of key importance is the Groundwater Replenishment System (GWRS), our partnership reclamation project discussed previously. More details on this \$427 million dollar project are described in Appendix N. Of note are the interdependencies of the District's operations (providing high quality secondary effluent for advanced treatment and managing backwash from microfiltration facilities and concentrates from reverse osmosis treatment) and the Orange County Water District's operation of the advanced treatment facilities on their adjoining property. Some regulatory considerations for this integrated operation will be needed as we proceed toward implementation of this unprecedented project to make Orange County less dependent upon imported water.

The second project of potential importance and consideration is a proposed seawater desalination facility proposed at the AES power plant in Huntington Beach by Poseidon Resources. The District is aware of claims that the quality of the source water (once-through cooling water) for this potential drinking water supply is adversely affected by the discharge from the District's ocean

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outfall. We believe that this is no longer an issue with the addition of disinfection facilities to the District's treatment train. Oceanographic and water quality studies performed by the project proponents and the District indicate there is no impact from our discharge. More information on this project is provided in Appendix O.

Appendix P contains information on EPA's effluent trading policies. We present this information in the hope that the permit will provide effluent quality credits in recognition of the positive impacts associated with our Environmental Stewardship programs (described in Appendix Q). It is possible that permit compliance issues may arise during the term of this permit that might be affected by our handling of other waste streams that are diverted and treated from other locations in the watershed of the Santa Ana River.

Our Operational Plan, developed in response to our Board's July 17, 2002 mandate to improve treatment as expeditiously as possible is presented in Appendix Q. This Plan details the actions that the District is taking in the short-term to ramp up our existing treatment facilities and optimize their performance until we construct new facilities to achieve 30/30 standards. The focus of this Plan covers the next five years (new permit period). The Plan includes an estimate of our estimated effluent quality over time as various facility changes occur and the GWRS project becomes operational in late 2007. Also, we have proposed in the Plan (Table 3 of Appendix Q) interim effluent limitations for consideration in the drafting of a new permit.

OCSD has demonstrated leadership with our Environmental Stewardship program which embodies a diverse group of water quality protection programs. These various programs include sponsorship of water conservation programs (toilet and showerhead retrofitting) to reduce our flows and save energy; cooperative programs with our member agencies to fund projects to reduce infiltration and inflow, peak wet weather flows, and defer the need for a new ocean outfall and new facilities; the dairy washwater pilot project that helps to prevent these high-strength wastes from entering the Santa Ana River; our biosolids management program and new Environmental Management System; and finally, our urban runoff management program to help protect coastal water quality. These programs are described in Appendix R.

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Appendix S contains a copy of the Short-term Ocean Outfall Bacteria Reduction Plan. This plan was provided to the regulators prior to the adoption of the modified ocean discharge permit on July 19, 2002, and it is included for reference purposes.

THE FUTURE OF WASTEWATER TREATMENT AT OCSD

Updated Capital Improvement Program - Alternative C (Full Secondary)

The 2002 Strategic Plan Update evaluated four alternatives for treatment. Two of these were for levels of treatment equivalent to secondary treatment (Alternatives C and D). Alternative C represents wastewater treatment processes to produce an outfall effluent quality that meets secondary treatment standards of 30 mg/L BOD and 30 mg/L TSS. Alternative D was based on the use of microfiltration which cannot achieve the 30 mg/L BOD without additional biological treatment which increases the costs above those of conventional secondary treatment. However, it has the capability of significantly reducing pathogens and thus has lower costs for pathogen reduction than conventional treatment. In its July 17, 2002 decision, the Board of Directors left the question of the appropriate technology to meet the secondary treatment standard open to a future decision based on continuing planning and research now underway.

To meet projected treatment needs based on the flows forecast in the Updated Capital Improvement Program (UCIP), new grit chambers, primary clarifiers, aeration basins, secondary clarifiers, dissolved air floatation (DAF) tanks, digesters, holding tanks, belt filter presses, cake storage facilities and pathogen reduction facilities are needed at both treatment plants. Details on the specific facilities mentioned are presented in Appendix C.

Microfiltration Research

The District is continuing to evaluate an alternative means of treating wastewater to achieve 30/30 standards. This alternative treatment technology is microfiltration. A demonstration project has been in operation at Plant No. 2 to demonstrate the effectiveness of this technology. Its main advantage is the high solids and bacterial removals achieved. If the removals of BOD and solids backwash handling can be resolved, this technology may be a far more environmentally beneficial technology compared to conventional activated

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sludge technologies. To further explore this option, the Board of Directors recently approved over \$1 million in additional funding for verifying the effectiveness of this technology and getting more detailed information that could be used for design purposes. Ongoing research will not delay projects necessary to achieve the secondary treatment standard.

Planning for Secondary Treatment

There are several factors that have led the District to an initial estimate of 11- years for implementation of full secondary treatment standards. In addition to the time required for design and construction of additional secondary treatment capacity, the District must undertake more detailed planning and scheduling to coordinate secondary treatment expansion with future and on-going projects. Other factors are discussed below.

OCSD Must Maintain its Current Operations and Level of Service During Construction.

The treatment plants are currently undergoing significant rehabilitation. Of the \$1.9 billion proposed 20-year Capital Improvement Program (CIP), only 25% is for additional capacity to handle increased sewage flows. The remainder is for rehabilitation and improved treatment of existing facilities. Major plant projects that are presently under construction or in design, will occupy nearly all the open space at our two treatment plant sites through 2006 for contractor staging, storage, and work areas. These projects do not include projects to increase the District's secondary treatment capacity. Maintaining our operations while major construction is underway is challenging as tie-ins are made and flows must be lowered to accommodate these tie-ins.

Detailed Planning for Expansion of Secondary Treatment Capacity Requires Answering Some Big Questions Prior to Designing and Constructing Additional Secondary Treatment Facilities

Our staff and consultants are addressing some of the major questions in the near future. These include:

- What impacts will new wastewater programs such as future water reclamation and urban runoff diversions have on secondary treatment technology to be used?

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- How will OCSD meet new permit requirements such as effluent toxicity?

Also, as discussed above, alternative technologies such as Microfiltration need further research for incorporation into secondary treatment expansion plans.

OCSD Needs to Evaluate its Infrastructure to Understand All of the Improvements Necessary to Support Full Secondary Treatment

Improvements to plant systems such as electric power generation and distribution, odor control, solids handling, and automation systems must be planned and designed to accommodate full secondary treatment.

The Current Capital Improvement Program is Being Reorganized to Allow Efficient Use of Existing OCSD Resources

We must maximize the use of existing District resources (facilities, personnel, infrastructure, etc.), existing District lands, and existing and proposed funding if we are to be efficient in our efforts to move to a higher level of treatment. We also must minimize problems due to the anticipated number of construction contractors on-site at any one time, and potential conflicts with existing levels of sewerage service.

The District's Engineering Department has reorganized and has brought a Program Management Consultant (IPMC, a joint venture of CH2MHill and Parsons) on-board for a five-year initial contract for \$15 million. The new organization and additional consultant resources will allow the District to optimize our planning and delivery and will provide manpower to plan and execute the many projects necessary for full secondary treatment expansion.

With the Board's decision to move this agency to a higher level of treatment, the Engineering Department is beginning a comprehensive planning effort to assess and revise our existing Capital Improvement Plan (CIP). The assessment will consist of evaluating each existing project's scope, schedule, budget, resource needs, and priority and to then include any new projects that are identified to get us to that higher level of treatment. The result, in the spring of 2003, will be a refined CIP that will become both the basis of our negotiations with the regulators regarding our commitment to compliance with

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the new standards, as well as the detailed plan for the Engineering Department's work for the next decade or so.

During the next few months, we will be finalizing our assessment process and will be supplementing our permit application with the final Plan developed during the process. This may result in some modifications to our application as we move forward and fine-tune our long-term Capital Improvement Plan and Operational Plan.

CLOSING

This application was developed to provide the EPA and RWQCB with comprehensive information necessary to renew OCSD's wastewater treatment permit. We are ready to provide additional information, as necessary, for you to complete the renewal process. We will be glad to meet with you to discuss the particulars of the tentative permit and monitoring program. Traditionally, OCSD, EPA, the RWQCB, and interested members of the public have worked together to develop reasonable and acceptable permit and monitoring terms and conditions. We renew our commitment to that process, and we look forward to continuing our history of cooperation.

Please contact Robert Ghirelli or Jim Colston from our staff at (714) 593-7400 and (714) 593-7458, respectively.

Blake P. Anderson
General Manager

Shirley McCracken
Board of Directors, Chair

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Enclosures

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