Item 6
Supporting Document No. 5
November 13, 2012

ITEM 6, SUPPORTING DOCUMENT NO. 5 - RESPONSE TO COMMENTS

TENTATIVE ORDER NO. R9-2012-0054

WASTE DISCHARGE REQUIREMENTS FOR THE SAN DIEGO COUNTY SANITATION DISTRICT, HARMONY GROVE WATER RECLAMATION PLANT, SAN DIEGO COUNTY

The San Diego Water Board has the following responses to the County of San Diego Department of Public Works letter dated September 5, 2012:

No.	Comments	San Diego Water Board Responses
1.	Please change throughout the Order the name of Discharger from "San Diego County Sanitation District-Harmony Grove Service Area" to "San Diego County Sanitation District".	The name of Discharger in the Order has been changed from "San Diego County Sanitation District-Harmony Grove Service Area" to "San Diego County Sanitation District" in the revised permit.
2.	Title of the Order. It appears that a space is missing between "FOR" and "THE."	The requested change has been made in the revised tentative Order.
3.	Page 3, I. Table 4. Please correct facilities contact name and mailing address as follows: Milica Kaludjerski Schipper 5500 Overland Avenue Suite 315 San Diego. CA 92123-1248	The requested change has been made in the tentative Order
4.	In several sections of the Tentative Order (including, but not limited to: B.1, C.5, Attachment C.I. Table C-1), the average dry weather flow of 180,000 gallons per day is referenced as if it would be the maximum effluent flow rate. For example, on page 3, B.1, it is indicated that "...applied for waste discharge requirements to discharge up to 180,000 gallons per day (gpd) of disinfected tertiary treated wastewater..."	The tentative Order and Information Sheet have been revised to modify the average monthly flow rate from 180,000 to 541,000 gallons per day (gpd). Revised flow calculations submitted by the Discharger show the plant will discharge an average monthly flow of 541,000 gpd to empty the wet weather basin and prepare for the next wet weather season.
5.	On page 7, C.5, also indicates that the average monthly effluent flow from the plant shall not exceed 180,000 gpd. The plant will have to discharge at a higher flow rate during wet weather or after peak flow conditions to empty the wet weather basin and prepare for the next wet weather season and avoid possible spills or discharge to surface waters. We suggest that the effluent flow rate limit is set at the average monthly effluent flow to 541,000 gpd or 376 gpm (please see the attached calculations	The requested change has been made in the tentative Order

No.	Comments	San Diego Water Board Responses
	from Dexter Wilson engineering).	
6.	Page 4, B.5. Please revise the last sentence to read, "There will also be another separate concrete below grade basin at the plant site, which will provide..."	The requested change has been made in the revised tentative Order
7.	Page 4, B.6.C. Please revise the first sentence to read "Effluent produced...in an onsite storage tank, and the effluent will be used for..."	The requested change has been made in the revised tentative Order
8.	Page 6, B.19. and F.3. The County requests modification of the salt and nutrient management plan (SNMP) requirements addressed in the Provision F.3 of the proposed revised Tentative Order. Compared to the City of Escondido's discharge, County's contribution to the Escondido Groundwater Basin shall be less than 2-percent. The County proposes to replace F.3 with the following: F.3 The State Water Resources Control Board Recycled Water Policy states that the appropriate way to address salt and nutrient issues is through the development of regional or sub regional salt and nutrient management plans. The development of the salt and nutrient management plans is expected to be a cooperative effort among local water and wastewater entities and local salt/nutrient contributing stakeholders. As the major recycled water producer and purveyor within the basin, it is anticipated that the City of Escondido and/or Rincon Del Diablo Water District will lead the development of a salt and nutrient management plan for the Escondido groundwater basin. This Order requires the Discharger to participate as a stakeholder in the City's and/or Water District's effort to develop a salt and nutrient management plan for the Escondido groundwater basin	Finding B.18 and Section F.3 (Salt and Nutrient Management Plan) have been modified in the revised tentative Order, while Finding B.19 has been deleted.
9.	Page 8, D.1, Table 6. We understand that the effluent limitation for TDS is based on the groundwater quality objectives for the Escondido HSA, which is 1,000 mg/L. It also appears that the Regional Board staff reviewed effluent TDS data from the Meadowlark WRP (927 mg/L), whose service area is supplied with the same potable water source as the Harmony Grove Village	The Basin Plan includes implementation provisions for recycled water projects that address the source water problem described in the comment (see Basin Plan, Factoring Water Supply Considerations into the Regional Board Regulation of Water Reclamation Projects, pages 4-36

No.	Comments	San Diego Water Board Responses
	(referenced in Attachment C, II.C. Table C-2), to determine the expected effluent TDS concentration from the Harmony Grove WRP. While it is our intention to meet the effluent TDS limitation, it is possible that compliance may become challenging beyond our control if the TDS in the potable water supply increases. TDS concentrations in the potable water supply could increase due to a combination of water conservation measures and/or increased reliance on water supplies from the Colorado River, which has a significantly higher TDS concentration than water from the State Water Project. We request that the following or similar statement be added to the Tentative Order: "Discharges with TDS concentrations exceeding 1,000 mg/L would not be considered a violation if the TDS concentration in the potable water supply within the Harmony Grove Service Area is greater than 700 mg/L" We feel that this language would allow us to provide recycled water and augment water supplies in our region without receiving violations for conditions that are beyond our control.	and 4-37). The Basin Plan states that "[i]n recognition of the variables in wastewater quality that are beyond the control of the discharger, the Regional Board authorizes the Executive Officer to suspend formal enforcement action where a discharger submits an initial technical report with subsequent quarterly updates, that demonstrate to the satisfaction of the Executive Officer compliance with all the following conditions: 1. The discharge is not subject to regulation by means of a NPDES Permit; and 2. The enforcement action is only for violations of discharge specifications for mineral constituents, total suspended solids (TSS), biological oxygen demand (BOD) or carbonaceous biological oxygen demand (CBOD); and 3. The effluent violations are due solely to changes in the quality of the imported water supply and/or to water conservation measures being implemented within the service area tributary to the treatment plant; and 4. The discharge does not result in a mass loading of TSS, BOD and CBOD that exceeds the loading prior to implementation of water conservation measures; and 5. The discharge will not cause Basin Plan water quality objectives to be exceeded, in the long term; and 6. The discharge will not cause a violation of any applicable section from Title 22 of the CCR or any requirement specified by either the State DHS or the appropriate county health officer for the protection of public health; and 7. The discharge does not contain a concentration of TDS exceeding 1,500 mg/l, or the concentration in the water supply plus 500 mg/l, whichever is less, with comparable adjustments for

No.	Comments	San Diego Water Board Responses
		other mineral constituents; and 8. The discharger implements a program to identify major sources of the mineral constituents of concern in the discharge, including but not limited to water softener regeneration brine; and to determine the average contribution of each major source and the best available options for reducing levels in the discharge; and to identify any negative effects on the potential for water reclamation caused by the failure to control the constituents of concern in the discharge. The program should include a time schedule to reduce mineral constituents in the discharge as necessary to assure that the potential for water reclamation will be realized to the maximum extent practicable." If the Discharger provides information to support the assertion that quality of the source water causes the discharge to violate the discharge specification for TDS, the San Diego Water Board will follow these implementation provisions.
10.	Section II of Tentative Monitoring and Reporting Program No. R9-2012-0054 (formerly Page B-5). To avoid problems, it would be beneficial to identify the specific effluent monitoring locations (please see the attached marked-up drawing), of the tentative monitoring program, as follows: II. EFFLUENT MONITORING REQUIREMENTS The Discharger shall monitor the effluent quality at a point between the end of the chlorine contact basin and the entry to the tertiary effluent wet well in accordance Table B-1. Recycled water effluent flow shall be monitored after the gravity filters.	The requested change has been made in the revised Tentative Monitoring and Reporting Program No. R9-2012-00154.
11.	Table 1 of Tentative Monitoring and Reporting No. R9-2012-0054 (formerly Page B-5, Table B-1). Please change reporting frequency to quarterly or annually for	The requested change has been made in the revised Tentative Monitoring and Reporting Program No. R9-2012-00154.

No.	Comments	San Diego Water Board Responses
	constituents that are sampled quarterly (from chloride to fluoride).	
12.	Section II of Tentative Monitoring and Reporting No. R9-2012-0054 (formerly Page B-5, 1st Paragraph). Reference to Table C-1 should be revised to Table B-1	The requested change has been made in the revised Tentative Monitoring and Reporting Program No. R9-2012-00154.
13.	Table 1 of Tentative Monitoring and Reporting No. R9-2012-0054 (formerly Page B-5. Table B-1). Effluent monitoring requirements for TDS appears to be missing.	The requested change has been made in the revised Tentative Monitoring and Reporting Program No. R9-2012-00154.
14.	Page 3, Table 2 of Information Sheet (formerly Page C-4, Table C-2). Please change HAARF chloride concentration to 189 mg/L.	The requested change has been made in the revised Information Sheet.
15.	Page 4, Section III. B of Information Sheet (formerly Page C-5, B). Please change date to "The Discharger certified a final Environmental Impact Report for this project on February 7, 2007."	The requested change has been made in the revised Information Sheet.
16.	Page 4, Section III. A of Information Sheet (formerly Page C-5, III). A. Please change sentence "This order serves as a master reclamation permit..." to waste discharge requirements.	The requested change has been made in the revised Information Sheet.
17.	Page 6, Table 4 of Information Sheet (formerly Page C-7, Table C-4). The effluent limitation for Total Nitrogen should be 15 mg/L per Page 8, D.1, Table 6. Effluent Limitations.	The requested change has been made in the revised Information Sheet.