

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

**ERRATA SHEET FOR
TENTATIVE ORDER NO. R9-2023-0014
WASTE DISCHARGE REQUIREMENTS FOR GENENTECH, INC.
INDUSTRIAL WASTEWATER REUSE FOR IRRIGATION
SAN DIEGO COUNTY**

California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) staff prepared this Errata Sheet to document proposed changes to Tentative Order No. R9-2023-0014, *Waste Discharge Requirements for Genentech Inc. Industrial Wastewater Reuse for Irrigation, San Diego County* (Tentative Order No. R9-2023-0014). The changes to Tentative Order No. R9-2023-0014 are proposed:

- In response to comments received from the Genentech Inc., a member of the Roche Family (Genentech) during the public comment period. The response to comments document (**Supporting Document 5**) explains the changes proposed in response to the Genentech’s comments;
- To ensure constituents of emerging concern (CEC) monitoring requirements are consistent with the water quality objectives established in the San Diego Water Board’s Water Quality Control Plan for the San Diego Basin (9) (Basin Plan).

The proposed changes to Tentative Order No. R9-2023-0014 are shown below in underline/strikeout format to indicate added and removed language, respectively. San Diego Water Board staff will incorporate the proposed changes upon adoption of Tentative Order No. R9-2023-0014.

1. Tentative Order No. R9-2023-0014, CONTENTS, section III. DISCHARGE SPECIFICATIONS AND EFFLUENT LIMITATIONS, will be modified as follows:

III. DISCHARGE SPECIFICATIONS AND ~~EFFLUENT LIMITATIONS~~
~~PERFORMANCE GOALS~~.....3

2. Tentative Order No. R9-2023-0014, Attachment D – Monitoring And Reporting Program, section II. will be modified as follows:

II. FACILITY DESCRIPTION

The Facility is a biological manufacturing plant to produce bioengineered human health care products. Genentech treats potable water to create ultra high-quality water (UHQW) used for manufacturing and clean-in-place systems. The purification process generates an industrial wastewater stream. The Discharger plans to reuse a portion of the industrial wastewater stream for landscape irrigation. The Discharger submitted the Report of Waste Discharge for Genentech, Inc. a Member of the

Roche Family, One Antibody Drive Oceanside, California (ROWD) to the San Diego Water Board in April 2022. The ROWD provided the following summarized information.

D. A. Wastewater Treatment

1. Genentech Industrial Wastewater Facility.

3. Tentative Order No. R9-2023-0014, III. DISCHARGE SPECIFICATIONS AND EFFLUENT LIMITATIONS – section B. will be modified as follows:

III. DISCHARGE SPECIFICATIONS AND ~~EFFLUENT LIMITATIONS~~ Performance Goal

B. Parameters that do not have reasonable potential to cause or contribute to an exceedance of water quality objectives, or for which reasonable potential to cause or contribute to an exceedance of water quality objectives cannot be determined, are referred to as performance goal parameters and are assigned the performance goals listed in Table 3 below. Performance goal parameters shall be monitored at Monitoring Location M-01, as described in Table D-1 of Attachment D to this Order (Monitoring and Reporting Program [MRP]). The San Diego Water Board will use the results for informational purposes only, not compliance determinations. The performance goals in Table 3 are not water quality-based effluent limitations and are not enforceable, as such.

~~B. Discharges of industrial wastewater from the Facility for landscape irrigation must not contain constituents in excess of the effluent limitations in Table 3. The Discharger must measure compliance at Monitoring Location M-01, as described in Table D-1 of Attachment D to this Order (Monitoring and Reporting Program [MRP]).~~

Table 3. Performance Goals ~~Effluent Limitations~~ for Landscape Irrigation

Constituent	Units	Daily Maximum ¹	Monthly Average ²	Annual Average ³
Boron	Milligrams per Liter (mg/L)	-	-	0.75
Chloride	mg/L	-	-	400
Color Units	Apparent Color Unit (ACU)	-	-	15
Fluoride	mg/L	-	-	1.0
Iron	mg/L	-	-	0.3
Manganese	mg/L	-	-	0.05
Methylene Blue-Activated Substances (MBAS)	mg/L	-	-	0.5

Constituent	Units	Daily Maximum ¹	Monthly Average ²	Annual Average ³
Nitrate	mg/L	-	-	45
Odor	-	none ⁴	-	-
pH	pH units	6.5 - 8.5	6.5 - 8.5	6.5 - 8.5
Sulfate	mg/L	-	-	500
Percent Sodium	Percentage	-	-	60
Total Dissolved Solids (TDS)	mg/L	-	-	1,000
Turbidity	Nephelometric Turbidity Units (NTU)	-	-	5

4. Tentative Order No. R9-2023-0014, Attachment A– Definitions, Part 2. – Glossary of Common Terms will be modified as follows:

Part 2. – Glossary of Common Terms

Average

An average is the sum of measured values divided by the number of measured values.

~~Average Annual Effluent Limitation~~

~~The average annual effluent limitation is the highest allowable average of daily discharges over a calendar year (January-December), calculated as the sum of all daily discharges measured during a calendar year divided by the number of daily discharges during that year.~~

California Code of Regulations

California Code of Regulations are the official compilation and publication of the regulations adopted, amended, or repealed by state agencies pursuant to the Administrative Procedure Act. Properly adopted regulations that have been filed with the Secretary of State have the force of law.

Code of Federal Regulations

Code of Federal Regulations are the codification (arrangement of) the general and permanent rules published in the Federal Register by the executive departments and agencies of the federal government. The Code of Federal Regulations are divided into 50 titles that represent broad areas subject to federal regulations. Title 40 of the

Code of Federal Regulations: Protection of Environment addresses the USEPA’s mission of protecting human health and the environment.

Daily Maximum Effluent Limitation

~~The daily maximum effluent limitation is the highest allowable daily discharge of a pollutant.~~

Performance Goals

Parameters that do not have reasonable potential to cause or contribute to an exceedance of water quality objectives, or for which reasonable potential to cause or contribute to an exceedance of water quality objectives cannot be determined, are referred to as performance goal parameters.

- 5. Tentative Order No. R9-2023-0014, Attachment D– Monitoring And Reporting Program, section III. MONITORING LOCATIONS will be modified as follows:

III. MONITORING LOCATIONS

The Discharger must establish the following monitoring location(s) to demonstrate compliance with the ~~effluent limitations~~, discharge specifications, and other requirements in the Order:

- 6. Tentative Order No. R9-2023-0014, Attachment D– Monitoring And Reporting Program, section IV. MONITORING REQUIREMENTS, will be modified as follows:

IV. MONITORING REQUIREMENTS

The Discharger must monitor the effluent discharged to the landscape irrigation sites at Monitoring Location M-01 and collect the effluent monitoring samples shown in Table D-2.

Table D-2. Effluent Monitoring

Constituent	Units	Sample Type	Minimum Sampling Frequency ¹	Reporting Frequency
Boron	Milligrams per Liter (mg/L)	Grab	Semiannual	Annually
Chloride	mg/L	Grab	Semiannual	Annually
Color Units	Apparent Color Unit (ACU)	Grab	Semiannual	Annually
Flowrate	Gallons per day (gpd)	Recorder/ Totalizer	Continuous	Annually

Fluoride	mg/L	Grab	Semiannual	Annually
Iron	mg/L	Grab	Semiannual	Annually
Manganese	mg/L	Grab	Semiannual	Annually
Methylene Blue-Activated Substances (MBAS)	mg/L	Grab	Semiannual	Annually
Nitrate	mg/L	Grab	Semiannual	Annually
Odor	-	Grab	Semiannual	Annually
Percent Sodium	Percentage	Grab	Semiannual	Annually
pH	pH units	Grab	Semiannual	Annually
Sulfate	mg/L	Grab	Semiannual	Annually
Total Dissolved Solids (TDS)	mg/L	Grab	Semiannual	Annually
Turbidity	Nephelometric Turbidity Units (NTU)	Grab	Semiannual	Annually

¹ The minimum frequency of monitoring for this parameter is automatically increased to twice the minimum frequency specified, if any analysis for this parameter yields a result higher than the applicable **effluent limitation performance goals** specified in the Order. The increased minimum frequency of monitoring shall remain in effect until the results of a minimum of four consecutive analyses for this constituent are below all applicable **effluent limitations performance goals** specified in the Order.

7. Tentative Order No. R9-2023-0014, Attachment D– Monitoring And Reporting Program, section V. SELF-MONITORING REPORTS, section A will be modified as follows:

A. The Discharger must submit the results of all monitoring required by this MRP in Self-Monitoring Reports (SMRs) to the San Diego Water Board via the San Diego Regional Water Quality Control Board’s (State Water **Resources Control** Board’s) GeoTracker system at <http://geotracker.waterboards.ca.gov> (GeoTracker). The Discharger must upload SMRs on or prior to the SMR due dates (Table D-3). The Discharger must:

8. Tentative Order No. R9-2023-0014, Attachment D– Monitoring And Reporting Program, section V. SELF-MONITORING REPORTS, section D, will be modified as

follows:

D. The Discharger must summarize all reported data in a tabular format. The reports must present data to clearly illustrate whether Genentech Inc. is operating in compliance with discharge specifications ~~and effluent limitations~~.

9. Tentative Order No. R9-2023-0014, Attachment D– Monitoring And Reporting Program, section VI. Table D-4 will be modified as follows:

Report Type	Reference Section	Report Due Date
Sampling and Analysis Plan	MRP section IV	Within 90 days of the adoption of the Order
Noncompliance Report	Order section IV.A	5 days after noncompliance
Report of Waste Discharge	Order section IV.I	120 days prior to proposed major change
Transfer of Ownership	Order section IV.H	120 days prior to proposed change

10. Tentative Order No. R9-2023-0014, Attachment E- Fact Sheet, section II. FACILITY DESCRIPTION, will be modified as follows:

III. FACILITY DESCRIPTION

11. Tentative Order No. R9-2023-0014, Attachment E- Fact Sheet, section III. APPLICABLE PLANS, POLICIES, AND REGULATIONS, will be modified as follows:

III. APPLICABLE PLANS, POLICIES, AND REGULATIONS

The requirements contained in the Order are based on the requirements and authorities described in section II of the Order and in this section.

A. Governor’s Water Supply Strategy 2022. Governor Newsom’s “California’s Water Supply Strategy, *Adopting Adapting to a Hotter, Drier Future*”¹, focuses on supporting local efforts to conserve, capture, recycle, and de-salt enough water to allow California communities to prosper in a hotter and drier climate. The adoption of the Order is consistent with the Governor’s Water Supply Strategy because it supports the use of industrial wastewater to partially replace the need for potable water for landscape irrigation.

¹ <https://resources.ca.gov/-/media/CNRA-Website/Files/Initiatives/Water-Resilience/CA-Water-Supply-Strategy.pdf>

12. Tentative Order No. R9-2023-0014, Attachment E– Fact Sheet, section IV. RATIONALE FOR DISCHARGE PROHIBITIONS, DISCHARGE SPECIFICATIONS AND EFFLUENT LIMITATIONS, will be modified as follows:

IV. RATIONALE FOR DISCHARGE PROHIBITIONS, DISCHARGE SPECIFICATIONS AND **EFFLUENT LIMITATIONS PERFORMANCE GOALS**

13. Tentative Order No. R9-2023-0014, Attachment E– Fact Sheet, section IV. RATIONALE FOR DISCHARGE PROHIBITIONS, DISCHARGE SPECIFICATIONS AND EFFLUENT LIMITATIONS, subsection B. Discharge Specifications and Effluent Limitations will be modified as follows:

B. Discharge Specifications and Effluent Limitations Performance Goals.

The San Diego Water Board did not designate WQOs in the Basin Plan for the Loma Alta HA. Based on the San Diego Water Board's professional judgment, and in the absence of designated WQOs for the Loma Alta HA, the San Diego Water Board relied on the WQOs of the adjacent hydrologic areas to establish **effluent limitations performance goals** that protect and maintain water quality.

Parameters that do not have reasonable potential to cause or contribute to an exceedance of water quality objectives, or for which reasonable potential to cause or contribute to an exceedance of water quality objectives cannot be determined, are referred to as performance goal parameters.

The closest hydrologic subareas (HSAs) to the Facility with designated WQOs in the Carlsbad Hydrologic Unit are the El Salto HSA, Vista HSA, and Los Monos HSA. The Order establishes discharge specifications and **effluent limitations performance goals** based on the most stringent, equivalent WQOs from these adjacent hydrologic areas, listed in Table E-2.

14. Tentative Order No. R9-2023-0014, Attachment E– Fact Sheet, section IV. RATIONALE FOR DISCHARGE PROHIBITIONS, DISCHARGE SPECIFICATIONS AND EFFLUENT LIMITATIONS, subsection B, Table E-2, will be modified as follows:

Table E-2. Groundwater WQOs From Nearby HSAs

CONSTITUENT ¹ (mg/L or as noted)												
(Concentrations not to be exceeded more than 10% of the time during any one-year period)												
TDS	Cl	SO ₄	%Na	NO ₃	Fe	Mn	MBAS	B	Odor	TURB (NTU)	COLOR (UNITS)	F
1,000	400	500	60	45	0.3	0.05	0.5	0.75	none	5	15	1.0

¹The constituents, from left to right in the table, are as follows: total dissolved solids (TDS), chloride (Cl), sulfate (SO₄), percent sodium (%Na), nitrate (NO₃), iron (Fe), manganese (Mn), methylene blue-

activated substances (MBAS), boron (B), turbidity (TURB), and fluoride (F).

15. Tentative Order No. R9-2023-0014, Attachment E– Fact Sheet, section VI. RATIONALE FOR MONITORING AND REPORTING PROVISIONS, subsection A, will be modified as follows:

VI. RATIONALE FOR MONITORING AND REPORTING PROVISIONS

A. The purpose of the MRP is to determine and ensure compliance with discharge specifications, ~~effluent limitations~~ performance goals, and other requirements established in the Order. The MRP also helps the San Diego Water Board and the Discharger to assess the treatment efficiency, characterize effluent quality, ensure protection of water quality objectives and beneficial uses of the groundwater basins, and minimize the effects of the discharge on receiving water quality. The MRP also specifies requirements concerning the proper use, maintenance, methods, and the monitoring type intervals and frequency necessary to provide monitoring data that are representative of the activities and discharges regulated under the Order.