

United States Environmental Protection Agency, Region IX

California Regional Water Quality Control Board
San Diego Region

Response to Comments Report

Tentative Order No. R9-2022-0078,

Addendum No. 1 to Order No. R9-2017-0007

NPDES No. CA0107409

Amending Waste Discharge Requirements and National Pollutant Discharge Elimination
System Permit for the City of San Diego Point Loma Wastewater Treatment Plant,
Discharge to the Pacific Ocean through the Point Loma Ocean Outfall

August 10, 2022



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA), REGION IX
75 Hawthorne Street San Francisco, CA 94105
<https://www.epa.gov/aboutepa/epa-region-9-pacific-southwest>

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>

United States Environmental Protection Agency (USEPA), Region IX
Tomás Torres, *Water Division Director*

STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

JARED BLUMENFELD, Agency Secretary, California Environmental Protection
Agency



California Regional Water Quality Control Board,
San Diego Region

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This report was prepared by

Fisayo Osibodu, P.E., *San Diego Water Board, Water Resource Control
Engineer*

Keith Yaeger, *San Diego Water Board, Environmental Scientist*

Peter Kozelka, *USEPA, Region IX, Environmental Scientist*

under the direction of

David Barker, P.E., *San Diego Water Board, Supervising Water Resource
Control Engineer*

Brandi Outwin-Beals, P.E., *San Diego Water Board, Senior Water Resource
Control Engineer*

INTRODUCTION

This report contains the California Regional Water Quality Control Board, San Diego Region's (San Diego Water Board) and USEPA Region IX's responses to written comments received from interested parties and persons on Tentative Order No. R9-2022-0078, Addendum No. 1 to Order No. R9-2017-0007, NPDES No. CA017409, *Amending Waste Discharge Requirements and National Pollutant Discharge Elimination System Requirements for the City of San Diego E.W Blom Point Loma Wastewater Treatment Plant Discharge to the Pacific Ocean through the Point Loma Ocean Outfall* (Tentative Order).

The San Diego Water Board provided public notice of the release of the Tentative Order on May 20, 2022, and provided a period of at least 30 days for public review and comment on the Tentative Order. The public comment period ended on June 20, 2022.

Written comments were received from:
City of San Diego (City)

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Comments and Responses

The 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. 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

1. Comment-Phytoplankton Simulation Study Question 1 (Section 4.2 of the Tentative Order)

As written in the Tentative Order, Question 1 reads: “Does the discharge from the Facility stimulate phytoplankton productivity in the receiving water? If so, to what extent and how does it vary temporally?” The City requests revision to “Does the discharge from the Facility reach areas of the water column that could indicate the potential to stimulate phytoplankton productivity in the receiving water? If so, how and to what extent does it vary temporally?”

The Euphotic Zone Study is intended to identify where light penetrates the water column and where (if at all) the plume enters the euphotic zone since phytoplankton production occurs within the euphotic zone. Current study requirements will not provide the information necessary to answer Question 1 as it is currently written. Thus, we are requesting the above revision to this question to improve alignment between the study questions and the monitoring and data analysis that will be conducted as part of this assessment.

Response

The San Diego Water Board and USEPA Region IX agree that the City’s requested modification to the study question is consistent with the objectives of the euphotic zone study, which include determining the depth of the euphotic zone and whether the plume from the PLOO enters the euphotic zone where it could stimulate phytoplankton productivity.

As requested by the City, study question 1 in section 4.2 of the Tentative Order has been modified as shown:

- 1) ~~Does the discharge from the Facility stimulate phytoplankton productivity in the receiving water? If so, to what extent and how does it vary temporally?~~ Does the discharge from the Facility reach areas of the water column that could indicate the potential to stimulate phytoplankton productivity in the receiving water? If so, how and to what extent does it vary temporally?

Comment-Phytoplankton Stimulation Study Question 2 (Section 4.2 of the Tentative Order)

As written in the Tentative Order, Question 2 reads: “*How does the nutrient loading from the Facility compare to the nutrient loading from other sources in the Point Loma Ocean Outfall (PLOO) region, such as upwelling?*” The City requests revision “*How does the nutrient loading data from the Facility compare to other sources with available nutrient data, if any, in the PLOO region, such as upwelling?*”

The City is requesting this clarification because data for nutrient loading from other sources in the PLOO region may not always be available for comparison.

Response

Study question 2 in section 4.2 of the Tentative Order is being modified as shown to more accurately reflect that other sources of nutrient loading in the PLOO region, may not be available to the City for comparison:

- 2) How does the nutrient loading from the Facility compare to the nutrient loading from other sources (such as upwelling) in the PLOO region, ~~such as upwelling~~ (to the extent data from other sources is available to the City for comparison)?