



October 14, 2021

Brandon Bushnell
San Diego Regional Water Quality Control Board
Groundwater Protection Unit
2375 Northside Drive
San Diego, CA 92108

SUBJECT: 255386:BBushnell Notice of Public Hearing and Opportunity to Comment on Tentative Order No. R9-2021-0100, Waste Discharge and Water Reclamation Requirements for the City of Oceanside, Advanced Water Purification Facility, Indirect Potable Reuse for Groundwater Recharge, San Diego County

Dear Mr. Bushnell,

The City of Oceanside (City) appreciates the opportunity to comment on Tentative Order R9-2021-0100 for the Pure Water Oceanside Advance Water Purification Facility (PWO). Listed below are comments on the Tentative Order for consideration by Regional Water Quality Control Board (RWQCB) staff for incorporation into the adopted Order.

1. Page 3 Section III.D. – Prohibitions include “discharges of diluted concentrate to land are prohibited unless the Discharger submits an ROWD and receives WDRs for the discharge.” The City requests that the secondary storage ponds not be considered a land discharge. Secondary effluent is routine moved in and out of these ponds, and the City is currently performing a nitrogen study in this area as requested by the RWQCB in Amendment to Order 93-07. If the City cannot use the plant ponds each day, what will be the options for operation of the Pure Water Facility? Could the plant ponds be used as emergency storage ponds?
2. Page 5 Table 4- The basis for the pH limitations in Table 4, note 7 are not correct. Note 7 refers to Title 22, section 60320.201(a)(1)(C), which describes the RO membrane test conditions for rejection, i.e., “an influent pH no less than 6.5 and no greater than 8.0.” This is not applicable to product water.
3. Tables 5 through 9 list the effluent limitation at M-008 as a “Running 4-Week Average”. The tables should be footnoted or have a reference in the introductory paragraph to clarify the compliance methodology, as the frequency is monthly and if a monthly sample exceeds an MCL, confirmation sampling and weekly triggered sampling are required before the running 4- Week Average” calculation requirements in 2(A) and 2(B) trigger additional reporting.

(2) For a contaminant whose compliance with its MCL is based on a running annual average, if the average of the initial and confirmation sample exceeds the contaminant's

MCL, or a confirmation sample is not collected and analyzed pursuant to this subsection, the GRRP shall initiate weekly monitoring for the contaminant until the running four-week average no longer exceeds the contaminant's MCL.

(a) If the running four-week average exceeds the contaminant's MCL, a project sponsor shall describe the reason(s) for the exceedance and provide a schedule for completion of corrective actions in a report submitted to the Department and Regional Board no later than 45 days following the quarter in which the exceedance occurred.

(b) If the running four-week average exceeds the contaminant's MCL for sixteen consecutive weeks, a project sponsor shall notify the Department and Regional Board within 48 hours of knowledge of the exceedance and, if directed by the Department or Regional Board, suspend application of the recycled municipal wastewater.

The basis for the "Running 4-Week Average" limits for Tables 5 through 9 is unclear. These contaminants are regulated under the drinking water regulations as running annual averages.

4. Page B-2, Figure B-2 is outdated and should be updated for the Final Order. The City offered updated figures during administrative draft comments.
5. Page B-3, Figure B-3 is outdated and should be updated for the Final Order. The City offered updated figures during administrative draft comments.
6. Page C-1, Figure C-1 is outdated and should be updated for the Final Order. The City provided a more current version in the February 2021 Title 22 report submitted to the RWQCB.
7. Page D-2, Section I.B.6- language should be consistent with the conditional approval letter from the Division of Drinking Water. This should read *"Prior to operations or another timeframe approved by the Division, the City must adopt a resolution establishing (1) a zone of controlled drinking water well construction, and (2) a zone of potential controlled drinking water well construction, including private wells, consistent with 22 CCR § 60320.200(e). In addition, the City must coordinate with the San Diego County Department of Environmental Health (SDCDEH), prior to operations and regularly as needed, to administer the primary boundary representing a zone of controlled drinking water well construction and the secondary boundary representing a zone of potential controlled drinking water well construction, pursuant to 22 CCR § 60320.200(e). The City must provide the necessary boundary map(s), locations of the Project's monitoring wells, and locations of drinking water wells within a two years travel time of the Project based on groundwater flow directions and velocities expected under the Project's normal operating conditions (3 MGD or lower) as needed to SDCDEH."*

This language was drafted by Water Rights attorneys and approved by the DDW. Please see the September 29, 2021 conditional acceptance letter issued to David Gibson, Executive Officer.

8. Page D-2 Section I.B.6 – The City is currently in the process of adopting an ordinance rather than a resolution. It is anticipated that drinking water well restrictions will be in place in December 2021. The City is working with the County of San Diego Department of Environmental Health and Quality (DEHQ) to enact an exclusion zone for private potable water wells. Additionally, this is not a requirement of the conditional approval letter.

9. Page D-5 Section IV.G suggesting changing this language to read “The Discharger must inspect the UVT meter at least weekly and check the UVT meter results against a reference benchtop or field unit of equal or greater accuracy to the installed UVT meter, to document accuracy. The OOP must include the tolerance and response actions to the UVT meter results.”
10. Page D-7 Section VI.E.3 suggest allowing cross-connection certifications by the American Backflow Prevention Association (ABPA) and the American Society of Sanitary Engineers (ASSE) in addition to certifications by AWWA.
11. Page D-13 VIII.A.i -The City agrees these are required for the project per the Conditional Acceptance Letter, but these are not requirements of the OOP per title 22 regulations.
12. Page D-13 VIII.A.1.i -The City agrees these are required for the project per the Conditional Acceptance Letter, but these are not requirements of the OOP per title 22 regulations.
13. Page D-13 VIII.A.1.j- The City wants clarification if the AWT is “unmanned” and what response would look from AWT operators in an unmanned scenario.
14. Page E-3 Table E.3 – Total nitrogen does not have an MCL; nitrate does. Nitrate and Nitrite have a California limit. The City requests the limit for total nitrogen be removed.
15. Page E-4, Table E-1, Footnote 2- The City requests that this footnote include language to say monitoring only required if the applicable injection well is in use.
16. Page E-5, Table E-3, See section IV.C and IV.D requirements for TN- The City respectfully requests a 5 day turnaround time for Total Nitrogen. MCL data for nitrate and nitrite may be received in 72 hours, however TKN is a limiting factor for a 72 hour turnaround many laboratories cannot meet.

The effluent must be a 24 hour composite sampled for TN twice per week three days apart and the analyses will be sent to a contract lab. Sunday’s composite can be picked up on Monday and Thursday’s sample can be picked up on Friday. The courier will not get the sample to the contract laboratory until late in the afternoon. Most contract labs do not perform TKN on the weekends. It will be challenging to find a lab who can analyze TKN first thing Monday and have results by the end of the day and the City is concerned with the ability to comply.

The City respectfully requests that the 72 hour turnaround be specified for only nitrate and nitrite while TN be on a 5 day turnaround time as TN has no MCL requirements.

17. Pages E-7 & E-8 Table E.4 – Are nitrate and nitrate considered inorganic compounds with MCLs? Should be included with this table.
18. Page E-14 Table E-11 – Is the water level difference between monitoring wells to be used for gradient and gradient calculations? Please provide clarification. Additionally, groundwater gradient is generally flowing west towards the Pacific Ocean, maps have been provided in Project documentation.

19. Page E-18, Table E-11, Footnote 1- the footnote is confusing and appears to be missing punctuation. The City requests language to be more clear in the final Order.
20. Page E-20, Table E-12- The City requests that Footnote 1 detail how long monthly samples will be required should detections be non detect.
21. Page F-2 Section II.A.1 – SLRWRF can now treat an annual average of 17.6 MG with the recent upgrade of Plant 2.
22. Page F-3- Fact Sheet, II(A)(2), paragraph 4 suggested changes to correct location of post-stabilization:
 - a. Delete the following sentence: “Following the RO system, the Discharger will add sodium hydroxide and calcium hydroxide to the effluent to stabilize and increase the pH of the water prior to entering the AOP system.”
 - b. Add this sentence after paragraph 5: “Post-stabilization chemicals are added to the conveyance pipeline upstream of the free chlorine disinfection compliance location. The free chlorine disinfection process takes into account the effect of post-stabilization on pH for free chlorine residual contact time determination.”
23. Page F-4 – Section II.B.1 – The City requests that the following sentences be revised from “The target injection flowrate for an individual injection well is 1,160 gallons per minute, or approximately 1 MGD. The Discharger plans to install Injection Wells 001, and 003, and prior to Injection Well 006. If Injection Wells 001 and 003 prior to Injection Well 006. If Injection Wells 001 and 003 can each achieve a sustained flowrate of 1.5 MGD, the installation of Injection Well 006 will be unnecessary. The injection wells will discharge to the deeper aquifer, which is capped by a groundwater basin-wide aquitard and will avoid raising groundwater elevations in the shallow aquifer.”

To

“The target injection flowrate for an individual injection well is 1,050 gallons per minute, or approximately 1.5 MGD. The Discharger has installed Injection Wells 001, 003, and 006. The injection wells will discharge to the deeper aquifer, which is capped by an aquitard and will avoid raising groundwater elevations in the shallow aquifer.”
24. Page F-4 – Section II.C – The City requests that the following sentences be revised from “The Discharger will install a third nested monitoring well, MW-C-1, in the deep and shallow aquifer prior to discharging if Injection Well 006 is installed.”

To

“The Discharger has installed a third nested monitoring well, MW-C-1, in the deep and shallow aquifer for discharges to Injection Well 006.”
25. Page F-5 Table F-3 Fact Sheet, II(B)(1), paragraph 1 suggested changes as Well 006 has already been drilled:
 - a. The Discharger plans to has installed install Injection Wells 001, and 003, and 006.

26. Fact Sheet, II(C), paragraph 1 and Table F-3 suggested changes as Well 006 has already been drilled:
- a. The Discharger will install a third nested monitoring well, MW-C-1, in the deep and shallow aquifer prior to discharging to Injection Well 006.
 - b. Delete footnote 1 on Table F-3.

Comments that would need to be vetted with DDW prior to adoption of the Order:

- A. Suggested change in language to item G in Section IV. Existing language: The Discharger must inspect the UVT meter at least weekly and check the UVT meter results against a reference benchtop unit to document accuracy. The OOP must include the tolerance and response actions to the UVT meter results. Suggested revision: "The Discharger must inspect the UVT meter at least weekly and check the UVT meter results against a reference benchtop or field unit of equal or greater accuracy to the installed UVT meter, to document accuracy. The OOP must include the tolerance and response actions to the UVT meter results."

The City requests to receive a copy of any changes made prior to the December 8, 2021 adoption so that preparations may be made to speak at the public hearing; the City appreciates consideration of these comments to be incorporated into the final Order. Should you have any question, please do not hesitate to contact me at 760-435-5912 or by email at lrigby@oceansideca.org.

Sincerely,



Lori Rigby
Compliance Officer

CC: Faraz Asad, State Water Resource Control Board, Division of Drinking Water
(by email only to Faraz.Asad@waterboards.ca.gov)