

California Regional Water Quality Control Board
San Diego Region

Response to Comments Report

Tentative Order No. R9-2021-0204
Amending

Order No. R9-2019-0169 as amended by Order No. R9-2020-0193
NPDES No. CA0108031
Waste Discharge Requirements for the Fallbrook Public Utility District,
Fallbrook Water Reclamation Plant and
Santa Margarita Groundwater Treatment Plant
Discharge to the Pacific Ocean through the Oceanside Ocean Outfall

December 8, 2021



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

2375 Northside Drive, Suite 100

San Diego, California 92108

Telephone: (619) 516-1990

Documents are available at: <https://www.waterboards.ca.gov/sandiego>

STATE OF CALIFORNIA
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San Diego Region

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This report was prepared by
Joann Lim, *Water Resource Control Engineer*
Keith Yaeger, *Environmental Scientist*

under the direction of
David Barker, P.E., *Supervising Water Resource Control Engineer*
Brandi Outwin-Beals, P.E., *Senior Water Resource Control Engineer*

INTRODUCTION

This report contains the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) responses to written comments received from Mr. John Odermatt on Tentative Order No. R9-2021-0204, amending Order No. R9-2019-0169, as amended by Order No. R9-2020-0193, NPDES No. CA0108031, *Waste Discharge Requirements for the Fallbrook Public Utility District, Fallbrook Water Reclamation Plant and Santa Margarita Groundwater Treatment Plant Discharge to the Pacific Ocean through the Oceanside Ocean Outfall* (Tentative Order). Mr. Odermatt's comments were received on September 28, 2021.

Comments and Responses

Mr. Odermatt's summarized written comments and San Diego Water Board responses are set forth below. The section of the Tentative Order the comment pertains to is shown in parenthesis in each comment below.

COMMENTS AND RESPONSES

Comments from Mr. John Odermatt, email dated September 28, 2021

1a. Mr. Odermatt Comment – Prohibition against tertiary treated wastewater into the outfall

Mr. Odermatt requests that the San Diego Water Board include a prohibition against the discharging of tertiary-treated wastewater into the Oceanside Ocean Outfall in Order No. R9-2019-0169 because tertiary-treated wastewater should be recycled not wasted!

(Attachment 1 to Tentative Order No. R9-2021-0204:
Section III)

Response

These comments are outside the scope of Order No. R9-2021-0204 and the related Notice of Opportunity to Comment. Order No. R9-2019-0169 is not being reopened for any other purpose than the revisions proposed in the Tentative Order. The proposed revisions do not include the list of prohibitions or the type of wastewater discharged to the outfall. Therefore, the addition on a new prohibition or revisions to the type of wastewater discharged cannot be considered at this time.

Order No. R9-2019-0169, Attachment F, section II.A.1 states “Treated effluent from the Fallbrook [Water Reclamation Plant] not distributed as recycled water in the Discharger’s service area is dechlorinated with sodium bisulfate and discharged to the Fallbrook Land Outfall, which conveys the effluent to the Oceanside Ocean Outfall (OOO).”

2a. Mr. Odermatt Comment – Reduce the permitted discharge volume by 10%

Mr. Odermatt requests that the San Diego Water Board reduce the permitted flow in Order No. R9-2019-0169 by 10%; the 10% reduction should result in a diversion of that wastewater into recycled water production.

(Attachment 1 to Tentative Order No. R9-2021-0204:
Section IV)

Response

These comments are outside the scope of Order No. R9-2021-0204 and the related Notice of Opportunity to Comment. Order No. R9-2019-0169 is not being reopened for any other purpose than the revisions proposed in the Tentative Order. The proposed revisions do not include the permitted flow. Therefore, revisions to the type of permitted flow cannot be considered at this time.

For information on Fallbrook Public Utility District’s efforts to maximize local

resources and minimize the need to import water by a potential collaborative effort with Camp Pendleton to develop indirect potable recharge within the lower Santa Margarita watershed and expanding the use of recycled water within the Fallbrook Public Utility District's service area, visit its website at <https://www.fpud.com/files/2e72337a2/FPUD+2020+UWMP.pdf>.

3a. Mr. Odermatt Comment – Requirement for report/plan to reduce ocean discharge

Mr. Odermatt requests that the San Diego Water Board add a requirement for Fallbrook Public Utility District to provide a report or plan to future reduce the Fallbrook Public Utility District's discharge into the Oceanside Ocean Outfall by 40% by 2031.

(Attachment 1 to Tentative Order No. R9-2021-0204, Section VI.C.5)

Response

These comments are outside the scope of Order No. R9-2021-0204 and the related Notice of Opportunity to Comment. Order No. R9-2019-0169 is not being reopened for any other purpose than the revisions proposed in the Tentative Order. The proposed revisions do not include a report or plan to make reduction on the discharges to the outfall. Therefore, the addition of this requirement to the amendments proposed by the Tentative Order cannot be considered at this time.

The San Diego Water Board's *Water Quality Control Plan for the San Diego Basin* (Basin Plan) does stipulate in Chapter 4 on Page 4-71 that water recycling should be carefully considered by persons proposing to discharge substantial quantities of once-used wastewater to the ocean particularly in a water short area where water is imported. It has long been a policy of the San Diego Water Board to encourage and promote water recycling while taking into consideration the need to protect beneficial uses of surface and ground waters and protect the public health. As a future initiative in keeping with this policy and the Basin Plan, the San Diego Water Board may consider requiring persons proposing a discharge of once-used wastewater into the ocean to 1) carefully analyze as an alternative, or partial alternative, the feasibility of recycling the wastewater for a beneficial use in lieu of ocean disposal and to 2) include the analysis in the report of waste discharge permit application.

For information on Fallbrook Public Utility District's efforts to maximize local resources and minimize the need to import water by 1) a potential collaborative effort with Camp Pendleton to develop indirect potable recharge within the lower Santa Margarita watershed and 2) plans to expand the use of recycled water within the Fallbrook Public Utility District's service area, visit its website at <https://www.fpud.com/files/2e72337a2/FPUD+2020+UWMP.pdf>.