



Via Email and
Hand Delivered

**SUPPORTING
DOCUMENT 5**

THE CITY OF SAN DIEGO

June 3, 2009

Ms. Melissa Valdovinos
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, California 92123-4340

Re: Comments on Responses to Comments and Errata Sheet for Draft
NPDES Permit No. CA 0107409 and Tentative Order No. R9-2009-0001

CRU: 9 000000275: MVALD

Dear Ms. Valdovinos:

Thank you for the opportunity to present comments relative to the Joint Responses to Comments (JRC) and Errata Sheet (ES) for Draft NPDES Permit No. CA 0107409 and Tentative Order No. R9-2009-0001 the San Diego RWQCB released on May 28, 2009. These comments fall into three categories: (1) discrepancies between the corrections indicated in the ES and JRC; (2) minor errors (misspellings, typos) indicated in the ES; (3) clarifications/changes requested, such as for several issues pertaining to toxicity testing, the requirement for offshore ammonia sampling, and for split bacti samples in conjunction with chlorine residual testing.

1. Errata Sheet No. 3 (Re: Table E-5):

- a. The sample type for ammonium should be changed to "grab" as indicated by EPA/RWQCB on page 11 of the JRC.
- b. On page 11 of the JRC, EPA/RWQCB state that "The final order/permit requires that ammonium be monitored at "F" and "kelp bed" stations located within State waters, at the discrete water depths and frequencies currently used for sampling bacteria indicators." However, *new* footnote #3 to Table E-5 in the ES mentions only that ammonia samples be collected at the discrete depths. No mention is made that sampling is required only in State waters. Either this footnote should be modified to indicate such or a new footnote should be added. Note: This would apply only to the "F" stations as all 8 kelp bed stations are within State boundaries. There are 15 "F" stations within State waters, including F01-F03, F06-F14, and F18-F20.
- c. The ES/JRC requires ammonia sampling quarterly at the "F" stations and 5x/month in the kelp beds. The reason for the ammonia sampling is to act as an indicator of the location of the wastewater plume due to the fact that with the implementation of partial disinfection the bacteriological signal from the plume will no longer be as strong. Historically, estimations for the plume location were made by bacteriological sampling.



Metropolitan Wastewater Department

9192 Topaz Way • San Diego, CA 92123
Tel (858) 292-6300 Fax (858) 292-6310



It is requested that the sampling requirement for ammonia be reviewed and consideration given to a modification that will provide the same amount of useful information as what has been proposed, bring it into alignment with how Orange County Sanitation District (OCSD) is required to accomplish the same task, and at the same time save valuable resources.

Since the Point Loma outfall was extended to 4.5 miles offshore, over 15 years of bacterial compliance monitoring off Pt. Loma has provided no evidence that the wastewater plume from the outfall ever reached the Pt. Loma kelp beds. Because of this, it is felt that it is not necessary to carry out weekly ammonia sampling at the kelp bed stations as specified in the ES/JRC, or even monthly sampling. However, it would be appropriate to conduct ammonia sampling in the kelp beds on a quarterly basis similar to that required for the F stations. This modification would allow for a complete picture of ammonia distributions during these surveys. Such a revised sampling frequency would also put the San Diego monitoring in synch with OCSD permit requirements for ammonia sampling on a quarterly basis. Finally, the City agrees with EPA and the RWQCB that this new “ammonia sampling” component of the monitoring program “may be re-considered and revised by USEPA and the Regional Water Board based on the results and new information presented in the City’s feasibility study to assess the behavior of the Point Loma Ocean Outfall plume” (JRC, page 11).

Additionally, since this work is not being done for determining compliance with any specific quantitative limit, it is requested that some flexibility be given in the method to be used. The City recommends permit language that allows the City the discretion to utilize any listed method such as EPA 350.1, 350.2, 350.3 or those in Standard Methods.

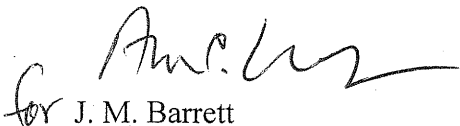
- d. The units of measurement listed in Table E-5 for chlorophyll-*a* is listed as “m,” which is incorrect – this appears to be a holdover from an error in the previous permit. It should be changed to “µg/L,” which is how this parameter is presently measured.
2. Errata Sheet No. 4 (Re: ammonium sampling): See comment 1b above. This should also be modified to reflect that sampling for ammonium is only required at stations located within State waters.
3. Errata Sheet No. 20, page 13 (Re: misspelling of species name): The correct spelling of the trivial name for the copper rockfish at the top of the pages should end with an “s” instead of an “m.” The correct name is *Sebastes caurinus*.
4. Errata Sheet No. 21, page 13 (Re: typo): The last word in the fourth line should be “collected” (not colleted) – i.e., it’s currently missing the second “c.”
5. CLARIFICATION – Errata Sheet No. 16 (Re: acute toxicity and pH drift): In the event of an acute toxicity exceedance, we are to ‘conduct three sets of parallel toxicity tests.’ However, given that acute toxicity tests are conducted (required) on a semi-annual basis, does this mean that the City has 18 months (3 x 6 months) to complete these parallel tests, or is there another ‘window’ in which we need to complete these tests and submit the results? Ideally, it makes the most sense to report the exceedance within the ‘current’ reporting period and then

complete the parallel studies and reporting them at the end of the 'following' reporting period.

6. CLARIFICATION – Errata Sheet No. 17 (Re: “A full laboratory report for all toxicity testing shall be submitted as an attachment to the DMR for the month in which...”): The City currently submits the Monthly Toxicity Testing Reports under separate cover, which has previously been the preference of the RWQCB. This is also our preference due to timing and QA routing needs. Can we keep to this current practice?
7. CLARIFICATION – Errata Sheet No. 17 (Re: ‘... all results for effluent parameters monitors concurrently with the toxicity test(s)’): We take this to mean the water quality measurements performed in the Toxicology Lab, but it could also be referring to the chemical analysis done by Wastewater Chemistry Services. We don't see an issue with including the Toxicity WQ datasheets, but would prefer to save paper, etc. if that is not what is being requested.
8. CLARIFICATION – Errata Sheet No. 18 (Re: Acute toxicity rescreening): Since the City conducts these tests on a semi-annual cycle, for the initial three suites of acute toxicity tests, do we run one suite every 6 months? This would mean that it will take 12-18 months to complete the initial screening.
9. JRC No. 14b, pages 8-9 (Re: Continuous Chlorine Monitoring): The City agrees with the EPA/RWQCB response requiring implementation of continuous chlorine monitoring within 180 days of the effective date of the permit, but requests that until then the current practice be continued that requires four (4) grab samples per day, but without the additional new requirement to also do bacteriological analysis on these samples. The bacteriological compliance requirement that the partial disinfection is addressing is in the offshore receiving waters that is already very well monitored, not in the effluent. Whereas the City does frequently take bacteriological samples of the effluent for operational control of the partial disinfection process, requiring four samples per day would add considerable costs with no commensurate benefit.

Please contact Alan Langworthy of my staff at (619) 758-2300 regarding any questions

Sincerely,



J. M. Barrett
Director of Public Utilities

cc: Robyn Stuber
U.S. Environmental Protection Agency, Region IX
NPDES Permits Office (WTR-5)
75 Hawthorne Street
San Francisco, CA 94105