



THE CITY OF SAN DIEGO

May 22, 2014

Ms. Joann Lim
California Regional Water Quality Control Board
San Diego Region
2375 Northside Drive, Suite 100
San Diego, California 92108

REF: 257821: JLLim
Comments – Tentative Order No. R9-2014-0009

Dear Ms. Lim:

Thank you for the opportunity to provide comments relative to Tentative Order No. R9-2014-0009 (NPDES Permit No. CA0108928) released April 25, 2014, which would renew NPDES Waste Discharge Requirements for the South Bay International Wastewater Treatment Plant (SBIWTP) and South Bay Ocean Outfall (SBOO).

Most of the City's comments reflect minor corrections, suggestions or questions regarding the Monitoring & Reporting Program for receiving waters that is jointly shared by permits for the SBIWTP and the City's South Bay Water Reclamation Plant. All of these comments are included in the attached enclosure and include reference to the specific section and page numbers of the Tentative Order.

We appreciate your thoughtful review of our comments provided. If you have any questions, please contact me at (619) 758-2329 or via email at TStebbins@sanidiego.gov.

Sincerely,

Timothy D. Stebbins, Ph.D.
Senior Marine Biologist
Ocean Monitoring Program Director

TDS:ts

Enclosures: 1. Corrections, Suggestions, and Questions to Tentative Order No. R9-2014-0009



Enclosure 1

**Corrections, Suggestions and Questions to Tentative Order No. R9-2014-0009
 Submitted by City of San Diego Public Utilities Department
 May 22, 2014**

Prepared by

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Section	Page	Comment
Attach. B – Map	B-2	Station Map: Trawl station SD17 is in the wrong location on this map and there is an unknown line associated with station SD18. The City will provide San Diego Water Board staff with an updated map.
Attach. E – MRP III.C	E-13	Table-E-4: Should the year in column 5 (minimum test frequency) be 2014 instead of 2012?
Attach. E – MRP IV.A	E-15	Table-E-6: The stations listed in row 3 should be “S0, S2-S6, S8-S-12” similar to the first two rows. [The “S2, S6” part is incorrect]
Attach. E – MRP IV.A	E-15	Surf Zone Repeat Sampling Requirements in Mexican Waters – Table E-6 (Footnote 3): Footnote 3 specifies that repeat sampling shall be conducted at the surf zone stations whenever a sample exceeds any single sample maximum (SSM) bacterial standard. The three stations located south of the U.S./Mexico International Border (i.e., S0, S2, S3) should be excluded from this requirement as they are not subject to Ocean Plan water quality standards.
Attach. E – MRP IV.A	E-15	Surf Zone Repeat Sampling Requirements in U.S. Waters – Table E-6 (Footnote 3): Footnote 3 specifies that repeat sampling shall be conducted at the surf zone stations whenever a sample exceeds any single sample maximum (SSM) bacterial standard. The City recommends that stations S4, S5, S6, S10, S11, and S12 located north of the U.S./Mexico International Border should be excluded from this resample requirement. Each of these six stations corresponds to a site included in Attachment F of the TO, Section III.D (p. F-14) as an impaired water body on the CWA 303(d) list. As such, these sites are not expected to meet applicable water quality standards. Attach. F, Sect. III.D: Location #1 = station S12; Location #3 = station S6; Location #4 = station S11; Location #5 = station S5; Location #6 = station S-10; Location #7 = station S4
Attach. E – MRP IV.B	E-16	Spelling Correction: The first word in the heading should be “Offshore” (i.e., one word; not Off Shore)

Section	Page	Comment
Attach. E – MRP IV.B	E-17	Table E-7 – Footnote 2: The sampling frequency in footnote #2 should be changed to quarterly to match the CTD profile frequency in column 5 for rows 3-7 of the table.
Attach. E – MRP IV.B	E-17	Table E-7 – Oil and Grease: The City recommends deleting the O&G sampling requirement at the offshore stations as was done several years ago for the Pt Loma outfall MRP. If retained, however, the frequency should be changed to quarterly both in row 8 and footnote 3. [delete footnote #3 if requirement dropped]
Attach. E – MRP IV.B	E-17	Table E-7 – Total Suspended Solids: The City recommends deleting the TSS sampling requirement at the offshore stations as was done several years ago for the Pt Loma MRP. If retained, however, the frequency should be changed to quarterly both in row 9 and footnote 4. [delete footnote #4 if requirement dropped]
Attach. E – MRP IV.B	E-17	Table E-7 – Offshore Bacteria Sampling: The sampling frequency for bacteria monitoring at the 25 offshore stations listed in row 10 and in footnote 5 should be changed to quarterly to match the profile frequency in rows 3-7.
Attach. E – MRP IV.B	E-17	Table E-7 – Kelp Bed Bacteria Sampling: As per discussion with San Diego Water Board staff, the City concurs and recommends that given the modification of offshore bacterial monitoring to a quarterly sampling schedule, that weekly monitoring of the three kelp bed stations (I25, I26, I39) listed in row 11 be expanded to include nearshore stations I19, I40, I24, and I32 located from South to North along the 9-m depth contour (see station map on page B-2). This “nearshore” sampling design would be similar in scope to that for the Pt Loma MRP and will provide more appropriate data necessary to address Special Study VI.C (Compliance with Bacteriological Standards) described on page E-31 of this TO. If adopted, these seven nearshore stations should be listed in column 3 as: I19, I24 to I26, I32, I39, and I40.
Attach. E – MRP IV.B	E-17	Table E-7 – Footnote 6: The footnote describes weekly bacteria sampling at the kelp stations but makes no mention of CTD profile sampling which is done simultaneously. The City recommends modifying the footnote accordingly, plus it should also reflect the additional nearshore sampling stations if the previous recommendation is adopted.
Attach. E – MRP IV.C	E-17	Section Title: The City recommends modifying the heading to “Benthic Monitoring Requirements” since that would include both sediments and infauna as described in the following subsections.

Section	Page	Comment
Attach. E – MRP IV.C.6	E-21	Sediment Toxicity: As per discussion with San Diego Water Board staff D. Barker and M. Mata on 5/21/14, the City concurs that language be inserted under the benthic monitoring section of the TO regarding development of a <i>Sediment Toxicity Monitoring Plan</i> to comply with new requirements of Ocean Plan Appendix III, Standard Monitoring Procedures, Aquatic Life Toxicity.
Attach. E – MRP IV.C.7	E-21	Subsection Title: The City recommends modifying the heading to “Benthic Monitoring Reporting Frequency” to include both sediments and infauna as described in the previous subsections and to change this to subsection from IV.C.6 to IV.C.7 to accommodate the addition of “Sediment Toxicity” as described above.
Attach. E – MRP IV.D	E-21	General Comment – Fish & Invertebrate Monitoring: The explanation for why fish and invertebrate monitoring is important is all about contaminants in fish tissues. Thus, it does not seem complete.
Attach. E – MRP IV.D.1.b	E-22	Fish & Invertebrate Community Structure Analysis: There is no mention here of measuring size class (e.g., standard length) for trawl-caught fishes, although such language is included for fish captured at the rig fishing stations on page E-25. It is probably more relevant in this section.
Attach. E – MRP IV.D.c	E-21– E-24	Fish Tissue Chemical Analyses (Trawls): This section does not state when the annual fish tissue samples from the trawl stations should be collected. The City recommends October (or Fall) to be the target sampling period similar to the MRP fro Pt Loma.
Attach. E – MRP IV.D.1.c	E-23 – E-24	Table E-9 – PAHs: The City recommends PAHs be deleted as a requirement for fish tissue monitoring for both liver tissues (trawl stations) and muscle tissues (RF stations). This change is consistent with a similar modification to the Pt Loma MRP approved several years ago by Regional Board.
Attach. E – MRP IV.D.1.e.v	E-24	Fish & Invertebrate Trawls Report: Bullet “e” under this section should be modified to include trawl invertebrate data as well as fish data.
Attach. E – MRP IV.D.2.a	E-24	Rig Fishing Frequency: This section does not state when the annual fish tissue samples from the rig fishing stations should be collected. The City recommends October (or Fall) to be the target sampling period similar to the MRP fro Pt Loma.
Attach. E – MRP IV.D.2.a	E-24	Rig Fishing Method & Location: This section should be revised to include specific reference to the two rig fishing stations, RF-3 and RF-4 and to include language describing the appropriate zones for the purpose of collecting sufficient numbers of fish for tissue analyses. The City will provide San Diego Water Board staff with suggested language.

Section	Page	Comment
Attach. E – MRP IV.D.2.a	E-33	Table-E-11, Footnote 2: Where the footnote refers to “fish monitoring requirements” it should refer to “fish and invertebrate” monitoring requirements.
Attach. F – Fact Sheet	F-1 – F-47	General Comment: The City recommends that language included in the Fact Sheet be revised as appropriate to reflect changes as described above mostly for Attachment E (Monitoring & Reporting Program).