

**SAN DIEGO REGIONAL BOARD RESPONSES TO COMMENTS
TENTATIVE ORDER NO. R9-2009-0037 NPDES NO. CA0107492**

Comments submitted by Neal Brown, Director of Engineering and Planning (Padre Dam Municipal Water District), on March 25, 2009.

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
5	II.B	<p>Comment 1</p> <p>PDMWD treats raw wastewater from the City of Santee, and portions of the City of El Cajon and the unincorporated community of Lakeside only. Please remove reference to the unincorporated communities of Alpine, Blossom Valley, Crest, Dehesa, Flinn Springs and Harbison Canyon.</p>	<p>The Regional Board agrees with the comment. The text will be modified accordingly:</p> <p>PDMWD directs up to 2.0 MGD of its raw wastewater from the City of Santee, portions of the City of El Cajon, and the unincorporated community of Lakeside to PDWRF.</p>
5	II.B	<p>Comment 2</p> <p>Please revise the first and second sentences in the second paragraph to read “The treatment process consist of...flocculation, sedimentation, denitrification filters, and chlorine disinfection. Effluent is discharged into three holding ponds before being discharged to Lake No. 7.”</p>	<p>The Regional Board agrees with the comment. The text will be modified accordingly:</p> <p>The treatment process consists of two primary clarifiers, a five-stage Bardenpho process, two secondary clarifiers, alum and polymer addition, flocculation, sedimentation, denitrification filters, and chlorine disinfection. Effluent is discharged into three holding ponds before being discharged to Lake No. 7.</p>
5	II.B	<p>Comment 3</p> <p>Please remove “a water source for park</p>	<p>The Regional Board agrees with the comment. The text will be modified accordingly:</p>

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
		irrigation” from the fifth sentence in the third paragraph. Water in the Lakes is not used for irrigation.	The Lakes are used as recreational facilities.
11 14	III.B IV.A.2.b	<p>Comment 4</p> <p>Please consider revising the sentence to read “Discharge to the San Diego River and contiguous waters from the Facility at a 30-day running average daily flow rate in excess of 2.0 million gallons per day (MGD) is prohibited.” This clarification is consistent with Discharge Specification No. 6 of the Waste Discharge and Recycling Requirements for the Production and Purveyance of Recycled Water for Padre Dam Municipal Water District (Order No. 97-49).</p>	The 2.0-million gallon per day (MGD) average daily flow rate limitation is consistent with the current order, Order No. R9-2003-0179. The flow rate limitation in Order No. 97-49 applies to land discharges (recycled water use).
12	IV.A.1.a Table 6a	<p>Comment 5</p> <p>Recent influent monitoring data, especially the data from 2008 and 2009 show monthly average TDS concentrations above 850 mg/L (occasionally above 900 mg/L). The recent trend of TDS increases in PDWRF influent may be due to a combination of water conservation measures and recent TDS increases in potable water supply, which could be</p>	Reasonable potential analysis warrants a total dissolved (TDS) limitation, which has been carried over from the current order, Order No. R9-2003-0179. This limitation is based on the Basin Plan Water quality objective associated with protecting beneficial uses in Hydrologic Subarea (HSA) 907.12 (see Tables 3-2 and 3-3 in the Basin Plan) and calculated according to procedures outlined in the State Implementation Policy, (SIP) for protecting surface waters. The 12-month average

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
		<p>related to the recent cutbacks in water supply to the Southern California Region from the State Water Project. While PDWMD is currently in compliance with the daily maximum TDS concentration limitation of 1,000 mg/L, consistent compliance in the future may become more challenging with the increased reliance on water supplies from the Colorado River, which has a significantly higher TDS concentration than water from the State Water Project, along with the other factors mentioned above. As a result, PDMWD requests that the following or similar statement be added to the Tentative Order:</p> <p style="text-align: center;"><i>“Discharges with TDS concentrations exceeding 1,000 mg/L would not be considered a violation if the influent water TDS concentration is greater than 910 mg/L and the difference between the effluent and influent TDS concentrations is maintained at or below 10 percent of the influent TDS concentration.”</i></p> <p>Please also consider applying the effluent limitation of 1,000 mg/L to a 12-month average TDS concentration.</p>	<p>limitation in Order No. 97-49 applies exclusively to groundwater discharges (recycled water use) and is not appropriate for the tentative order, a National Pollutant Discharge Elimination System (NPDES) permit. The tentative order cannot support compromising beneficial uses.</p> <p>The TDS limitation does not inhibit providing recycled water to customers (augmenting water supplies in the region) as the limitation is only being applied to surface water discharges that result from “skimming” from the sewage collection system, flow that is in excess of recycled water demand.</p>

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES														
		<p>PDMWD is a leading proponent of water conservation and reuse in the San Diego region. We feel that this language would allow us to continue providing recycled water to our customers and augmenting water supplies in our region without receiving violations for conditions that are beyond our control.</p>															
12	IV.A.1.a Table 6a	<p>Comment 6</p> <p>Please remove footnote No. 4, as it is no longer applicable to this table.</p>	<p>The Regional Board agrees with the comment. The text will be deleted.</p>														
13	IV.A.2.a Table 6b	<p>Comment 7</p> <p>The daily maximum mass loading limitation for MTBE should be 0.083 lb/day, which is consistent with the value included in Table F12 on page F-30 (0.018 lb/day appears to be a typo). As Table F-12 does not include monthly average limitations, it appears that the monthly average limitation of 0.010 lb/day was erroneously entered into Table 6b. Please remove the monthly average limit or consider revising the limit based on the correct daily maximum mass loading</p>	<p>The Regional Board agrees with the comment. The typographical errors will be corrected accordingly:</p> <table border="1" data-bbox="1247 1032 1896 1110"> <tbody> <tr> <td data-bbox="1247 1032 1436 1073">Methyl Tert-Butyl Ether</td> <td data-bbox="1436 1032 1535 1073">µg/L</td> <td data-bbox="1535 1032 1587 1073">--</td> <td data-bbox="1587 1032 1640 1073">--</td> <td data-bbox="1640 1032 1692 1073">--</td> <td data-bbox="1692 1032 1745 1073">5</td> <td data-bbox="1745 1032 1797 1073">--</td> </tr> <tr> <td data-bbox="1247 1073 1436 1110"></td> <td data-bbox="1436 1073 1535 1110">lb/day¹</td> <td data-bbox="1535 1073 1587 1110">--</td> <td data-bbox="1587 1073 1640 1110">--</td> <td data-bbox="1640 1073 1692 1110">--</td> <td data-bbox="1692 1073 1745 1110">0.083</td> <td data-bbox="1745 1073 1797 1110">--</td> </tr> </tbody> </table>	Methyl Tert-Butyl Ether	µg/L	--	--	--	5	--		lb/day ¹	--	--	--	0.083	--
Methyl Tert-Butyl Ether	µg/L	--	--	--	5	--											
	lb/day ¹	--	--	--	0.083	--											

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
		<p>limitation. We also would like to note that the units appear in a reversed order compared to the other parameters in the table, which is confusing.</p>	
<p>Pages 15-20</p>	<p>Table 6d</p>	<p>Comment 8</p> <p>It appears that the performance goals (monthly average) at EFF-001A for THMs (bromoform, chlorodibromomethane, dichlorobromomethane, and chloroform) are based on “consumption of water and organisms” standards that are established by EPA in the California Toxics Rule (CTR) and National Toxics Rule (NTR). EFF-001A is located upstream of Santee Lakes, through which THM reduction is anticipated prior to reaching EFF-001B, the point of discharge to Sycamore Creek. As Santee Lakes are not designated as a source of potable supply, are not used for human consumption of water, and are clay lined, we feel that the performance goals for THMs and other CTR/NTR compounds at EFF-001A should be based on “consumption of organisms only” as opposed to “consumption of water and organisms”. Although we understand that monitoring at EFF-001A is for informational purposes only, we feel that application of appropriate standards is</p>	<p>The Regional Board agrees with the comment regarding the performance goals for bromoform, chlorodibromomethane, and dichlorobromomethane; these performance goals will be corrected based on California Toxics Rule (CTR)/National Toxics Rule (NTR) “consumption of organisms” criteria of 360, 34, and 46 micrograms per liter (µg/L), respectively. Chloroform does not have a CTR/NTR criterion. Its performance goal will be removed since the Basin Plan criterion of 80 ug/L that it is based on (to protect municipal beneficial use of waters downstream of the Santee Lakes) is the criterion used for total trihalomethanes (THMs). If the performance goal for total THMs is being met, it ensures that the performance goal for chloroform (a component of total THMs) is also being met.</p>

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
		<p>important, as Appendix F IV.E. states that “Effluent concentrations above the performance goals will not be considered as violations of the permit but serve as red flags that indicate water quality concerns. Repeated red flags may prompt the Regional Water Board to reopen and amend the permit to replace performance goals for constituents of concern with effluent limitations, or the Regional Water Board may coordinate such actions with the next permit renewal.”</p> <p>If the performance goals at EFF-001A will remain as shown in the Tentative Order, please consider adding the following footnote that applies to “OBJECTIVES FOR PROTECTION OF HUMAN HEALTH”:</p> <p><i>Performance goals for several of the parameters listed within this table are based on California Toxics Rule standards for the protection of human health (consumption of water and organisms), which apply to all waters released at EFF-001B. Exceedance of the performance goals at EFF-001A may indicate the need for the implementation of additional monitoring at EFF-001B</i></p>	

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
		<i>in order to assess conformance with the standards at EFF-001B.</i>	
32	VI.C.7	<p>Comment 9</p> <p>It is not practical to develop a schedule of compliance until sufficient monitoring data are available. If the additional monitoring results indicate that compliance will be achieved immediately or through operational adjustments and/or additional source control programs, then the compliance date of May 18, 2010 would likely be practical. However, if the monitoring data and follow-up studies show that design and construction of a new treatment process, source control measures, or other improvements would be necessary, then the compliance date of May 18, 2010 would not be practical, as any significant upgrades to the PDWRF would likely involve securing of funds, feasibility studies, environmental studies, and other lengthy processes in addition to design and construction of the system. Please note that since bis 2-ethylhexyl phthalate (DEHP) is a common plasticizer used in PVC pipes and other similar products found throughout the environment, achieving significant reductions through source control</p>	<p>According to Definition 2.d of State Water Resources Control Board Resolution No. 2008-0025, Policy for Compliance Schedules in National Pollutant Discharge Elimination System Permits, a compliance schedule is not authorized under the given circumstances. If the bis(2-ethylhexyl)phthalate limitation cannot be met by May 18, 2010, a Cease and Desist Order (CDO) may be adopted to allow for a time schedule beyond May 18, 2010.</p>

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
		<p>measures may not be practical.</p> <p>In Section 2.1 of the 2005 Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California, it is stated that:</p> <p>“Up to <u>five years from the date of permit issuance, reissuance, or modification</u> to complete actions (such as pollutant minimization or facility upgrades) necessary to comply with CTR criterion-based effluent limitations that are derived with or without a TMDL.”</p> <p>We recognize from previous correspondence with the Regional Board that the May 18, 2010 compliance date is referenced in the SWRCB policy on compliance schedules in NPDES permits (Resolution No. 2008-0025). This resolution also states that “nothing in this Policy precludes the Water Boards from authorizing compliance schedules as part of a new or revised standard that are longer than those authorized in this Policy, provided that the Water Boards adequately justify the compliance</p>	

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
		<p>schedule length and that the State Water Board and the U.S. EPA approve the new or revised standard."</p> <p>Based on this information, the Regional Board appears to have the ability to extend the compliance date beyond May 18, 2010. Depending on the outcome of future monitoring and related studies, PDMWD may need up to 5 years to achieve compliance with the proposed DEHP effluent limitations (especially, if the results of the monitoring and studies show that significant modifications to the existing treatment processes are required to meet the new effluent limits). Thus, PDMWD requests that the Regional Board extend the final compliance date to 5 years from date of permit reissuance. The compliance schedule may include:</p> <ul style="list-style-type: none"> ○ Effluent monitoring to confirm feasibility of long-term compliance or determine if compliance is infeasible: Approximately 1 year to monitor potential seasonal 	

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
		<p>variation in the effluent concentration.</p> <ul style="list-style-type: none"> ○ Development of a compliance work plan, if deemed necessary: Approximately 1 year to evaluate treatment alternatives and/or other measures to achieve compliance. ○ Implementation of the compliance work plan: Depending on the extent of the required measures to achieve compliance, this phase may take up to 3 years or longer to design and construct required improvements. 	
36	VII.H.5	<p>Comment 10</p> <p>“1/n” in the equation for the geometric mean should be in superscript. Please also note that PDMWD uses IDEXX Colilert®-18 for detection of Escherichia coli and IDEXX Enterolert™ for detection of Enterococcus. These methods are approved and accepted methods by the US-EPA. The test results are reported as most probable number (MPN) not colony-</p>	<p>The Regional Board agrees with the comment. References to colony-forming units (CFU) will be changed to most probable number (MPN) and the typographical error will be corrected accordingly:</p> <p>Geometric Mean = $(C1 \times C2 \times \dots \times Cn)^{1/n}$</p>

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
		forming units (CFU).	
E-3	Table E-1	<p>Comment 11</p> <p>The monitoring location name for influent sampling should be INF-001 (without "A") to be consistent with the name used in Section III on Page E-4.</p>	<p>The Regional Board agrees with the comment. The reference to INF-001A will be changed to INF-001.</p>
E-3	Table E-1	<p>Comment 12</p> <p>Collecting water, fish tissue, Benthic Macroinvertebrates and Periphyton samples from Station RSW-001a (Approximately 400 yards downstream from the Discharge Point No. 001) is impractical. Locating a sampling station at this location will not likely provide useful information. There are two small ponds downstream of the described location where fish could be taken for the semi-final fish tissue tests. PDMWD requests that Station RSW-001a to include the downstream ponds. Please consider revising the monitoring location description to "approximately 400 to 1,000 feet downstream from Discharge Point No. 001" to allow for the fish tissue, Benthic, and Periphyton samples to be collected from the best possible location available at</p>	<p>The Regional Board agrees with the comment. The text will be modified accordingly:</p> <p>Approximately 400 to 1,000 feet downstream from the discharge from Discharge Point No. 001.</p>

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
		the time of required sampling.	
E-4	Table E-2	<p>Comment 13</p> <p>Please consider reducing the sampling frequency of influent total dissolved solids (TDS) to monthly to be consistent with the sampling frequency for effluent TDS.</p>	<p>The Regional Board finds the request appropriate. Influent sampling for TDS will be required monthly.</p>
E-5 E-6	Table E-3 Table E-4	<p>Comment 14</p> <p>Monitoring requirements for bromoform, chlorodibromomethane, chloroform, dichlorobromomethane, and total trihalomethanes (THMs) appear in both tables (i.e. monitoring required at both EFF-001A & 001B). Please consider eliminating the THM monitoring requirements at EFF-001B. Since THMs are included in the performance goals described in Table 6d, monitoring at more than one location may not be necessary and would result in additional cost. Limiting THM monitoring to EFF-001A appears to be appropriate, particularly if the performance goals for THMs are revised per Comment No. 8 above. This approach is also consistent with Section IV.A.4 of the Tentative Order.</p>	<p>Monitoring of THMs at EFF-001A is required to meet performance goals based on consumption of fish in the Santee Lakes. Monitoring at EFF-001B provides information on THMs introduced into waters (downstream of the Santee Lakes) with municipal beneficial use. Monitoring cannot be eliminated at EFF-001B and applied exclusively at EFF-001A unless performance goals at EFF-001A are based on consumption of fish in the Santee Lakes and consumption of water downstream of the Santee Lakes. Padre Dam Municipal Water District requests that performance goals be based on consumption of fish (organisms), not consumption of fish and water, in Comment 8.</p>

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
E-5 E-6	Table E-3 Table E-4	<p>Comment 15</p> <p>Monitoring requirements for Acute and Chronic Toxicity are currently shown in Table E-3 to be monitored at EFF-001A. This appears to be an error, as Attachment E V. on Page E-7 states that “The Discharger shall conduct quarterly acute and chronic toxicity testing on effluent samples collected at Effluent Monitoring Station EFF-001B...” This statement is consistent with the current monitoring location at EFF-001B per Order No. 2003-0179. Please move the toxicity testing requirement from Table E-3 (EFF-001A) to Table E-4 (EFF-001B). Footnote No. 5 for Table E-3 should also be moved to Table E-4. It’s our understanding that the toxicity results at stations RSW-001a and RSW-001 were going to be used to compare the toxicity leaving the Santee lakes at Station EFF-001B.</p>	<p>The Regional Board agrees with the comment. References to toxicity monitoring at EFF-001A will be revised to apply where intended, at EFF-001B.</p>
E-6	Table E-3 (Footnote 1)	<p>Comment 16</p> <p>This footnote seems to be more applicable to Table E-4.</p>	<p>The Regional Board agrees with the comment. The footnote will be moved from Table E-3 to Table E-4.</p>
E-10	VIII.A & B	Comment 17	The Regional Board finds the request

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
to E-12		<p>Tentative Order requires water quality monitoring at a total of 7 receiving water stations, including both RSW-001a and 2. Monitoring and Reporting Program (MRP) under Order No. R9-2003-0179 requires water quality monitoring at a total of 6 receiving water monitoring stations. Please note that flow rate is the only parameter that is monitored at the current Receiving Water Monitoring Station No. 3, which is located at the outlet from the first pond within Carlton Oaks Golf Course. Based on the results of the receiving water monitoring to date and the high cost that would be incurred to add an additional water quality monitoring station, PDMWD requests that the frequency of water quality monitoring for RSW-006 be reduced to once per quarter for all parameters currently noted as once per month.</p>	<p>appropriate given that monthly monitoring will be conducted at RSW-005, another downstream San Diego River monitoring location.</p>
E-12	VIII.B	<p>Comment 18</p> <p>Please remove Station RSW-007, as this station does not exist per Table E-1.</p>	<p>The Regional Board agrees with the comment. References to Station RSW-007 will be deleted.</p>
E-13 and	IX A.1, 2, and 3	<p>Comment 19</p>	<p>The Regional Board will revise the benthic macroinvertebrate and periphyton analysis</p>

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
E-14		<p>The first paragraph below Table E-6c states, "Benthic macroinvertebrate analysis shall be conducted in May and December of each year,..." The first paragraph below Table E6-d states, "Periphyton analysis shall be conducted in August and December of each year..." The first paragraph below Table E-6e states, "...Sampling at RSW-001a must take place at the same time as benthic macroinvertebrate analysis." PDMWD requests that the language above be revised to allow for samples to be collected during specified quarterly periods (e.g. 2nd and 4th quarters of the year or 3rd and 4th quarters) in lieu of the specified months. This would allow us the opportunity to schedule sampling at times when the data would be most useful.</p>	<p>monitoring requirements to May and October to be consistent with one another and with the monitoring schedule under Order No. R9-2003-0179, so that data is comparable and to minimize variations due to seasonal effects.</p>
F-4	II.A	<p>Comment 20</p> <p>Please see Comments Nos. 1, 2 and 3 for suggested revisions to the facility description.</p>	<p>The Regional Board agrees with the comment. The text will be modified to be consistent with Regional Board responses to Comments Nos. 1, 2 and 3.</p>
F-4	II.A	<p>Comment 21</p> <p>The Order No. for the waste discharge requirements (WDR) is No. 97-49 (second</p>	<p>The Regional Board agrees with the comment. The typographical error will be corrected.</p>

PAGE	SECTION/TABLE	COMMENTS	REGIONAL BOARD RESPONSES
		paragraph).	
F-42	VI.D.1.a	<p>Comment 22</p> <p>Page F-42, Attachment F. There is a typo in the paragraph above Table F-19. "...in Sycamore Creek."</p>	<p>The Regional Board agrees with the comment. The typographical error will be corrected.</p>
F-43	VI.D.1.c	<p>Comment 23</p> <p>Please delete RSW-007 from the last sentence, as this station does not exist.</p>	<p>The Regional Board agrees with the comment. References to Station RSW-007 will be deleted.</p>