



SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

Lori Vereker
Director of Utilities
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2010 MAY 24 P 3: 01

May 19, 2010

Mr. Robert Morris
P.E., Senior WRC Engineer
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

Subject: 229727:rpierce

**TENTATIVE ORDER NO. R9-2010-0032, CITY OF ESCONDIDO HALE
AVENUE RESOURCE RECOVERY FACILITY (HARRF)**

Dear Mr. Morris:

In response to your letter dated May 3, 2010, the City of Escondido is submitting the following comments to the above referenced tentative order. Our comments and requested changes are in *bold italic*.

1. First page, Table 1 Discharger Information;

Change the title of John Burcham from "Superintendent" to "Deputy Utilities Manager."

Facility Contact, Phone - John Burcham, Deputy Utilities Manager (760) 839-6273

This title change is also needed on Pg. 4 Table 4 and Attachment D Pg. D-2 Table D-1.

2. Section IV Effluent Limitations Pg. 9 Table 6

Nitrate as NO3 12 month average discharge limit is 10 mg/l Base on Water Quality Objective Ground Water hydrologic Basin plan for Escondido Creek.

Historical ground water in HSA 5.21 and 4.62 nitrate level is over 30 mg/l on Nitrate as NO3

**Nitrate As NO3 Data for Ground Water
Monitoring in HSA 5.21**

	Kit Carson	Kit Carson	Kit Carson
Sample	Well	Well	Well
Date	#7 mg/l	#14 mg/l	#15 mg/l
7/18/01	32.1	35.7	42.9
8/1/01	32.3	36.0	43.6
10/24/01	32.6	38.3	41.9
2/7/02	31.3	37.4	40.4
5/30/02	36.9		43.3
8/22/02	34.8	42.4	
11/20/02	36.0	43.8	43.5
3/12/03	30.1	35.0	39.0
6/25/03	30.7	31.5	40.7
9/17/03	31.3	33.6	39.9
12/15/03	33.1	34.6	39.8
3/17/04	31.2	31.0	37.9
6/16/04	29.4	28.2	37.2
9/29/04	29.7	31.3	35.8
12/8/04	30.1	31.3	36.4
3/16/2005	30.2	30.1	38.6
6/22/2005	29.2	32.2	43.6
9/14/2005	32.6	29.5	37.7
12/21/2005	30.4	28.1	39.1
3/22/2006	29.9	29.8	38.3
6/15/2006	28.4	30.2	36.6
9/20/2006	28.5	32.7	35.9
12/14/2006	29.3	34.4	36.8
2/28/2007	28.3	34.0	36.3
5/30/2007	27.1	35.2	36.5
8/29/2007	29.4	38.3	39.1
11/28/2007	25.0	37.0	38.0
2/27/2008	26.5	37.5	44.3
5/21/2008	24.9	34.7	38.8
Average	30.4	34.1	39.3
Nitrate As NO3 Data for Ground Water Monitoring in HSA 4.62			
	MW5 mg/l		
8/5/09	45.2		

Our recycled water has levels of nitrate as NO₃ that range from 8.9 to 59.8 mg/l. The historical data for groundwater shows nitrate levels above the proposed recycled water nitrate limits. The historically high nitrate levels in the groundwater are most likely due to fertilizer use in the agricultural areas in and around Escondido. After recycled water discharge for irrigational purposes began in September of 2004 the nitrate levels in groundwater did not noticeably increase from 2001.

Since the recycled water has shown no impact on groundwater nitrate levels, the city is requesting the nitrate numeric limitation be removed and replaced with a requirement that the effluent nitrate concentration 'not degrade water quality'. Example language could be "The effluent nitrate concentration shall not degrade water quality in Receiving Groundwater as measured in monitoring locations RGW-001, RGW-002, RGW-003, or RGW-004."

The proposed Arsenic limit is 0.01 mg/L, while the basin plan limitation is 0.05 mg/L. We prefer to have our limit match the basin plan.

The proposed Cadmium limit is 0.0005 mg/L, while the basin plan limitation is 0.005 mg/l. We prefer to have limit match the basin plan.

3. Section V, Pg. 12, letter "d"

Since we have both UV and Chlorine disinfection ability, we recommend changing the wording from "Failure of UV equipment" to "Failure of Disinfection system." In the case of the UV system, what would be considered a failure? The UV system has the ability to disinfect flows based on UVT, number of banks online and flow rate. Would notification begin if one bank has failed even though disinfection can be met at a lower rate of flow?

4. C. Special Provision, Pg 17, letter "d"

Since this is a new provision the city is requesting a 6 month delay in the implementation of section d to ensure that all changes have been made and the documentation matches the manual.

5. Pg. 18, 2. Recycled Water Use Provisions, "b"

The city has scheduled to have the water and wastewater master plans updated during the 2010/11 fiscal year. Since there currently is not a master plan specifically for recycled water we are adding that to the list. In order to complete this task without penalty we are requesting that the 180 days be extended to 1 year.

6. Attachment A, Pg. A-1

A revised map is enclosed. There has been one new line installed on Del Dios Highway.

7. Attachment B – Flow Schematic

A revised schematic is enclosed.

8. Pg. C-6, Table C-2

Line 2 has Total Coliform Bacteria^c taken at sample point RWS-001. Historically we have sampled at the disinfection systems separately. For chlorination we use RWS-002 and UV we use RWS-003. We would prefer to continue sampling for coliform bacteria separately at the current location. This would provide us and the Regional Board the ability, if there is a problem, to determine which process was at fault. This does not appear to be in violation with Title 22 regulations.

9. Pg. C-7, Table C-6

The parameters beginning with "Total Dissolved Solids (TDS)" Sample Type should be changed from "Composite" to "Grab". These are well samples and are collected as grabs and not composites.

10. Pg. C-8 Table C-7

We are requesting the daily Monitoring Period be changed from "Midnight through 11:59 PM" to "8 AM through 7:59 AM." Semiannually SMR Due Dates be changed from "August 1 and February 1" to "September 1 and March 1". The Annually SMR Due Date be changed from "February 1" to "March 1" and the 5 year period SMR due date be changed from "February 1" to "March 1."

11. Pg. C-10, last paragraph, last sentence

Change submittal date from "February 1" to "March 1."

12. Pg. D-4, Table D-2

"Nitrate (NO3)" should be changed to "Nitrate as N."

13. Pg. D-7

Is there a proposed process to modify the tentative order referenced in the last paragraph?

Summary of Final Effluent Limitations - Table D-5 should match Table 6 on Page 9

If you have any questions or need further information please give me a call at (760) 839-6273.

Sincerely,

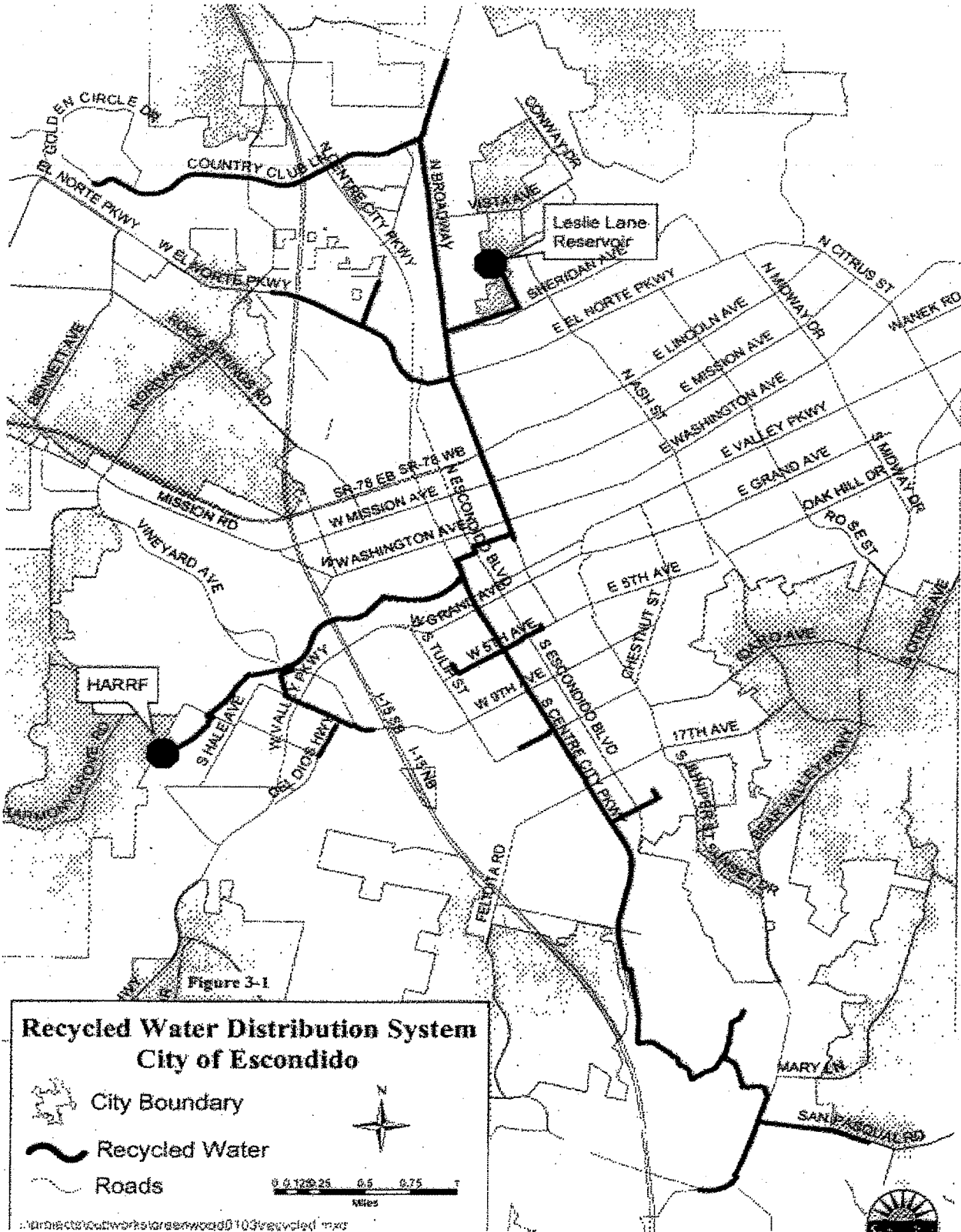


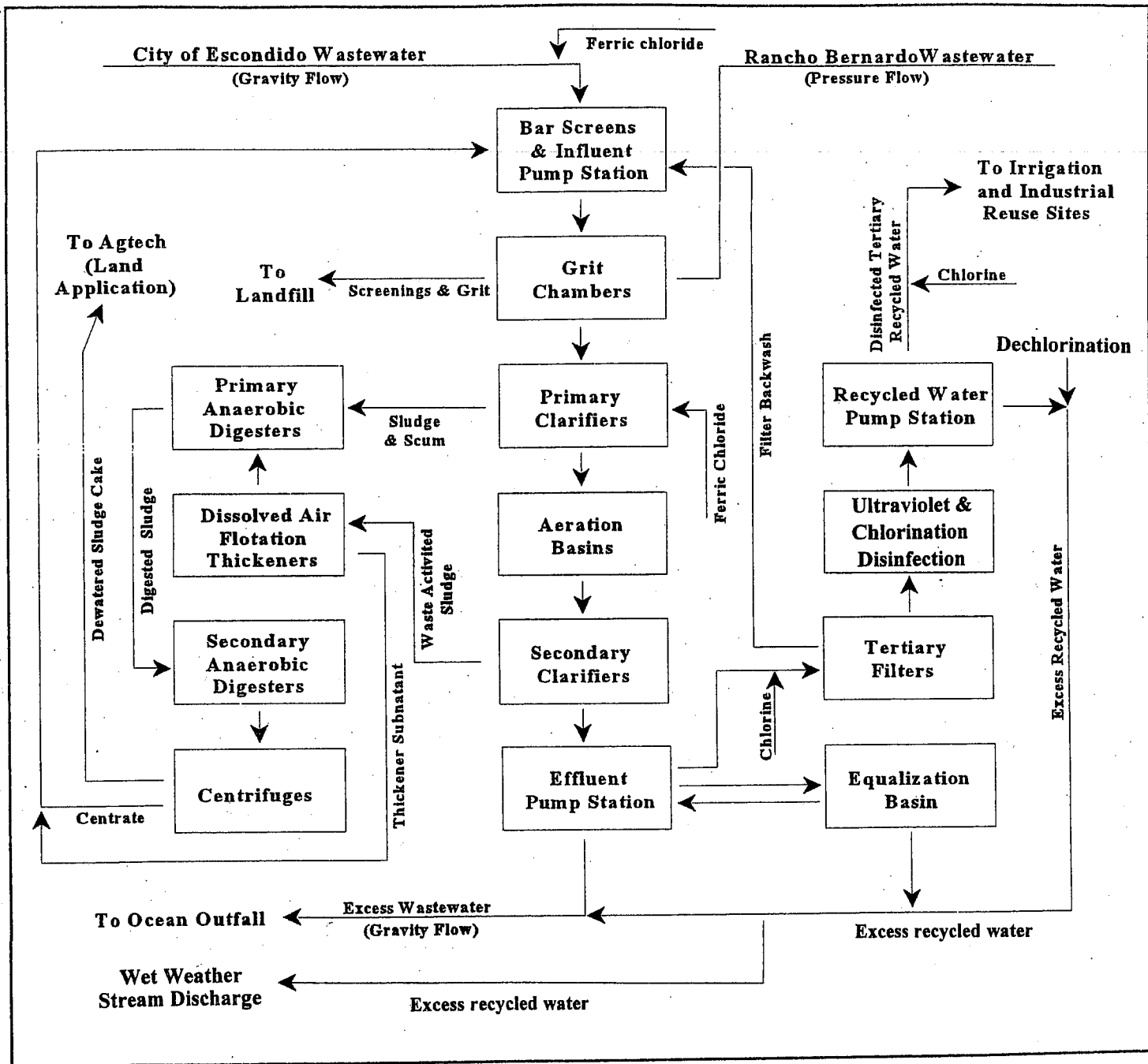
John Burcham
Deputy Utilities Manager, Wastewater

cc:

Lori Vereker, Director of Utilities

ATTACHMENT A – MAP





Schematic of HARRF Treatment Processes