

**SAN DIEGO WATER BOARD RESPONSES TO COMMENTS
TENTATIVE ORDER NO R9-2012-0006
NPDES No. CA0109258**

A. Comments submitted by the City of Escondido (January 17, 2012)

| GENERAL COMMENTS & MAJOR CONCERNS | SAN DIEGO WATER BOARD RESPONSES |
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| <p>1. If a violation is detected at the end of the outfall, which party will be responsible for addressing the violation and how will that determination be made?</p> | <p>There are currently no effluent limitations established at the end of the outfall for the combined wastewater flows. Compliance monitoring is conducted by each discharger prior to discharging into the outfall (and prior to commingling with other waste in the outfall).</p> |
| <p>2. As the Utilities Department will be providing the conveyance facility, the permittee shall receive from the Utilities Department any discharge restrictions, such as instantaneous and daily flow, and authorization to facility prior to the RWQCB issuing a permit. A similar requirement should exist for the expansion of existing dischargers.</p> | <p>The request is reasonable. Changes have been made to the Tentative Order. See Errata Sheet No. 5</p> |
| <p>3. The Utilities Department will need to assure the quality of effluent because all effluent flow is combined and discharged directly to the Pacific Ocean. The Utilities Department requests increased self-monitoring by the permittee for Ocean Plan Table A Parameters starting with monthly monitoring in the first year for baseline information followed by quarterly monitoring in the following years if no violations have occurred.</p> | <p>This comment is no longer applicable. Further discussions with the City of Escondido indicate this requirement will be addressed through the agreement between the City of Escondido and the Discharger.</p> |
| <p>4. The Utilities Department requests discharger monitoring of Ocean Plan Table B Parameters for the first year of the permit and 180 days before the permit is due to expire. If initial screening detects that these constituents have been exceeded, increased monitoring will be necessary to assure compliance with discharge limits.</p> | <p>This comment is no longer applicable. See Response to Comment No. 3</p> |

Item No. 9, Supporting Document No. 5

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| 5. Please add an appropriate section for discharge volume and flow limits for this permit at a daily maximum flow not exceed of 0.07 MG. | Changes have been made to the tentative Order. See Errata Sheet No.'s 3 and 6 |
| 6. Utilities Department staffs believe the Phenolic Compound (non-chlorinated) and Chlorinated Phenolics load in lbs/day on Page 13 were erroneously calculated. | Changes have been made to the tentative Order. See Errata Sheet No.'s 4 and 7 |
| 7. The Utilities Department has great interest in assuring compliance of all dischargers through the IBCS, per Page E11 Section X, B, 7, b & c of NPDES CA 0109258. Please add a requirement that the discharger send copies of self-monitoring reports to the City of Escondido at 1521 S. Hale Ave, Escondido, CA 92029. | This comment is no longer applicable. See Response to Comment No. 3 |
| 8. If any violation or operational upset occurs, the discharger shall also notify the City of Escondido, Utilities Department as provided the Attachment D, V. Standard Provisions-Reporting, Section E Twenty Four-Hour Reporting Part 1,2, and 3. | This comment is no longer applicable. See Response to Comment No. 3 |

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