

November 15, 2016

Mr. David W. Gibson
Executive Officer
California Regional Water Quality Control Board, San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

Subject: Submittal of Comments
Tentative Order No. R9-2016-0183
Carlsbad Water Recycling Facility
Reference Code 213270:oosibodu

Dear Mr. Gibson:

Thank you for the opportunity to review and comment on Tentative Order No. R9-2016-0183. The Tentative Order would establish updated master water recycling requirements for the Carlsbad Water Recycling Facility (CWRF). This letter presents Carlsbad Municipal Water District (CMWD) comments on the Tentative Order.

A list of minor errata and revisions to the Tentative Order are presented in the attached errata table. Requested modifications to the Tentative Order include the following:

Revision No. 1 – Table 3. Effective Date (page 1)

To avoid confusion associated with modifying sampling and monitoring protocols in mid-week for the final 17 days of calendar year 2016, CMWD requests that the effective date of Order No. R9-2016-0183 be changed from December 14, 2016 to January 1, 2017. With this change, CMWD will implement the monitoring provisions of Order No. R9-2016-0183 at the start of calendar year 2017.

Revision No. 2 – Finding I.A (page 3)

As documented within the CWRF Report of Waste Discharge, CMWD supplements CWRF recycled water production with the purchase of recycled water from the Vallecitos Water District and Leucadia Wastewater District. Finding No. 9 of Order No. 2001-352 authorizes CMWD to purchase up to 5.0 mgd of recycled water from the Vallecitos Water District Meadowlark Water Reclamation Plant and up to 2.0 mgd of recycled water from the Leucadia Wastewater District (formerly Leucadia County Water District) Gafner Water Reclamation Plant. Consistent with this existing Order, CMWD requests that Finding I.A of Tentative Order R9-2016-0183 (along with supporting text in Attachment C) be modified to ensure that it is

clear that Order No. R9-2016-0183 authorizes CMWD to purchase and use recycled water from these agencies. Suggested language for Finding I.A is as follows:

I.A. Background. Carlsbad Municipal Water District (hereinafter Discharger) submitted a Report of Waste Discharge (ROWD), dated May 23, 2016, which describes proposed upgrades to expand the capacity of the CWRW from 43 mgd to 7 mgd. Upon adoption, Order No. R9-2016-0183 (Order) will supersede and replace the Discharger's Master Reclamation Permit¹ except for enforcement purposes. This Order increases the permitted CWRW flowrate from 43-mgd to 7 mgd, revises some of the discharge specifications, adds requirements of the State Recycled Water Policy² and adds requirements for recycled water fill stations. This Order also retains provisions from the Discharger's Master Reclamation Permit¹ that authorizes the Discharger to purchase and use up to 5.0 mgd of recycled water from the Vallecitos Water District Meadowlark Water Reclamation Plant and up to 2.0 mgd of recycled water from the Leucadia Wastewater District Gafner Water Reclamation Plant. Recycled water quality and production at the Meadowlark and Gafner facilities are regulated by separate waste discharge requirements established by the San Diego Regional Water Board.

Revision No. 3 – Special Provision VI.C (page 14)

Special Provision VI.C (along with supporting text in Attachment D on page D-7) requires CMWD to submit a nitrate study work plan by March 15, 2017, and to submit the results of the nitrate study by December 15, 2017. CMWD may need outside technical assistance to develop the nitrate study work plan and complete the required study. Under CMWD's procurement procedures, it may take two or more months to complete the mandated process of contractor solicitation, contractor selection, contract authorization, and contract review/approval. As a result of this contracting process, it may not be possible to complete the nitrate study work plan within the 90-day window proposed within Tentative Order No. R9-2016-0183. CMWD proposes the following schedule for developing the nitrate study work plan and submitting the completed study:

Submit Work Plan: September 15, 2017 ~~March 15, 2017~~

Submit Nitrate Study: June 15, 2018 ~~December 15, 2017~~

Revision No. 4 – Special Provision VI.I (page 15)

In accordance with implementation provisions established within Chapter 4 (page 4-18) of the Basin Plan, Order No. 2001-352 grants an exemption to the 100-year flood protection requirement for recycled water ponds at the North La Costa Golf Course. Tentative Order No. R9-2016-0183 should carry forward this exemption. Consistent with Runoff Protection Requirement D.9 of Order No. 2001-352, CMWD requests that Special Provision VI.I (page 15) be revised as follows:

VI.I. All wastewater and recycled water storage facilities shall be protected against erosion, overland runoff, and other impacts resulting from a 100-year, 24-hour frequency storm. An exemption from this requirement has been granted for the recycled water storage ponds at the North La Costa Golf Course, which shall be operated to prevent discharges of recycled water

from the ponds to San Marcos Creek and Batiquitos Lagoon. The measures shall include termination of the discharge to the reservoirs when there is a potential for overflow.

Revision No. 5 – Table 1. Effluent Monitoring (page D-4)

Tentative Order No. R9-2016-0183 proposes weekly monitoring for biochemical oxygen demand (BOD). As shown in Attachment C of the Tentative Order, CWRF BOD concentrations are typically on the order of 5 mg/l, and rarely above 10 mg/l. Because of the consistency and low level of historic CWRF BOD concentrations, CMWD requests that the BOD monitoring frequency be established at a monthly frequency, rather than weekly.

Revision No. 6 – Table 1. Effluent Monitoring (page D-5)

CMWD assumes that priority pollutants addressed within the Recycled Water Policy and the Tentative Order are as listed in Appendix A to 40 CFR 423, as opposed to the priority pollutants addressed within the California Toxics Rule (40 CFR 131.38.) Clarification on the applicable list of priority pollutants to be monitored should be provided within footnote “f” of Table 1 (page D-5).

Revision No. 7 – Table 1. Effluent Monitoring (page D-5)

Tentative Order No. R9-2016-0183 requires annual monitoring of priority pollutants. In lieu of annual reporting of priority pollutants within the CWRF effluent, CMWD requests that the Order provide CMWD with the option of providing priority pollutant analyses for the CWRF influent (e.g., effluent from the Encina Wastewater Authority facility). To accomplish this, CMWD requests that a new footnote “g” be added to priority pollutants line within Table 1 (page D-5):

g In lieu of annual reporting of priority pollutant concentrations in the CWRF disinfected tertiary recycled water, consistent with the Recycled Water Policy, the Discharger may at its option provide priority pollutant monitoring results for secondary treated CWRF influent.

Thank you for the opportunity to comment on Tentative Order No. R9-2016-0183. Please contact me at (760) 438-2722 if you have any questions concerning these comments or if you need any additional information.

Sincerely,



Wendy Chambers
General Manager

**MINOR REVISIONS/ ERRATA
TENTATIVE ORDER NO. R9-2016-0183**

Errata No.	Page No.	Correction
1	1 C-3 C-6 C-8	Typo: "El Salto" HSA is misspelled as "El Sato".
2	1	Table 1, Discharger Information. As documented on State of California Form 200 within the CWRP Report of Waste Discharge, the facility contact should be Wendy Chambers, General Manager, (760) 438-2722.
3	1 C-3	To avoid confusion regarding Hydrologic Subarea (HSA) boundaries, within Table 2 (page 1), Hydrologic Area 904.5 (San Marcos HA 904.5) be cited instead of the Richland HSA (904.52). (Similar change on page C-3.)
4	3 C-1	Typo: The capacity of the CWRP addressed in Order No. 2001-0027 is 4 mgd, not 3 mgd.
5	3 4 C-1	Footnote 1 on page 3, text on page 4, and text on page C-1 should reference: Order No. 2001-352 <u>as amended by Order No. R9-2012-0027</u> , Master Reclamation Permit with Waste Discharge Requirements for the Carlsbad Municipal Water District, Carlsbad Water Recycling Facility, San Diego County.
6	4	Typo: Discharge Specification III.B should refer to Table 4, not Table 5
7	4 C-9	Typo: Daily maximum values for BOD and TSS should be 45 mg/l, not 30 mg/l. Monthly average values for BOD and TSS should be 30 mg/l, not 45 mg/l.
8	5 C-10	Table 4. The Basin Plan groundwater objective for iron is 0.3 mg/l. To be consistent with the number of significant figures represented within the Basin Plan objective, CMWD requests that the annual average concentration limit for iron be changed from 0.30 to 0.3 mg/l. Same change to Table 5 of Attachment C (page C-10).
9	6	Typo: "Ultrafiltration" is misspelled within Discharge Specification III.E
10	8	IV.B.2. The County DEH shall be notified at least 30 days prior to any cross connection test, <u>or per notification requirements within the Recycled Water Oversight Consent Agreement between Carlsbad Municipal Water District and DEH³</u> . A written report documenting the result of the inspection testing for the prior year shall be submitted to the County DEH within 30 days following the completion of the inspection or testing, <u>or per notification requirements within the Recycled Water Oversight Consent Agreement between Carlsbad Municipal Water District and DEH.</u>
11	C-2	First sentence of bottom paragraph (II.A). Should state "The <u>existing</u> CWRP has a treatment capacity of 4 mgd ...
12	C-3	II.A, third paragraphs. Delete size of ultrafiltration strainers as follows: The third treatment train will include a new set of 300-micron pretreatment strainers followed by ultrafiltration treatment. ¹
13	C-3	II.A, third paragraph. Average daily production capacity <u>of the UF units</u> will be 3.38 mgd.
14	C-5	Typo: III.B, first sentence "Master" is misspelled; should be Master Recycling Permit.
15	C-5	Typo: Footnote 5 should refer to Order No. 2001-352, as amended by Order No. R9-2012-0027, not Order No. 93-07.
16	C-9	IIV.C, last paragraph. This Order eliminates the daily maximum and/or 30-day average discharge specifications for TDS, chloride, sulfate, <u>and boron, iron, and manganese</u> , and establishes annual average discharge specifications. ²

- Note: Actual current pretreatment strainers on the third treatment train are 200 microns, but this may be subject to change in the future. Recommend deleting reference to strainer size.
- Daily maximum and 30-day average effluent limits for iron and manganese were already eliminated and replaced by annual average limits by Order R9-2012-0027. Annual average discharge limits were already established by Order R9-2012-0027.
- The Consent Agreement establishes notification and requirements for DEH regulation of CMWD recycled water use.