

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, SAN DIEGO REGION**

**RESPONSES TO COMMENTS ON TENTATIVE ORDER NO. R9-2010-0032, CITY OF ESCONDIDO HALE AVENUE RESOURCE RECOVERY FACILITY (HARRF)**

**CITY OF ESCONDIDO COMMENTS:**

No.	SECTION	COMMENT	RESOLUTION																																																
1	Table 1, Table 4, Table D-1, Facility Information	<p><b><i>Change the title of John Burcham from “Superintendent” to “Deputy Utilities Manager.”</i></b>  <b><i>Facility Contact, Phone - John Burcham, Deputy Utilities Manager (760) 839-6273</i></b></p>	Change made in Table 4, and D-1. Reference removed from Table 1.																																																
2	IV.A.1. Table 6. Effluent Limitations	<p><b><i>Nitrate as NO3 12 month average discharge limit is 10 mg/l Base on Water Quality Objective Ground Water hydrologic Basin plan for Escondido Creek.</i></b></p> <p><b><i>Historical ground water in HSA 5.21 and 4.62 nitrate level is over 30 mg/l on Nitrate as NO3</i></b></p> <p style="text-align: center;"><b>Nitrate As NO3 Data for Ground Water Monitoring in HSA 5.21</b></p> <table border="1" data-bbox="527 980 1148 1511"> <thead> <tr> <th></th> <th>Kit Carson</th> <th>Kit Carson</th> <th>Kit Carson</th> </tr> <tr> <th>Sample</th> <th>Well</th> <th>Well</th> <th>Well</th> </tr> <tr> <th>Date</th> <th>#7 mg/l</th> <th>#14 mg/l</th> <th>#15 mg/l</th> </tr> </thead> <tbody> <tr> <td>7/18/01</td> <td>32.1</td> <td>35.7</td> <td>42.9</td> </tr> <tr> <td>8/1/01</td> <td>32.3</td> <td>36.0</td> <td>43.6</td> </tr> <tr> <td>10/24/01</td> <td>32.6</td> <td>38.3</td> <td>41.9</td> </tr> <tr> <td>2/7/02</td> <td>31.3</td> <td>37.4</td> <td>40.4</td> </tr> <tr> <td>5/30/02</td> <td>36.9</td> <td></td> <td>43.3</td> </tr> <tr> <td>8/22/02</td> <td>34.8</td> <td>42.4</td> <td></td> </tr> <tr> <td>11/20/02</td> <td>36.0</td> <td>43.8</td> <td>43.5</td> </tr> <tr> <td>3/12/03</td> <td>30.1</td> <td>35.0</td> <td>39.0</td> </tr> <tr> <td>6/25/03</td> <td>30.7</td> <td>31.5</td> <td>40.7</td> </tr> </tbody> </table>		Kit Carson	Kit Carson	Kit Carson	Sample	Well	Well	Well	Date	#7 mg/l	#14 mg/l	#15 mg/l	7/18/01	32.1	35.7	42.9	8/1/01	32.3	36.0	43.6	10/24/01	32.6	38.3	41.9	2/7/02	31.3	37.4	40.4	5/30/02	36.9		43.3	8/22/02	34.8	42.4		11/20/02	36.0	43.8	43.5	3/12/03	30.1	35.0	39.0	6/25/03	30.7	31.5	40.7	<p>The 10 mg/L effluent limitation is overly conservative because the plant uptake will reduce nitrate concentration before the recycled water infiltrates to groundwater. Therefore, the effluent limitation for nitrate is removed because of user rules and regulations requiring irrigation at agronomic rates. The user rules also require reporting to the City of Escondido and a description of user compliance.</p> <p>In addition, Monitoring and Reporting Program Requirement in Attachment C section V. A.6.c. inserted: <i>The Discharger shall include historical data in either tabular</i></p>
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		9/17/03	31.3	33.6	39.9	<p><i>or graphical format for parameters in section IV of this MRP. The data shall be summarized to clearly indicate trends in Receiving Groundwater monitoring locations.</i></p> <p>The Information Sheet (Attachment D) is modified to explain the rationale for the changes.</p> <p>Changes for arsenic and cadmium limitations are accepted to correct typographical errors.</p>
		12/15/03	33.1	34.6	39.8	
		3/17/04	31.2	31.0	37.9	
		6/16/04	29.4	28.2	37.2	
		9/29/04	29.7	31.3	35.8	
		12/8/04	30.1	31.3	36.4	
		3/16/2005	30.2	30.1	38.6	
		6/22/2005	29.2	32.2	43.6	
		9/14/2005	32.6	29.5	37.7	
		12/21/2005	30.4	28.1	39.1	
		3/22/2006	29.9	29.8	38.3	
		6/15/2006	28.4	30.2	36.6	
		9/20/2006	28.5	32.7	35.9	
		12/14/2006	29.3	34.4	36.8	
		2/28/2007	28.3	34.0	36.3	
		5/30/2007	27.1	35.2	36.5	
		8/29/2007	29.4	38.3	39.1	
		11/28/2007	25.0	37.0	38.0	
		2/27/2008	26.5	37.5	44.3	
		5/21/2008	24.9	34.7	38.8	
		Average	30.4	34.1	39.3	

		<table border="1" data-bbox="527 203 1148 430"> <tr> <td colspan="4" style="text-align: center;"><b>Nitrate As NO3 Data for Ground Water Monitoring in HSA 4.62</b></td> </tr> <tr> <td></td> <td></td> <td style="text-align: center;">MW5 mg/l</td> <td></td> </tr> <tr> <td style="text-align: center;">8/5/09</td> <td></td> <td style="text-align: center;">45.2</td> <td></td> </tr> </table> <p data-bbox="415 505 1470 574"><b><i>Our recycled water has levels of nitrate as NO3 that range from 8.9 to 59.8 mg/l.</i></b></p> <p data-bbox="415 578 1442 795"><b><i>The historical data for groundwater shows nitrate levels above the proposed recycled water nitrate limits. The historically high nitrate levels in the groundwater are most likely due to fertilizer use in the agricultural areas in and around Escondido. After recycled water discharge for irrigational purposes began in September of 2004 the nitrate levels in groundwater did not noticeably increase from 2001.</i></b></p> <p data-bbox="415 834 1467 1088"><b><i>Since the recycled water has shown no impact on groundwater nitrate levels, the city is requesting the nitrate numeric limitation be removed and replaced with a requirement that the effluent nitrate concentration 'not degrade water quality'. Example language could be "The effluent nitrate concentration shall not degrade water quality in Receiving Groundwater as measured in monitoring locations RGW-001, RGW-002, RGW-003, or RGW-004."</i></b></p> <p data-bbox="415 1127 1428 1235"><b><i>The proposed Arsenic limit is 0.01 mg/L, while the basin plan limitation is 0.05 mg/L. We prefer to have our limit match the basin plan.</i></b></p> <p data-bbox="415 1274 1455 1344"><b><i>The proposed Cadmium limit is 0.0005 mg/L, while the basin plan limitation is 0.005 mg/l. We prefer to have limit match the basin plan.</i></b></p>	<b>Nitrate As NO3 Data for Ground Water Monitoring in HSA 4.62</b>						MW5 mg/l		8/5/09		45.2		
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3	V.A.6.d. Standard Provisions	<b><i>Since we have both UV and Chlorine disinfection ability, we recommend changing the wording from "Failure of UV equipment" to "Failure of Disinfection system." In the case of the UV system, what</i></b>	Change accepted. Provision 6 is for noncompliance that may endanger health or the												

		<b><i>would be considered a failure? The UV system has the ability to disinfect flows based on UVT, number of banks online and flow rate. Would notification begin if one bank has failed even though disinfection can be met at a lower rate of flow?</i></b>	environment, for example notification would not be needed if the treated wastewater can be disinfected at a lower flow rate.
4	V.C.1.d. Special Provisions	<b><i>Since this is a new provision the city is requesting a 6 month delay in the implementation of section d to ensure that all changes have been made and the documentation matches the manual.</i></b>	Change accepted.
5	V.C.2.b. Recycled Water Use Provisions	<b><i>The city has scheduled to have the water and wastewater master plans updated during the 2010/11 fiscal year. Since there currently is not a master plan specifically for recycled water we are adding that to the list. In order to complete this task without penalty we are requesting that the 180 days be extended to 1 year.</i></b>	Change accepted.
6	Attachment A, Facility Map	<b><i>A revised map is enclosed. There has been one new line installed on Del Dios Highway.</i></b>	Revised map inserted.
7	Attachment B, Flow Schematic	<b><i>A revised schematic is enclosed.</i></b>	Revised schematic inserted.
8	Attachment C, III.A. Table C-2. Effluent Monitoring	<b><i>Line 2 has Total Coliform Bacteria<sup>c</sup> taken at sample point RWS-001. Historically we have sampled at the disinfection systems separately. For chlorination we use RWS-002 and UV we use RWS-003. We would prefer to continue sampling for coliform bacteria separately at the current location. This would provide us and the Regional Board the ability, if there is a problem, to determine which process was at fault. This does not appear to be in violation with Title 22 regulations.</i></b>	Change accepted. Total Coliform Bacteria will be sampled at each disinfection system daily when operating. Tables C-3 and C-4 updated accordingly.
9	Attachment C, IV.A.1. Table C-6, Receiving Water Monitoring	<b><i>The parameters beginning with "Total Dissolved Solids (TDS)" Sample Type should be changed from "Composite" to "Grab". These are well samples and are collected as grabs and not composites.</i></b>	Change accepted.

	Requirements		
10	Attachment C, V.A.3. Table C-7, Monitoring Periods and Reporting Schedule	<b><i>We are requesting the daily Monitoring Period be changed from “Midnight through 11:59 PM” to “8 AM through 7:59 AM.” Semiannually SMR Due Dates be changed from “August 1 and February 1” to “September 1 and March 1”. The Annually SMR Due Date be changed from “February 1” to “March 1” and the 5 year period SMR due date be changed from “February 1” to “March 1.”</i></b>	Changes accepted. Monitoring report due dates will be pushed back to avoid conflict with NPDES permit due dates.
11	Attachment C, V.C. Annual Recycled Water Summary	<b><i>Change submittal date from “February 1” to “March 1.”</i></b>	Change accepted. Monitoring report due dates will be pushed back to avoid conflict with NPDES permit due dates.
12	Table D-2, Historic Effluent Limitations and Monitoring Data	<b><i>“Nitrate (NO3)” should be changed to “Nitrate as N.”</i></b>	Change accepted.
13	Attachment D, IV.A. Rationale for Effluent Limitations	<b><i>Is there a proposed process to modify the tentative order referenced in the last paragraph?</i></b>	Standard Provisions V.A.17 through V.A.19 describe the causes or conditions that may necessitate modifying the Order.
14	Attachment D, IV.A. Table D-5	<b><i>Summary of Final Effluent Limitations - Table D-5 should match Table 6 on Page 9</i></b>	Concur; changes made to Table 6 will be made in Table D-5.