

**California Regional Water Quality Control Board  
San Diego Region**

**Response to Comments Report**

**Tentative Order No. R9-2015-0002  
NPDES NO. CA0107492**

**Waste Discharge Requirements  
for the  
Padre Dam Municipal Water District,  
Ray Stoyer Water Recycling Facility,  
Discharge to Sycamore Creek,  
San Diego County**

**May 13, 2015**

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN DIEGO REGION**

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**California Regional Water Quality Control Board  
San Diego Region**

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## **Introduction**

This report contains responses to written comments received on Tentative Order No. R9-2015-0002, NPDES NO. CA0107492, Waste Discharge Requirements for the Padre Dam Municipal Water District, Ray Stoyer Water Recycling Facility, Discharge to Sycamore Creek, San Diego County (Tentative Order). The Tentative Order was made available for public review and comment for 31 days, with the comment period ending on April 13, 2015.

## **Comments and Responses**

The written comments and staff responses are in the table that follows. The comments are organized according to the person that made the comment. The table indicates if the Tentative Order was revised in response to the comment.

No.	Comment	Response	Action Taken
<b>David W. Smith, Manager, NPDES Permits Section, U.S. Environmental Protection Agency (USEPA)</b>			
1	<p>USEPA supports the requirements for chronic toxicity contained in the Tentative Order. These requirements include numeric monthly and daily effluent limitations and the use of the Test of Significant Toxicity (TST) bioequivalence statistical t-test approach for the chronic toxicity. These requirements</p> <ul style="list-style-type: none"> <li>• comport with Clean Water Act sections 301(b)(1)(C) and 502(11), and the Code of Federal Regulations, title 40, sections 122.44(d)(1)(i) and (v) and section 122.45(d);</li> <li>• are necessary to protect against highly toxic short-term peaks of acute or chronic toxicity that exceed the applicable toxicity water quality standard;</li> <li>• are consistent with other NPDES Permits in California; and</li> <li>• minimize inconsistent judgments by toxicity laboratories reviewing and reporting results after a toxicity test is conducted.</li> </ul>	Comment noted.	No changes to the Tentative Order were necessary.

No.	Comment	Response	Action Taken
<b>Albert C. Lau, PE, Director of Engineering and Planning, Padre Dam Municipal Water District (Discharger)</b>			
2	The Discharger concurs with requirements of the Tentative Order (pages 1 through 29). The Tentative Order was prepared in balance of protecting water quality and meeting the San Diego Water Board's practical vision. The Tentative Order is comprehensive, and accounts for the values and benefits of the Santee Lakes system to the community and the watershed .	Comment noted.	No changes to the Tentative Order were necessary.
3	The Discharger requests that Attachment E be revised to be consistent with the Tentative Order. Specifically, Table E-3 and Table E-4 of Attachment E appear to be inconsistent with the intent of the Order. To aid in this process, Padre Dam is attaching proposed revised Tables E-3 and E-4 for inclusion into Attachment E to provide additional clarity. These tables provide a summary of the sampling parameters and units, frequency of sampling, methods of analysis, and the effluent limitations where applicable. The tables we prepared are consistent with the requirements for the discharge points EFF-001A and EFF-001B as presented in the Tentative Order.	As requested by the Discharger, the following changes have been made for the Tentative Order: <ul style="list-style-type: none"> <li>• Tables E-3 and E-4 have been revised to clarify the monitoring location and to require mass emission rate calculations for some of the parameters;</li> <li>• Table E-3 has been revised to remove the duplicate dissolved oxygen monitoring requirement; and</li> <li>• Table E-3 has been modified to require monitoring for ammonia, un-ionized (as N) at monitoring location EEF-001A, consistent with the intent of the Tentative Order.</li> </ul>	Tentative Order, Attachment E, Tables E-3 and E-4 have been revised as noted.
4	The Discharger supports the San Diego Water Board's regional monitoring framework approach, and stands ready to coordinate with the Board to implement the core monitoring, receiving water monitoring, and receiving water studies proposed within Tentative Order No. R9-2015-0002.	Comment noted.	No changes to the Tentative Order were necessary