



SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD

County of San Diego

2012 SEP -5 P 3: 38

RICHARD E. CROMPTON
DIRECTOR

DEPARTMENT OF PUBLIC WORKS

5510 OVERLAND AVE, SUITE 410
SAN DIEGO, CALIFORNIA 92123-1295
(858) 694-2212 FAX: (858) 694-3597
Web Site: www.sdcountry.ca.gov/dpw/

September 5, 2012

Julie Chan, P.G., Chief
Cleanup and Land Discharge Branch
CA Regional Water Quality Control Board, San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123

Dear Ms. Chan:

783251: oosibodu

Please see below the San Diego County Sanitation District's and Engineer of Record's comments to TENTATIVE ORDER NO. R9-2012-0054, WASTE DISCHARGE EQUIREMENTS FOR THE SAN DIEGO COUNTY SANITATION DISTRICT-HARMONY GROVE SERVICE AREA, HARMONY GROVE WATER RECLAMATION PLANT, SAN DIEGO COUNTY.

1. Please change throughout the Order the name of Discharger from "San Diego County Sanitation District-Harmony Grove Service Area" to "San Diego County Sanitation District".
2. Title of the Order. It appears that a space is missing between "FOR" and "THE."
3. Page 3, I. Table 4. Please correct facilities contact name and mailing address as follows:
Milica Kaludjerski Schipper
5500 Overland Avenue
Suite 315
San Diego, CA 92123-1248
4. In several sections of the Tentative Order (including, but not limited to: B.1, C.5, Attachment C.I. Table C-1), the average dry weather flow of 180,000 gallons per day is referenced as if it would be the maximum effluent flow rate. For example, on page 3, B.1, it is indicated that "...applied for waste discharge requirements to discharge up to 180,000 gallons per day (gpd) of disinfected tertiary treated wastewater..."

11/13/12

5. On page 7, C.5, also indicates that the average monthly effluent flow from the plant shall not exceed 180,000 gpd. The plant will have to discharge at a higher flow rate during wet weather or after peak flow conditions to empty the wet weather basin and prepare for the next wet weather season and avoid possible spills or discharge to surface waters. We suggest that the effluent flow rate limit is set at the average monthly effluent flow to 541,000 gpd or 376 gpm (please see the attached calculations from Dexter Wilson engineering).
6. Page 4, B.5. Please revise the last sentence to read, "There will also be another separate concrete below grade basin at the plant site, **which** will provide..."
7. Page 4, B.6.c. Please revise the first sentence to read "Effluent produced...in an onsite storage tank, and the effluent **will be** used for..."
8. Page 6, B.19. and F.3. The County requests modification of the salt and nutrient management plan (SNMP) requirements addressed in the Provision F.3 of the proposed revised Tentative Order. Compared to the City of Escondido's discharge, County's contribution to the Escondido Groundwater Basin shall be less than 2-percent. The County proposes to replace F.3 with the following:

F.3 The State Water Resources Control Board *Recycled Water Policy* states that the appropriate way to address salt and nutrient issues is through the development of regional or sub regional salt and nutrient management plans. The development of the salt and nutrient management plans is expected to be a cooperative effort among local water and wastewater entities and local salt/nutrient contributing stakeholders. As the major recycled water producer and purveyor within the basin, it is anticipated that the City of Escondido and/or Rincon Del Diablo Water District will lead the development of a salt and nutrient management plan for the Escondido groundwater basin. This Order requires the Discharger to participate as a stakeholder in the City's and/or Water District's effort to develop a salt and nutrient management plan for the Escondido groundwater basin

9. Page 8, D.1, Table 6. We understand that the effluent limitation for TDS is based on the groundwater quality objectives for the Escondido HAS, which is 1,000 mg/L. It also appears that the Regional Board staff reviewed effluent TDS data from the Meadowlark WRP (927 mg/L), whose service area is supplied with the same potable water source as the Harmony Grove Village (referenced in Attachment C, II.C. Table C-2), to determine the expected effluent TDS concentration from the Harmony Grove WRP. While it is our intention to meet the effluent TDS limitation, it is possible that compliance may become challenging beyond our control if the TDS in the potable water supply increases. TDS concentrations in the potable water supply could increase due to a combination of water conservation measures and/or increased reliance on water supplies from the Colorado River, which has a significantly higher TDS concentration than water from the State Water Project. We request that the following or similar statement be added to the Tentative Order:

Ms. Chan
September 5, 2012
Page 3 of 3

"Discharges with TDS concentrations exceeding 1,000 mg/L would not be considered a violation if the TDS concentration in the potable water supply within the Harmony Grove Service Area is greater than 700 mg/L."

We feel that this language would allow us to provide recycled water and augment water supplies in our region without receiving violations for conditions that are beyond our control.

10. Page B-5, To avoid problems, it would be beneficial to identify the specific effluent monitoring locations (please see the attached marked-up drawing), of the tentative monitoring program, as follows:

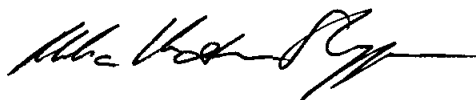
II. EFFLUENT MONITORING REQUIREMENTS

The Discharger shall monitor the effluent quality at a point between the end of the chlorine contact basin and the entry to the tertiary effluent wet well in accordance Table B-1. Recycled water effluent flow shall be monitored after the gravity filters.

11. Page B-5, Table B-1, Please change reporting frequency to quarterly or annually for constituents that are sampled quarterly (from chloride to fluoride).
12. Page B-5, 1st Paragraph. Reference to Table C-1 should be revised to Table B-1
13. Page B-5, Table B-1. Effluent monitoring requirements for TDS appears to be missing.
14. Page C-4, Table C-2; please change HAARF chloride concentration to 189 mg/L.
15. Page C-5, B. Please change date to "The Discharger certified a final Environmental Impact Report for this project on February 7, 2007."
16. Page C-5, III. A. Please change sentence "This order serves as a master reclamation permit..." to waste discharge requirements.
17. Page C-7, Table C-4. The effluent limitation for Total Nitrogen should be 15 mg/L per Page 8, D.1, Table 6. Effluent Limitations.

If you have any questions or require additional information, please phone me at 858-694-2718 or email at Milica.Kaludjerski@sdcounty.ca.gov.

Sincerely,



Milica Kaludjerski Schipper, PE
DPW Unit Manager
Department of Public Works
Wastewater Managemnt

NON-OT-0

cc: Daniel Brogadir; Tim Wellman; Dexter Wilson; John Odermatt; Fisayo Osibodu

SECTION 1

PROCESS DESIGN CRITERIA

Influent Flow

Pumping rate from Harmony Grove Sewer Lift Station

One force main: One pump = 250 gpm

 Two pumps = 500 gpm

Two force mains = 900 gpm

INFLUENT FLOW REGIMES		
Flow	gpd	gpm
24 Hour Total		
Average Dry Weather Flow (215 gpd/edu)	180,000	125
Peak Monthly Dry Weather Flow (1.2 x average)	216,000	150
Wet Weather Flow (2.11 average)	380,000	264
1 Hour Peak		
Dry Weather (2.42 x average)	436,000	303
Wet Weather (4.0 x average)	720,000	500
WASTEWATER STRENGTH		
Strength	mg/l	lbs/day
Average (Including recirculation flow loads)		
BOD	363.8	546.1
SS	413.4	620.6
TKN	52.9	79.4
NH ₃ -N	31.4	47.1
Peak Month (1.2 times Average) (Including recirculation flow loads)		
BOD	363.8	655.4
SS	413.4	744.7
TKN	52.9	95.3
NH ₃ -N	31.4	56.6
TEMPERATURE		
	High	Low
Air	105°F	30°F
Sewage	90°F	70°F

Discharge Specifications

Recycled water effluent from the Harmony Grove Water Reclamation Plant shall meet the definition of “disinfected tertiary recycled water” in CCR Title 22 Section 60301.230 and “filtered wastewater” in Section 60301.320. These definitions are incorporated by reference, prospective, including future changes to the incorporated provisions as the changes take effect.

- a. The median concentration of total coliform bacteria measured in the disinfected recycled water effluent from the Harmony Grove WRP shall not exceed a Most Probable Number (MPN) of 2.2 per 100 milliliters, utilizing the bacteriological results of the last seven days for which analyses have been completed; and the number of total coliform bacteria shall not exceed a MPN of 23 per 100 milliliters in more than one sample in any 30-day period. No sample shall exceed a MPN of 240 total coliform bacteria per 100 milliliters.

- b. Turbidity measurement of the recycled water effluent from the Harmony Grove WRP shall not exceed a daily average value of 2 NTU, shall not exceed 5 NTU more than 5% of the time during a 24-hour period, and shall not exceed 10 NTU at any time.

Expected Discharge Parameters (non-regulated)

BOD	<5 mg/l
SS	<5 mg/l
NH ₃ -N	~1 mg/l
NO ₃ -N	~9 mg/l
Total Nitrogen – N	<10 mg/l

SECTION 5

TERTIARY GRAVITY FILTERS

The March 23, 2012 Submittal included a total of four (4) filter bays. County review comments indicated that the County wished to have five (5) filter bays. The current plan shows five (5) filter bays. The calculations below reflect the design for four (4) filter bays on the basis that the fifth filter bay is for excess or redundant capacity.

Upstream of the filters are flash mixing tanks and flocculation tanks. Two flash mixing tanks are provided, and each filter has a dedicated flocculation tank. Polymer can be added to each of the two separate 500 gallon flash mixers to feed the filters. Flows from secondary treatment, off-quality effluent, or wet weather storage can be directed to either or both of the flash mixer tanks. From the flash mixers the flow proceeds to the flocculation tanks and then to the gravity filters.

Additional piping and valving is provided in the gravity filter gallery which allows 1, 2, 3, 4, or 5 filters to be fed from one or both of the flash mixing basins. Influent piping and valving also allow the possibility for one flash mixer to feed one or two filters while the other flash mixer feeds four or three filters, respectively.

Effluent piping and valving allow the filtered effluent to be routed to the chlorine contact basin or to bypass the chlorine contact tank and discharge to the effluent pump wet well. The valving to accomplish this is not comprehensive enough to permit any filter or combination of filters to discharge to the bypass pipe; rather, Filters 1 and 2 (on the east side of the filter bank) can be directed to the bypass piping while Filters 3, 4, and 5 (or any combination thereof) flow to the clearwell and to the chlorine contact tank.

The capacity of each filter is a maximum of approximately 150,000 gpd. This provides for a total peak filtration capacity of about 750,000 gpd. This is based on the peak filter flow rate of 5 gallons per minute per square foot and a filter area of 20.9 square feet.

With this set up the filters could be fed combine flow from both secondary effluent, off-quality effluent, and wet weather storage simultaneously by blending the flow in the flash mixers. The filters could also be isolated into separate sets so that the off-quality effluent

or wet weather storage could be sent to one group of filters while the other group of filters filtered secondary effluent from the Aeromod system.

Filter backwash water is collected in the Mudwell located on the back side of the filter bays. The Mudwell has a 6" gravity drain line which extends to the Plant Drain Pump Station.

Filtered Effluent

The filtered effluent will discharge and flow by gravity to the chlorine contact tank system. Upstream of the chlorine contact system the filtered effluent shall flow through the Off Quality Diversion Vault where sodium hypochlorite will be injected into the pipeline. The sodium hypochlorite will be evenly distributed in the pipeline flow stream by means of an inline static mixer.

Initial Filter Startup

During the initial start-up of the plant, the filters will experience low influent flows. The filter manufacturer recommends that the minimum surface loading rate for these filters should not be less than 1.0 gpm/ft². With a filter area of 20.9 ft², and with one filter operating, this is equivalent to around 21 gpm flow. The initial start-up flow of 18,000 gpd is 13 gpm average. Therefore, the manufacturer recommends adding a recirculation pump which will draw filtered effluent from the clearwell and pump it back to the filter inlet box to supplement the plant influent flow and sufficiently increase the filter surface loading rate beyond the recommended minimum surface loading rate.

Tertiary Gravity Filters Process Equipment

The blowers, air compressors, and controls for the Tertiary Gravity Filters process are located in a separate room which is part of the Equipment Building. The blower air and compressed air will be routed from this room to the Gravity Filters. This equipment design is still under development and therefore is not shown in this progress submittal.

The typical equipment manufacturers for the equipment to be supplied by Severn-Trent include:

- Backwash Air Blowers – GE Roots, Gardener Denver, MD Pneumatic, or equal
- Filter System Valves – Dezurik, Pratt, Valmatic, GA or equal
- Backwash Water Pumps – Goulds, Grundfos, Flowserve, or equal
- Instrument Air Compressor – Ingersoll-Rand, Kaeser, Atlas Copco, or equal
- Coagulant System – PulsaFeeder, Prominent, LMI, Neptune, or equal
- Main Control Panel – Allen-Bradley

SECTION 5

TERTIARY GRAVITY FILTERS

COAGULATION/FLOCCULATION BASINS

One basin will be provided upstream of each of the five (5) filter bays.

Size for 30 minutes detention time under Peak Monthly Dry Weather flow with two (2) filter bays not in service.

$$216,000 \text{ gpd} = 150 \text{ gpm}$$

$$150 \text{ gpm} \times 30 \text{ minutes} = 4,500 \text{ gallons total volume for 3 basins}$$

$$\text{Then each basin is } 4,500 \text{ gallons} \div 3 \text{ basins} = 1,500 \text{ gallons or } 200 \text{ cu.ft.}$$

Coag/Floc Tank size for each filter bay is:

$$5.75' \text{ W} \times 5.75' \text{ L} \times 6' \text{ D} = 198 \text{ cu.ft.}$$

Check detention time for Wet Weather flow of 410,000 gpd through the filters:

$$410,000 \text{ gpd} = 285 \text{ gpm}$$

$$\text{For 4-filter operation, } 1,500 \text{ gallons} \div (285 \text{ gpm} \div 4 \text{ tanks}) = 21 \text{ minutes detention}$$

$$\text{For 3-filter operation, } 1,500 \text{ gallons} \div (285 \text{ gpm} \div 3 \text{ tanks}) = 16 \text{ minutes detention}$$

Check detention time for Average Dry Weather flow of 180,000 gpd through the filters:

$$180,000 \text{ gpd} = 125 \text{ gpm}$$

$$\text{For 3-filter operation, } 1,500 \text{ gallons} \div (125 \text{ gpm} \div 3 \text{ tanks}) = 36 \text{ minutes detention}$$

$$\text{For 2-filter operation, } 1,500 \text{ gallons} \div (125 \text{ gpm} \div 2 \text{ tanks}) = 24 \text{ minutes detention}$$

SECTION 5

TERTIARY GRAVITY FILTERS - FILTER BAYS

Normal Operation - No Return Flow from Wet Weather Storage

Number of filter beds = 4

Maximum hydraulic loading rate = 5 gpm/sq ft

Maximum design flowrate: Use maximum loading rate with one filter bed not in service

Maximum design flowrate = Wet Weather Scenario, flow is 380,000 gpd

Design criteria per Severn Trent:

Maximum specific solids loading = 0.67 lbs/sf

Backwash rate = 5 gpm/sf

Backwash duration = 24.2 minutes

Influent TSS = 20 mg/l

Effluent TSS = 3 mg/l

Backwash volume, estimated at 7% of filter flowrate = 30,000 gpd

Then maximum wet weather flow through filters is = 410,000 gpd = 285 gpm

Add 10% safety factor = 313.5 gpm

Filter area needed: $313.5 \text{ gpm} \div 5 \text{ gpm/sf} = 62.7 \text{ sf}$ with one filter bed out of service

Four filter beds, each bed = $62.7 \text{ sf} \div 3 = 20.9 \text{ sf}$

Total filter area = $20.9 \text{ sf} \times 4 = 83.6 \text{ sf}$

Under Wet Weather Scenario, determine number of backwashes needed per day:

$(20 \text{ mg/l} - 3 \text{ mg/l}) \times 0.41 \text{ mgd} \times 8.34 = 58.2 \text{ lbs/day filtered}$

Max. loading of filters = $0.67 \text{ lbs/sf} \times 20.9 \text{ sf} \times 3 \text{ filters} = 42.0 \text{ lbs per cycle}$

Backwash cycles = $58.2 \text{ lbs/day} \div 42.0 \text{ lbs/cycle} = 1.4 \text{ cycles per day}$

Then total backwash volume = $1.4 \text{ cycles/day} \times 83.6 \text{ sf} \times 5 \text{ gpm/sf} \times 24.2 \text{ min} = 14,162 \text{ gallons}$

Thus, the estimate of 30,000 gpd backwash volume is conservative

Hydraulic Loading Rate:

Wet Weather Flow, 380,000 gpd plus filtrate of 30,000 gpd = 410,000 gpd = 285 gpm

Add 10% safety factor = 313.5 gpm

Three filter beds in service = $20.9 \text{ sf} \times 3 = 62.7 \text{ sf}$
 Loading rate is: $313.5 \text{ gpm} \div 62.7 \text{ sf} = 5.0 \text{ gpm/sf}$

Four filters in service = $20.9 \text{ sf} \times 4 = 83.6 \text{ sf}$
 Loading rate is: $313.5 \text{ gpm} \div 83.6 \text{ sf} = 3.75 \text{ gpm/sf}$

Peak Month Flow, 216,000 gpd plus filtrate of 30,000 gpd plus 90,000 gpd from off-quality storage = 336,000 gpd = 234 gpm

Add 10% safety factor = 257.4 gpm

Three filter beds in service = $20.9 \text{ sf} \times 3 = 62.7 \text{ sf}$
 Loading rate is: $257.4 \text{ gpm} \div 62.7 \text{ sf} = 4.11 \text{ gpm/sf}$

Four filters in service = $20.9 \text{ sf} \times 4 = 83.6 \text{ sf}$
 Loading rate is: $257.4 \text{ gpm} \div 83.6 \text{ sf} = 3.08 \text{ gpm/sf}$

Backwash flow rate = 5 gpm/sf

Backwash air scour rate = 3.0 icfm/sf

**RETURN FLOW FROM WET WEATHER STORAGE ADDED
 MAXIMUM EFFLUENT FLOW CALCULATION**

Use a maximum flow rate of 4.5 gpm/sf for 4 filters

$$4.5 \text{ gpm/sf} \times 20.9 \text{ sf/filter} \times 4 = 376.2 \text{ gpm} = 541,000 \text{ gpd}$$

SUMMARY OF FILTER LOADING RATES

FILTER LOADING RATES			
Flow, gpd	4 Filters in Service, gpm/sf	3 Filters in Service, gpm/sf	5 Filters in Service
180,000	1.5	2.0	
216,000	1.8	2.4	
380,000	3.2	4.2	
410,000	3.4	4.5	
541,000	4.5	--	3.6

PACIFIC DWG 615011-50 PROCESS SCHEMATIC EXHIBIT A-1.DWG 03-21-12 15:48:53 LAYOUT: 11X17

WET WEATHER FLOW SCENARIO

- NO RETURN FLOW FROM OFF-QUALITY EFFLUENT
- CENTRIFUGE NOT IN OPERATION
- NO SLUDGE WASTING

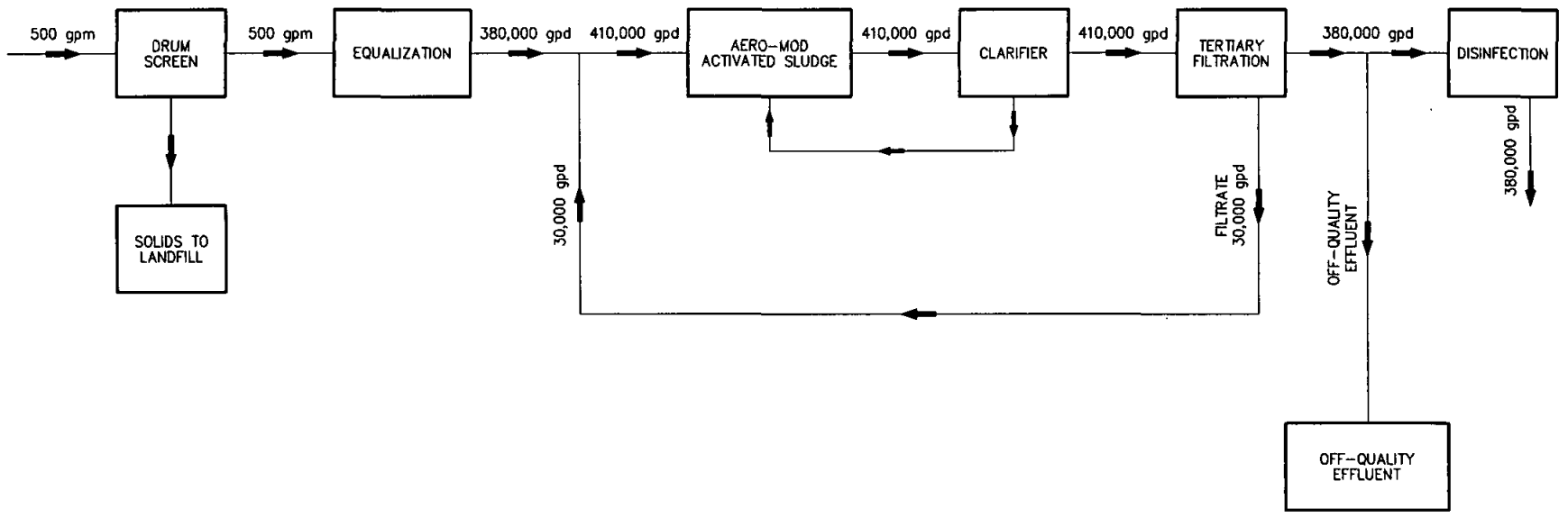
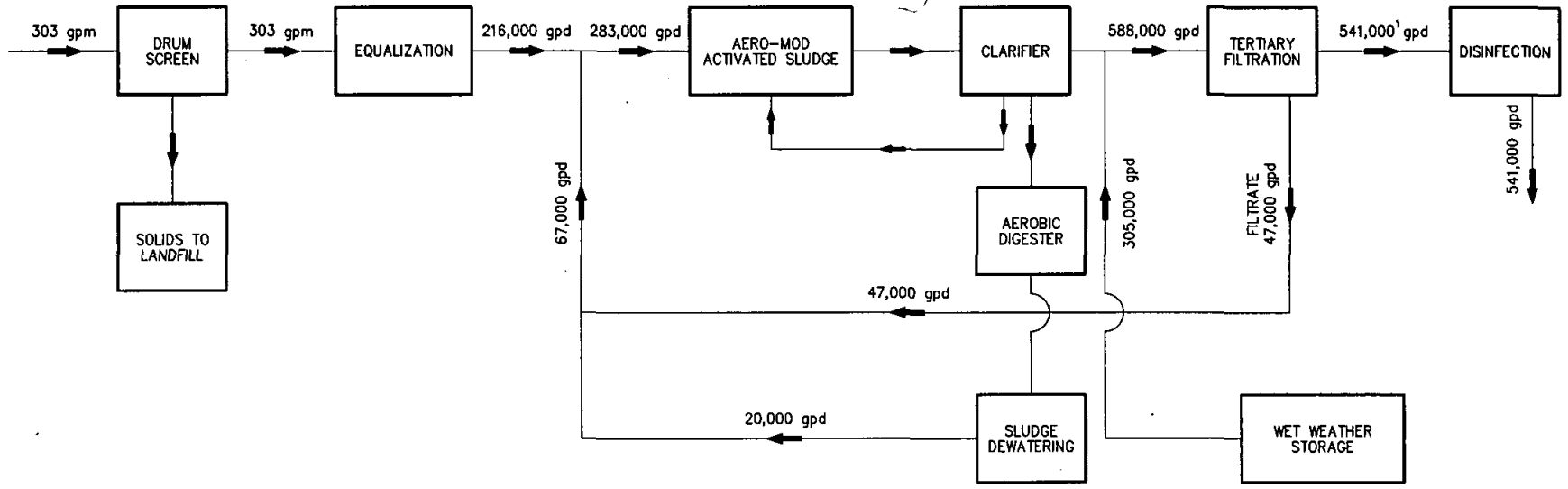


EXHIBIT A-1
WET WEATHER FLOW
PROCESS SCHEMATIC
HARMONY GROVE
WATER RECLAMATION PLANT

C:\PACIFIC\DWG\615011-50\PROCESS SCHEMATIC EXHIBIT A-2.DWG 08-29-12 08:11:16 LAYOUT: 11X17

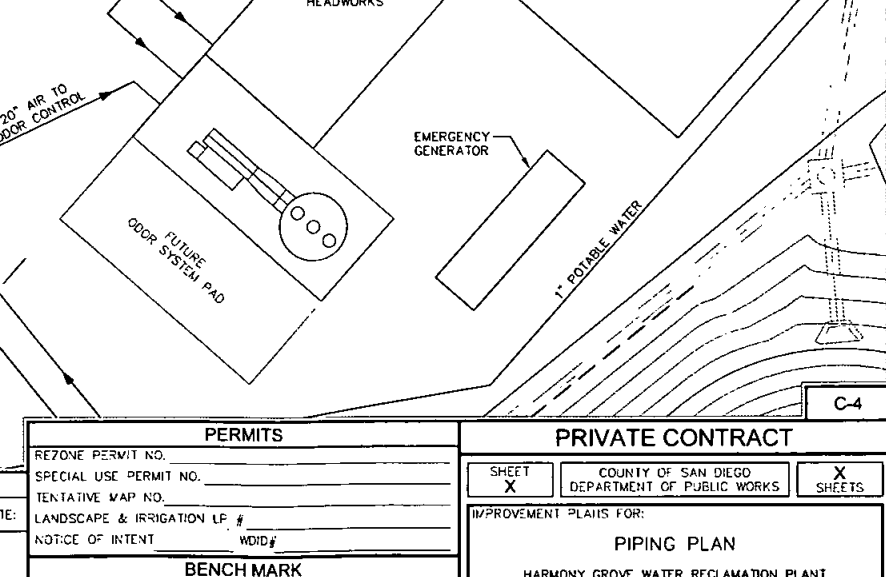
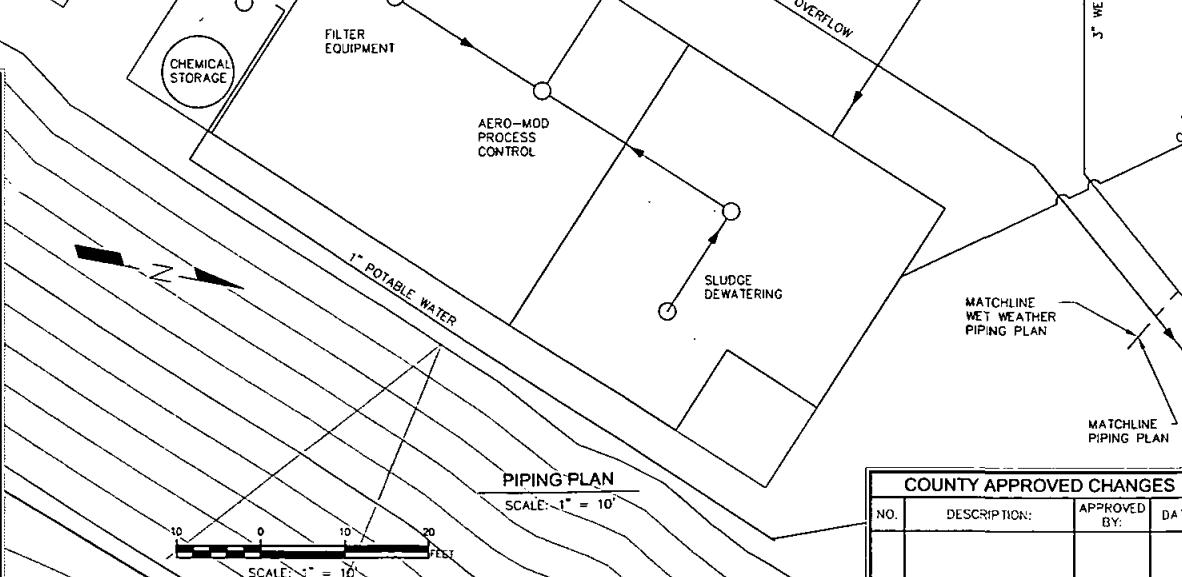
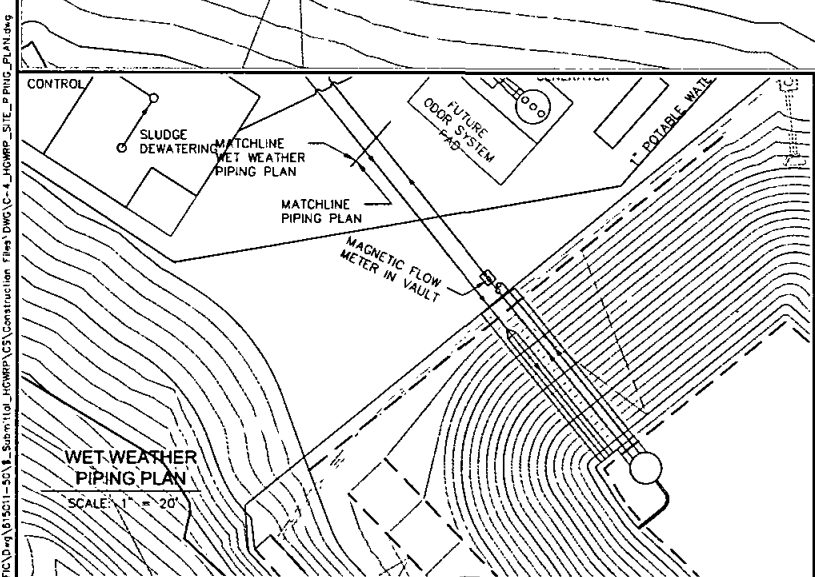
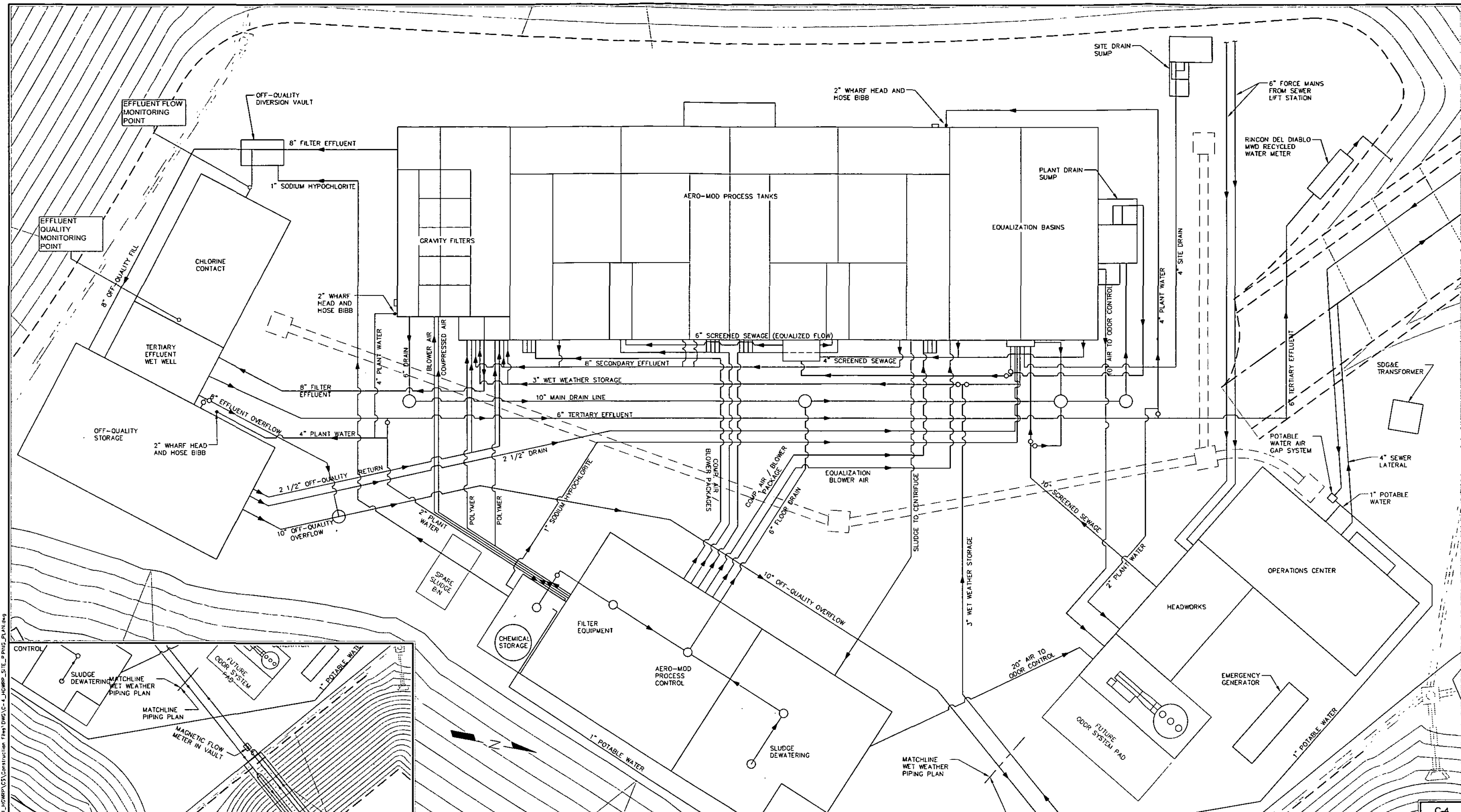
PEAK MONTHLY FLOW SCENARIO

- CENTRIFUGE IN OPERATION
- WET WEATHER RETURN FLOWS



1. REQUIRES AVERAGE CHLORINE DOSE OF 5.7 mg/L TO MEET CT REQUIREMENTS

EXHIBIT A-2
PEAK MONTHLY FLOW
PROCESS SCHEMATIC
HARMONY GROVE
WATER RECLAMATION PLANT



DEXTER WILSON ENGINEERING, INC.
 CONSULTING ENGINEERS
 7234 FARADAY AVENUE
 CARLSBAD, CA 92008 (760) 438-4422



RECORD PLAN
 BY: _____ DATE: _____
 R.C.E.: _____
 EXPIRES: _____

SD COUNTY DPW WASTEWATER
 APPROVED BY: _____
 DATE: _____

COUNTY APPROVED CHANGES

NO.	DESCRIPTION:	APPROVED BY:	DATE:

PERMITS
 REZONE PERMIT NO. _____
 SPECIAL USE PERMIT NO. _____
 TENTATIVE MAP NO. _____
 LANDSCAPE & IRRIGATION LP # _____
 NOTICE OF INTENT W/D# _____

BENCHMARK
 DESCRIPTION: SEE BENCHMARK ON SHEET 7

LOCATION: _____
 RECORD FROM: _____
 ELEVATION: _____ DATUM: _____

PRIVATE CONTRACT

SHEET X	COUNTY OF SAN DIEGO DEPARTMENT OF PUBLIC WORKS	X SHEETS
----------------	---	--------------------

IMPROVEMENT PLANS FOR:
PIPING PLAN
 HARMONY GROVE WATER RECLAMATION PLANT
 CALIFORNIA COORDINATE INDEX 338-1725

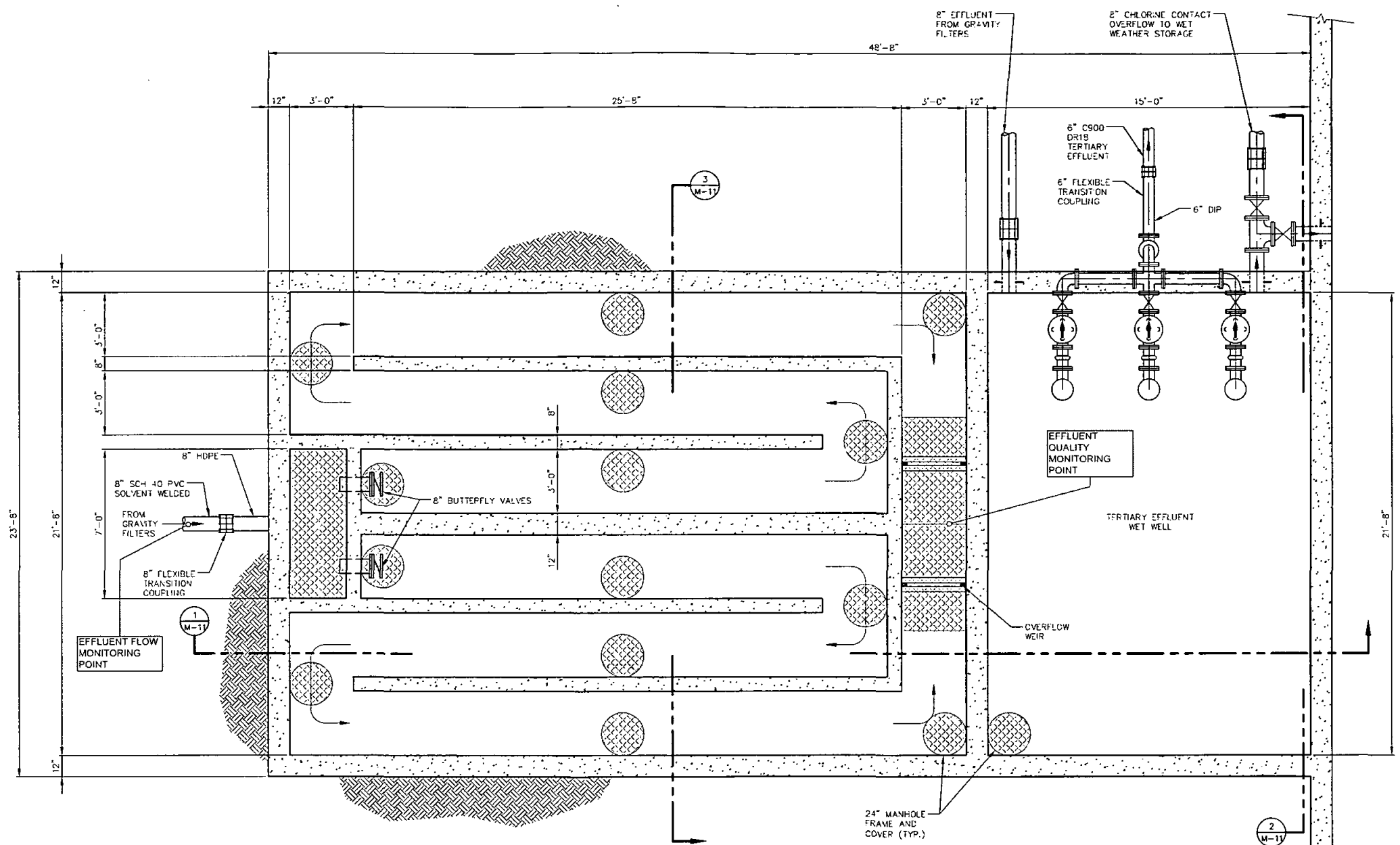
APPROVED FOR:
 MOHAMAD K. FAKHRRIDDINE
 COUNTY ENGINEER

BY: _____ DATE: _____

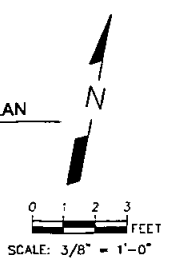
ENGINEER OF WORK:
 R.C.E. DATE: _____

PERMIT NO.: **XX**

Aug 30, 2012 1:42 PM C:\p\0151-301\Submittal\SDPW\110\110\SDPW_SITE_PIPING_PLAN.dwg

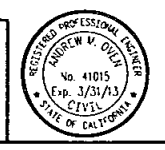


CHLORINE CONTACT PLAN
SCALE: 3/8" = 1'-0"



Aug 30, 2012 \\PACIFIC\dwg\815011-501\Submittal\DWG\CS\Construction\Task\DWG\M-11_Howerp_Chlorine>Contact_Plan.dwg

DEXTER WILSON ENGINEERING, INC.
CONSULTING ENGINEERS
2234 FARADAY AVENUE
CARLSBAD, CA 92008 (760) 438-4422



RECORD PLAN		SD COUNTY DPW WASTEWATER	
BY: _____	DATE: _____	APPROVED BY: _____	DATE: _____
R.C.E. _____			
EXPIRES: _____			

COUNTY APPROVED CHANGES			
NO.	DESCRIPTION:	APPROVED BY:	DATE:

PERMITS	
REZONE PERMIT NO. _____	SPECIAL USE PERMIT NO. _____
TENTATIVE MAP NO. _____	LANDSCAPE & IRRIGATION LF # _____
NOTICE OF INTENT _____	WDIC# _____
BENCH MARK	
DESCRIPTION: SEE BENCHMARK ON SHEET 2	
LOCATION: _____	ELEVATION: _____ DATUM: _____
RECORD FROM: _____	

PRIVATE CONTRACT	
SHEET X	COUNTY OF SAN DIEGO DEPARTMENT OF PUBLIC WORKS
IMPROVEMENT PLANS FOR:	
CHLORINE CONTACT PLAN	
HARMONY GROVE WATER RECLAMATION PLANT	
CALIFORNIA COORDINATE INDEX 338-1725	
APPROVED FOR WOLAMAD K. FAKHRIDDINE COUNTY ENGINEER	ENGINEER OF WORK R.C.E. _____ DATE: _____
BY: _____ DATE: _____	PERMIT NO: XX

M-11