

Item No. 16
September 8, 2010
Supporting Document 6

From: Chris Trees <treesc@sejpa.org>
To: "Lori Vereker" <Lvereker@ci.escondido.ca.us>, <BKelley@waterboards.ca....>
CC: "John Burcham" <Jburcham@ci.escondido.ca.us>, <mwelch1@san.rr.com>, <t...>
Date: 9/1/2010 4:10 PM
Subject: WDID: 9 000000125:jconfrancesco; Revised compliance schedule for Tentative Order No. R9-2010-0087
Attachments: Recommended Time Schedule - NPDES Provision VI.C.6.docx

Mr. Barker,

The San Elijo Joint Powers Authority supports the proposed revisions to the compliance schedule submitted by the City of Escondido. We feel that the tasks are well justified by the schedule rationale given in the Table and the Regional Board would be well informed on the progress by reports or deliverables due every 6 months during the first 3 years. Please consider the attached Compliance Schedule as a replacement to the Table in Paragraph VI.C.6 of the Preliminary Order and as an amendment to our comment No. 25 in our letter dated August 25, 2010.

Thank you for your consideration.

Christopher A. Trees

Director of Operations

San Elijo Joint Powers Authority

2695 Manchester Avenue,

Cardiff by the Sea, CA 92007

(p) 760-753-6203 x70

(f) 760-753-5935

<mailto:treesc@sejpa.org> treesc@sejpa.org

<http://www.sejpa.org/> www.SEJPA.org

From: Lori Vereker [mailto:Lvereker@ci.escondido.ca.us]
Sent: Wednesday, September 01, 2010 3:44 PM
To: BKelley@waterboards.ca.gov; dbarker@waterboards.ca.gov;
jcofrancesco@waterboards.ca.gov
Cc: John Burcham; mwelch1@san.rr.com; treesc@sejpa.org; thornton@sepja.org
Subject: Revised compliance schedule

Dear Mr. Barker,

I have attached a revision to the compliance schedule requested in the letter/email from the City of Escondido dated August 25, 2010. The

compliance schedule outlined in that letter was preliminary and was sent in order to meet the requested early comment timeline in the cover letter to the tentative order. We had also requested an extension of the comment period in order to do a more in-depth assessment of compliance requirements and schedule implications. We have worked hard over the past two weeks to do a very compressed assessment of the bacteriological compliance issues and the required tasks to meet compliance. We have determined that the San Elijo outfall compliance issues are more complex than we had originally recognized. We therefore feel that a 5 year schedule is warranted to properly identify and evaluate compliance issues and implement applicable compliance actions.

Please see the attached compliance schedule and consider it instead of the schedule sent to you on August 25. We appreciate your consideration of this request.

Lori Vereker

Director of Utilities

Proposed Compliance Schedule - Provision VI.C.6

Task.	Description	Proposed Schedule	Schedule Rationale
1	Prepare and submit a proposed work plan that outlines the tasks and the approach to be used in evaluating and selecting alternatives for ensuring compliance with Bacterial Characteristics receiving water limitations.	Within 6 months of adoption of the Order	<p>A 6 month period is required to:</p> <ul style="list-style-type: none"> bring technical experts on board (if required), assess receiving water conditions and required degree of coliform reduction, identify initial alternative compliance approaches, complete an initial fatal flaw analysis of the potential approaches, and identify required work tasks and schedules for evaluating the proposed approaches.
2	Submit progress report detailing progress achieved to date.	Within 12 months of adoption of the Order	Progress report
3	Submit alternative analysis and proposed plan for achieving compliance with Bacterial Characteristics receiving water limitations.	With 18 months of adoption of the Order	<p>After completion of Task 1, a 12 month period is required to:</p> <ul style="list-style-type: none"> complete technical analysis of facilities/operations requirements, evaluate required capital facilities and operations and estimate capital and operation and maintenance costs, conduct required monitoring and/or bench scale testing (if required) and assess potential water quality impacts (e.g. chlorine residual or disinfection byproducts) identify other required permits or approvals, identify CEQA-compliance approaches and required information, assess feasibility and compare alternative compliance options, prepare final report, and secure governing body approval of the proposed compliance approach.
4	Submit progress report detailing progress achieved to date.	Within 24 months of the Order	Progress report
5	Complete financial arrangements for the selected alternative(s).	Within 30 months of the adoption of the Order	<p>California Environmental Quality Act (CEQA) compliance and all other applicable regulatory approvals must be completed prior to completing financial arrangements. After completion of Task 3, a 12 month time period is required to :</p> <ul style="list-style-type: none"> determine financing needs, identify potential funding sources and funding requirements, develop and implement plan for addressing other required regulatory approvals (e.g. Coastal Commission, etc.), advertise, select and bring CEQA contractor on board (if required), prepare CEQA initial study and determine required CEQA compliance approach, prepare CEQA Notice of Intent or draft Environmental Impact Report, complete CEQA public review and respond to comments, secure governing body approval of CEQA compliance, secure other required regulatory approvals (if required), complete financial application documents, and secure approval for required financing.
6	Initiate construction of any required facilities.	Within 36 months of the adoption of the Order	<p>After completion of Task 5, a 6 month period is required to:</p> <ul style="list-style-type: none"> prepare required contract documents, advertise for bids, evaluate received bid proposals, and select a contractor, secure governing body approval for the contract, and execute contract and provide notice to proceed.
7	Complete construction of required facilities and initiate facilities start-up.	Within 48 months of adoption of the Order	<p>After completion of Task 6, a 12 month period is required for:</p> <ul style="list-style-type: none"> initial contractor mobilization, initiating and completing onsite construction, facilities testing, inspection, approval, and review/acceptance by client, completing operator training (if required), and initiating start-up operations.
8	Identify and implement operational refinements and confirm compliance with Bacterial Characteristics receiving water limitations.	Within 60 months of adoption of the Order	<p>After completion of Task 7, a 12 month period is required to:</p> <ul style="list-style-type: none"> identify and resolve operational issues and initial "teething" problems associated with start-up, conduct follow-up monitoring to assess potential water quality impacts (e.g. chlorine residual or disinfection byproducts) and to evaluate/confirm compliance, fine tune treatment/disinfection facilities/operations as required (e.g. flows, blending, dose rates, load rates, etc.), and prepare and submit final compliance report.