



May 12, 2015

Mr. Vincent Rodriguez
Water Resource Control Engineer
California Regional Water Quality Control Board, San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

Dear Mr. Rodriguez:

Subject: Comment - Tentative Order Nos. R9-2015-0026 and R9-2015-0027
Hale Avenue Resource Recovery Facility
Intermittent Wet Weather Discharge to Escondido Creek
Reference: 228725:vrodriguez

The purpose of this letter is to provide written comment on the following Tentative Orders relative to the proposed intermittent wet weather discharge to Escondido Creek from the City of Escondido Hale Avenue Resource Recovery Facility (HARRF):

- Tentative Order No. R9-2015-0026, NPDES No. CA0108944, Waste Discharge Requirements for the City of Escondido, Hale Avenue Resource Recovery Facility, Intermittent Wet Weather Discharge to Escondido Creek, and
- Tentative Order No. R9-2015-0027, NPDES No. CA0108944, Time Schedule Order for the City of Escondido, Hale Avenue Resource Recovery Facility, Intermittent Wet Weather Discharge to Escondido Creek.

TENTATIVE ORDER NO. R9-2015-0026

Discharge Prohibitions III.Q.1 and III.Q.2. The purpose of the City's request for NPDES requirements for the HARRF intermittent stream discharge is to allow the City to temporarily discharge excess treated recycled water to Escondido Creek during periods of extraordinary and extreme wet weather after all other wet-weather flow handling and management options are exhausted. Discharge Prohibitions III.Q.1 and III.Q.2 attempt to implement this objective, but as currently written, the City is concerned that Discharge Prohibition III.Q.2 could potentially be misinterpreted as restricting stream discharge to only those occasions when the San Elijo Joint Powers Authority (SEJPA) restricts City of Escondido outfall flows to 16 mgd.

As currently worded, Prohibition III.Q.2 is unacceptable to the City, and indeed, would defeat the entire purpose of the HARRF wet-weather intermittent stream discharge permit. As previously cited by the City, extraordinary hydrologic events necessitating HARRF stream discharge would be rare, infrequent, and short-term, but such extraordinary conditions could potentially occur during the next few years even during times the City has access to its full allotted ocean outfall capacity. To clearly and unambiguously accomplish the objective of prohibiting HARRF stream discharge except for

conditions in which all applicable flow handling and management options are exhausted, Discharge Prohibitions III.Q.1 and III.Q.2 should be revised as follows:

- III.Q.1. The discharge of recycled water to Escondido Creek from the Facility is required to ensure that the design capacities of the Escondido Land Outfall and SEOO are not exceeded.
- III.Q.2. The combined discharge to the San Elijo Ocean Outfall from the Facility, from the San Elijo Water Pollution Control Facility, from Stone Brewing Company and from the SDG&E Palomar Energy Center exceed the maximum capacity of the outfall, or the San Elijo Joint Powers Authority has informed the Discharger that Facility discharge flows to the SEOO must be throttled back to 16 MGD to accommodate larger than normal wet weather outfall discharge flows ~~from SEJPA.~~

Table E-3 of Attachment E, Monitoring and Reporting Program. Table E-3 of Monitoring and Reporting Program (Attachment E to Tentative Order No. R9-2015-0026) could be misinterpreted as requiring the City to perform daily sampling on a number of parameters regardless of whether stream discharge is occurring at Discharge Point No. 001, or in fact, regardless of whether the HARRF tertiary facility is even producing recycled water. To rectify this, the City suggests that Footnote 9 of Table E-3 be added to the Minimum Sampling Frequency column of Table E-2 for flow rate, pH, turbidity, CBOD₅, TSS, total coliform, fecal coliform, enterococcus, *E. coli*, and total cyanide.

Additionally, the City requests that the analytical test methods for *E. Coli* and enterococcus within Table E-3 of Attachment E be revised to provide the City with the ability to utilize the Colilert test for evaluating *E.coli* and the Enterolert test for evaluating enterococcus.

With the two above proposed modifications, the first 10 rows of Table E-3 of Attachment E (Monitoring and Reporting Program) would be as follows:

Table E-3 Effluent Monitoring for Discharge Point No. 001

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Flow	GD	Recorder/totalizer	1/Day ⁹	1
pH	Standard units	Grab	1/Day ⁹	1
Turbidity	NTU	Recorder	1/Day ⁹	1
CBOD ₅	mg/L	24-hour composite	1/Day ⁹	1
TSS	mg/L	24-hour composite	1/Day ⁹	1
Total Coliform	MPN/100 ml	Grab	1/Day ⁹	1
Fecal Coliform	MPN/100 ml	Grab	1/Day ⁹	1
Enterococcus	MPN/100 ml	Grab	1/Day ⁹	^{1,10}
<i>E. Coli</i>	MPN/100 ml	Grab	1/Day ⁹	^{1,11}
Cyanide, Total	µg/l	24-hour composite	1/Day ⁹	^{1,8}

¹⁰ Use of the EPA-approved Enterolert test (per *Standard Methods for the Examination of Water and Wastewater*) is allowed for evaluating enterococcus.

¹¹ Use of the EPA-approved Colilert test (per *Standard Methods for the Examination of Water and Wastewater*) is allowed for evaluating *Escherichia Coli* (*E. Coli*).

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Table E-5 of Attachment E, Monitoring and Reporting Program. Table E-5 of Monitoring and Reporting Program (Attachment E to Tentative Order No. R9-2015-0026) establishes that quarterly reports are due on May 1, August 1, November 1, and February 1, semiannual reports are due on September and March 1, and annual reports are due on March 1. To make reporting dates consistent between quarterly, semiannual, annual reports, it is requested that quarterly report due dates of Table E-5 be revised as follows:

Table E-5 Monitoring Periods and Reporting Schedules

Parameter	Monitoring Period Begins On . . .	Monitoring Period	SMR Due Date
Quarterly	Closest of January 1, April 1, July 1, or October 1 following (or on) permit effective date	January 1 through March 31	May 1
		April 1 through June 30	August <u>September</u> 1
		July 1 through September 30	November 1
		October 1 through December 31	February <u>March</u> 1
Semiannual	Closest of January 1 or July 1 following (or on) permit effective date	January 1 through June 30	September 1
		July 1 through December 31	March 1
Annual	January 1 following (or on) permit effective date	January 1 through December 31	March 1

Attachment F - Page 1 of Fact Sheet. The telephone number for Dennis Sperino (City of Escondido Deputy Utilities Manager, Wastewater) is (760) 839-4290.

Item 13.b.

TENTATIVE ORDER NO. R9-2015-0027

Table 4. Interim Effluent Limitations. As documented within Table 3 of Tentative Time Schedule Order (TSO) No. R9-2015-0027, the maximum observed HARRF un-ionized ammonia concentration during August 2009 through August 2013 was 32.6 mg/l, and the maximum observed total nitrogen concentration during August 2009 through August 2013 was 37.4 mg/l. Similar maximum concentrations have been observed in the HARRF effluent subsequent to August 2013. The City requests that the interim maximum effluent concentration limits of Table 4 of the TSO be revised as follows to reflect the historically achievable (and maximum anticipated) HARRF effluent ammonia and total nitrogen values.

Table 4. Interim Effluent Limitations

Constituent	Units	Maximum Effluent Concentration
Ammonia, Un-ionized (NH ₃)	mg/L	25 <u>35</u>
	lbs/day	1334 <u>1868</u>
Total nitrogen	mg/L	35 <u>40</u>
	lbs/day	1868 <u>2135</u>

D. Compliance Schedule Reporting Requirements. Compliance Schedule Reporting Requirement D.2 requires the City to prepare and submit quarterly progress reports that detail efforts taken by the City to achieve the milestones established within Table 5 of Tentative TSO No. R9-2015-0027. The

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City does not believe that the nature of the proposed compliance work justifies or warrants the need for quarterly progress reports.

Because of the nature of the City's proposed compliance effort, progress reports will be largely limited to identifying dates when design is completed, construction is initiated, and construction is completed. A total of 21 of the 23 compliance deadlines identified within in Table 5 of the TSO occur in January, and 2 of the 23 compliance deadlines occur in July. Because compliance task start-up and completion dates are almost exclusively in January, the only progress to address in most quarterly progress reports would be to note that ongoing design and construction activities remain in progress and on schedule.

In lieu of requiring quarterly reports, the City proposes that Compliance Schedule Reporting Requirement D.2 of the TSO be modified to require that compliance reports be submitted to the Regional Board within 60 days of each of the compliance task dates listed in Table 5 of the TSO. The effect of this requirement would be that the City would be required to submit compliance reports in:

- March 2016 (reporting on 1/4/2016 compliance tasks),
- March 2017 (reporting on 1/2/2017 compliance tasks),
- March 2018 (reporting on 1/2/2018 compliance tasks),
- March 2019 (reporting on 1/2/2019 compliance tasks),
- March 2020 (reporting on 1/2/2020 compliance tasks),
- September 2020 (reporting on 7/1/2020 compliance tasks), and
- March 2021 (reporting on 1/4/2021 compliance tasks).

In accordance with the requirements of the TSO, the City would identify compliance tasks that are completed, and would detail efforts and schedules associated with implementing future required compliance tasks. The City believes that the above proposed schedule of compliance reporting (the submittal of annual compliance reports, except for semiannual reports submitted in 2020) would be more than adequate for allowing the Regional Board to track the City's compliance progress, and would result in considerably more effective use of City and Regional Board staff time.

Thank you for the opportunity to provide input on Tentative Order No. R9-2015-0026 and Tentative Time Schedule Order No. R9-2015-0027. Please contact me at (760) 839-4290 if you have any questions concerning the City's comments and requested modifications.

Thank you for your assistance.

Sincerely,



Dennis Sperino
Deputy Utilities Manager, Wastewater