

**SAN DIEGO REGIONAL BOARD RESPONSES TO COMMENTS
TENTATIVE ORDER NO R9-2008-0082**

Supporting Document No. 6

A. Comments submitted by Genentech dated August 22, 2008

GENERAL COMMENTS & MAJOR CONCERNS	REGIONAL BOARD RESPONSES
<p>1. Section II.B page 4 and Attachment F, Section II.A: In order to accurately reflect current operations, Genentech requests that the references to boiler and cooling tower blowdowns be removed. Genentech also requests that the second paragraph in Section II.B be revised to read as follows: "...and other non-biologics maintenance activities (including vapor compression stills blowdowns)". Genentech has notified the Water Board in its current renewal application that the facility's boiler and cooling tower blowdowns are no longer discharged to the brine line.</p>	<p>The tentative Addendum will be revised. See Errata Sheet Item No's 1 and 18.</p>
<p>2. Section IV.A.1.a, Table 7 (Effluent Limitations Based on Table A of the Ocean Plan): Genentech requests that the effluent limitation for temperature in Table 7 be removed. The appropriateness of having an effluent limitation, which is the same limitation contained in the 2003 Order, has been previously discussed with Water Board staff beginning in 2006. The facility's discharge of effluent to the Oceanside Ocean Outfall (OOO) occurs at a distance of over six miles from the actual ocean discharge point and combines with significantly higher volume wastestreams from other discharges prior to being discharged to the ocean. Because of this factors, Genentech, in consultation with and direction from Water Board staff, agreed starting in the second half of 2006 to report temperature readings in its Self Monitoring Reports for three locations: the facility's monitoring point 001, the City's monitoring point M-003, and Ocean Buoy 045. At that time, Water Board staff advised that the use of a temperature effluent limitation should be re-evaluated at the time of permit renewal.</p>	<p>Based on information from the current compliance point, their is reasonable potential for exceedance of the temperature limitation and thus the limitation will not be removed at this time.</p> <p>The Regional Board understands that Genentech's discharge is six miles from the discharge location and that it combines with other higher volume waste streams, however, the Regional Board has no data that would clearly demonstrate compliance under a worse case scenario (in which Genentech is the only discharger of the outfall). If the discharger can clearly demonstrate that, under worse case-scenario, the discharge would be in compliance with temperature limitations, the Regional Board would reevaluate the need for a limit. Some options the discharger may consider are to conduct a model that shows how temperature is reduced as it moves through the outfall or using another point of compliance further downstream (from their existing one).</p>
<p>3. Section IV.A1.b, Table 8 (Effluent Limitations Based on the</p>	<p>The tentative Order will be revised.</p>

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<p>Ocean Plan): <u>The chronic toxicity effluent limit in Table 8 should be corrected to read “ 88 TUc”, consistent with the value provided in Table F-12.</u></p>	<p>See Errata Sheet Item No. 4.</p>
<p>4. Section VI.A2.e: <u>GNE is an industrial facility that does not operate a municipal wastewater treatment plant . Accordingly, Genentech requests that this paragraph be deleted given its specific application to municipal wastewater treatment plants.</u></p>	<p>The tentative Order will be revised. See Errata Sheet Item No. 7.</p>
<p>5. Attachment E, Section IX – Other monitoring Requirements: <u>Genentech requests further clarification in this section regarding the scope and timing of monitoring to be performed. For example, in Section IX.A, reference is made to performing the “intensive monitoring specified below” only during the 12 month period beginning July 1, 2008; however there is no “intensive monitoring” specified below. Similarly, the biological monitoring specified in Section IX.B1 is described as commencing on July1, for a 12-month period, yet Table E-11 specifies the “Minimum Frequency” of monitoring as “Year 4”.</u></p>	<p>The tentative Order will be revised. See Errata Sheet Item No’s 13 and 14.</p>
<p>6. Attachment E, Section X.B.2-Self Monitoring Reports: <u>Sections VIII and IX In Attachment E of Tentative Order state that the Discharger may conduct receiving water and sediment monitoring jointly with the City of Oceanside and other agencies or dischargers utilizing the OOO. Given the possibility that such monitoring may be performed by others (e.g., the City of Oceanside), Genentech requests that this section be modify to clarify that such a jointly-conducted monitoring activities may be reported by those parties conducting such work on behalf of the Discharger in lieu of the Discharger submitting such results in its own SMRs.</u></p>	<p>The tentative Order will be revised. See Errata Sheet Item No. 31.</p>
<p>7. Attachment F, Section II.A: <u>The fact sheet states at page F-4:</u></p>	<p>The tentative Order will be revised.</p>

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<p><u>"The Discharger filed a Report of Waste Discharge and submitted an application for renewal of its NPDES permit May 29, 2008". The correct application date is June 9, 2008, as noted in paragraph II.A of Tentative Order.</u></p>	<p>See Errata Sheet Item No. 17.</p>																
<p>8. <u>Attachment F, Section II.A, Table F-2 (Brine/Wastewater Stream Descriptions and Flow Rates):</u> Genentech notes that this table is inconsistent with data submitted in Genentech's June 9, 2008 renewal application and with the information presented in Figure C-2, NIMO Brine Flows, of the Tentative Order. Genentech requests that Table F-2 be revised to be consistent with the data contained in Figure C-2. The following table is an update to Figure C-2 flow data and GNE recommends that this table replace Table F-2:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Wastewater Stream Description</th> <th style="text-align: left;">Flow Range (GPD)</th> </tr> </thead> <tbody> <tr> <td>Multimedia filter</td> <td>4,500- 10,000</td> </tr> <tr> <td>Softeners</td> <td>14,000- 28,000</td> </tr> <tr> <td>WFI pretreatment, softeners/filters</td> <td>10,000- 24,000</td> </tr> <tr> <td>WFI vapor compression stills</td> <td>30,000- 63,000</td> </tr> <tr> <td>WFI process loop discharge</td> <td>10,000- 24,000</td> </tr> <tr> <td>Clean Steam generators</td> <td>1,400- 6,000</td> </tr> <tr> <td style="text-align: right;">Total</td> <td>70,000- 155,000</td> </tr> </tbody> </table>	Wastewater Stream Description	Flow Range (GPD)	Multimedia filter	4,500- 10,000	Softeners	14,000- 28,000	WFI pretreatment, softeners/filters	10,000- 24,000	WFI vapor compression stills	30,000- 63,000	WFI process loop discharge	10,000- 24,000	Clean Steam generators	1,400- 6,000	Total	70,000- 155,000	<p>The tentative Order will be revised.</p> <p>See Errata Sheet Item No. 19.</p>
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<p>9. <u>Attachment F, Section II.A:</u></p> <p>a) <u>Genentech notes that the section sequencing is not correct, as there is no Section II.A.1.</u></p> <p>b) <u>With regard to the description for "Primary City Water Treatment," Genentech requests that the description be revised as follows to reflect the updated wastewater stream descriptions and flows: "...A total of 4,500-10,000 GPD of is generated from backwashing and rinsing of the MMF. A total of 14,000-28,000 GPD of brine and wastewater is generated</u></p>	<p>The tentative Order will be revised.</p> <p>See Errata Sheet Item No's 20, 21, 22 and 23.</p>																

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<p>from the triplex softener unit backwashing, softener generation, and rinsing processes...”</p> <p>c) <u>With regard to the description for “Pretreatment of Water For Injection,” Genentech requests that the description be revised as follows to reflect the updated wastewater stream descriptions and flows: “...The total wastewater flow from the WFI pretreatment processes is 10,000-24,000 GPD...”</u></p> <p>d) <u>With regard to the description for “Pretreatment of Boiler Water,” Genentech requests that the entire description be revised and relabeled as follows to reflect the updated waste water stream descriptions and flows: “WFI Process Loop Discharge – The WFI Storage Tank has a process loop that discharges 10,000-24,000 GPF. The pollutants contained in this wastewater are extremely low concentrations since this is highly purity water.”</u></p> <p>e) <u>With regard to the description for “Cooling Towers, Boilers, and Vapor Compression Stills,” Genentech requests that the entire description be revised as follows to reflect the updated wastewater stream descriptions and flows: “The WFI vapor compression stills at the Facility are subject to daily blowdowns for maintenance purposes. A total of 30,000-63,000 GPD of blowdowns range from 2,000-3,000 mg/L.”</u></p>	
<p>10. Attachment F, Section II.C, Table F-3: <u>Because the reported values for TSS OF “66 mg/L” suggests that a violation of the facility’s effluent limitation had occurred when, in fact, no such violation had occurred based on the specific circumstances involving such data, Genentech requests that the following footnote be added to the TSS monitoring data: “While TSS readings were reported above effluent limitations, the data were deemed invalid due to laboratory error and not in violation of effluent limitations, as documented by Regional Water Board letter dated 9 October 2007.”</u></p>	<p>The tentative Order will be revised.</p> <p>See Errata Sheet Item No. 25.</p>

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<p>11. <u>Attachment F, Section IV.C.2.b, Page F-15:</u> Genentech has submitted semi-annual reports for 2007 and requests that the sentence be revised to also include this year.</p>	<p>The tentative Order will be revised. See Errata Sheet Item No. 28.</p>
<p>12. <u>Attachment F, Section IVC, Page F-25:</u> Genentech requests that additional clarification be providing for conducting the screening period for chronic toxicity. The Tentative Order currently states that such screenings is to be conducted “every other year”. To avoid future uncertainty as to the timing for such screening, Genentech suggests that the language be revised to clarify that such screening is to be conducted either “once every odd year” or “once every even year”.</p>	<p>The tentative Order will be revised. See Errata Sheet Item No. 30.</p>