



San Diego County Water Authority

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December 3, 2010

Mr. David Gibson, Executive Officer
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, California 92123-4340

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**OTHER
REPRESENTATIVE**

County of San Diego

Re: Comments on Tentative Order No. R9-2010-0120
NPDES CA0107433

Dear Mr. Gibson:

Thank you for the opportunity to comment on Tentative Order No. R9-2010-0120 (NPDES CA0107433). This letter presents San Diego County Water Authority's comments on the Tentative Order. The Water Authority is supportive of the comments provided by the City of Oceanside.

In particular, we would like to express our concerns about how the order imposes the requirements to comply with Ocean Plan Table A Effluent limitations directly on the Mission Basin Desalting Facility (MBDF) discharge. The City of Oceanside's co-mingled MBDF and wastewater effluent discharge has been subject to the Table A standards since 1990 and has operated to comply with those standards for the past twenty years. There are no recent changes to the Ocean Plan indicating that compliance should be determined any differently than it has been in the past. In addition, there has been no evidence or scientific basis provided which would indicate the current approach of co-mingling brine effluent is not adequately protective of ocean water quality.

The Salt and Nutrient Management Guidelines that were supported by the San Diego Regional Board in November 2010 identify reasonable and proper disposal of brine in the San Diego Region as a key strategy for managing salts. Ability to discharge brine to the ocean is critical. The permit provisions, as proposed, would eliminate the current co-mingled effluent compliance approach for brine disposal. If similar provisions are applied universally throughout the San Diego Region, this will pose a significant impediment to salinity management and brine disposal in the region. This will also impact water supplier ability to develop and use important local groundwater and recycled water supplies:

A public agency providing a safe and reliable water supply to the San Diego region

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1. The provisions could require salt brines to be delivered to a wastewater treatment plant influent in order to meet waste discharge standards. This will significantly increase the total dissolved solids (TDS) concentrations in the recycled water produced and render the recycled water unacceptable for beneficial reuse.
2. A lack of cost effective alternatives for brine treatment to meet Table A standards without the option to co-mingle could result in a loss of a critical groundwater water supply for the City of Oceanside and other local water suppliers that are unable to dispose of their brine that will negatively impact regional water reliability.

We appreciate the opportunity to comment on these important issues. If you have any questions regarding this letter, please contact Toby Roy at (858) 522-6743.

Sincerely,



Ken Weinberg
Director of Water Resources