



December 20, 2016

**Delivered via email**

To: Peter Kozelka at USEPA (Kozelka.Peter@epa.gov) and  
Joann Lim at the San Diego Water Board (Joann.Lim@waterboards.ca.gov)

**Re: Comment - Tentative Order No.R9-2017- 0007**

Dear Mr. Kozelka and Ms. Lim,

The Surfrider Foundation San Diego County Chapter is an environmental non-profit, dedicated to the protection and enjoyment of the oceans, waves and beaches through a powerful activist network. Surfrider Foundation is an organization representing 250,000 surfers and beach-goers worldwide that value the protection of the coastal environment. We appreciate the opportunity to provide comments to the USEPA and San Diego Regional Water Quality Control Board about this important issue.

For more than a decade, the San Diego Chapter has been working with the City of San Diego to reduce flows and pollutants entering the marine environment from the Point Loma Wastewater Treatment Plant. We are supportive of the draft Tentative Order and the City's recent efforts to accelerate the schedule to offload [30 mgd \(million-gallons-a-day\) of wastewater by 2021](https://www.sandiego.gov/water/purewater/purewatersd) (<https://www.sandiego.gov/water/purewater/purewatersd>). We applaud those efforts, and believe those commitments should be reflected in this tentative order. Please also consider incorporating the two following suggested modifications.

On page 17, section 2.b. under the receiving water limitations, the tentative order lists some outdated language for the Enterococcus Single Sample Maximum. The designations of moderate, light and infrequent use are from an old EPA guidance document and were not included in the 2012 Water Quality Criteria. The problem with basing water quality standards on frequency of use include defining what those use intensity designations mean and justifying why someone who is exposed infrequently should get less protection than a frequent user. Surfrider recommends dropping these designations in favor of a uniform single sample maximum of 104.

The [2012 Water Quality Criteria](#) (pg. 40) states:

"Further, EPA is no longer utilizing the concept of "use intensity" as a basis for recommending multiple SSM criteria. EPA recommends instead that states adopt both the GM and STV into their WQS for all primary contact recreation waters. EPA now specifically recommends a duration period over which the GM of samples should be calculated and over which the STV should be compared against a recommended limit on the frequency of excursions. EPA is recommending that states use a duration for the GM and STV of 30 days."

Additionally, we believe the tentative order should reiterate the agreed upon effluent concentration limits in the draft OPRA II language:

*(iii) discharge no more than a concentration of 60 milligrams per liter of total suspended solids calculated as a thirty-day average.*

In conclusion, we are supportive of the tentative order with the modification of the Enterococcus Single Sample Maximum to be consistent with the 2012 Water Quality Criteria, the inclusion of the accelerated implementation schedule, and additional clarity on the effluent concentration limits. Please let us know if you have any questions.

Sincerely,

Julia Chunn-Heer  
Policy Manager  
San Diego County Chapter

Rick Wilson  
Senior Staff Scientist  
Surfrider Foundation