May 13, 2020
Item No. 5
Supporting Document No. 7

California Regional Water Quality Control Board
San Diego Region

Response to Comments Report

Tentative Order R9-2020-0001
NPDES No. CA0109398

Waste Discharge Requirements for the City of San Diego,
North City Water Reclamation Plant and Pure Water Facility,
Indirect Potable Reuse Reservoir Water Augmentation
Discharge to Miramar Reservoir, San Diego County

May 13, 2020

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INTRODUCTION

This report contains California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) responses to written comments received on Tentative Order No. R9 2020-0001, NPDES No. CA0109398, Waste Discharge Requirements for the City of San Diego North City Water Reclamation and Pure Water Facility, Indirect Potable Reuse Reservoir Water Augmentation, Discharge to Miramar Reservoir, San Diego County (Tentative Order). The San Diego Water Board provided public notice of the release of the Tentative Order on January 27, 2020, and provided a period of 30 days for public review and comment on the Tentative Order. The public comment period ended on February 26, 2020.

Comments and Responses

The summarized written comments and San Diego Water Board responses are set forth below. The responses include a description of any actions taken to revise the Tentative Order in response to the comment. Proposed revisions to the Tentative Order are in red-underline for added text and ~~red strikeout~~ for deleted text.

COMMENTS AND RESPONSES

The San Diego Water Board responses are labeled and follow each comment.

1. City of San Diego (City)

Comment – Delete Requirement to Install Permanent Mooring Station

In the Tentative Order Table E-16, rows 10, 12, 14, and 27, and footnote #14 specify the following (summarizing):

> At monitoring locations RSW-001 and RSW-003, the Discharger shall install a permanent mooring system that will continuously measure dissolved oxygen, temperature, pH, and turbidity at the surface of the reservoir.

The City recommends that the continuous monitoring at station RSW- 003 be deleted, while somewhat expanding the continuous monitoring at station RSW-001.

Monitoring location RSW-001 is in the deepest portion of the reservoir near the outlet tower. Monitoring location RSW-003 is at the eastern end of the reservoir, distant from the outlet tower.

There is no real value in continuous monitoring at location RSW-003. The reservoir's hydrodynamic, chemical, and biological processes overwhelmingly happen in the vertical dimension, not the horizontal. Thus, conditions at any given depth are the same across the entire horizontal extent of the reservoir. Monitoring will not show any difference in the measured parameters at the surface at RSW-003 versus RSW-001. Separate from the continuous monitoring, the Tentative Order mandates vertical profile monitoring (surface to bottom) at RSW-001 and RSW-003, as well as station RSW-002 in the middle of the reservoir. This robust dataset of vertical profiles at three sites will serve to confirm there is no significant variability of the measure parameters along the horizontal.

In lieu of the continuous monitoring described in the Tentative Order at both stations RSW- 001 and RSW-003, the City proposes the following: We will deploy at monitoring location RSW-001 a moored sensor string that will measure and transmit useful data at the surface and at fixed elevations down the water column. The parameters measured will include temperature, dissolved oxygen, oxidation-reduction potential, pH, and electrical conductivity (which yields TDS). Sensors will be located at the surface (0.2 m deep) and at fixed elevations corresponding to the level of reservoir outlets. Not all parameters will be measured at each elevation; rather, the sensors will be parsimoniously deployed to give information useful for understanding the limnology of the reservoir and for treatability at the Miramar Water Treatment Plant. The sensor string will be autonomous and will transmit data to a hosted server.

Also note that monitoring location RSW-001 (where we propose to deploy the sensor string) is in the portion of the reservoir that is closed to public entry. Moored instruments at this location will not be subject to damage from boat traffic or vandalism, whereas instruments deployed at location RSW-003 would be subject to such damaged.

Response

The San Diego Water Board agrees that using a moored sensor string to monitor temperature, dissolved oxygen, pH, and electrical conductivity in the reservoir at monitoring station RSW-001 in lieu of installing permanent mooring systems at RSW-001 and RSW-003 will provide sufficient data to assess conditions of the reservoir.

The following section of the Order is modified as follows:

Table E-16 of Attachment E of the Tentative Order

Parameter	Units	Sample Type	Minimum Sampling Frequency[2]	Required Analytical Test Method
Temperature[11]	°F	Recorder	Continuous[14]	RSW-001[4], ~~RSW-003[4]~~
Dissolved Oxygen[11]	mg/L	Recorder	Continuous[14]	RSW-001[4], ~~RSW-003[4]~~
pH[11]	standard units	Recorder	Continuous[14]	RSW-001[4], ~~RSW-003[4]~~
~~Turbidity[11]~~	~~NTU~~	~~Recorder~~	~~Continuous[14]~~	~~RSW-001[4], RSW-003[4]~~
Electrical Conductivity[11]	mmho/cm or dS/m	Recorder	Continuous[14]	RSW-001[4], ~~RSW-003[4]~~

14. The Discharger shall ~~install a permanent mooring system~~ install a moored sensor string that will measure dissolved oxygen, temperature, pH, and ~~turbidity~~ electrical conductivity at the surface (0.~~5~~2 m ~~below surface~~ deep) of the reservoir and at fixed elevations corresponding to the level of reservoir outlets.

2. Building Industry Association

Comment – Letter of Support

The Building Industry Association submitted a letter in support of the Tentative Order.

Response

None

3. Water Tech Alliance

Comment – Letter of Support

Water Tech Alliance submitted a letter in support of the Tentative Order.

Response

None

4. Citizens Coordinate for Century 3

Comment – Letter of Support

Citizens Coordinate for Century 3 submitted a letter in support of the Tentative Order.

Response

None