



Lori Vereker
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August 25, 2010

Mr. David Barker
Supervising WRC Engineer
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

Subject: WDID: 9 000000031

**TENTATIVE ORDER NO. R9-2010-0086, NPDES PERMIT NO. CA0107981;
WASTE DISCHARGE REQUIREMENTS FOR THE OF ESCONDIDO, HALE
AVENUE RESOURCE RECOVERY FACILITY DISCHARGE TO THE
PACIFIC OCEAN VIA THE SAN ELIJO OCEAN OUTFALL**

Dear Mr. Barker:

In response to your letter dated August 2, 2010, the City of Escondido is submitting the following comments to the above referenced tentative order.

1. First page, Table 3 - Order expires on November 30, 2010, I believe that should be 2015
2. Pg 18, A.i.- "this Order expires on November 10, 2010", I believe that should be 2015
3. pg 25, iv.c. end of line 2 - Change "or" to "of"
4. pg 32, f. first line - Change "or" to "of"
5. Page 15, A. Surface Water Limitations, 1.a. – We have requested, in writing, an extension to comment on this significant change to the permit requirements.
6. Page 28, Compliance Schedule - We would like to extend the compliance dates in the table as follows: 6 months to 12 months, 9 months to 18 months, 12 months to 24 months and achieve full compliance within 36 months. We have requested, in writing, an extension of time to comment on this significant change to the permit requirements. In lieu of that, we are requesting this change to the compliance schedule in order to complete the engineering and operational analysis of our system to determine the most beneficial way to comply.

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Comments

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7. Page E-7, Footnote 7, Monitoring of total chlorine residual – The City of Escondido secondary discharge does not use chlorine for disinfection so Total Chlorine Residual is not required. It could be required if/when we implement the new requirement to satisfy bacterial characteristics beyond the zone of initial dilution (see number 6 above), depending upon the method we implement to meet that requirement.
8. Page E15 A.4 - We request an extra 30 days for this requirement by changing February 1 to March 1.
9. Page E-16, Table E-13, second to the last row - We request the annual report Due Date be changed to March 1 as it is in the R9 2005-0101 permit.

Thank you for the opportunity to comment on the tentative order. If you have any questions or need clarification on any of the comments please contact me at lvereker@escondido.org or 760-839-5432.

Sincerely,



Lori Vereker
Director of Utilities

cc: Joann Cofrancesco (e-mail only)
John Burcham