

**Item Number 9**

**Supporting Document 3**

**City of San Diego Comment Letter**

**June 9, 2021**

April 28, 2021

California Regional Water Quality Control Board  
San Diego Region  
Attn: Mr. Brandon Bushnell  
2375 Northside Drive, Suite 100  
San Diego, CA 92108  
Email: Brandon.Bushnell@waterboards.ca.gov

Submitted electronically to SanDiego@WaterBoards.ca.gov:

**Re: Comment - Tentative Order No. R9-2021-0015**

Dear Mr. Bushnell:

The City of San Diego (City) Public Utilities Department (PUD) appreciates the opportunity to comment on the Master Recycling Permit for the South Bay Water Reclamation Plant (SBWRP), under Tentative Order No. R9-2021-0015. The City's SBWRP has a maximum capacity and recycled water distribution limit of 15 million gallons per day and distributes recycled water to customers in the Otay and Tijuana Valley hydrologic areas. Recycled water is critically important to the City, as it provides San Diego a dependable, year-round, and locally controlled water resource that diversifies our water portfolio and promotes the City's sustainability and water reliability efforts. The City looks forward to continuing to produce and distribute recycled water within our SBWRP service area under this new permit. We have two main requests for your consideration prior to adoption of this tentative order, as discussed below.

*Revise the boron discharge specification limit to 0.75 mg/L in Provision II, Table 1.*

The 30-day average (0.75 mg/L) and daily maximum (1.0 mg/L) discharge specifications for boron in the current permit, Order No. 2000-203, were revised to a new annual average of 0.5 mg/L in the tentative order. We believe this to be a typographical error missing the "7" in 0.75 mg/L and that the intent was for the limit to be 0.75 mg/L because:

1. Based on review of the past six years of data, no exceedances of current discharge specifications for boron have been identified;
2. The boron discharge specification included in the tentative order (0.5 mg/L) is lower than the Water Quality Control Plan for the San Diego Basin (Basin Plan) Groundwater Quality Objectives for the Otay Valley and Tijuana Valley hydrologic areas where SBWRP distributes recycled water, at 0.75 mg/L and 2.0 mg/L, respectively; and
3. No justification for the reduced boron discharge specification was included in the tentative order fact sheet.

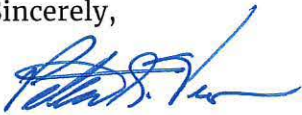
Based on this evaluation, the City requests that the discharge specification limit for boron be corrected to 0.75 mg/L.

*Clarify that, as written, the intent of the language in Attachment D, Provision I.K allows for time-weighted or flow-weighted composite sampling as long as the sample is representative.*

Provision I.K of Attachment D states that *“The composite must be flow proportional; either the time interval between each aliquot or the volume of each aliquot must be proportional to either the stream flow at the time of sampling or the total stream flow since the collection of the previous aliquot.”* As this statement may be subject to interpretation, the City requests confirmation that either time- or flow-weighted composite sampling methods can be utilized as long as the aliquots collected are representative of the flow and the pollutant concentrations.

If you have any questions, feel free to contact me at 619-758-2301.

Sincerely,



Peter S. Vroom, Ph.D., Deputy Director, Public Utilities Department

PV/rnd

cc: Shauna Lorance, Director, Public Utilities Department  
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