

ERRATA SHEET
TENTATIVE ORDER NO. R9-2011-0019, NPDES NO. CA0107395

WASTE DISCHARGE REQUIREMENTS
FOR THE ENCINA WASTEWATER AUTHORITY
ENCINA WATER POLLUTION CONTROL FACILITY
AND SATELLITE WASTEWATER TREATMENT PLANTS
DISCHARGE TO THE PACIFIC OCEAN VIA THE ENCINA OCEAN OUTFALL

The following changes have been made to Tentative Order No. R9-2011-0019. Changes below are shown in **bold and underline**/strikeout format to indicate added and removed language, respectively.

Errata No. 1, Page No. 35, Section VI.C.5.e

e. Collection System

On May 2, 2006, the State Water Board adopted State Water Board Order No. 2006-0003, a Statewide General WDR for Sanitary Sewer Systems. EWA's member agencies shall be subject to all applicable requirements of Order No. 2006-0003 and any future revisions thereto. Order No. 2006-0003 requires that all public agencies that currently own or operate sanitary sewer systems apply for coverage under the General WDR.

Regardless of the coverage obtained under Order No. 2006-0003, EWA's member agencies' collection system is part of the treatment system that is subject to this Order. As such, pursuant to federal regulations, ~~the Discharger~~EWA's member agencies must properly operate and maintain ~~its~~their ~~respective~~ collection system [40 CFR 122.41(e)], report any non-compliance

Errata No. 2, Page Nos. 36-37, Section VI.C.7

7. Compliance Schedules – Not Applicable

The Discharger shall comply with the following time schedule to ensure that the discharge from the Facilities do not cause or contribute to excursion above the Receiving Water Limitations for Bacterial Characteristics contained in section V.A.1 of this Order:

Table 13.—Time Schedule for Conformance with Bacteria Characteristics

Task	Compliance Date
1. Prepare and submit a proposed work plan that outlines the tasks and the approach to be used in evaluating and selecting alternatives for ensuring compliance with Bacterial Characteristics receiving water limitations.	No later than 6 months after the adoption date of this Order
2. Submit plan and alternatives analysis for ensuring compliance with Bacterial Characteristics receiving water limitations outside the Initial Dilution Zone of the EOO. The proposed plan shall include a schedule for completion that reflects a realistic assessment of the shortest practicable time required to perform each task.	No later than 18 months after the adoption date of this Order
3. Complete financial arrangements for selected alternative	No later than 30 months after the adoption date of this Order
4. Initiate construction of any required facilities	No later than 36 months after the adoption date of this Order
5. Complete construction of required facilities and initiate facilities start-up	No later than 48 months after the adoption date of this Order
6. Identify and implement operational refinements and confirm compliance with Bacterial Characteristics receiving water limitations	No later than 60 months after the adoption date of this Order
7. Achieve full compliance with Bacterial Characteristics receiving water limitations outside the Initial Dilution Zone of the EOO	No later than 60 months after the adoption date of this Order

The Discharger shall implement the plan identified in Task 2 of the above schedule in accordance with the shortest practicable time required to complete each task, but in no case later than the Compliance Dates listed in the above schedule. The Discharger shall submit to the San Diego Water Board on or before each compliance date, the specified document or, if appropriate, a written report detailing compliance or noncompliance with the specific schedule date and task. If noncompliance is

being reported, the reasons for such noncompliance shall be stated, and shall include an estimate of the date when the Discharger will be in compliance. The Discharger shall notify the San Diego Water Board by letter when it returns to compliance with the time schedule.

Progress reports shall be submitted annually by March 1, consistent with the schedule in Table E-15 of the MRP and shall continue until compliance is achieved.

Errata No. 3, Attachment H

ATTACHMENT H -- DILUTION MODEL INFORMATION

In the process of issuance of Order No. R9-2005-0219, the San Diego Water Board performed modeling and calculations to determine the minimum initial dilution. The minimum initial dilution value was used to develop effluent limitations in Order No. R9-2005-0219, which was adopted by the San Diego Water Board on December 14, 2005 and remains in effect at the time of reissuance. For this proposed permit reissuance (Tentative Order No. R9-2011-0019), flows for the Encina Ocean Outfall, as reported in the Report of Waste Discharges are the same as those used as the basis for limitations in Order No. R9-2005-0219; therefore, the minimal initial dilution remains appropriate. As such, the minimum initial dilution value is carried over from R9-2005-0219 for use in calculation of limitations. A description of the San Diego Water Board's procedures was included as Attachment H from Order R9-2005-0219 and is presented below for background information.

Dilution Model Information as Presented in Attachment H of Order No. R9-2005-0219

The San Diego Water Board determined the minimum initial dilution factor for the discharge of up to 43.3 million gallon per day (mgd) of effluent through the Encina Ocean Outfall (EOO) to be 144 using the US EPA approved computer modeling package, Visual Plumes with the UM3 model. The computer modeling was performed using EOO design characteristics and receiving water density data provided by Encina Wastewater Authority (EWA) for the 12-month period July 2003 through June 2004 and average effluent temperature characteristics. The Visual Plumes model package is limited to modeling diffusers with ports all pointing in one direction, while the EOO features ports discharging on both sides of the outfall diffuser. To determine EOO minimum initial dilution (lowest average initial dilution in any month of the year), the San Diego Water Board used the Visual Plumes and UM3 model package to simulate initial dilution under two scenarios. Scenario 1 simulated conditions on each side of the EOO by applying half of the EOO flow through the diffuser ports on that respective half of the outfall; this scenario is appropriate when the discharges from each side of the diffuser do not interact. Scenario 2 simulated conditions in which the total EOO flow is discharged through all of the EOO diffuser ports, discharging in the same direction; this scenario simulates conditions when the discharges from each side of the diffuser strongly interact and is a more conservative approach. Minimum initial dilution factors under these two modeling scenarios were approximately the same; however, the results from Scenario 2 modeling were used to determine the minimum initial dilution factor for this permit renewal. These dilution model results are summarized in Table H-1 below.

Table H-1: Summary of Visual Plumes Dilution Model Results

Ambient Profile	Effluent Temperature (°C)	Dilution Factor at Last Trap Level	Dilution Factor at Surface
Jan-04	21.3	No result	261.2
Feb-04	21.1	125.3	148.2

Errata No. 4, Page Nos. F-40, Section V -

V. RATIONALE FOR RECEIVING WATER LIMITATIONS

Receiving water limitations of this Order are derived from the water quality objectives for ocean waters established by the Basin Plan and the Ocean Plan.

Prior to this Order, the San Diego Water Board has interpreted the Bacterial Characteristics Water Contact Standards of the Ocean Plan (Receiving Water Limitations section V.A.1) to apply only in the zone bounded by the shoreline and a distance 1,000 feet from the shoreline or the 30-foot depth contour, whichever is further from the shoreline, and within kelp beds. The 2005 Ocean Plan also has language that these standards also apply in areas outside this zone used for water contact sports, as determined by the Regional Boards (i.e., waters designated as REC-1). These designations would need to be specified in the Basin Plan. Because the San Diego Water Board has not completed a process to designate specific areas where the water contact standards apply, Ocean Plan Bacterial Standards apply throughout all ocean waters in the San Diego Region. This interpretation has been confirmed by the USEPA. The water contact bacterial standards in the previous Order No. R9-2005-0219, which were based on the language in the 2001 Ocean Plan, have changed. The language in the 2005 Ocean Plan now specifies that the Water Contact Standards apply to ocean waters within California's jurisdiction designated by the San Diego Water Board as having REC-1 beneficial uses. Because the San Diego Water Board has not completed a process to designate specific areas where the water contact standards apply, Ocean Plan Bacterial Standards apply throughout all ocean waters in the San Diego Region. Thus, the applicable standards are included in this Order. See Section VII.B.7 of this Fact Sheet for additional information on compliance with the 2005 Ocean Plan bacterial standards.

By letter dated March 3, 2011, EWA submitted a summary of the near shore and offshore receiving water monitoring results collected for January 2006 through December 2010. The results from the offshore stations were all within the Ocean Plan Bacterial Standards for total coliform and fecal coliform. For enterococcus, there were two values in excess of the 30-day geometric mean limitation; however, EWA provided details indicating that these two exceedances may not have been caused by the discharge from EWA's facilities. In addition to their compliance history, EWA's March 3, 2011 letter stated that EWA would ensure compliance by sampling early each month, expediting testing of samples, and conducting repeat sampling if there are any exceedances. Thus, the 5-year compliance

schedule, that was included in three recently adopted POTW Ocean Outfall NPDES Permits, is not included in this tentative Order.

Errata No. 5, Page Nos. F-47-48, Section VII.B.7

7. Compliance Schedules – Not Applicable

~~Prior to this Order, the San Diego Water Board has interpreted the Bacterial Characteristics Water contact Standards of the California Ocean Plan (Receiving Water Limitations section V.A.1) to apply only in the zone bounded by the shoreline and a distance 1,000 feet from the shoreline or the 30 foot depth contour, whichever is further from the shoreline, and within kelp beds. The 2005 Ocean Plan also has language that these standards also apply in areas outside this zone used for water contact sports, as determined by the Regional Boards (i.e., waters designated as REC 1). These designations would need to be specified in the Basin Plan. Because the San Diego Water Board has not completed a process to designate specific areas where the water contact standards apply, Ocean Plan Bacterial Standards apply throughout all ocean waters in the San Diego Region. This interpretation has been confirmed by the USEPA.~~

~~From 2006-2010, according to the Discharger's near shore and offshore receiving water monitoring results, there were only two exceedance of the 30 day geometric mean limit for enterococcus. There, however, is insufficient information to reach a conclusion regarding the contribution, if any, that Encina's discharge is having on the bacteria levels in the near and off shore. In order to ensure that the Discharger is not causing, or contributing to, excursions of the Bacterial Characteristics Water contact Standards contained in the Ocean Plan, this Order requires the discharge to comply with a time schedule to ensure compliance with the standards.~~

~~The time schedule requires the discharger to: 1) prepare and submit a proposed work plan that outlines the tasks and the approach to be used in evaluating and selecting alternatives for ensuring compliance with Bacterial Characteristics receiving water limitation; 2) submit a plan and alternatives analysis; 3) complete financial arrangements for the selected alternative; 4) initiate construction of any required facilities; 5) complete construction of required facilities and initiate facilities start up; 6) identify and implement operational refinements and confirm compliance with Bacterial Characteristics receiving water limitations; and 7) achieve full compliance with Bacterial Characteristics receiving water limitations outside the Initial Dilution Zone of the EOO. Final compliance with the standards is to be~~

~~achieved no later than 60 months of the adoption date of this Order, unless modified by the San Diego Water Board. The Discharger is also required to implement the plan identified in Task 2 in accordance with the shortest practicable time required to complete each task, but in no case later than the Compliance Dates listed in the schedule.~~