



PADRE DAM
Municipal Water District

An Everyday Essential

November 13, 2012
Item No. 8
Supporting Document No. 7

November 2, 2012

Ms. Julie Chan, P.G. Chief
California Regional Water Quality Control Board
San Diego Region
Cleanup and Land Discharge Branch
9174 Sky Park Court, Suite 100
San Diego, CA 92123

Subject: Padre Dam MWD Comments on Tentative Addendum No. 1 to Order No. 97-49, An Addendum Modifying Waste Discharge Requirements and Water Recycling Requirements for the Production and Purveyance of Recycled Water for Padre Dam Municipal Water District, San Diego County

Regional Board Ref; 247351: oosibodu

Ms. Chan:

Padre Dam Municipal Water District (Padre Dam) is in receipt of the above referenced Tentative Addendum No. 1 to our Waste Discharge Requirements (WDR) per your cover letter dated October 3, 2012.

Although Padre Dam will develop a Salt and Nutrient Management Plan (SNMP) for the Santee Basin as part of the Integrated Regional Water Management Plan, Padre Dam takes exception to the requirement to develop a Salt Nutrient Management Plan (SNMP) for the Santee/El Monte Basin as part of the WDR amendment for the following reasons:

- Padre Dam's application of recycled water to the Santee basin (as allowed in the current WDR permit) is not the major contributor to salt and nutrient loadings in the Santee/El Monte Basin and therefore should not be conditioned to develop the SNMP with the WDR permit amendment;
- Recycled water is only applied to the limits of Santee Basin and the upper Santee and El Monte basins are outside the jurisdictional boundary for Padre Dam; therefore, it would be inappropriate to require Padre Dam to prepare an SNMP for the entire Santee/El Monte Basin as a condition of the permit amendment.

Specifically, Paragraph 9, Page 2 of the Tentative Order states....."The development of the salt and nutrient management plans is expected to be a cooperative effort among local water and wastewater entities and local salt/nutrient contributing stakeholders." Padre Dam is currently pursuing development of an SNMP for the Santee Basin (within the jurisdictional boundary of Padre Dam) in a cooperative effort with the Integrated Regional Water Management Plan. Padre Dam has no plans or budget to develop an SNMP for the El Monte Basin because recycled water is not applied in those areas and is outside of the jurisdictional boundary for Padre Dam.

The requirement to develop the SNMP appears in several locations in the Tentative Addendum including; Paragraphs 9 and 10 on Page 2; Footnote 3 on Page 2; Paragraph 2 on Page 5 and Footnote 4 on Page 5. Padre Dam respectfully requests removal of the requirement to develop an SNMP from the Tentative Order.

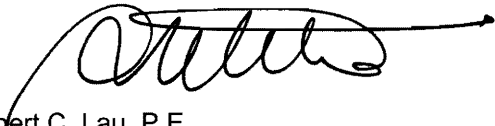
BOARD OF DIRECTORS
Douglas S. Wilson
Augie Scalzitti
Bill Pommering
August A. Caires
James Peasley

9300 Fanita Parkway
Santee, CA 92071
T 619 448 3111
F 619 449 9469
www.padredam.org
PO Box 719003
Santee, CA 92072-9003

Ms. Julie Chan, P.G. Chief
California Regional Water Quality Control Board
San Diego Region
Page 2
November 2, 2012

Padre Dam requests to modify Paragraph "o" on Page 4 which addresses the use of recycled water for street cleaning purposes. Paragraph "o" states "Recycled water shall not be applied where it could spray on external drinking water fountains, passing vehicles, buildings, or areas where food is handled or eaten." The words "passing vehicles" should be stricken from this sentence because street cleaning will be performed on streets where there will be vehicles passing the street cleaner; the wording proposed would be too restrictive and could prevent the used of recycled water on any street.

PADRE DAM MUNICIPAL WATER DISTRICT

A handwritten signature in black ink, appearing to read 'Albert C. Lau', with a long horizontal stroke extending to the right.

Albert C. Lau, P.E.
Director of Engineering & Planning

ACL:AS:cc

cc: Allen Carlisle, CEO/General Manager, Padre Dam Municipal Water District
Frank Kowalski, Director of Operations and Water Quality, Padre Dam Municipal Water District
Arne Sandvik, P.E., Senior Engineer, Padre Dam Municipal Water District

#34183v1