

ITEM 8, SUPPORTING DOCUMENT NO. 8: RESPONSE TO COMMENTS

**TENTATIVE ADDENDUM NO. 1 TO ORDER NO. 97-49
 AN ADDENDUM MODIFYING WASTE DISCHARGE REQUIREMENTS AND WATER
 RECYCLING REQUIREMENTS FOR THE PRODUCTION
 AND PURVEYANCE OF RECYCLED WATER FOR
 PADRE DAM MUNICIPAL WATER DISTRICT
 SAN DIEGO COUNTY**

The San Diego Water Board has the following responses to the Padre Dam Municipal Water District's (District) letter dated November 2, 2012:

No.	Comments	San Diego Water Board Responses
1.	<p>The District requested in its letter dated November 2, 2012 that that the requirement for it to develop a salt and nutrient management plan (plan) for the Santee/El Monte groundwater basin be deleted from the tentative Addendum. The District reported in its letter that it plans to develop a plan only for the portion of the Santee basin within its jurisdictional boundary and not the entire limits of the Santee and El Monte basins. The District provided the following justification in its letter:</p> <ul style="list-style-type: none"> a. <i>Padre Dam's application of recycled water to the Santee basin (as allowed in the current WDR permit) is not the major contributor to salt and nutrient loadings in the Santee/El Monte Basin and therefore should not be conditioned to develop the SNMP with the WDR permit amendment.</i> b. <i>Recycled water is only applied to the limits of Santee Basin and the upper Santee and El Monte basins are outside the jurisdictional boundary for Padre Dam; therefore, it would be inappropriate to require Padre Dam to prepare an SNMP for the entire Santee/El Monte Basin as a condition of the permit amendment.</i> c. <i>Specifically, Paragraph 9, Page 2 of the Tentative Order states "The development of the salt</i> 	<p>The San Diego Water Board has not deleted the requirement for developing a salt and nutrient management plan from Tentative Addendum No. 1 to Order No. 97-49 (tentative Addendum) as requested by the District. The San Diego Water Board is consistently including requirements in new and revised recycled water permits for the recycled water purveyors to develop salt and nutrient management plans. Including this requirement will provide incentives for water purveyors to develop salt and nutrient management plans by the due date in 2014, as required by the Recycled Water Policy.</p> <p>The tentative Addendum, however, has been revised and now requires the District to develop a salt and nutrient management plan for only the Santee groundwater basin. This change has been made because the District only applies recycled water within the Santee basin, and the El Monte groundwater basin is outside the District's jurisdictional boundary.</p>

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	<p><i>and nutrient management plans is expected to be a cooperative effort among local water and wastewater entities and local salt/ nutrient contributing stakeholders." Padre Dam is currently pursuing development of an SNMP for the Santee Basin (within the jurisdictional boundary of Padre Dam) in a cooperative effort with the Integrated Regional Water Management Plan. Padre Dam has no plans or budget to develop an SNMP for the El Monte Basin because recycled water is not applied in those areas and is outside of the jurisdictional boundary for Padre Dam.</i></p>	
2.	<p>Padre Dam requests to modify Paragraph "o" on Page 4 which addresses the use of recycled water for street cleaning purposes. Paragraph "o" states "Recycled water shall not be applied where it could spray on external drinking water fountains, passing vehicles, buildings, or areas where food is handled or eaten." The words "passing vehicles" should be stricken from this sentence because street cleaning will be performed on streets where there will be vehicles passing the street cleaner; the wording proposed would be too restrictive and could prevent the use of recycled water on any street.</p>	<p>The requested change has been made in the revised tentative Addendum.</p>

The San Diego Water Board has the following responses to the California Department of Public Health's (CDPH) letter dated October 30, 2012:

No.	Comments	San Diego Water Board Responses
1.	<p>The CDPH in its letter stated that Requirement 1.f and 1.s of Tentative Addendum No. 1 to Order No. 97-49 (tentative Addendum) are in conflict and requested that Requirement 1.f should be deleted to make the tentative Addendum consistent. Requirement 1.f and 1.s of the tentative Addendum are shown below for reference:</p>	<p>The requested change has been made in the revised tentative Addendum. The San Diego Water Board agrees with the CDPH's comments regarding deleting Requirement 1.f from the tentative Addendum.</p>

No.	Comments	San Diego Water Board Responses
	<p>1.f <i>Each vehicle shall be completely cleaned and disinfected prior to delivery of potable water for human consumption.</i></p> <p>1.s. <i>Vehicles used to transport recycled water shall not be used to carry water for potable purposes, regardless of the source water. The use of recycled water for street sweeping shall comply with the appropriate municipality's storm water ordinance. Typical compliance measures include preventing overspray, ponding, or runoff of recycled water from the use area.</i></p>	<p>Consequently, Requirement 1.f has been deleted from the tentative Addendum as requested by the CDPH, in order to be consistent with CDPH's recycled water hauling and use criteria.</p>
<p>2.</p>	<p><i>Please be aware that CDPH Food & Drug Branch has regulatory oversight for and issues potable water hauling licenses, which do not allow the hauling of recycled water in a licensed potable water truck. Recycled Water trucks shall not be used or allowed to be used for providing potable water consumption. CDPH requires separate trucks, hoses, and equipment for recycled water hauling and potable water hauling. Therefore, CDPH requests that item number f be removed from the tentative Addendum No. 1 in order to be consistent with CDPH recycled water use criteria.</i></p>	<p>The requested change has been made in the revised tentative Addendum.</p>