

California Regional Water Quality Control Board
San Diego Region

Response to Comments Report

Tentative Time Schedule Order No. R9-2022-0014
Requiring Padre Dam Municipal Water District, Ray Stoyer Water Recycling Facility to
Comply with Requirements Prescribed in Order No. R9-2022-0003
NPDES No. CA0107492

February 9, 2022



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
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San Diego Region

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INTRODUCTION

This report contains the California Regional Water Quality Control Board, San Diego Region's (San Diego Water Board) responses to written comments received from Padre Dam Municipal Water District (Padre Dam) on Tentative Time Schedule Order No. R9-2022-0014, *Requiring Padre Dam Municipal Water District, Ray Stoyer Water Recycling Facility to Comply with Requirements Prescribed in Order No. R9-2022-0003, NPDES No. CA0107492* (Tentative TSO).

The San Diego Water Board provided public notice of the release of the Tentative TSO on December 17, 2021, and provided a period of at least 30 days for public review and comment on the Tentative Order. The public comment period ended on January 17, 2022.

Comments and Responses

The summarized written comments and San Diego Water Board responses are set forth below. The responses include a description of any actions taken to revise the Tentative Order in response to the comment. Proposed revisions to the Tentative Order are in red-underline for added text and ~~red-strikeout~~ for deleted text.

COMMENTS AND RESPONSES

Comment

This is a summary of written comments received from Padre Dam on the Tentative TSO. Padre Dam submitted a comment letter dated January 10, 2022 in which it requested that the San Diego Water Board revise the due dates in Table 4 of the Tentative TSO to give it additional time for completing several of the tasks required by the Tentative TSO. The modifications to the compliance schedule due dates were requested to accommodate for any delays in delivery of materials and equipment that may be caused by the COVID-19 pandemic. Padre Dam also submitted additional revisions to the due dates in Table 4 of the Tentative TSO via email on January 12, 2022. The additional revisions were requested to ensure that Padre Dam's proposed compliance timeline is consistent with the State Water Board *Policy for Compliance Schedules in National Pollutant Discharge Elimination System Permits* (Resolution No. 2008-0025). The revised due dates proposed by Padre Dam for Table 4 of the Tentative TSO are below:

Table 1. Compliance Schedule Tasks and Due Dates

Task	Compliance Date
Submit a workplan identifying proposed facilities or control measures necessary to achieve compliance with final effluent limitations for MTBE and zinc listed in Order No. R9-2022-0003 (and Table 1 above).	June 1, 2022
Complete 60 percent design of any required facilities and control measures.	September 1, 2022
Start construction of required facilities.	April 1, 2023
Complete 100 percent design of any required facilities and control measures.	September 1, 2023
Complete 30 percent of construction of required facilities.	April 1, 2024
Complete 60 percent of construction of required facilities.	March 30, 2025
Complete 100 percent of construction of required facilities.	March 29, 2026
Begin testing of facilities.	August 28, 2026
Complete startup, commissioning, and testing of facilities.	April 1, 2027

Task	Compliance Date
Start operation of facilities and achieve consistent compliance with final effluent limitations for MTBE and zinc in Order No. R9-2022-0003.	May 1, 2027

Response

San Diego Water Board staff find the requested modifications to the compliance schedule due dates reasonable. As a result, Table 4 of the Tentative TSO is modified as follows:

Table 2. Compliance Schedule Tasks and Due Dates

Task	Compliance Date
Submit a workplan identifying proposed facilities or control measures necessary to achieve compliance with final effluent limitations for MTBE and zinc listed in Order No. R9-2022-0003 (and Table 1 above).	June 1, 2022
Complete 60 percent design of any required facilities and control measures.	September 1, 2022
Start construction of required facilities.	October 31, 2022 <u>April 1, 2023</u>
Complete 100 percent design of any required facilities and control measures.	June 1, 2023 <u>September 1, 2023</u>
Complete 30 percent of construction of required facilities.	October 1, 2023 <u>April 1, 2024</u>
Complete 60 percent of construction of required facilities.	September 30, 2024 <u>March 30, 2025</u>

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Task	Compliance Date
Complete 100 percent of construction of required facilities.	September 29, 2025 <u>March 29, 2026</u>
Begin testing of facilities.	February 28, 2026 <u>August 28, 2026</u>
Complete startup, commissioning, and testing of facilities.	November 30, 2026 <u>April 1, 2027</u>
Start operation of facilities and achieve consistent compliance with final effluent limitations for MTBE and zinc in Order No. R9-2022-0003.	December 21, 2026 <u>May 1, 2027</u>