



**Santa Ana Regional Water Quality Control Board**

**TO:** Vicky Whitney  
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State Water Resources Control Board

*K.V. Berchtold*

**FROM:** Kurt V. Berchtold  
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SANTA ANA REGIONAL WATER QUALITY CONTROL BOARD

**DATE:** June 27, 2014

**SUBJECT: EXECUTIVE OFFICER CORRECTIONS: SALT MANAGEMENT PLAN BASIN PLAN AMENDMENTS ADOPTED UNDER RESOLUTION NO. R8-2014-0005**

On April 25, 2014, the Santa Ana Regional Water Board adopted Resolution No. R8-2014-0005, approving amendments to the Basin Plan for the Santa Ana Region that revise the 2004 Salt Management Plan and incorporate other Basin Plan changes. The amendments are shown in the attachment to Resolution No. R8-2014-0005, which is the underline/strikeout version of the amendments.

Based on comments received and in reviewing the amendments in preparation for State Water Board consideration of adoption, it has come to my attention that certain non-substantive corrections are required. These corrections are shown below.

The final version of the amendments are shown in the corrected Attachment 1 to Resolution No. R8-2014-0005 which is attached to this memo. Also attached is a clean version of the corrected amendments.

If there are any questions concerning these corrections, please contact Hope Smythe at 951-782-4493 or [Hope.Smythe@waterboards.ca.gov](mailto:Hope.Smythe@waterboards.ca.gov).

**June 27, 2014, Corrections to Attachment 1 – Basin Plan Amendments (R8-2014-0005)**

1. **Existing Basin Plan, pages 5-20, 5-21:** Revise the following discussion on **Assimilative Capacity** to delete all references to Tables 5-3 and 5-4 as follows:

~~Tables 5-3 and 5-4 show the assimilative capacity available in management zones for which "maximum benefit" objectives have been specified. As described in Chapter 4 and later in this Chapter, the application of these "maximum benefit" objectives is contingent on the implementation of certain projects and programs by specific dischargers as part of their maximum benefit demonstrations. Assimilative capacity created by these projects/programs will be allocated to the party(-ies) responsible for implementing them.~~

Chapter 3 delineates the Prado Basin Management Zone, and Chapter 4 identifies the applicable TDS and nitrogen objectives for this Zone (the objectives for the surface waters that flow in this Zone). No assimilative capacity exists in this zone.

These assimilative capacity findings are significant from a regulatory perspective. If there is assimilative capacity in the receiving waters for TDS, nitrogen or other constituents, a waste discharge may be of poorer quality than the objectives for those constituents for the receiving waters, as long as the discharge does not cause violation of the objectives and provided that antidegradation requirements are met. However, if there is no assimilative capacity in the receiving waters, ~~such as the management zones identified in Tables 5-3 and 5-4,~~ the numerical limits in the discharge requirements cannot exceed the receiving water objectives or the degradation process would be accelerated.<sup>1</sup> This rule was expressed clearly by the State Water Resources Control Board in a decision regarding the appropriate TDS discharge limitations for the Rancho Caballero Mobilehome park located in the Santa Ana Region (Order No. 73-4, the so called "Rancho Caballero decision") [Ref. 7]. However, this rule is not meant to restrict overlying agricultural irrigation, or similar activities, such as landscape irrigation. Even in management zones without assimilative capacity, groundwater may be pumped, used for agricultural purposes in the area and returned to the management zone from which it originated.

In regulating waste discharges to waters with assimilative capacity, the Regional Board will proceed as follows. (see also Section III.B.6., Special Considerations – Subsurface Disposal Systems).

If a discharger proposes to discharge wastes that are at or below (i.e., better than) the current ambient TDS and/or nitrogen water quality, then the discharge will not be expected to result in the lowering of water quality, and no antidegradation analysis will

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<sup>1</sup> A discharger may conduct analyses to demonstrate that discharges at levels higher than the objectives would not cause or contribute to the violation of the established objectives. See, for example, the discussion of wasteload allocations for discharges to the Santa Ana River and its tributaries (Section III. B. 4.) If the Regional Board approves this demonstration, then the discharger would be regulated accordingly.

be required. TDS and nitrogen objectives are expected to be met. Such discharges clearly implement the Basin Plan and the Board can permit them to proceed. Of course, other pertinent requirements, such as those of the California Environmental Quality Act (CEQA) must also be satisfied. For groundwater management zones, current ambient quality ~~is as defined in Table 5-3 and Table 5-4, or as these Tables may be revised (through the Basin Plan amendment process)~~ **will be determined every three years** pursuant to the detailed monitoring program to be conducted by dischargers in the watershed (see Section V., Salt Management Plan – Monitoring Program Requirements).

**2. Proposed Basin Plan Amendments, page 4 of 62, Resolution No. R8-2014-0005. Insert the following to the Assimilative Capacity discussion:**

Since adoption of the 2004 Basin Plan amendment and per Basin Plan requirements, ambient quality and assimilative capacity findings have been, and will continue to be, updated every three years. **Following Regional Board approval at a duly noticed Public Hearing,** the updated findings of ambient quality and assimilative capacity will be posted on the Regional Board's web-site and will be used for regulatory purposes.

**3. Proposed Basin Plan Amendments, Page 7 of 62, Revise the following discussion on Wastewater Reclamation to delete all references to Table 5-7 (note – the proposed deletion of references to Table 5-7 was identified in the January 31, 2014 proposed amendments, but was inadvertently deleted from the April 25, 2014 amendments). The complete revised text showing deletion of Table 5-7 is shown as follows:**

**5. Wastewater Reclamation**

Wastewater is presently being reclaimed in the Santa Ana Watershed in a number of different ways:

**3. Groundwater Recharge by Percolation**

This type of reclamation is common throughout the Region. Most wastewater treatment plants that do not discharge directly to the River discharge their effluent to percolation ponds. All of the treated wastewater in the upper Santa Ana Basin that is not directly reclaimed for commercial agricultural and landscape irrigation purposes, or discharged directly to the Santa Ana River, is returned to local or downstream groundwater management zones by percolation. In Orange County, reclaimed water is used for greenbelt and landscape irrigation, and injected into coastal aquifers to control sea water intrusion.

Significant additional reclamation activities are planned in the Region, ~~as reflected in Table 5-7.~~ The Chino Basin Watermaster, Inland Empire Utilities Agency, Yucaipa Valley Water District, the City of Beaumont and the San Timoteo Watershed Management Authority propose to implement extensive groundwater recharge projects using recycled water. To accommodate these projects and other water and wastewater management strategies, these agencies have made

the requisite demonstrations necessary to support the "maximum benefit" TDS and nitrate-nitrogen water quality objectives specified in this Plan for certain groundwater management zones (see Chapter 4). The recharge projects will provide reliable sources of additional water supply needed to support expected development within the agencies' areas of jurisdiction. These agencies' "maximum benefit" programs are described in detail in Section VI. of this Chapter.

**4. Existing Basin Plan, Page 5-36, continuing Wastewater Reclamation Discussion, delete reference to Table 5-7 as follows:**

The Salt Management Plan draws a balance between the benefits and problems of reclamation by including carefully planned reclamation activities in the watershed. The Recommended Plan provides for reclamation within the upper basin, ~~as shown in Table 5-7~~. All recycled water recharge projects will be regulated pursuant to the process identified in the discussion regarding assimilative capacity, and in accordance with the "maximum benefit" implementation strategies identified later in this Chapter (see section VI., Maximum Benefit Implementation Plans for Salt Management).

**5. Existing Basin Plan, Page 5-29, #4. TDS and Nitrogen Wasteload Allocations for the Santa Ana River. With the deletion of Table 5-7 from the Basin Plan, it is necessary to maintain a reference to the reclamation/reuse plans that formed the basis of the 2004 TDS and Nitrogen Wasteload Allocations. Clarification that references to Table 5-7 are specifically referencing Table 5-7 of the 2004 Salt Plan Amendments, is provided as follows:**

WEI performed three model evaluations in order to assess wasteload allocation scenarios through the year 2010. These included a "baseline plan" and two alternative plans ("2010-A" and "2010-B"). The baseline plan generally assumed the TDS and TIN limits and design flows for POTWs specified in waste discharge requirements as of 2001. These limits implemented the wasteload allocations specified in the 1995 Basin Plan when it was approved in 1995. A TDS limit of 550 mg/L was assumed for the Rapid Infiltration and Extraction Facility (RIX) and the analysis assumed a 540 mg/L TDS for the City of Beaumont. The baseline plan also assumed reclamation activities at the level specified in the 1995 Basin Plan, when it was approved. The purpose of the baseline plan assessment was to provide an accurate basis of comparison for the results of evaluation of the two alternative plans. For alternative 2010-A, it was generally assumed that year 2001 discharge effluent limits for TDS and TIN applied to POTW discharges, but projected year 2010 surface water discharge amounts were applied. TDS limits of 550 mg/L and 540 mg/L were again assumed for RIX and the City of Beaumont discharges. The same limited reclamation and reuse included in the baseline plan was assumed (see [R8-2004-0001, 2004 Salt Plan Amendments](#), Table 5-7 in Section III.B.5.). For alternative 2010-B, POTW discharges were also generally limited to the 2001 TDS and TIN effluent limits (RIX was again held to 550 mg/L and Beaumont to 540 mg/L). However, in this case, large increases in wastewater recycling and reuse were assumed ([R8-2004-0001, 2004 Salt Plan Amendments](#), Table 5-7), resulting in the reduced surface water discharges projected for 2010.