

**SAN DIEGO WATER BOARD RESPONSES TO COMMENTS
TENTATIVE ORDER NO R9-2010-0012
NPDES No. CA0108952**

A. Comments submitted by Sweetwater Authority dated February 23, 2010

GENERAL COMMENTS & MAJOR CONCERNS	SAN DIEGO WATER BOARD RESPONSES
<p>1. New San Diego Formation well locations and discharge points: The order mistakenly groups the discharge of the five proposed new San Diego Formation (SDF) well purge discharges with effluent discharge Eff-002.</p> <p>The proposed new wells are located further south in Chula Vista and will be discharged into storm drains that lead to either the Sweetwater River, the Sweetwater Marsh, or the San Diego Bay.</p>	<p>The tentative Order has been revised. See Errata Sheet.</p>
<p>2. Water Quality Effluent Limitation for Temperature: The order requires that the maximum temperature of the discharge for both the plant outfalls (001a and 001b) shall not exceed the natural receiving water temperature by more than 20 °F.</p> <p>The Reynolds Desalination Facility (plant) treats groundwater whose temperatures vary little throughout the year. As such, compliance with this requirement will be difficult if not impossible during the winter months when the receiving water temperatures fall below 60 °F but the well waters (and thus the plant discharge) remain approximately 80 °F. The Authority requests that the effluent limitation be calculated on a 12 month running average and that instantaneous values not be considered a violation.</p>	<p>The San Diego Water Board concurs and will make clarifications to Section VII. Compliance Determination Language of the tentative Order.</p>
<p>3. Water Quality Effluent Limitations for pH: The pH range for the SDF wells 1, 2 and 6 remains between 7.0 and 9.0, The pH from the purges for these wells occasionally dips below 7.0, but the purges are infrequent and of short duration. There is no viable way to treat the purges to increase the pH during the short time that the purges occur, The Authority requests the pH range remain at 6.5 to 9.0 or as an alternative, the effluent limitation be calculated on a running annual average; and not be based on instantaneous values.</p>	<p>The tentative Order will be revised to carry over the limits contained in Order No. R9-2004-0111 of "Within 6.0 to 9.0 at all times".</p>
<p>4. Monitoring Requirements for the Plant Feed Dump: The order requires grab samples each time the feed dump discharge is in use. Use of the feed dump is an operational requirement, with the</p>	<p>This requirement has been carried over from the existing permit.</p>

Item No. 7
 Supporting Document No. 3

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<p>discharge occurring every time the plant is started up, until the plant pressures stabilize. This will occur several times during the year and depending on circumstances, at all hours of the day. Compliance with this requirement will be difficult. As the quality of the well water (and thus the feed dump) is not likely to change often, the Authority requests that the monitoring frequency be changed to an annually or bi-annually".</p>	<p>Monitoring for copper and selenium will be revised from once per discharge event to quarterly.</p>
<p>5. Plant Discharge Flow Limitation: The Regional Board staff has not approved the Authority's request to increase the flow limitation from 0.8 MGD to up to 1.25 MGD without expansion of the plant. The Authority respectfully requests reconsideration of this matter. With its current capability, the plant capacity can easily be increased by 25% to 5 MGD. However, this requires an increase in the effluent flow limitation. Authority staff believes that data shows little increase in negative effects by this relatively small increase in discharge flow.</p>	<p>After discussion with the Discharger, the San Diego Water Board will revise the permit to allow an increase in flow from 0.8 MGD to 1.0 MGD at the existing location during the months of December thru May on an interim basis until the discharge is moved to the new release point further downstream.</p> <p>During the rainy season, heavy rainfalls convey large volumes of freshwater into the salt marsh dropping salinity levels significantly. The 0.2 MGD increase in flow rate at the current location during wet weather conditions would not contribute to adverse biological impacts.</p>
<p>6. Groundwater Well Purge Monitoring Requirements: This order requires quarterly grab samples for metals as well as pH monitoring with each purge, SWA staff feels that because of the small volume, these discharges contribute very little contaminant loading in the receiving waters and that no WQBEL's should be included for these points, As it stands now, in the advent of an exceedance, the Authority would feel compelled to re-sample, This strategy would be counter productive because we would be generating a well purge discharge for no other reason than to attempt to maintain compliance with our discharge permit.</p> <p>The Authority respectfully requests that the well purges be considered of limited threat to surface waters and that the discharge requirements should fall under a general permit for limited threat discharges. If such a permit no longer exists, the Authority requests that the Regional Board staff review the need and that the well purge discharges fall under such a permit. As an alternative, the Authority respectfully points out that because of</p>	<p>The San Diego Water Board currently does not have a general permit for limited threat discharges. Discharges associated with well purges have a potential to cause an exceedance of applicable water quality criteria and thus require coverage under an NPDES permit.</p> <p>Although the San Diego Water Board agrees that it would be adequate to regulate well purge water under a general permit for limited threat discharges, no such permit is available at this time. Discharges from well purges will continue to be covered under the tentative Order until the San Diego Water Board adopts a permit for limited threat discharges.</p> <p>The requirement to obtain quarterly samples has been carried over from the existing permit.</p>

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<p>the increased number of separate discharge points for the well purges, compared to the limited number of discharge points for the plant itself, that a separate permit for the well purges be considered, and that the permit should consider the purges to be of limited threat to receiving waters and treated as such.</p>	
<p>7. Costs of Compliance with the Monitoring Requirements: Attached is a spread sheet that compares the cost of monitoring under the existing permit as compared to that for a new permit. To summarize, the laboratory monitoring for the discharges is increasing roughly fourfold (\$ 4,856 to \$ 21,954). In addition, there are new receiving water monitoring requirements that will cost the Authority \$124,000 each year to implement This is in addition to over \$400,000 spent by the Authority to date collecting data for the Regional Board staff to assist in evaluating our request for increased discharge flows.</p>	<p>This comment is no longer applicable. Further discussion with the Discharger indicated a misunderstanding of permit requirements yielding higher than normal costs.</p>