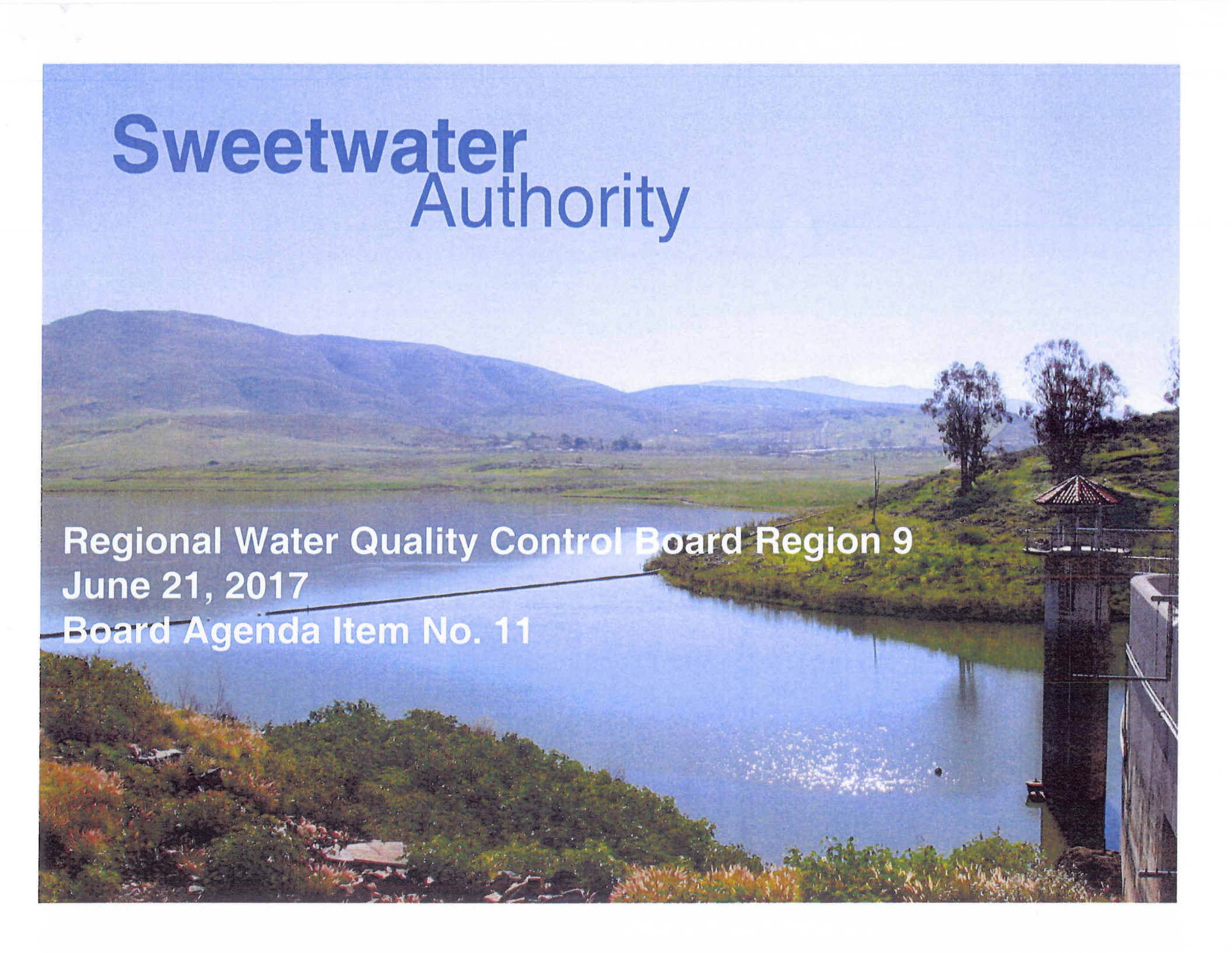


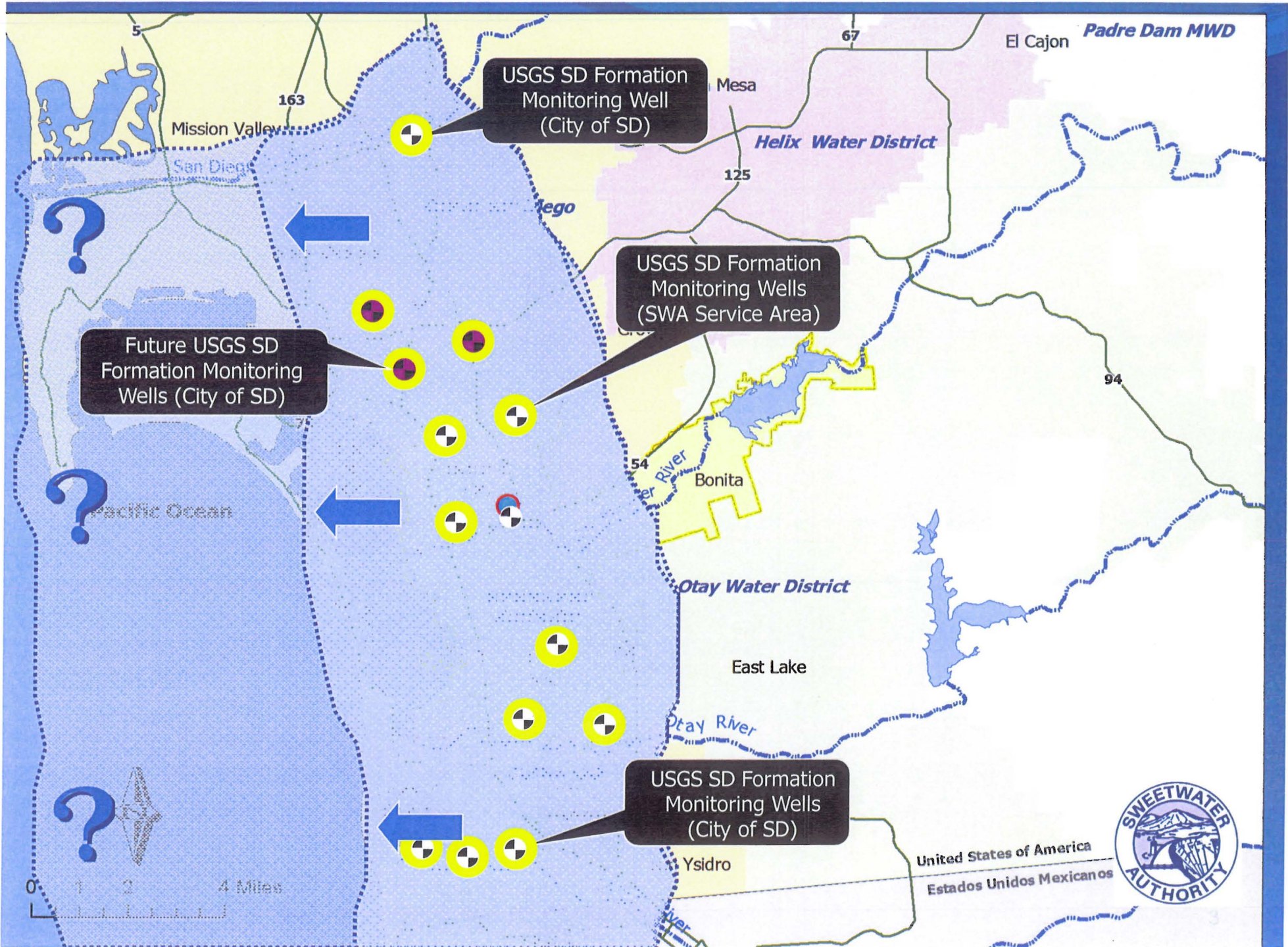
Sweetwater Authority



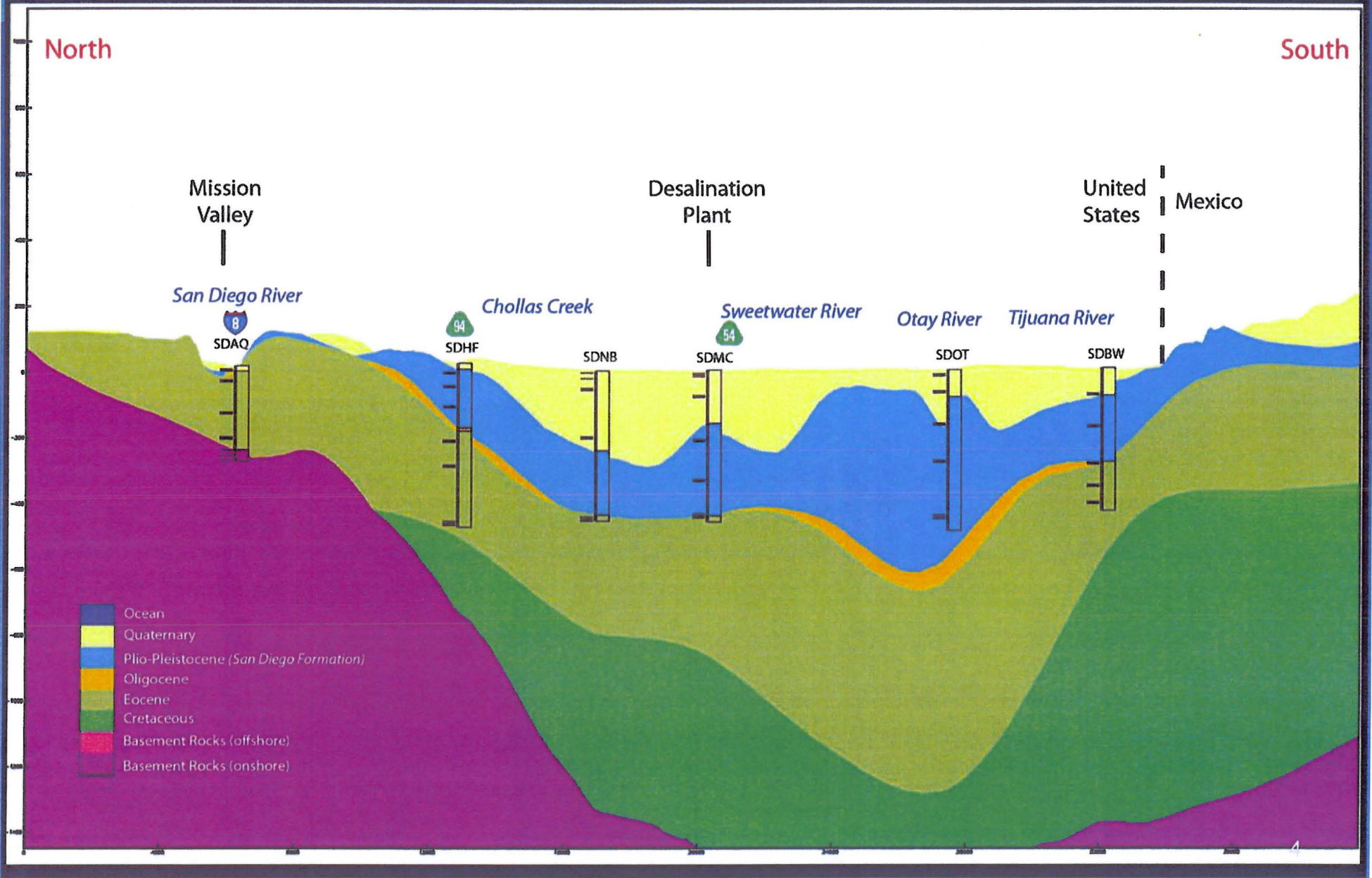
Regional Water Quality Control Board Region 9
June 21, 2017
Board Agenda Item No. 11

Richard A. Reynolds Desalination Expansion Project





Geology – View geology along the coast, from Mission Valley to Mexico





Reynolds Groundwater Desal Expansion

- Currently produces 3,600 AF/year – 20% of annual need
- Adds 2,600 AF/year or total of 6,200 AF/year – 34% of annual need via five new production wells
- The project benefits from local water resources; augments imported water; sustainable; does not harm the environment
- Relocated 3,200 lineal feet of 16-inch brine discharge line per RWQCB (RB) requirement to discharge to bay (\$1 million)



Reynolds Groundwater Desal Expansion

- Local, drought proof, emergency supply; improves reliability; and less power intensive than seawater
- Capital and O&M is ~ \$450/AF vs. \$1,255/AF purchase treated imported water from County Water Authority
- Saves Sweetwater \$2.1 million first year versus imported water purchase
- June 19 Union Tribune Editorial – “...foresight and good planning. We need more of that in government.”



Concerns with Tentative Order

- RB continues to provide challenges with draft permit. Are there significant water quality improvements to justify more regulations and costs to Authority customers?
- Appreciate RB staff concurring with SWA concerns to make adjustments to Tentative Order
- Testing requirements previous TO's: 1999 = 281; 2010 = 522; and proposed TO = 1901 but reduced to 800
- Number of violations shown on document No. 5 (pg. F-8) = 11. Report is misleading as six tests were laboratory errors



Requests of RWQCB for Tentative Order

(Referring to RB's Response to Comments Report –
Support Doc. No. 4)

- Copper (2) and Cyanide (3) Effluent Limitations – Leave same as current TO as past low level actual results are penalizing the Authority
- Remove Effluent Monitoring program (8) – Need to strike reference to 001b on Table 2, page 1 of TO and Table E-1, page E-4 be consistent with other changes made by RB staff



Requests of RWQCB for Tentative Order

- Sediment Monitoring Requirement (10) – remove as not practical or reasonable for this application
 - SWA not responsible for background conditions of larger environment as well as collecting data
 - SWA has been good stewards – history shows no degradation
 - An example of a regulation that adds costs with minimal benefit



Requests of RWQCB for Tentative Order

- Align Toxicity Testing Requirements (12); TST is Scientifically Unreliable (13); TST is Contrary to Law (14); and TRE Process creates Regulatory Uncertainty (15) – remove these requirements
 - TST is not promulgated by EPA and not required by any law or regulation
 - NOEC is acceptable standard under 40 CFR part 136 so SWA should have the option to use
 - More likely to see false positives thus fines



Requests of RWQCB for Tentative Order

- Include a reopener provision (16) – Allow per Section 5.3 of SIP (as provided on page 34 of SIP)
- Change effective date (17) – RB comment misleading; SWA request is not based on inconvenience; allowing January 1, 2018 is more practical and beneficial to both parties based on required data calculations. What is the rush?