Richard A. Reynolds Desalination Expansion Project
Mission Valley
San Diego

USGS SD Formation Monitoring Well (City of SD)

Future USGS SD Formation Monitoring Wells (City of SD)

USGS SD Formation Monitoring Wells (SWA Service Area)

USGS SD Formation Monitoring Wells (City of SD)

Padre Dam MWD

Helix Water District

San Diego

East Lake

Otay River

Bonita

States of America

Estados Unidos Mexicanos

Sweetwater Authority
Reynolds Groundwater Desal Expansion

- Currently produces 3,600 AF/year – 20% of annual need

- Adds 2,600 AF/year or total of 6,200 AF/year – 34% of annual need via five new production wells

- The project benefits from local water resources; augments imported water; sustainable; does not harm the environment

- Relocated 3,200 lineal feet of 16-inch brine discharge line per RWQCB (RB) requirement to discharge to bay ($1 million)
Reynolds Groundwater Desal Expansion

- Local, drought proof, emergency supply; improves reliability; and less power intensive than seawater

- Capital and O&M is ~ $450/AF vs. $1,255/AF purchase treated imported water from County Water Authority

- Saves Sweetwater $2.1 million first year versus imported water purchase

- June 19 Union Tribune Editorial – “...foresight and good planning. We need more of that in government.”
Concerns with Tentative Order

- RB continues to provide challenges with draft permit. Are there significant water quality improvements to justify more regulations and costs to Authority customers?
- Appreciate RB staff concurring with SWA concerns to make adjustments to Tentative Order
- Testing requirements previous TO’s: 1999 = 281; 2010 = 522; and proposed TO = 1901 but reduced to 800
- Number of violations shown on document No. 5 (pg. F-8) = 11. Report is misleading as six tests were laboratory errors
Requests of RWQCB for Tentative Order

(Referring to RB’s Response to Comments Report – Support Doc. No. 4)

• Copper (2) and Cyanide (3) Effluent Limitations – Leave same as current TO as past low level actual results are penalizing the Authority

• Remove Effluent Monitoring program (8) – Need to strike reference to 001b on Table 2, page 1 of TO and Table E-1, page E-4 be consistent with other changes made by RB staff
Requests of RWQCB for Tentative Order

- Sediment Monitoring Requirement (10) – remove as not practical or reasonable for this application
  - SWA not responsible for background conditions of larger environment as well as collecting data
  - SWA has been good stewards – history shows no degradation
  - An example of a regulation that adds costs with minimal benefit
Requests of RWQCB for Tentative Order

- Align Toxicity Testing Requirements (12); TST is Scientifically Unreliable (13); TST is Contrary to Law (14); and TRE Process creates Regulatory Uncertainty (15) – remove these requirements
  - TST is not promulgated by EPA and not required by any law or regulation
  - NOEC is acceptable standard under 40 CFR part 136 so SWA should have the option to use
  - More likely to see false positives thus fines
Requests of RWQCB for Tentative Order

• Include a reopen provision (16) – Allow per Section 5.3 of SIP (as provided on page 34 of SIP)

• Change effective date (17) – RB comment misleading; SWA request is not based on inconvenience; allowing January 1, 2018 is more practical and beneficial to both parties based on required data calculations. What is the rush?