

**SAN DIEGO REGIONAL BOARD RESPONSES TO COMMENTS
TENTATIVE ORDER NO R9-2010-0003, NPDES No. CAG679001**

GENERAL COMMENTS & MAJOR CONCERNS	REGIONAL BOARD RESPONSES
July 30, 2010 email from Eastern Municipal Water District	
<p>Eastern Municipal Water District (EMWD) has one comment concerning potable discharges that exceed a basin water quality objective. For example, EMWD receives potable water from MWD Skinner Water Filtration Plant where the TDS level can exceed the Auld basin Water Quality Objective of 500 mg/L (see Attachment G, Page G-1). For 2007, the TDS range from MWD Skinner Water Filtration Plant has been 438 to 551 mg/L with an average 495 mg/L. In 2008 the TDS range was 450 to 630 mg/L with an average 539 mg/L, and in 2009 the TDS range was 420 to 670 mg/L with an average 576 mg/L. If EMWD should discharge potable water from Skinner as a source, it may violate the Order under "Discharge Prohibition" section IV, A., B., F & H for high TDS.</p> <p>EMWD would like this condition addressed as an exemption within the Order where potable water may exceed basin plan water quality objectives.</p>	<p>The Water Quality Control Plan for the San Diego Basin (Basin Plan) does not provide an exception for the total dissolved solids (TDS) water quality objectives applicable to the example described by EMWD.</p> <p>The San Diego Water Board acknowledges in the Fact Sheet (page F-10) of the tentative Order that the TDS of potable water supplies in the San Diego Region vary significantly between 400 mg/l to above 700 mg/l depending on the blend of Colorado River water and State Water Project water. Accordingly, it is impracticable and economically infeasible for the water agencies to reduce the TDS concentrations for the type of short-term and infrequent discharges of hydrostatic test water and/or potable water that are regulated by the tentative Order.</p> <p>Moreover, the water quality objectives in Table 3-2 of the Basin Plan are expressed as concentrations not to be exceeded in the receiving water more than 10 percent of the time during any one year period. It is anticipated that the discharges will not cause objectives to be exceeded in the receiving water more than 10 percent of the time during any one year period due the short term, infrequent, and intermittent nature of the discharges. Based on these considerations the San Diego Water Board has concluded that the discharges, in accordance with the terms and conditions of the tentative Order, will not cause violations of TDS water quality objectives in the receiving water.</p>

Item No. 9
Supporting Document No. 3