

Response to Comments from City of Escondido by letter dated August 25, 2010 and email dated September 1, 2010  
Tentative Order No. R9-2010-0086  
Waste Discharge Requirements for the  
City of Escondido, Hale Avenue Resource Recovery Facility  
Discharge to the Pacific Ocean via the San Elijo Ocean Outfall

Comment No.	Page No.	Section	Comment	Response
1	1	Table 3	Order expires on November 30, 2010, I believe that should be 2015	The permit has been corrected. (see Errata No. 1)
2	18	VI.A.2.i	"this Order expires on November 10. 2010", I believe that should be 2015	The permit has been corrected. (see Errata No. 2)
3	25	VI.C.5.c.iv .c)	End of line 2 - Change "or" to "of"	The permit has been corrected. (see Errata No. 3)
4	32	VII.I.2.f.	The first line - Change "or" to "of"	The permit has been corrected. (see Errata No. 6)
5	15	V.A.1.a.	We have requested, in writing, an extension to comment on this significant change to the permit requirements.	The request for an extension of time to submit written comments on Tentative Order No. R9-2010-0086 was not granted. Adoption of the tentative Order is still scheduled for consideration on the September 8, 2010 Board meeting agenda. However, the San Diego Water Board has received additional comments from the City of Escondido concerning the compliance schedule to comply with the Ocean Plan water contact bacterial standards. The tentative permit has been revised in response to these comments. See Response to Comment No. 10.

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6	27-28	VI.C.6.	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.	Additional comments and a recommended revised compliance schedule were submitted by the Discharger via email on September 1, 2010. The proposed schedule is the same as that proposed by San Elijo Joint Powers Authority, which shares the San Elijo Ocean Outfall. See Comment No. 10 for a summary of the proposed compliance schedule and the San Diego Water Board response. (see Errata No. 4 and 8)
7	E-7	Table E-3, Foot note 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.	The footnote states, "Monitoring of total chlorine residual is not required on days when none of the treatment units that are subject to this Order use chlorine for disinfection." Assuming no disinfected reclaimed water enters the outfall and secondary discharge remains the same, monitoring for Total Chlorine Residual is not required as stated in your comment. The San Diego Water Board also concurs that monitoring for Total Chlorine Residual may be necessary depending on the tasks required under the plan to achieve compliance with the bacterial standards. The tentative Order will remain unchanged.

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8	E-15	X.A.4.	We request an extra 30 days for this requirement by changing February 1 to March 1.	The permit has been modified. (see Errata No. 6)
9	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.	The permit has been modified. (see Errata No. 7)

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10	27-28	VI.C.6.	<p>This additional comment was submitted by the City of Escondido via email on September 1, 2010. The City proposes a revised compliance schedule to achieve compliance with the Ocean Plan bacteria standards that includes 8 tasks as follows:</p> <ol style="list-style-type: none"> <li>1. Prepare and submit a proposed work plan that outlines the tasks and the approach to be used in evaluating and selecting alternatives for ensuring compliance with Bacterial Characteristics receiving water limitations. (Within 6 months of adoption of the Order)</li> <li>2. Submit progress report detailing progress achieved to date. (Within 12 months of adoption of the Order)</li> <li>3. Submit alternative analysis and proposed plan for achieving compliance with Bacterial Characteristics receiving water limitations. (With 18 months of adoption of the Order)</li> <li>4. Submit progress report detailing progress achieved to date. (Within 24 months of the Order)</li> <li>5. Complete financial arrangements for the selected alternative(s). (Within 30 months of the adoption of the Order)</li> <li>6. Initiate construction of any required facilities. (Within 36 months of the adoption of the Order)</li> <li>7. Complete construction of required facilities and initiate facilities start-up. (Within 48 months of adoption of the Order)</li> <li>8. Identify and implement operational refinements and confirm compliance with Bacterial Characteristics receiving water limitations. (Within 60 months of adoption of the Order)</li> </ol> <p>The Discharger provided detailed justification for extending the compliance schedule deadline dates from 36 months to 60 months.</p>	<p>The San Diego Water Board acknowledges that depending on the alternative selected, more than 36 months may be needed to achieve full compliance with the Ocean Plan bacteria standards. However, other alternatives may not require the full 60 months to comply and, for these alternatives, the San Diego Water Board would expect the Discharger to comply in 36 months or less. Therefore, in order to ensure that the compliance schedule requires compliance as soon as possible, and to be consistent with the State Water Board Compliance Schedule Policy (State Water Resources Control Board Resolution No. 2008-0025), additional language is being added to the time schedule. The additional language will hold the Discharger to the shortest possible time schedule depending on the selected alternative. (see Errata No. 4 and 8)</p>