

**California Regional Water Quality Control Board
San Diego Region**

Response to Comments Report

**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, San Diego County**

June 24, 2015

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

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**California Regional Water Quality Control Board
San Diego Region**

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Introduction

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has prepared this Response to Comments Report on 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, San Diego County* (Tentative Order). This Report addresses written comments received from the interested party listed below on the Tentative Order. Public notice of the Tentative Order was published in the newspaper on April 17, 2015 and the Tentative Order was made available for public review and comment on April 20, 2015, with the comment period ending on May 18, 2015.

<u>Written comments were received from:</u>	<u>Page No.</u>
City of Escondido	6

Comments and Responses

The summarized written comments and San Diego Water Board responses to the comments are listed in the table that follows. The comments are organized according to the party that made the comment. The table indicates if the Tentative Order was revised in response to the comment. All of the original comment letters are provided on the San Diego Water Board website at the following link:

http://www.waterboards.ca.gov/sandiego/board_info/agendas/2015/Jun/Jun24.shtml

No.	Comment	Response	Action Taken
Dennis Sperino, Deputy Utilities Manager, Wastewater, City of Escondido, May 12, 2015			
1	<p>Discharge Prohibitions III.Q.1. and III.Q.2.</p> <p>The purpose of the City's request for National Pollutant Discharge Elimination System (NPDES) requirements for the Hale Avenue Resource Recovery Facility (HARRF) intermittent stream discharge is to allow the City to temporarily discharge excess tertiary -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 million gallons per day (MGD).</p> <p>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</p>	<p>As requested by the Discharger, the following changes have been made to section III of the Tentative Order:</p> <p>Q. Discharges from the Facility to Escondido Creek are prohibited unless all of the following conditions have been met:</p> <p>1.—The discharge of recycled water to Escondido Creek from the Facility is required to ensure that</p> <p>2.1. The combined discharge to the San Elijo Ocean Outfall (<u>SEOO</u>) from the Facility, from the San Elijo Water Pollution Control Facility, from Stone Brewing Company, and from the San <u>Diego Gas and Electric (SDG&E)</u>, Palomar Energy Center exceed the maximum capacity of the outfall, or the San Elijo Joint Powers Authority (<u>SEJPA</u>) has informed the Discharger that Facility discharge flows to the SEOO must be throttled back to 16 MGD-reduced to accommodate larger than normal wet weather outfall discharge flows from SEJPA.</p>	<p>Tentative Order, section III.Q.has been revised.</p>

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	<p>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:</p> <p>III.Q.1. The discharge of recycled water to Escondido Creek from the Facility is required to ensure that <u>the design capacities of the Escondido Land Outfall and SEOO are not exceeded.</u></p> <p>III.Q.2. The combined discharge to the San Elijo Ocean Outfall from the Facility, from the San Elijo Water Pollution Control Facility, <u>from Stone Brewing Company</u> 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.</p>		

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2	<p>Table E-3 of Attachment E, Monitoring and Reporting Program (MRP).</p> <p>Table E-3 of the MRP 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, carbonaceous biochemical oxygen demand (CBOD5), total suspended solids (TSS), total coliform, fecal coliform, enterococcus, E. coli, and total cyanide.</p>	<p>As requested by the Discharger, a footnote has been added to Attachment E, Table E-3 of the Tentative Order clarifying that monitoring is only required when discharging through Discharge Point No. 001.</p>	<p>Tentative Order, Attachment E, Table E-3 has been revised.</p>
3	<p>Table E-3 of Attachment E, MRP.</p> <p>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.</p>	<p>As indicated in footnote 1 to Table E-3 and in Attachment E, section I.J., the Discharger may use methods that are contained in Title 40 of the Code of Federal Regulations (CFR) part 136, provided that the analytical procedures to evaluate compliance with effluent limitations established in the Tentative Order 1) use minimum levels (ML) no greater than the applicable effluent limitation and 2) are consistent with the requirements of 40 CFR part 136 or</p>	<p>No changes have been made to the Tentative Order.</p>

No.	Comment	Response	Action Taken
		<p>otherwise approved by USEPA and authorized by the San Diego Water Board. If no authorized ML value is below the effluent limitation, then the method must achieve an ML no greater than the lowest ML value indicated in Attachment H of the Tentative Order (or if not listed in Attachment H of the Tentative Order, be the lowest ML provided for in 40 CFR part 136).</p> <p>Alternatively, the San Diego Water Board may authorize the use of an alternative method once approved by the US Environmental Protection Agency (EPA) and the State Water Resources Control Board (State Water Board)</p>	

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4	<p>Table E-5 of Attachment E, MRP.</p> <p>Table E-5 of Monitoring and Reporting Program (Attachment E to Tentative Order No. R9-20 15-0026) 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.</p>	<p>As requested by the Discharger, the following changes have been made to Attachment E, Table E-5 of the Tentative Order:</p> <p>Quarterly Reports for January 1 through March 31 are due June 1, Quarterly Reports for April 1 through June 30 are due September 1, Quarterly Reports for July 1 through September 30 are due December 1, and Quarterly Reports for October 1 through December 31 are due March 1.</p>	<p>Tentative Order, Attachment E, Table E-5 has been revised.</p>
5	<p>Attachment F - Page 1 of Fact Sheet.</p> <p>The telephone number for Dennis Sperino (City of Escondido Deputy Utilities Manager, Wastewater) is (760) 839-4290.</p>	<p>As requested by the Discharger, the following changes have been made to Attachment F, Table F-1 of the Tentative Order:</p> <p>Facility Contact, Title and Phone: Dennis Sperino, Deputy Utilities Mgr., Wastewater, (760) 839-49304290</p>	<p>Tentative Order, Attachment F, Table F-1 has been revised.</p>