

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

**RESPONSE TO COMMENTS FOR
TENTATIVE ORDER NO. R9-2023-0014
WASTE DISCHARGE REQUIREMENTS FOR GENENTECH, INC.
INDUSTRIAL WASTEWATER REUSE FOR IRRIGATION
SAN DIEGO COUNTY**

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) staff prepared responses to the comments received regarding Tentative Order No. R9-2023-0014, *Waste Discharge Requirements for Genentech Inc. Industrial Wastewater Reuse for Irrigation, San Diego County (Tentative Order)*.

The San Diego Water Board provided the Tentative Order to Genentech Inc., a member of the Roche Family, (Genentech) on July 27, 2023, and received one comment letter during the public comment period from Gary Merrill, Genentech’s Environmental Manager on August 8, 2023. The comment period ended on August 28, 2023. Staff prepared the following responses to Genentech’s comments. This response copies Genentech’s comments verbatim from the comment letter received. Each response indicates if Staff proposes revisions to the Tentative Order in response to the comment.

No.	Genentech’s Comment	San Diego Water Board Response	Action Taken
1	<i>As stated in the Permit [Tentative Order], in the absence of Water Quality Objectives ("WQOs") for the Loma Alta hydrologic subarea that the corresponding property relates to overlies, Regional Board Staff incorporated and applied the "most stringent, equivalent WQOs from [the Carlsbad, El Saito, Vista, and Los Monos] adjacent hydrological areas" (See Permit, Attachment E (Fact Sheet) at III.B)(emphasis added);</i>	Staff concur with Genentech’s comment. The San Diego Water Board’s <i>Water Quality Control Plan for the San Diego Basin</i> (Basin Plan) does not designate water quality objectives (WQOs) in Loma Alta Hydrologic Area (HA) due to its naturally poor water quality, as indicated by historic high concentrations of total dissolved solids (TDS) and elevated chloride levels in	Staff modified the Tentative Order, as described in the Errata Sheet, errata No. 3.

No.	Genentech's Comment	San Diego Water Board Response	Action Taken
	<p>a. <i>Because the WQOs from adjacent hydrological areas are not specifically designed to be protective of the Loma Alta hydrologic subarea, for which there are no WQOs in place, Genentech requests that the Regional Board consider applying the least stringent of those WQOs;</i></p> <p>b. <i>Alternatively, Genentech requests that the Regional Board consider applying an average or median value for each WQO from adjacent hydrologic subareas;</i></p>	<p>the groundwater. Coastal watersheds such as Loma Alta HA, the land, saturated by ocean waters, merges with inland groundwaters, compromising the freshwater and leading to brackish groundwaters with TDS concentrations between 1,000 and 10,000 ppm.</p> <p>Staff evaluated Genentech's proposals and proposed modifying the Tentative Order to replace the effluent limitations with performance objectives for the chemical and physical parameters.</p>	
2	<p><i>Could you please clarify the effect of the following statement in Table E-2, Groundwater WQOs from Nearby HSAs: "(Concentrations not to be exceeded more than 10% of the time during any one-year period)"?</i></p> <p>a. <i>Is this intended to apply to Genentech's compliance with the monitoring requirements in Attachment D, Monitoring and Reporting Program?</i></p> <p>b. <i>Because the sampling frequency for most of the effluent monitoring to be completed pursuant to Table D-2 is semi-annual, a single exceedance for any particular analyte would result in a "starting point" of 50% of the corresponding year in exceedance;</i></p>	<p>Staff provides the following clarification in response to Genentech's comment.</p> <p>a. The referenced sentence is from the San Diego Water Board's <i>Water Quality Control Plan for the San Diego Basin</i> (Basin Plan) and does not relate to compliance with the monitoring requirements.</p> <p>b. The referenced sentence is from the Basin Plan and does not relate to compliance with the sampling frequency requirements.</p> <p>c. Staff propose modifying the Tentative Order to remove the sentence.</p>	<p>Staff modified the Tentative Order as described in the Errata Sheet, errata No. 14.</p>

No.	Genentech's Comment	San Diego Water Board Response	Action Taken
	<p><i>c. To the extent some sort of percentage threshold is intended to apply within the Permit, Genentech respectfully requests that (a) it take into account the fact that most sampling is to be completed semi-annually, and (b) the consequence of violating such a threshold be specified;</i></p>		
3	<p><i>There appears to be an error in the numeration of headings in Attachment E, as both "ORDER INFORMATION" and "FACILITY DESCRIPTION" begin with Roman Numeral "I".</i></p>	<p>Staff concur with Genentech's comment. Staff propose modifying Attachment E to correct the numeration.</p>	<p>Staff modified the Tentative Order as described in the Errata Sheet, errata No. 10.</p>