

RESPONSE TO COMMENTS

ADDENDUM NO. 2 TO ORDER NO. R9-2002-0025
NPDES NO. CA0107409

WASTE DISCHARGE REQUIREMENTS AND NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM PERMIT FOR THE CITY OF SAN DIEGO E. W. BLOM POINT LOMA
METROPOLITAN WASTEWATER TREATMENT PLANT DISCHARGE TO THE PACIFIC
OCEAN THROUGH THE POINT LOMA OCEAN OUTFALL

Below are responses to the comments submitted to the Regional Board by the Sierra Club San Diego Chapter on July 30, 2008 regarding tentative Addendum No. 2 to Order No. R9-2002-0025.

Sierra Club San Diego Chapter Comment 1

Bacteria regrowth and biofilm formation harboring bacteria in the outfall may likely require higher dose rates than determined by the bench test chlorination dose.

Regional Board Response: The proposed effluent disinfection is a prototype system that would be used to determine if compliance with bacterial objectives in the next permit period could be consistently achieved. Although regrowth and biofilm formation in the outfall may contribute additional bacterial loads, the new bacterial objectives will not be required until the next permit period. The City of San Diego is currently in compliance with bacterial objectives in its current permit and the prototype system will provide data to determine how compliance with new bacterial objectives may be maintained using sodium hypochlorite solution for disinfection.

Sierra Club San Diego Chapter Comment 2

The existing effluent sampling is located at the head of the ocean outfall. The “in pipe” disinfection system raises a concern that the end of pipe effluent is not directly monitored unless special monitoring provisions are added to the addendum. Should the required chlorination dose exceed the effluent water quality due to residual chlorine and chlorination by-products at this sampling point then how would effluent monitoring be conducted without special direct monitoring of the effluent to assure compliance with the NPDES permit?

Regional Board Response: Effluent sampling is performed prior to the drop shaft that leads to the ocean outfall. Sampling locations post-treatment and prior to outfall discharge are standard for chlorine residual and chlorination by-product monitoring at wastewater treatment plants in the San Diego Region. Based on the total chlorine residual and chlorination by-product effluent limitations derived from the 2005 California Ocean Plan, maximum projected concentrations of chlorination by-products that may form in the outfall would be in compliance with 2005 California Ocean Plan objectives.

Sierra Club San Diego Chapter Comment 3

The bench acute toxicity tests used the disinfected effluent. The concern again is that whole effluent toxicity tests (acute and chronic) would require special end of pipe effluent measurements or some indirect monitoring.

Regional Board Response: Compliance with total chlorine residual and chlorination by-product effluent limitations in Order No. R9-2002-0025 at the current effluent sampling location would still ensure compliance with the receiving water objectives for these constituents in the 2005 California Ocean Plan. These 2005 California Ocean Plan objectives are based on protection of marine aquatic life and human health. As stated above, sampling locations post-treatment and prior to outfall discharge are standard for chlorine residual and chlorination by-product monitoring at wastewater treatment plants in the San Diego Region.

Sierra Club San Diego Chapter Comment 4

Special monitoring plan should be included in the addendum to validate that the implementing the prototype disinfection system will meet the indicator bacteria receiving water quality objectives. Seasonal and spatial variations in the indicator bacteria must be accounted.

Regional Board Response: The proposed effluent disinfection is a prototype system that would be used to determine if compliance with bacterial objectives in the next permit period could be consistently achieved. The City of San Diego will be required to monitor and maintain compliance with receiving water bacteria concentrations throughout the year once these requirements are established in the next permit period.