

From: [Pasek, Jeffery](#)
To: [Barker, David@Waterboards](#); [Osibodu, Olufisayo@Waterboards](#)
Cc: [Dorman, Amy](#); [Owen, Douglas](#); [Shane Trussell](#); "[Debbie Burris \(dburris@ddb.com\)](#)"; [Michael R. Welch Ph.D. P.E. Consulting Engineer](#); [Llagas, Margaret](#); [Petoscia, Stormie](#)
Subject: 850597:Oosibodu, comment on Tentative Order
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EXTERNAL:

Ref: 850597:Oosibodu

Dave, Fisayo –

The City of San Diego has reviewed the Tentative Order No. R9-2020-0001, NPDES Permit No. CA 0109398, *Waste Discharge Requirements for the City of San Diego, North City Water Reclamation Plant and Pure Water Facility, Discharge to Miramar Reservoir San Diego County* (Tentative Order).

We genuinely appreciate the cooperative effort of Water Board staff and our project team on the Tentative Order. We have just one comment for your consideration.

In the Tentative Order Table E-16, rows 10, 12, 14, and 27, and footnote #14 specify the following (summarizing):

At monitoring locations RSW-001 and RSW-003, the Discharger shall install a permanent mooring system that will continuously measure dissolved oxygen, temperature, pH, and turbidity at the surface of the reservoir.

The City recommends that the continuous monitoring at station RSW- 003 be deleted, while somewhat expanding the continuous monitoring at station RSW-001.

Monitoring location RSW-001 is in the deepest portion of the reservoir near the outlet tower. Monitoring location RSW-003 is at the eastern end of the reservoir, distant from the outlet tower.

There is no real value in continuous monitoring at location RSW-003. The reservoir's

hydrodynamic, chemical, and biological processes overwhelmingly happen in the vertical dimension, not the horizontal. Thus, conditions at any given depth are the same across the entire horizontal extent of the reservoir. Monitoring will not show any difference in the measured parameters at the surface at RSW-003 versus RSW-001. Separate from the continuous monitoring, the Tentative Order mandates vertical profile monitoring (surface to bottom) at RSW-001 and RSW-003, as well as station RSW-002 in the middle of the reservoir. This robust dataset of vertical profiles at three sites will serve to confirm there is no significant variability of the measure parameters along the horizontal.

In lieu of the continuous monitoring described in the Tentative Order at both stations RSW-001 and RSW-003, the City proposes the following: We will deploy at monitoring location RSW-001 a moored sensor string that will measure and transmit useful data at the surface and at fixed elevations down the water column. The parameters measured will include temperature, dissolved oxygen, oxidation-reduction potential, pH, and electrical conductivity (which yields TDS). Sensors will be located at the surface (0.2 m deep) and at fixed elevations corresponding to the level of reservoir outlets. Not all parameters will be measured at each elevation; rather, the sensors will be parsimoniously deployed to give information useful for understanding the limnology of the reservoir and for treatability at the Miramar Water Treatment Plant. The sensor string will be autonomous and will transmit data to a hosted server.

Also note that monitoring location RSW-001 (where we propose to deploy the sensor string) is in the portion of the reservoir that is closed to public entry. Moored instruments at this location will not be subject to damage from boat traffic or vandalism, whereas instruments deployed at location RSW-003 would be subject to such damaged.

Please contact me if you have questions.

Jeffery Pasek
Public Utilities Department
mobile 619 772 0986
office 619 533 7599