



An Everyday Essential



Place ID 247351: JLLim

April 13, 2015

California Regional Water Quality Control Board
San Diego Region
Attention: Joann Lim
2375 Northside Drive, Suite 100
San Diego, California 92108-2700

SUBJECT: COMMENT - TENTATIVE ORDER NO. R9-2015-0002; NPDES PERMIT NO. CA 0107492; WASTE DISCHARGE REQUIREMENTS FOR THE PADRE DAM MUNICIPAL WATER DISTRICT, RAY STOYER WATER RECYCLING FACILITY, DISCHARGE TO SYCAMORE CREEK, SAN DIEGO COUNTY

Thank you for working diligently with Padre Dam Municipal Water District (Padre Dam) in developing the final draft of Order No. R9-2015-0002. Padre Dam values its ongoing partnership with the Regional Water Quality Board (RWQCB) in protecting water quality and is proud of its water recycling water project that is one of the nation's oldest and most well-known (a project that predates the Clean Water Act by a decade). Padre Dam supports the adoption of the draft order in support the District's mission to provide quality water, recycled water, park and recreational facilities and wastewater management services for our customers.

In reviewing the current Draft Order, Padre Dam has identified several areas of attachments that should be revised to ensure consistency with the Order. Specifically, Padre Dam requests the RWQCB to consider the following:

1. Padre Dam concurs with requirements of the Draft Order (pages 1 through 29). The Order was prepared in balance of protecting water quality and meeting the RWQCB's practical vision. The Draft Order is comprehensive, and accounts for the values and benefits of the Santee Lakes system to the community and the watershed.
2. Padre Dam requests that Attachment E is revised to be consistent with the Draft Order. Specifically, Table E-4 and Table E-5 of the Attachment E appears to be inconsistent with the intent of the Order. To aid in this process, Padre Dam is attaching proposed revised Tables E3 and E4 for inclusion into Attachment E to provide additional clarity. These tables provide a summary of the sampling

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parameters and units, frequency of sampling, methods of analysis, and the effluent limitations where applicable. The tables we prepared are consistent with the requirements for the discharge points EFF-001A and EFF-001B as presented in the Draft Order.

As a final note, Padre Dam supports the Regional Water Board's regional monitoring framework approach, and stands ready to coordinate with the Regional Water Board to implement the core monitoring, receiving water monitoring, and receiving water studies proposed within Tentative Order No. R9-2015-0002.

Again, I would like to thank the RWQCB staff for the opportunity to comment on this Draft Order and for working with Padre Dam Staff to renew the Permit.

PADRE DAM MUNICIPAL WATER DISTRICT



Albert C. Lau, PE
Director of Engineering and Planning

ACL:cc

Attachments: Table E-3 and E-4

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Table E-3. Effluent Monitoring for Discharge Point No. 001A¹

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method	Effluent Limitations ²			
					Average Monthly	Average Weekly	Maximum Daily	Instantaneous Maximum
Flow Rate	MGD	recorder/ totalizer	continuous	3	--	--	--	--
Chemical Oxygen Demand	mg/L	24-hour composite	3/week	3	--	--	--	--
BOD ⁵	mg/L	24-hour composite	3/week	3	--	--	--	--
	Percent Removal	Calculate	3/week	3	--	--	--	--
TSS	mg/L	24-hour composite	3/week	3	15	23	25	--
	Percent Removal	Calculate	3/week	3	--	--	--	--
	lbs/day				250	384	417	--
Turbidity ⁴	Nephelometric Turbidity Units (NTU)	recorder	continuous	3				10
Total Dissolved Solids	mg/L	24-hour composite	1/month	3	--	--	1,000	--
	lbs/day				--	--	16,680	--
Specific Conductance	µmhos/cm	recorder	continuous	3	--	--	--	--
Total Hardness (as CaCO ₃)	mg/L	24-hour composite	1/quarter	3	--	--	--	--
Oil and Grease	mg/L	grab	1/quarter	3	5	--	7.5	--
	lbs/day				83	--	125	--
Ph	standard units	recorder	continuous	3	--	--	--	8.5
Color	ADMI Color Units	24-hour composite	1/month	3	--	--	--	--
Total Organic Carbon	mg/L	24-hour composite	1/quarter	3	--	--	--	--
Dissolved Oxygen	mg/L	grab	1/week	3	--	--	5.0 ⁵	--

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method	Effluent Limitations ²			
					Average Monthly	Average Weekly	Maximum Daily	Instantaneous Maximum
Total Coliform	Most probable number per 100 milliliters (MPN/100 mL)	grab	1/day	3	23	2.2		240
Fecal Coliform ⁶	MPN/100 mL	grab	1/day	3	200/400 ⁶			
Enterococcus	MPN/100 mL	grab	1/day	3	33			61
Escherichia coli	MPN/100 mL	grab	1/week	3	126			235
Nitrate Nitrogen	mg/L	24-hour composite	1/month	3	--	--	--	--
Nitrogen, Total (as N)	mg/L	24-hour composite	1/month	3	--	--	--	--
Phosphorous, Total (as P)	mg/L	24-hour composite	1/month	3	--	--	--	--
Percent Sodium	percent	24-hour composite	1/month	3	--	--	--	--
Bromoform	micrograms per liter (µg/L)	24-hour composite	1/ quarter	7	--	--	--	--
Chlorodibromomehtane	µg/L	24-hour composite	1/ quarter	7	--	--	--	--
Chloroform	µg/L	24-hour composite	1/ quarter	7	--	--	--	--
dichlorobromomethane	µg/L	24-hour composite	1/ quarter	7	--	--	--	--
Aluminum, Total Recoverable	mg/L	24-hour composite	1/month	3	--	--	0.2	--
	lbs/day				--	--	3.3	--
Chloride	mg/L	24-hour composite	1/month	3	--	--	400	--
	lbs/day				--	--	6,672	--

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method	Effluent Limitations ²			
					Average Monthly	Average Weekly	Maximum Daily	Instantaneous Maximum
Iron, Total Recoverable	mg/L	24-hour composite	1/month	³	--	--	0.3	--
	lbs/day				--	--	5.0	--
Manganese, Total Recoverable	mg/L	24-hour composite	1/month	³	--	--	0.05	--
	lbs/day				--	--	0.83	--
Bis(2-Ethylhexyl)Phthalate	µg/L	grab	1/month ⁸	⁷	1.8	--	3.6	--
	lbs/day				0.03	--	0.06	--
Total Chlorine Residual	µg/L	grab	1/day	³	2	8	18	--
	lbs/day				0.033	0.13	0.3	--
Total Trihalomethanes ⁹	µg/L	24-hour composite	1/month	³	80.0	--	160	--
	lbs/day				1.33	--	2.68	--
Methyl-tert-butyl-ether (MTBE)	µg/L	grab	1/quarter	³	--	--	--	--
Zinc	µg/L	grab	1/month	²	115	--	230	--
	lbs/day				1.91	--	3.84	--
Barium	µg/L	grab	2/year	³	--	--	--	--
Boron	mg/L	24-hour composite	2/year	³	--	--	--	--
Fluoride	mg/L	24-hour composite	2/year	³	--	--	--	--
Methylene Blue Active Substances (MBAS)	mg/L	24-hour composite	2/year	³	--	--	--	--
Sulfate	mg/L	24-hour composite	2/year	³	--	--	--	--
Priority Pollutants ¹⁰	µg/L	24-hour composite	2/year	⁷	--	--	--	--

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method	Effluent Limitations ²			
					Average Monthly	Average Weekly	Maximum Daily	Instantaneous Maximum
Chronic Toxicity ¹¹	Pass/Fail, % Effect (Test of Significant Toxicity)	24-hour composite	2/year	12	Pass ¹³	--	Pass or % effect <50 ¹⁴	--
Biochemical Oxygen Demand 5-day @ 20°C (BOD ¹³)	milligrams per liter (mg/L)	--	--	--	15	23	25	--
	pounds per day (lbs/day)	--	--	--	250	384	417	--

- 1 See Attachment A for definitions of abbreviations and a glossary of common terms used in the Order.
- 2 The mass emission rate (MER) limitations, in pounds per day, were calculated based on the following equation:
 $MER (lb/day) = 8.34 \times Q \times C$, where Q is the maximum allowable flow rate (in million gallons per day (MGD) and C is the concentration (in mg/L)).
- 3 Consistent with the requirements of 40 CFR part 136.
- 4 Turbidity: Effluent turbidity shall not exceed the following: i. 2 Nephelometric Turbidity Units (NTU) as a daily average; ii. 5 NTU more than five percent of the time within a 24-hour period.
- 5 Applied as a Daily Minimum.
- 6 Fecal Coliform: Effluent fecal coliform organisms' concentration shall not exceed the following: i. 200 MPN/100 mL geometric mean, based on a minimum of not less than five samples for any 30-day period; and 400 MPN/100 mL for more than 10 percent of the total samples during any 30-day period.
- 7 Consistent with the requirements of 40 CFR part 136 and Attachment H of the Order.
- 8 Monitoring frequency may be reduced to 2/year after four consecutive months of results of non-detect. If the parameter is detected, monitoring shall return to monthly. The Discharger shall use a ML equal to or less than five µg/L and shall use sample collection and handling techniques to reduce the possibility of contamination.
- 9 Total trihalomethanes equal the sum of the concentrations of chloroform, bromodichloromethane, dibromochloromethane, and bromoform.
- 10 Priority pollutants as specified in 40 CFR section 131.38.
- 11 A numeric WQBEL is established because effluent data showed that there was reasonable potential for the effluent to cause or contribute to an exceedance of the chronic toxicity water quality objective. The chronic toxicity final effluent limitation is protective of both the numeric acute toxicity and the narrative toxicity Basin Plan water quality objectives. These final effluent limitations will be implemented using the Short Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms (USEPA 2002, EPA-821-R-02-013), current USEPA guidance in National Pollutant Discharge Elimination System Test of Significant Toxicity Implementation Document

(EPA 833-R-10-003, June /2010) and EPA Regions 8, 9 and 10 Toxicity Training Tool (January 2010),<http://www2.epa.gov/region8/epa-regions-8-9-and-10-toxicity-training-tool-january-2010>.

- 12 Monitoring for whole effluent toxicity (WET) shall be conducted as specified in section III.C of this MRP.
- 13 The Median Monthly Effluent Limitation for chronic toxicity shall only apply when there is a discharge more than one day in a calendar month period. During such calendar months, up to three independent toxicity tests may be conducted when one toxicity test results in "Fail".
- 14 As specified in section III.C.1 of the MRP, Attachment E of the Order.

Table E-4. Effluent Monitoring for Discharge Point No. 001 B¹

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method	Effluent Limitations		
					Average Monthly	Maximum Daily	12 Month Average
Flow Rate	MGD	Recorder/totalizer	continuous	²	2		
Ammonia, Unionized (as Nitrogen)	mg/L		1/month	²		0.025	
	lbs/day			²		0.42	
Total Coliform ³	MPN/100 mL	grab	1/week	²			
Fecal Coliform ³	MPN/100 mL	grab	1/week	²			
Enterococcus ³	MPN/100 mL	grab	1/week	²			
Escherichia coli ³	MPN/100 mL	grab	1/week	²			
Dissolved Oxygen	mg/L	grab	1/week	²			
Nitrogen series ⁴	mg/L	24-hr composite	1/month	²			
Phosphorous series ⁵	mg/L	24-hr composite	1/month	²			
Total Dissolved Solids	mg/L	24-hr composite	1/month	²			
Chronic Toxicity	Pass/Fail, % Effect (Test of Significant Toxicity)	24-hr composite	1/quarter	⁶			
Temperature	F	grab	1/quarter	¹			
pH	Standards Units	grab	1/quarter	¹			
Turbidity	NTU	grab	1/quarter	¹			
Electric Conductivity at 25 C	umhos/com	grab	1/quarter	¹			
Active Ingredient ⁷	ug/L	grab	1/quarter	¹			
Nonylphenol ⁸	ug/L	grab	1/quarter	¹			
Hardness (if copper is monitored)	mg/L	grab	1/quarter	¹			
Dissolved Oxygen	mg/L	grab	1/quarter	¹			
Nitrate Nitrogen	mg/L	24-hr composite	1/month			45	

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method	Effluent Limitations		
					Average Monthly	Maximum Daily	12 Month Average
	lbs/day					751	
Nitrogen, Total	lbs/day						17 ⁹
Phosphorous, Total	lbs/day						1.7 ⁹

- 1 See Attachment A for definitions of abbreviations and a glossary of common terms used in the Order.
- 2 Consistent with the requirements of 40 CFR part 136.
- 3 Bacteria samples will be collected, analyzed and reported, but the point of compliance is location EFF-001A. If exceedances of applicable receiving water limitations for total coliform, fecal coliform, and/or enterococcus specified in section V.A.1 of the Order are observed immediately downstream of Discharge Point No. 001 (as measured at Monitoring Location RSW-001a), the Discharger shall increase effluent monitoring frequency for that parameter(s) from once a week to daily until the receiving water has demonstrated compliance at Monitoring Location RSW-001a with applicable receiving water limitations for that parameter(s) specified in section V.A.1 of the Order for a minimum of one week or the Discharger demonstrates to the San Diego Water Board that Facility effluent at EFF-001A is not a contributing source of that parameter(s) to the downstream receiving water exceedances at Monitoring Location RSW-001a.
- 4 Includes: total nitrogen (as N), total organic nitrogen (as N), total nitrate (as N), total nitrite (as N), and ammonia, un-ionized (as N)
- 5 Includes: total phosphorus (as P) and total orthophosphate (as P).
- 6 Monitoring for WET shall be conducted as specified in section III.C of this MRP.
- 7 2,4-D, acrolein, dissolved copper, diquat, endothall, fluridone, glyphosate, imazamox, imazapyr, penoxsulam, and triclopyr.
- 8 It is required only when a surfactant is used.
- 9 Based on a running 12-month average.