

**SAN ELIJO
JOINT POWERS AUTHORITY**

December 18, 2012

March 13, 2013
Item No. 5
Supporting Document No. 3

BOARD OF DIRECTORS

Teresa Barth
Thomas M. Campbell
Mark Muir
David W. Roberts

ADMINISTRATION

Michael T. Thornton
General Manager

Mr. David Gibson, Executive Officer
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

RE: 255265:00sibodu
Subject: Comments on Revised Tentative Addendum No. 1 to Order No. 2000-10, An Addendum Modifying Master Recycled Water Permit for the Production and Purveyance of Recycled Water for San Elijo Joint Powers Authority, San Dieguito Water District, Santa Fe Irrigation District, and City of Del Mar, San Diego County


Dear Mr. Gibson:

The San Elijo Joint Powers Authority (SEJPA) has received the subject Revised Tentative Amendment dated November 16, 2012. The Regional Board has requested that all written comments be submitted by 5:00 p.m. on December 18, 2012 and so we have compiled the attached list of questions and comments in accordance with that request.

In addition, Jon Bishop at the SWRCB has requested that your staff contact him to discuss the Salinity/Nutrient Management Planning that is outlined in the Revised Tentative Addendum No. 1 so that he may clarify the intent of the State Board related to impaired basins such as the San Elijo groundwater basin.

Your consideration of our request is appreciated. If you have any questions, please contact me at 760-753-6203 ext. 72.

Sincerely,
SAN ELIJO JOINT POWERS AUTHORITY


Michael T. Thornton, P.E.,
General Manager

cc: Julie Chan, Chief Cleanup and Land Discharge Branch, RWQCB
Christopher Trees, Director of Operations, SEJPA
File

Attachment: SEJPA Comments on Revised Tentative Order

SEJPA - 2012 Revised Tentative Addendum No. 1 Comments

Comment #	Page #	Section	Comment or Question
1	1	Findings	Add a finding that says "SEJPA has requested authorization to deliver recycled water to Olivenhain Municipal Water District (OMWD) for distribution within the same Hydrologic Areas and Hydrologic Subareas that have already been approved by the Regional Board in Order No. 2000-10."
2	2	Finding #5	Add to the end of the last sentence "...Hydrologic Subareas, including the OMWD service area."
3	2	Finding #6	The San Elijo groundwater basin is listed as a Tier D-2 groundwater basin. According to page 3-18 of the Guideline for Salinity/Nutrient Management Planning in the San Diego Region (SNMP), "Recycled water compliance with existing Basin Plan salinity objectives is not a concern within the Tier D basins. As a result, salinity management plans are not required within Tier D basins." Therefore, no schedule for developing a SNMP should be required. It is clearly stated in the guidelines that the SNMP is not required for Tier D basins and making this requirement in the recycled water permit is a misuse of public funds.
4	2	Finding #7	Replace finding #7 with the following: "The San Diego Water Board adopted Resolution No. R9-2009-0125 on November 10, 2010, which endorsed the Guidelines for Salinity/Nutrient Management Planning in the San Diego Region (SNMP Guidelines). SEJPA's recycled water use areas are within the Batiquitos Hydrologic Subarea (904.51), the San Elijo Hydrologic Subarea (904.61), and the Solana Beach Hydrologic Area (905.10). In accordance with criteria established in the SNMP Guidelines, groundwater within HSA 904.51, 904.61, and HA 905.10 are defined as "Tier D-2" groundwater basins and recycled water use is in compliance with existing Basin Plan groundwater quality objectives. The adopted SNMP Guidelines do not require the preparation of salt and nutrient management plans for Tier D-2 basins, as existing Basin Plan objectives in the Tier D-2 basins are deemed adequate for purposes of protecting groundwater quality and encouraging recycled water use. Therefore, the SEJPA recycled water permit (Permit No. 2000-10) is in compliance with the intent and desire of both the SNMP Guidelines and the State Recycled Water Policy."
5	3	intro of Order	Typo: "Order No. R9-2000-10" should be "Order No. 2000-10"
6	3	A.5	Current rating of dynasand filter is 2.88 MGD (5 gpm/sf x 400 sf = 2,000 gpm or 2.88 MGD). Please change "2.48 MGD" to "2.88 MGD".
7	3	A.7	First paragraph implies that the tertiary treatment facilities may be operated in excess of 3.02 MGD. Change first paragraph to: "SEWRF may not operate the new MF/RO equipment for distribution to water purveyors unless:"
8	4	A.7.c	This paragraph implies that the tertiary treatment facilities may be operated in excess of 3.02 MGD. Change to: " The San Diego Water Board has notified the Discharger by letter that operation of the expanded tertiary treatment facilities may be initiated."
9	4	E.21	Remove this section from the Addendum based on the comment to Finding #7 above.
10	4	E.22	Revise this section as follows: "SEJPA will supply nutrient information annually to our recycled water purveyors so that the water purveyors can distribute the information to their customers and promote the use of best management practices for irrigation. Nutrient information that will be provided to purveyors is defined in section B.1 of the effluent monitoring program. This will allow the purveyors to promote healthy landscapes, appropriate irrigation rates, and avoid nutrient overload."

SEJPA - 2012 Revised Tentative Addendum No. 1 Comments

Comment #	Page #	Section	Comment or Question
11	5	B.1	Priority Pollutants are required to be monitored once per year in the State Recycled Water Policy. Request that the new semiannual monitoring requirement be changed to annual monitoring.
12	6	5	Monitoring & Reporting Program No. 2000-10 currently has two sections labeled "Section D." We assume you are intending to modify the second one called "Section D REPORTING". Modify the Tentative Amendment to replace "Section D Reporting" with the new "Section E Reporting" as written in the Addendum.
13	Throughout	Current Order No. 2000-10 and M&RP No. 2000-10	Replace "State Department of Health Services and the County of San Diego Department of Environmental Health" with "State Department of Health Services OR the County of San Diego Department of Environmental Health" throughout the entire permit. Current Permit implies that the permittee is regulated by both agencies. Having duplicate oversight is onerous and creates confusion.
14	2	Finding #7	Coordinate SNMP requirements with State WQCB staff (Jon Bishop) to ensure that State Recycled Water Policy is being applied appropriately.