



South Orange County Wastewater Authority

Agenda Item: 8.D.

February XX, 2023

David Gibson
California Regional Water Quality Control Board
San Diego Region
2375 Northside Dr. Suite 100
San Diego, CA. 92108

SUBJECT: Tentative Time Schedule Order R9-2023-0006 Comment Letter

Dear Mr. Gibson:

We thank the San Diego Regional Water Quality Control Board (SDRWQCB) for the opportunity to comment on the draft tentative Time Schedule Order (TSO) R9-2023-0006. SOCWA is not a Permittee identified in the tentative TSO but provides testing of shoreline samples utilized for compliance with the Total Maximum Daily Loads for both San Juan Creek and Aliso Creek¹.

SOCWA appreciates that the tentative TSO includes finding #14 which moves in sync with developing science that SOCWA member agencies have funded for the differentiation of live versus dead cells as false positives in watersheds dominated by recycled water. SOCWA also recognizes the significant and important work that Boehm and Soller (2020)² have demonstrated in the development of risk based thresholds (RBTs) for raw sewage included in Table 6a in the tentative TSO. Included in Table 6a, footnote 6 states that Permittees are not allowed to utilize the HF183 marker when sources are disinfected tertiary recycled water. From a practical implementation, it is difficult to determine one HF183 source from another using current EPA approved methods. It is at this technical juncture that SOCWA respectfully requests updating the language in the tentative TSO, that would allow Permittees to submit compliance data for HF183 that differentiate live versus dead signals using HF183-PMA methods to ascertain health risk at impacted REC-1 waters.

We thank you for the opportunity to comment and look forward to working with the Permittees and the SDRWQCB to monitor beaches for the protection of public health.

Best,

SOCWA Board President
Matt Collings

¹ Tentative Time Schedule Order R9-2023-0006, p.4.

https://www.waterboards.ca.gov/sandiego/board_decisions/tentative_orders/docs/r9_2023_0006/tentative_tso_r9_2023_0006.pdf

² Boehm and Soller, 2020, Refined ambient water quality thresholds for human-associated fecal indicator HF183 for recreational waters with and without co-occurring gull fecal contamination. Microbial Risk Analysis. Available at <https://doi.org/10.1016/j.mran.2020.100139>.