

BAY AREA

Air Quality

MANAGEMENT

DISTRICT

April 26, 2016

Laurie Taul

California Regional Water Quality Control Board

San Francisco Bay Region

151 Clay Street, Suite 400

Oakland, CA 94612

ALAMEDA COUNTY Tom Bates Margaret Fujioka Scott Haggerty Nate Miley Subject: Initial Study and Mitigated Negative Declaration (IS/MND) for the Adoption and Implementation of General Waste Discharge Requirements (General WDRs) for Confined Animal Facilities including the Re-opening of an Existing Dormant Facility (Project)

CONTRA COSTA COUNTY

John Gioia David Hudson (Secretary) Karen Mitchoff Mark Ross

MARIN COUNTY Katie Rice

NAPA COUNTY Brad Wagenknecht

SAN FRANCISCO COUNTY John Avalos Edwin M. Lee Eric Mar (Chair)

SAN MATEO COUNTY David J. Canepa

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SANTA CLARA COUNTY Cindy Chavez Liz Kniss (Vice-Chair) Jan Pepper Rod G. Sinks

> James Spering Osby Davis

SONOMA COUNTY Teresa Barrett Shirlee Zane

Jack P. Broadbent EXECUTIVE OFFICER/APCO Dear Ms. Taul:

Bay Area Air Quality Management District (Air District) staff has reviewed the California Regional Water Quality Control Board's IS/MND prepared for the Project. The Project consists of the San Francisco Bay Regional Water Quality Control Board establishing General WDRs for the management of process water, manure, and other organic materials at confined animal facilities (CAFs), including the application of such materials to land. The General WDRs may be used to regulate currently operating CAFs and any dairies that may reopen within the footprint of a former dairy operation within the San Francisco Bay region.

Air District staff recommends that the IS/MND state that CAFs are regulated by Air District Regulation 2, Rule 10, and that CAFs may require Air District permits, per Air District Regulation 2, Rule 1.

Air District rules and regulations can be found on our webpage at http://www.baaqmd.gov/rules-and-compliance/current-rules. Air District staff is available to assist the California Regional Water Quality Control Board to address these comments. If you have any questions, please contact Barry Young, Senior Advanced Projects Advisor at (415) 749-4721 or byoung@baaqmd.gov.

Sincerely,

Deputy Executive Officer