



ORANGE COUNTY SANITATION DISTRICT

We protect public health and the environment by providing effective wastewater collection, treatment, and recycling.

October 17, 2010

Via email: commentletters@waterboards.ca.gov

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SUBJECT: Comment Letter-California Ocean Plan Amendments

- Serving
- Anaheim
- Brea
- Buena Park
- Cypress
- Fountain Valley
- Fullerton
- Garden Grove
- Huntington Beach
- Irvine
- La Habra
- La Palma
- Los Alamitos
- Newport Beach
- Orange
- Picentia
- Santa Ana
- Seal Beach
- Stanton
- Tustin
- Villa Park
- Yorba Linda
- Costa Mesa Sanitary District
- Midway City Sanitary District
- Irvine Ranch Water District
- County of Orange

The Orange County Sanitation District (OCSD) appreciates this opportunity to provide written comments on the State Water Resources Control Board's (SWRCB) proposed amendments to the California Ocean Plan (COP) regarding the Model Monitoring Program. OCSD is a publicly owned wastewater agency, operating two treatment plants, one in the city of Fountain Valley and the other in the city of Huntington Beach, California. For more than 50 years, OCSD has been safely collecting, treating, disposing, and reclaiming wastewater generated by 2.5 million people living and working in central and northwestern Orange County. Each day OCSD treats approximately 230 million gallons of wastewater, encompassing a service area of 479 square mile.

The Orange County Sanitation District has reviewed the proposed amendments to the COP. The following comments are intended to solicit clarification on specific provisions of the Model Monitoring program:

1) Appendix III Section 2 Quality Assurance:

This section states, "All monitoring conducted in compliance with MRPs must be comparable with the Quality Assurance requirements of the Surface Water Ambient Monitoring Program (SWAMP);" however, these requirements have not been fully developed. On April 20, 2010, the SWRCB held a public meeting hosted by Southern California Coastal Water Research Project to discuss development of marine matrices for the SWAMP. A SWAMP Quality Assurance Team (Team) was established and decided that measurement quality objectives (MQO) tables for marine matrices should be developed through the SWAMP. The Team set priorities for tables as follows:

PRIORITY 1	PRIORITY 2	PRIORITY 3
Toxicity testing	Chemistry in water	Sampling methods
Chemistry in sediment	Water column data	Benthic community structure
Chemistry in tissue	Field measurements	Fish trawls
Bacteria		

The Team was able to expedite the matter and included tables for both Priority 1 and Priority 2 analyte groups; however, there are currently no plans for the SWAMP to address Priority 3 items. Consequently, the language in Appendix III section 2 should be clarified to exclude those components listed as Priority 3, since there are currently no SWAMP MQOs that can be followed.

2) Appendix III.4.1 Indicator Bacteria: Point Sources

This section states, "To answer these questions, core monitoring shall be conducted at a minimum of five times per month for any point sources discharging treated sewage effluent." This provision does not state whether sampling applies to offshore REC-1 waters, surfzone





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(beaches), or both; nor is it clear whether the minimum five samples per month should be collected in every month of the year, quarterly, semi-annually, annually, or at the discretion of the Regional Water Board.

If the intent of the provision is to sample both offshore REC-1 waters and beaches each month of the year, then it seems that such a requirement is overly burdensome, particularly for dischargers who are disinfecting their effluent. It may be more appropriate to require REC-1 sampling more frequently sampling (e.g., monthly) when surfzone samples demonstrate wastewater contamination (i.e., contamination unrelated to proximity to river or storm water drainage) and less frequently (e.g., quarterly) when surfzone sampling shows little or infrequent contamination.

3) Appendix III. 6.1 Sediment Monitoring: Point Sources

This section states, "If sufficient data exists from previous water column monitoring for these parameters, the Regional Water Board at its discretion may reduce the frequency of monitoring, or may allow this requirement to be satisfied through participation in a regional monitoring program." It is recommended to change "*water column*" to *sediment chemistry* since the water column is not monitored for the constituents mentioned in the supporting language in the section.

4) Appendix III.7.1 Aquatic Life Toxicity: Point Sources

The first paragraph of this section appears to call for receiving waters (i.e., water column) toxicity testing: "Core monitoring for Table 1 receiving water toxicity shall be required periodically." If this is the intent of this sentence, OCSD does not see a need to perform water column toxicity tests if routine whole effluent toxicity (WET) tests are also being performed and demonstrate that the effluent is not toxic. In such cases, receiving water toxicity testing would waste resources unnecessarily. If the intent of this language is to require receiving waters toxicity testing, then the State should clarify when such testing would be necessary (e.g., when routine WET testing exceeds permitted limits).

In the second paragraph of section 7.1 states, "Core monitoring for acute sediment toxicity will utilize alternative amphipod species (*Eohaustorius estuaries*, *Leptocheirus plumulosus*, *Rhepoxynius abronius*)" needs to be clarified. First, the prior paragraph does not specify that sediment toxicity tests are required, nor does it recommend a minimum frequency. Second, the use of "alternative amphipod species" implies some preference for a primary species; however, Table III-1 does not list any sediment species for testing. All species listed in Table III-1 are typical of the WET testing methods. Overall, it is unclear if sediment toxicity testing is a requirement of the revised California Ocean Plan model monitoring program.

Thank you very much for providing this opportunity to comment. I would be pleased to provide further clarification or answer any questions, call me at (714) 593-7450.

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TM:JC:jb