

California Regional Water Quality Control Board
San Diego Region

David Gibson, Executive Officer



Executive Officer's Report
September 13, 2023

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Part A – San Diego Region Staff Activities

1. Personnel Report

Staff Contact: Dulce Romero

An updated San Diego Water Board staff list is available online at: [San Diego Regional Water Quality Control Board Staff List \(ca.gov\)](#)

Recruitment

We are recruiting for five positions: one Water Resource Control Engineer, one Senior Water Resources Control Engineer, and one Student Assistant in the Surface Water Protection Branch; and one Student Assistant and one Environmental Scientist in the Healthy Waters Branch.

Filled Vacancies

The Groundwater Sustainability and Protection Unit welcomes our new Student Assistant, Emily Sok. Emily will be assisting the Groundwater Sustainability and Protection Unit with report reviews and database management for onsite wastewater treatment systems, recycled water facilities, salt and nutrient management plans, confined animal facilities, wineries, agricultural operations, conditional waivers, and the non-point source program. Emily is attending San Diego State University as a student in the Biomechanical Engineering program.

Information regarding our vacancies is located on the CalCareers and San Diego Water Board websites:

<https://calcareers.ca.gov/CalHRPublic/Search/AdvancedJobSearch.aspx>

https://www.waterboards.ca.gov/sandiego/about_us/employment/

2. Water Quality/Agricultural Educational Tour

Staff Contacts: Cailynn Smith and Abigail Pashina

Cailynn Smith, Abigail Pashina, and Ben Neill from the Groundwater Sustainability and Protection Unit, along with Vincent Vu from the Office of Chief Counsel (Staff), attended a water quality/agricultural education tour (farm tour) organized by the San Diego Region Irrigated Lands Group (SDRILG) on July 18, 2023. The SDRILG arranged the farm tour to provide regulatory agencies with an overview of the varied and unique agricultural practices in the San Diego Region. Farm tour attendees included representatives from the County of San Diego, City of San Marcos, City of Escondido, City of Oceanside, Mikhail Ogawa Engineering, the University of California Department of Agriculture and Natural Resources, and local growers. The farm tour visited the following locations:

Mellano and Company Farm, Oceanside. The Mellano and Company Farm (MCF) operates on 315 irrigated acres to grow annual and perennial cut flowers, bouquet greens, succulents, and avocados. MCF Chief Executive Officer, Mike Mellano showed farm tour attendees the varied plant species grown at MCF. Mike also explained that each plant species grown at MCF requires specific practices regarding harvest

techniques, pest management, and fertilizer demand and application. Mike emphasized that these agricultural practices are labor intensive and the ability to introduce automation is limited due to the delicate nature of crops grown. Mike further highlighted that agricultural practices in California's Central Valley are different than those in San Diego. Specifically, Central Valley farms are often very large in size, sometimes over 1,000 acres, and grow only one crop type; as opposed to San Diego farms that are smaller in size, on average 10 acres or less, and typically grow multiple crops simultaneously. Therefore, regulations that may work in the Central Valley may not work well in San Diego.

Beach House Winery, Fallbrook. The Beach House Winery and associated vineyard are owned and operated by Kim and George Murray. The Murray's, with over thirty years of wine-making experience, manage their vineyard, which is situated on a steep hillside. The Murray's shared that the location of their vineyard presents challenges for both growing and management, however the vines require less water than other crop types, such as avocados. George Murray added that he only waters the vines three or four times a year for approximately two hours at a time, and explained the roots of the vines grow deep into the ground, so they can absorb the irrigation water as it infiltrates.

Olive Hill Greenhouse, Fallbrook. The Olive Hill Greenhouse is owned and operated by Tony and Sue Godfrey. The Godfrey's started the operation fifty years ago, and over time it grew from 3,000 square feet to 760,000 square feet of greenhouse production space. The Olive Hill Greenhouses produces a variety of species and different sized plants, each with different fertilizer and water needs. Plant species grown at the Olive Hill Greenhouse include Anthurium, Dracena, Guzmania bromeliads, Kimberly queen ferns, Pothos, and Spathiphyllum. Tony shared that bromeliads occupy about fifty percent of the production space. He also shared that the COVID-19 pandemic challenged their operation and triggered a need to adapt their business to meet market demand.

Farm tour attendees also heard from the following presenters during the lunch break:

Carmen Summers, La Villa Sulla Collina Tropical Fruit U-Pick Operation.

Carmen Summers purchased her house and orchard in 2020 and began irrigating the neglected guava trees on the property due to the threat of wildfires. Carmen later received her first water bill in December 2020 and was shocked by the high price of water. Carmen decided to drill a groundwater well to keep operating her agricultural business long-term. Carmen shared that she has many challenges as a new grower due to labor shortages and the costs associated with capital investments, water, electricity, and meeting regulatory requirements. Carmen stated that there should be a "cliff notes" version of all the regulations and permit requirements that growers need to follow to operate a farm. Carmen also stated that there should be a "viable, cost-effective path" for people to pursue dreams like hers.

Neil Nagata of Nagata Bros. Farms. Neil Nagata shared that he is a third-generation Oceanside farmer and was named San Diego County Farm Bureau's 2021 Farmer of the Year. Neil grows strawberries, blueberries, cherimoyas, other fresh fruits, and seasonal vegetables. Neil shared that he needed to apply methyl bromide to the strawberry fields to help control soil-borne pathogens, but the United States banned methyl bromide in 2005. Neil explained that the ban provided a challenge to his operation, even though methyl bromide is still allowed in developing countries. Neil shared that the cost of business is high and regulatory requirements are burdensome, but he considers them part of doing business.

Staff found the farm tour educational and will use the information gained to help evaluate and modify current agricultural permit requirements.

3. Groundwater Sustainability and Protection Unit Addresses Outdated Onsite Wastewater Treatment System Permits

Staff Contacts: Mahsa Izadmehr and Brandon Bushnell

Groundwater Sustainability and Protection Unit staff continue to work to review, evaluate, and update the San Diego Water Board's inventory of individual onsite wastewater treatment systems (OWTS) permits, which prescribe waste discharge requirements (WDRs) for OWTS in our region. Initial staff efforts identified 75 permits, adopted by the San Diego Water Board between 1986 and 2009, that required additional review to ensure consistency with the following statewide policy and permit:

- 1) *Water Quality Control Policy for Siting, Design, Operation and Maintenance of Onsite Wastewater Treatment Systems (OWTS Policy)*,¹ adopted by the State Water Resources Control Board (State Water Board) on June 19, 2012, and/or
- 2) Order WQ 2014-153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems (General Order)*,² adopted by the State Water Board on September 23, 2014.

Staff further evaluated each permit, the respective Discharger's OWTS, and compliance records to determine the need to: 1) issue new individual WDRs for the OWTS, 2) enroll the OWTS in the General Order, or 3) transfer the OWTS to a local permitting agency to be managed under an approved Local Agency Management Plan for Onsite Wastewater Treatment Systems (LAMP), in accordance with the OWTS Policy. Over the last four years these efforts have reduced the San Diego Water Board's inventory of outdated permits from 75 to 11. Based on staff's findings and recommendations, the San Diego Water Board acted to:

¹ OWTS Policy:

https://www.waterboards.ca.gov/water_issues/programs/owts/docs/owts_policy.pdf

² General Order:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf

- Rescind 47 individual OWTS permits and regulate those OWTS through enrollment in the General Order. Staff evaluation of the permits and the Discharger's OWTS and compliance record affirmed the understanding that wastewater treatment technologies evolve over time and that prescribed WDRs must be updated to ensure the protection of water quality and beneficial uses. The General Order established consistent statewide WDRs for discharges to land from OWTS having certain common characteristics, such as similar constituents, concentrations of constituents, disposal techniques, flow ranges, and require the same or similar treatment standards. OWTS with a monthly average flow rate between 10,000 and 100,000 gallons per day, are eligible for enrollment in the General Order.³ The San Diego Water Board's use of the General Order 1) supports the equal regulation of eligible OWTS in the Region, 2) allows prescribed WDRs for all enrollees to be updated uniformly, and 3) supports the San Diego Water Board's ability to efficiently and effectively use limited staff resources. The San Diego Water Board's use of the General Order does not limit the Board's authority and discretion to terminate a Discharger's enrollment in the General Order and issue the Discharger individual WDRs for the OWTS.

Staff routinely evaluate enrollee compliance with the General Order requirements. Approximately 80% of enrollees consistently submit the required monitoring and technical reports to the San Diego Water Board, in accordance with the General Order. Staff work with the remaining enrollees to ensure compliance with the General Order, following the State Water Board's *Water Quality Enforcement Policy*.

- Rescind 17 individual OWTS permits and allow local permitting agencies, with approved LAMPs, to regulate the OWTS. The OWTS Policy recognizes the effectiveness of local permitting agencies and established a statewide, risk-based, tiered approach for the regulation and management of OWTS installations and replacements. The OWTS Policy allows local permitting agencies to approve OWTS, based on a local ordinance, after the designated Regional Water Quality Control Board approves the LAMP. The San Diego Water Board approved the County of San Diego LAMP⁴ on April 29, 2015. San Diego County is in the process of revising the LAMP and staff will present the revised LAMP to the San Diego Water Board for approval consideration in Spring 2024.⁵ The Colorado River Basin Water Board, the designated Regional Board for the County of Riverside, approved the

³ OWTS with a monthly average flow rate of 100,000 gallons per day must submit a report of waste discharge to the appropriate Regional Water Quality Control Board, for the development of an individual permit.

⁴ San Diego County LAMP:

<https://www.sandiegocounty.gov/content/dam/sdc/deh/lwqd/RWQCB%20Approved%20LAMP%20Final%202-24-15.pdf>

⁵ San Diego County Draft LAMP:

<https://www.sandiegocounty.gov/content/dam/sdc/deh/lwqd/draftLAMPedits03132023.pdf>

County of Riverside LAMP⁶ on December 13, 2022. LAMPs are intended to allow the continued use of OWTS within the jurisdiction of the local permitting agencies and expand the local OWTS program to permit and regulate alternative OWTS, while ensuring protection of water quality and public health. OWTS that: 1) have a monthly average flow rate of less than 10,000 gallons per day, 2) do not accept recreational vehicle waste, and 3) do not accept industrial-strength wastewater, are eligible for regulation under the LAMP.

- Based on the complexity and conditions of the OWTS, the San Diego Water Board may choose to retain the existing individual WDR or issue new WDRs for the OWTS. However, the San Diego Water Board has yet to identified any OWTS that are ineligible for the General Order and require new individual WDRs issued for the existing OWTS.

Staff will continue to review and evaluate the remaining 11 individual permits. Staff efforts to address the inventory of outdated individual permits is consistent with the San Diego Water Board's Practical Vision,⁷ *Strategized for Health Waters* chapter and is anticipated to be completed during fiscal year 2024-2025. Staff will continue to provide the San Diego Water Board with periodic progress updates on the inventory of outdated individual permits for OWTS in the San Diego Region.

4. Border Water Quality Update (Attachment A-4)

Staff Contact: David Gibson

As of September 5, 2023, Border Field State Park and south Imperial Beach have been closed for 636 consecutive days due to transboundary flows of sewage and polluted water from both discharges from Tijuana on the coast at Punta Bandera (5 miles south of the U.S.-Mexico Border) and in the Tijuana River.

On August 16, 2023, I met with Commissioner Maria-Elena Giner and staff of the International Boundary and Water Commission (IBWC) at the South Bay International Wastewater Treatment Plant (ITP). Due to long deferred maintenance and increased flows into the ITP from the collection system in Tijuana due to malfunction of the influent controls in Junction Box 1, the ITP primary treatment system was at that time severely compromised with 3 of 6 influent pumps out of service and all five of the primary sedimentation basins non-operational. Although some solids are retained in the basins, the result has been excessive solids entering the secondary treatment system and exceedances of the secondary effluent standards (Turbidity, Settleable Solids, Total Suspended Solids, and Carbonaceous Biochemical Ocean Demand) in treated wastewater discharged through the South Bay Ocean Outfall (SBOO).

⁶ Riverside County LAMP:

https://www.waterboards.ca.gov/santaana/water_issues/programs/septic_tanks/docs/Riverside_Lamp.pdf

⁷ San Diego Water Board Practical Vision:

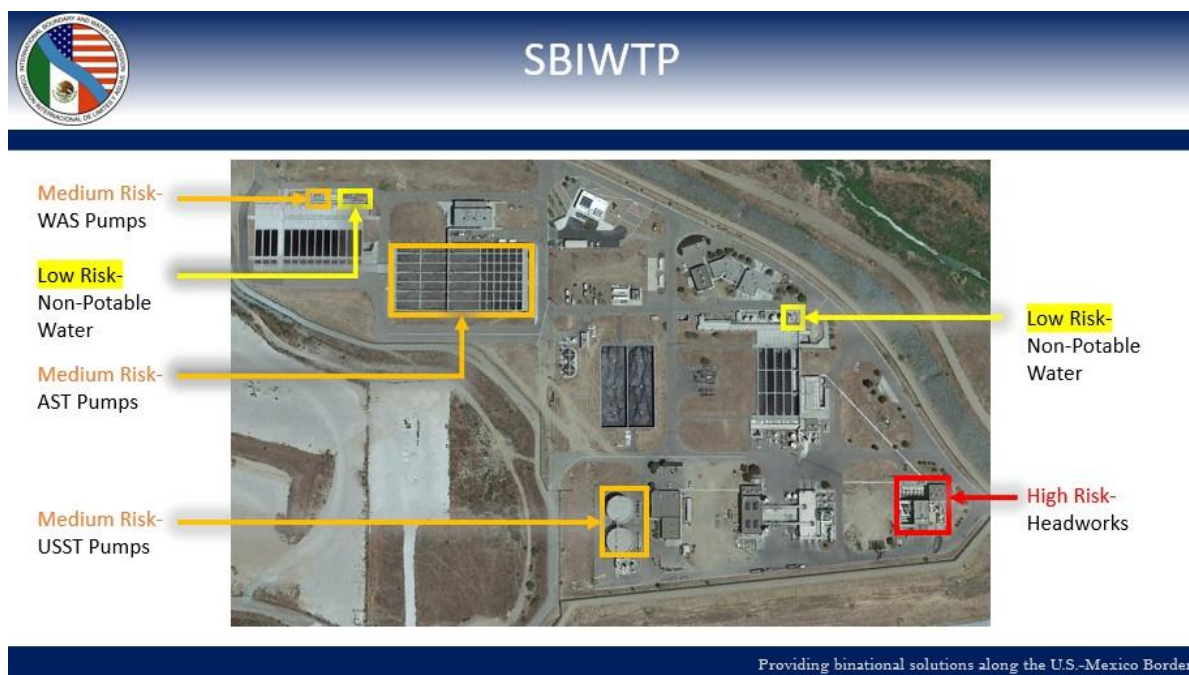
https://www.waterboards.ca.gov/sandiego/water_issues/programs/practical_vision/

A Notice of Violation (attached) was issued to IBWC on September 5, 2023, for the exceedances and overdue reports and plans. Additional Notices of Violation will follow as we receive additional reports on spills and additional exceedances. I will update you regularly regarding potential pending enforcement actions in the Executive Officers Report.

It should be noted that at other, non-federal facilities, the 86 Chronic Violations and 125 Serious Violations reported by IBWC would constitute 211 Minimum Mandatory Penalty Violations and would result in assessment of Administrative Civil Liabilities of \$633,000. During our meetings with IBWC on August 16th and August 31st (below), the Commissioner and staff identified \$10 million in repairs and rehabilitation using redirected internal funds to return the ITP to compliance with the NPDES Permit and Cease and Desist Order R9-2021-0709 within 9-12 months. The repairs were contracted and about to begin before the damage caused by Tropical Cyclone Hilary.

Tropical Cyclone Hilary brought intense rainfall and caused significant damage throughout the ITP due to the extremely high inflow and infiltration of the sanitary sewage collection system in Tijuana and the aforementioned issues with the headworks controls. Flows into the ITP greatly exceeded the design flow capacity of the plant by 100% for 6 hours (>50mgd) and by 220% for 6 hours (80 mgd). Due to the extremely high inflows, IBWC bypassed secondary treatment for 10 hours (30 million gallons) as an emergency measure to prevent overflow of the ITP to the Tijuana River and additional damage to the treatment plant.

Damage to the already compromised influent headworks was serious and resulted in the failure of both bar racks, 2 of the 3 remaining influent pumps and numerous pumps, motors, and controls through the ITP. The storm damage will impair the ability of IBWC to fully operate the ITP and return to compliance with the NPDES Permit secondary effluent standards and will be subject to additional enforcement actions.



ITP Storm Related Damage Assessment (IBWC)



Photo of flooded influent bar racks and influent pumps 8-20-21 (IBWC)



Photo of flooded influent bar racks and influent pumps 8-20-21 (IBWC)

The Hollister Ave. Pump station was also severely damaged by the storm with all four pumps disabled due to excessive sedimentation and debris that clogged or damage critical components. Due to failed sump pumps at the Hollister Pump Station, flow from Goats Canyon and Smugglers Gulch Canyon Collectors backed up at the pump station, overflowed the pump sumps, and spilled onto Hollister Road. The spill occurred over a 25-minute period on August 28, 2023, the spill volume is estimated at approximately 20,000 gallons. IBWC reported that as much of the spill as possible was recovered by Veolia and City of San Diego Vactor trucks and discharged at the ITP.

The Goat Canyon and Smuggler's Gulch Canyon Collectors are out of service due to pump failures at the Hollister Pump Station. Both Canyon Collectors are passing flows downstream. On August 28, 2023, the flow rate in Smugglers Gulch was estimated at approximately 67,000 gallons per day and approximately 13 million gallons per day in Goat Canyon. IBWC has been

coordinating with state and federal agencies in Mexico and requested they immediately investigate the sources of these flows and eliminate or reduce them as soon as possible.



Smuggler's Gulch and Goat Canyon Collectors (8-27-2023, IBWC)



IBWC/Veolia staff and Vactor truck 8-28-23 spill response (IBWC)

The staff and I were in regular contact with IBWC before, during, and after the storm. We met with Commissioner Giner and staff on August 31, 2023, for an update on storm damage and repair plans. IBWC has identified \$8 million of storm repairs that are being fast tracked with existing internal resources to restore operational capacity at the ITP. IBWC has also identified \$32 million of additional capacity and operations reliability improvements that will be undertaken; these additional improvements are emergency enhancement that will be compatible with the proposed expansion of the ITP and can be completed with the 2020 Congressional allocation and in advance of the full expansion construction schedule.

I asked the Commissioner to present the damage assessment and plans to return to full operations and compliance with the NPDES Permit and Cease and Desist Order R9-2021-0709 at your public Board Meeting this month. Agenda Item 8 was added to the San Diego Water Board Meeting Agenda Notice for September 13, 2023, for this report. Additional information will be provided in the October and November Executive Officers Report regarding the status of compliance and repairs and rehabilitation of the ITP.

Part B – Significant Regional Water Quality Issues

1. Effects of Colorado River Water Allocation Reductions on Regional Agriculture

Staff Contacts: Cailynn Smith and Abigail Pashina

San Diego Water Board staff prepared this report in response to Board Member Dr. Olson's request for information on the effects resulting from the Colorado River water allocation reductions on our regional agriculture.

San Diego Water Board staff reached out to Alexi Schnell, Colorado River Program Manager for the San Diego County Water Authority, to better understand the agricultural effects resulting from the Colorado River water allocation reductions. Staff learned that the San Diego County Water Authority is not anticipating any reductions in water allocations from the Colorado River under the current plan, which expires in 2026. The Colorado River's "Lower Division States," which includes California, Arizona, and Nevada, developed a new plan called the Lower Basin Plan.⁸ The Lower Basin Plan proposes that the Lower Division States will begin implementing voluntary conservation measures in 2026, instead of receiving Colorado River allocation reductions, as prescribed by the United States Bureau of Reclamation's *Near-Term Colorado River Operations Draft Supplemental Environmental Impact Statement*. The Bureau of Reclamation is reviewing the Lower Basin Plan and will decide in September whether to accept the plan.

⁸ A letter sent to the United States Bureau of Reclamation from the Lower Division States that includes the terms of the Lower Basin Plan is assessable at the following link:

<https://www.doi.gov/sites/doi.gov/files/lower-basin-plan-letter-5-22-2023.pdf>.

The San Diego County Water Authority's website reports that in 2022, only 13% of the total water supply portfolio came from the Colorado River.⁹ Should the Bureau of Reclamation decide to not accept the Lower Basin Plan, the San Diego County Water Authority anticipates the Colorado River water allocation reductions will likely not affect agricultural water rates. However, water rates may rise due to other economic factors, such as inflation and energy costs, and growers who receive the agriculture water rate may be impacted first.

2. May 10, 2023 Agricultural Workshop Summary

Staff Contacts: Cailynn Smith and Abigail Pashina

The San Diego Water Board held a public workshop during the regularly scheduled board meeting on May 10, 2023. San Diego Water Board staff intended the public workshop to be an opportunity for Board Members to hear from interested, concerned, and informed stakeholders regarding the Board members' questions expressed at the September 2022 Board meeting. Staff prepared an Executive Officer's report in December 2022¹⁰ that addressed the Board members' questions on (1) the potential correlation between algae growth and total phosphorus, and (2) nitrate concentrations in drinking water wells located on commercial agricultural operations. Board member questions and stakeholder responses heard during the public workshop are summarized below:

1) What actions are growers taking to test their groundwater wells for nitrates and other agricultural related pollutants of concern?

San Diego Region Irrigated Lands Group (SDRILG) - Tasha Ardalan. Tasha Ardalan stated that drinking water testing is part of the SDRILG's testing protocol. Tasha added that 73 drinking water wells are located on farms in the San Diego Region, and only five of those wells have concentrations of nitrate that are above the maximum contaminant level, which is 45 milligrams per liter. Tasha shared that most growers use some sort of water filtration, primarily reverse osmosis, prior to drinking water consumption. Tasha also shared that many growers test both their municipal water supply and groundwater from their private wells for various constituents including salts, total dissolved solids, *Escherichia coli* (*E. coli*), pH, and nitrates. Tasha said that many growers factor in how much nitrogen is present in their irrigation water when determining how much fertilizer to apply to their crops.

⁹ The San Diego County Water Authority's website, which includes a pie chart of San Diego's 2022 water supply, is assessable at the following link: <https://www.sdcwa.org/your-water/>.

¹⁰ An electronic copy of the December Executive Officer's Report is assessable at the following link:

https://www.waterboards.ca.gov/sandiego/publications_forms/publications/docs/executive_officer_reports/2022/eor_12_14_2022.pdf.

2) What actions are other organizations taking to notify communities about elevated nitrate concentrations detected in or near their private drinking water wells and the associated health concerns?

SDRILG – Tasha Ardan. Tasha Ardan shared the SDRILG notifies its' members of the nitrate concentrations measured in their respective groundwater wells as part of the SDRILG's annual monitoring requirements. SDRILG members receive the benefit of this testing and notification, while growers who are not members would have to join the group to receive this information.

SDRILG – Mary Matava. Mary Matava, a SDRILG and San Diego Farm Bureau board member, shared that the SDRILG sends out regular newsletters and could make it a priority to talk about the harm that nitrates pose in drinking water. Mary added that she is not sure if the SDRILG has the resources to conduct outreach to everyone in rural areas.

SDRILG – Andy Lyall. Andy Lyall, a SDRILG and San Diego Farm Bureau board member, commented that groundwater results can be different even within the same basin. Andy added that as a food producer, water testing for food safety is mandatory.

SDRILG – Valerie Mellano. Valerie Mellano, a consultant for the SDRILG, shared that the SDRILG would like to capture the farms that are not members of the SDRILG, but believes most of those farms do not have onsite drinking water wells. Valerie added that the SDRILG would need to first determine which growers have onsite drinking water wells before assuming everyone is at risk.

San Diego River Park Foundation President and CEO – Rob Hutzel. Rob Hutzel shared that the San Diego River Park Foundation (Foundation) owns close to 3,000 acres of land, most of which is adjacent to agricultural lands. Rob stated that the Foundation has never received notifications regarding elevated nitrate concentrations in the area of the Foundation property. Rob asked if he would receive a notification if the monitoring showed an exceedance.

State Water Resources Control Board, Division of Drinking Water (DDW) – Sean Sterchi. Sean Sterchi stated that DDW regulates public water systems and not private wells used for drinking water. Sean added that DDW notifies the customers of a public water system when the public water system has an exceedance of California drinking water standards. Sean stated that DDW does not have a formal mechanism in place to notify people whose homes are not connected to the public water system. DDW has a program called Safe and Affordable Funding for Equity Resilience (SAFER) that has done further water quality characterization and modeling.¹¹

¹¹ More information regarding the SAFER program can be found at the following link:

<https://www.waterboards.ca.gov/safer/>.

Mission Resource Conservation District (MRCD) – Darcy Cook. Darcy Cook shared that most agricultural operations that the MRCD works with use municipal water, but offered that the MRCD can prioritize notifying growers to have their drinking water wells tested.

San Diego County Department of Environmental Health and Quality – Heather Buonomo. Heather Buonomo sent an email following the Board meeting clarifying that San Diego County does not notify the surrounding community when water sampling results indicate levels of nitrate above drinking water standards.

3) What funding sources are made available to people whose private groundwater wells have been impacted?

SDRILG – Tasha Ardalan. Tasha Ardalan shared that the SDRILG has no additional funding to provide to people whose private groundwater wells are impacted.

SDRILG – Mike Mellano. Mike Mellano, a San Diego Farm Bureau board member, expressed that a challenge growers have is they do not qualify for funding because they are not located in rural areas. Mike added that the United States Census Bureau defines all of San Diego County as an urban area due to the size of the population.

DDW – Sean Sterchi. Sean Sterchi shared that funding is available, usually on medium or larger scale projects with multiple benefits. DDW has a project funded through the State Water Resources Control Board's Division of Financial Assistance that has identified fifty people with wells that have nitrate or bacteria issues in Ramona. DDW also has a project in the Cameron Corners area to consolidate a half dozen water systems. Private well owners that are located within the project area are welcome to join. Sean added that DDW has done a lot of outreach to try to bring private well owners into the project.

4) How many farms are located within the San Diego Region?

SDRILG – Andy Lyall. Andy Lyall stated that the SDRILG membership is about 1,300 farms. The SDRILG believes they cover a high percentage of irrigated acres in San Diego County, as it correlates with the number of growers estimated by the San Diego County Department of Agriculture/Weights & Measures (AWM). The estimated number of growers in San Diego County is 6,000 based on Internal Revenue Service (IRS) Form Schedule F filing data reported in the 2010 census. However, Andy said that not all growers who file Schedule F operate a commercially irrigated farm that requires enrollment in the Ag Orders. The SDRILG is confident that their membership accounts for more than fifty percent of the growers in San Diego County.

SDRILG – Mary Matava. Mary Matava added that the data from AWM showed that San Diego County had approximately 41,000 irrigated acres in 2017. Mary also explained that, historically, San Diego County has lost about 1,000 acres of irrigated lands a year. She anticipates that the new census will show that the number of irrigated acres in San Diego County will fall between 35,000 to 37,000. Mary said that the current SDRILG membership accounts for approximately 31,000 irrigated acres.

5) What are the costs and benefits to growers from enrolling as a member of a Third-Party monitoring group?

SDRILG – Enrico Ferro. Enrico Ferro, a SDRILG and San Diego Farm Bureau board member, stated that growers who are members of the SDRILG pay between \$300-\$1,500 to join. The San Diego Water Board has a \$50 enrollment fee to enroll in the Ag Orders. The enrollment fee increases to \$200 if the grower receives a directive letter from the San Diego Water Board. The SDRILG has an annual fee of close to \$9/acre which includes the San Diego Water Board's annual fee of \$1.35/acre. Growers must also pay the annual San Diego Farm Bureau fee of \$330. Enrico added that the benefits to enrolling through the third-party group is that the third-party group conducts the required monitoring and submits the required reporting documents on the grower's behalf. The third-party group also informs growers of best management practices they can use and problems in the area. The third-party group also informs growers of any new regulations that may apply to them. Enrico said the SDRILG receives complaints from growers regarding the costs but explained the cost per individual grower will decrease as more growers join the SDRILG.

SDRILG – Neil Nagata. Neil Nagata, a San Diego Farm Bureau board member, said that the monitoring cost is expensive, but added that he would not be able to afford the monitoring costs if he enrolled as an individual.

San Pasqual Valley Soils – Craig Kolodge. Craig Kolodge shared that everybody is part of the agricultural community. Public agencies and the urban population need to invest in farmers to ease the burden placed on growers.

Mikhail Ogawa Engineering – Jason DuMond. Jason DuMond shared that he has heard from small farmers who could not afford to enroll in the Ag Orders and were forced to shut down their operation. Jason requested that the San Diego Water Board find a way to make it more affordable for the small farmers to enroll.

6) What effect do growers not enrolled in the Ag Orders have on enrolled growers? Is there an equity concern?

SDRILG – Enrico Ferro. Enrico Ferro stated that growers not enrolling means that the cost for growers already enrolled will increase.

7) How are underrepresented communities impacted by potential water quality concerns from agricultural operations?

SDRILG – Tasha Ardan. Tasha Ardan reiterated that there is a small number of drinking water wells on agricultural operations within the San Diego area, and only a small number of those wells have reported water quality exceedances. Tasha added that other parts of the state, that rely solely on groundwater wells for drinking water, have bigger risks compared to the San Diego area.

Grubb & Nadler Nurseries in Fallbrook – Gregg Opgenorth. Gregg Opgenorth, in response to Board Chair Cantú's comment, "Who represents the fish?", said California Trout is constructing a new bridge over the Santa Margarita River on Sandia Creek

Drive to replace the existing Arizona crossing and to reestablish steelhead trout in the Santa Margarita River. Gregg asked if the water quality in the river is suitable to allow this to happen.

8) How is the increased cost of fuel, water, and other supplies affecting the local agricultural community?

San Diego Farm Bureau President – Dana Groot. Dana Groot shared that the costs in fuel, water, and supplies have increased 2-3 times the rate of inflation since the COVID-19 pandemic. The consequence is profit margins become squeezed. Dana added that additional regulatory burdens affect those margins and the sustainability of farming as a resource to the nation. Dana shared that food security is a big consideration in San Diego County.

SDRILG – Derek Davis. Derek Davis, a SDRILG board member, stated that we must preserve agriculture by not regulating it out of business. Derek added that San Diego Water Board must streamline regulations for farmers and set practical benchmarks. The United States is increasing costs on growers and letting in foreign imports. Growers have an economic incentive to test their irrigation water so that they know what is in the water to best irrigate their crops.

Grower, Valley Center – Alicia. Alicia stated that growers have a hard time keeping up with new and existing regulations. Costs of fertilizer, water, and supplies keep increasing. Alicia encouraged regulators to use common sense, science, and existing practices and technology to help everyone understand that farmers are doing the best they can and do not need more financial burdens.

9) Other comments

SDRILG – Valerie Mellano. Valerie Mellano delivered a presentation to the Board summarizing the results of a grower survey conducted by the SDRILG. The SDRILG received over 200 responses from growers located in San Diego, Orange, and Riverside County. The responses identified that many growers practice farming techniques that are different compared to the Central Valley; and therefore, growers have expressed concern regarding the Eastern San Joaquin precedential requirements adopted by the State Water Board. Valeria also shared that some growers have expressed confusion between County, City, and State regulations. Valerie also shared that 99% of the growers who responded in the survey indicated that they take steps to minimize erosion from their property. Many growers said that they experienced difficulties this past rainy season due to the large amount of rain. Valerie recommended that regulatory agencies consolidate their water quality inspections, focus on education and outreach, and participate in coordinated site visits meant to train inspectors who are not familiar with growing practices in the San Diego region.

SDRILG – Mary Matava. Mary Matava said in her experience working with farmers, most of them are frugal and many farmers work second jobs. Mary posed a question asking if California will have a food security issue if farming ceases due to the regulatory burdens. Mary said new growers have a difficult time getting involved in the business

due to conflicting regulations and the cost of business. Mary said that the San Diego Farm Bureau helps new growers try to understand regulations. She said that San Diegans need to preserve farmland and food production for our generation and future generations.

San Diego River Park Foundation – Rob Hutsel. Rob Hutsel commented that the only way to know the water quality effects from small farming operations is to have sufficient water quality data.

Grower, Fallbrook - Jennifer. Jennifer, who owns a small avocado farm, said they are facing competition with imported avocados from other countries. Many farmers cannot afford to pay any extra fees. Jennifer stated that perhaps the County of San Diego could help with the extra costs that regulations force growers to pay.

Mikhail Ogawa Engineering – Jason DuMond. Jason DuMond recommended that the San Diego Water Board combine the bioassessment and surface water monitoring in the Ag Orders to reduce costs; or allow the third-party groups to work with other agencies to conduct the monitoring. Jason stated that, in regard to the Eastern San Joaquin requirements, the Ag Orders should only require nitrogen removed data if the removal data is scientifically researched. The nitrogen removal data does not exist for specialty crops.

Grubb & Nadler Nurseries in Fallbrook – Gregg Opgenorth. Gregg Opgenorth attended the meeting by Zoom but audio difficulties prevented him from sharing his comments. Gregg provided comments by email following the meeting. Gregg said that new regulations should be applied equitably to all stakeholders. Gregg requests that regulations should have a required periodic evaluation of the results with a forum to discuss other possible solutions that should be explored to achieve the desired result. Gregg said that the results shown by the water quality monitoring of Rainbow Creek due to the total maximum daily load (TMDL) for total nitrogen and total phosphorus indicate that the Rainbow Creek TMDL is not a viable enforcement strategy to achieve water quality that is acceptable to sustain a viable ecosystem. He asked if it is time to find other solutions that will not drive farmers and nurseries out of business. He said that farmers cannot afford to use one more ounce of fertilizer or pesticides than they need.

3. San Diego Water Board Regional Recycled Water Use in 2022

Staff Contact: Brandon Bushnell

Recycled wastewater is an important water resource for the region, which is highlighted in the Sustainable Local Water Supply chapter of the San Diego Water Board's Practical Vision.¹² The State Water Resources Control Board (State Water Board) adopted the *Policy for Water Quality Control for Recycled Water* (Recycled Water Policy)¹³ in 2009, with amendments in 2013 and 2019, to streamline permitting for recycled water projects.

The 2019 Recycled Water Policy amendment established statewide goals to increase recycled water use from 714,000 acre-feet per year (afy)¹⁴ in 2015 to 1.5 million afy by 2020, and to 2.5 million afy by 2030. To track these goals, the State Water Board's Executive Director issued an investigative order to wastewater treatment plants discharging more than 20,000 gallons per day. The Investigative Order required wastewater treatment plants to collect data monthly, and report annually, the volumes of wastewater received, treated, and discharged for beneficial reuse (e.g., recycled water), and the volumes of wastewater treated and discharged without beneficial reuse. This volumetric data collection and reporting will help the State Water Board identify additional opportunities for recycled water production and reuse. The statewide data for 2022 shows that wastewater treatment plants produced 762,003 acre-feet of recycled water, which is 30,417 acre-feet more than last year's total recycled water production.

However, the volume of recycled water produced in 2022 is less than the goal of 1.5 million acre-feet, specified in the Recycled Water Policy. Additional information about the State Water Board's Volumetric Annual Report dashboard is available online at:

https://www.waterboards.ca.gov/water_issues/programs/recycled_water/volumetric_annual_reporting.html

¹² The Practical Vision can be found at the following webpage:

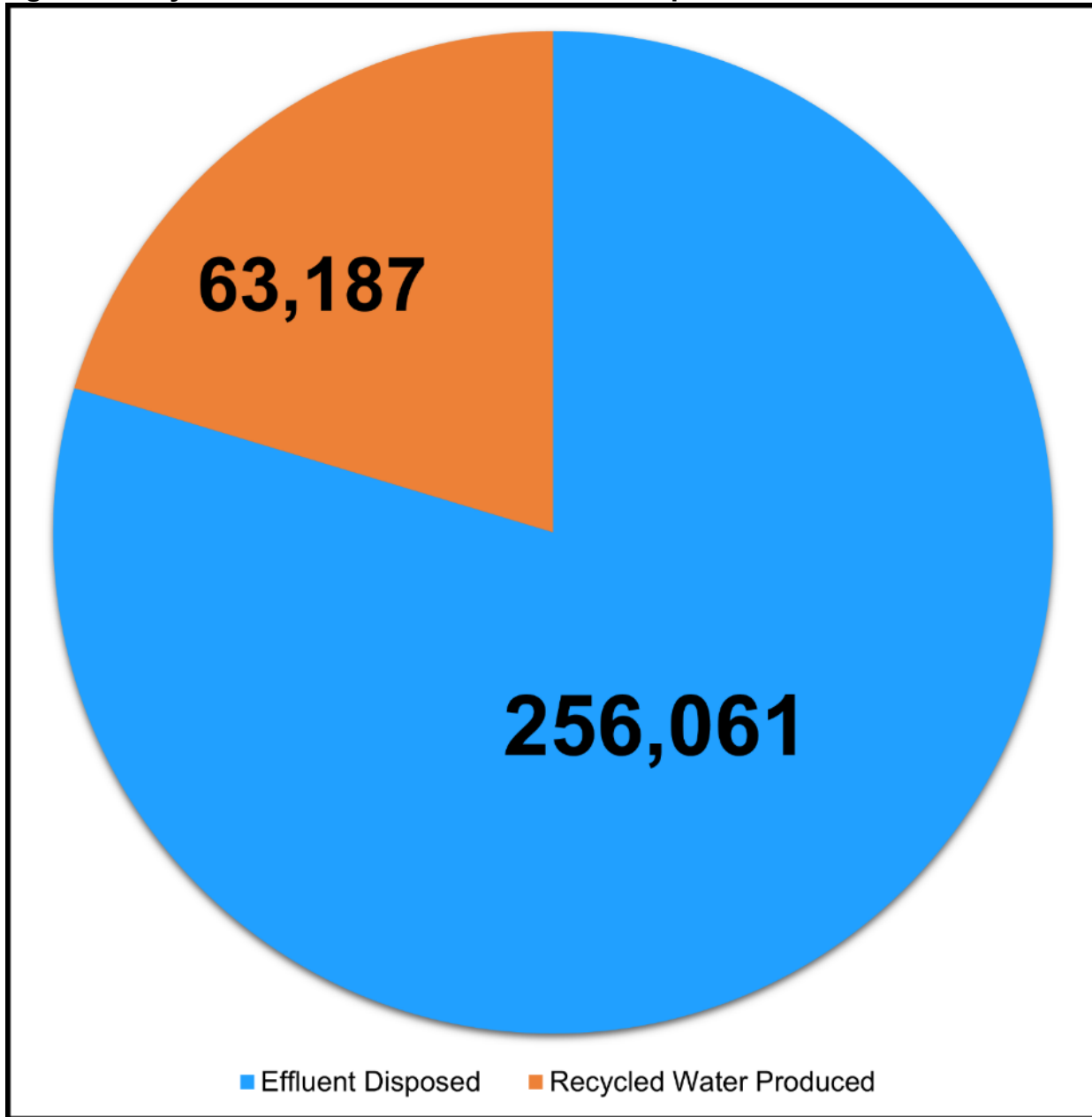
https://www.waterboards.ca.gov/sandiego/water_issues/programs/practical_vision/

¹³ The Recycled Water Policy can be found at the following webpage:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2018/121118_7_final_amendment_oal.pdf

¹⁴ 1 acre-foot equals 325,851 gallons.

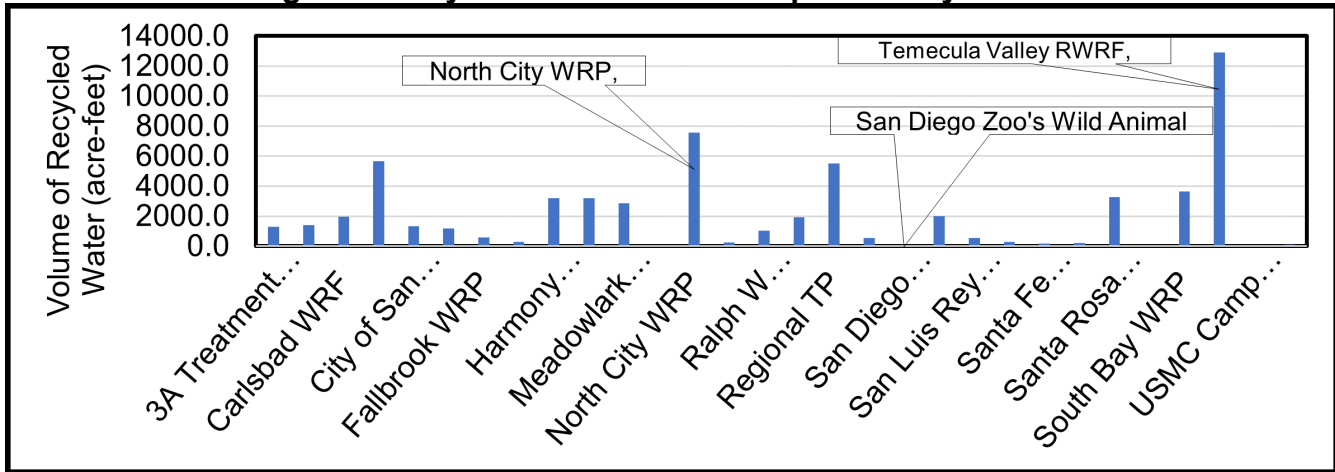
Figure 1 Recycled Water Produced vs Effluent Disposed in 2022 in acre-feet.



Wastewater treatment plants within the San Diego Water Board's jurisdiction reused approximately 19 percent of the wastewater collected in 2022. From a total of 328,356 acre-feet of influent wastewater collected, 63,187 acre-feet of recycled water was produced, and 256,061 acre-feet was treated and disposed without beneficial reuse as shown in Figure 1 below.

Figure 2 below shows the volume of recycled water produced by each wastewater treatment plant within the San Diego Water Board's jurisdiction during the 2022 calendar year.

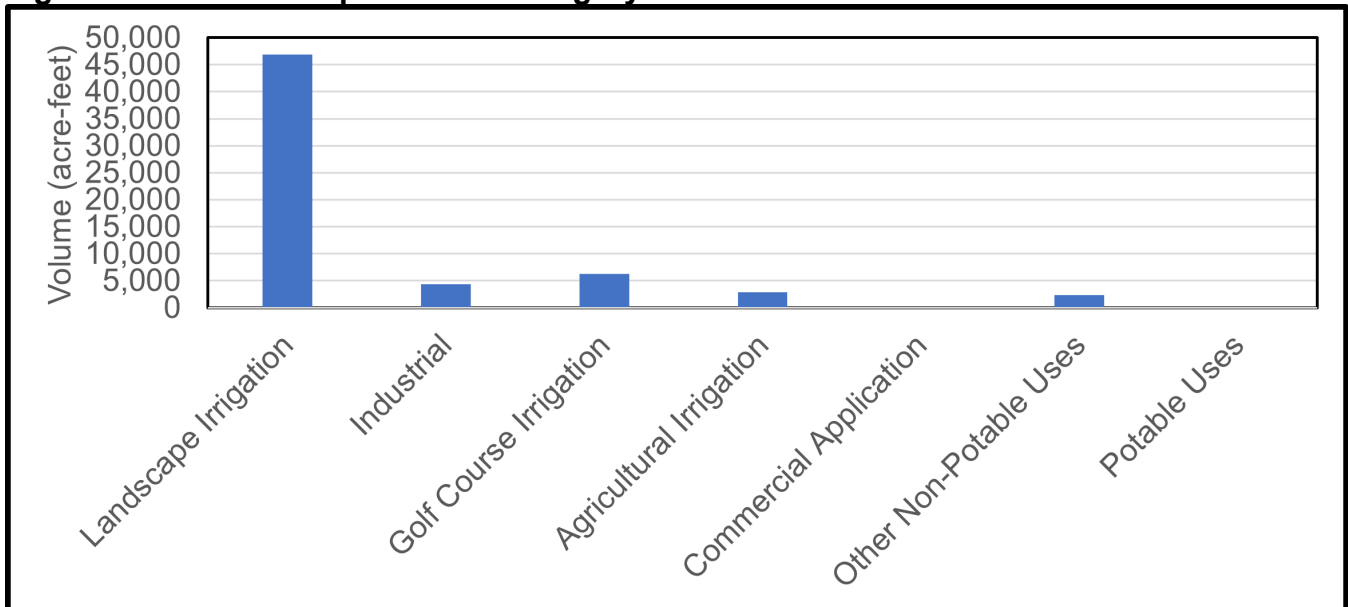
Figure 2 Recycled Water Produced per Facility in 2022¹⁵



The Temecula Valley RWRf is the biggest producer of recycled water within the region. However, most of the recycled water produced at the Temecula Valley RWRf is reused in the California Regional Water Quality Control Board, Santa Ana Region for landscape irrigation. The City of San Diego's North City and South Bay WRPs are the biggest producers of recycled water that is reused within the San Diego Water Board region.

Figure 3 below shows the volume of recycled water by uses from all the facilities in the region.

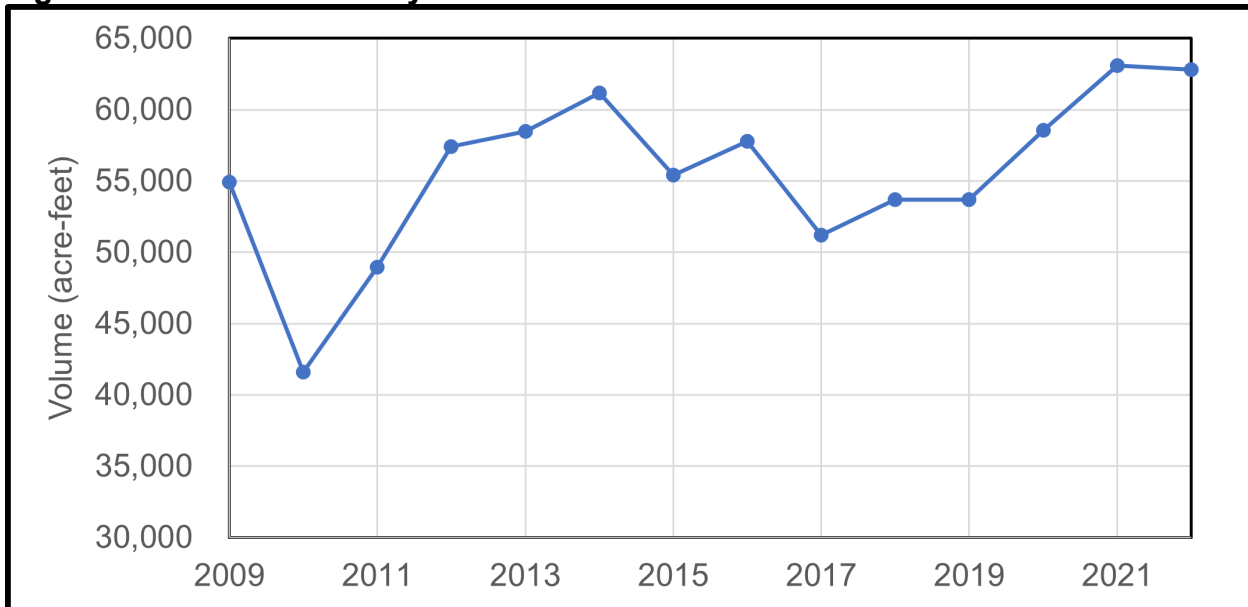
Figure 3 Total Volume per Reuse Category 2022



¹⁵ Acronym Definitions: NRTTP/SRTTP – Northern/Southern Regional Tertiary Treatment Plant, WRP – Water Reclamation/Recycling Plant, WRF - Water Reclamation/Recycling Facility, RWRf – Regional Water Reclamation Facility, HARRF – Hale Avenue Resources Recovery Facility, TP – Treatment Plant, and WTP or WWTP – Wastewater Treatment Plant

Most of the recycled water produced in the region is used for landscape irrigation at areas such as freeway medians or common areas of housing developments. The use of non-potable recycled water is limited by customer’s demand for recycled water. One indirect potable reuse project has begun producing a limited amount of advanced treated recycled water. Figure 4 below shows the volume of recycled water reused over the last 15 years in the region:

Figure 4 Volume Reused by Year



As shown in the figure above, recycled water production over the past decade is relatively stable. However, recycled water production is expected to increase due to many agencies developing recycled water projects for indirect potable reuse. Within the San Diego Water Board’s jurisdiction several indirect potable reuse projects are currently operational, in development, or construction. These projects include but are not limited to:

- The City of Oceanside’s Pure Water Oceanside project will produce up to 4.5 million gallons per day or 3,920 afy of advanced treated recycled water for indirect potable reuse. The City of Oceanside completed the Pure Water Oceanside project in late December 2021. However, the City of Oceanside was only able to produce advanced treated recycled water for 22 days in 2022, due to start up issues. The City of Oceanside anticipates the production of advanced treated recycled water will increase in 2023.
- The City of San Diego continues construction of the North City Pure Water Treatment Plant, which is designed to produce up to 33,604 afy of advanced treated recycled water for indirect potable reuse. San Diego Water Board staff anticipate the City of San Diego will start producing advanced treated recycled water from the North City Pure Water Treatment Plant in 2025.
- The Padre Dam Municipal Water District, City of El Cajon, County of San Diego, and Helix Water District are developing plans for the East County Advanced Water Purification Program to produce 12,881 afy of recycled water for indirect potable reuse. San Diego Water Board staff anticipate the East County Advanced Water Purification Program Plant will start producing advanced treated recycled water in 2025.

In addition to the indirect potable reuse projects, the State Water Resources Control Board's Division of Drinking Water released draft regulations¹⁶ for the direct potable reuse of advanced treated recycled water. Recycled water producers and purveyors will be studying these draft regulations to determine if direct potable reuse projects are feasible for their agencies.

Staff plan to continue activities in the upcoming year to support recycled water reuse: 1) prioritize applications for new recycled water projects and the expansion of existing recycled water projects; 2) engage with recycled water producers and purveyors to assist with identifying and applying for available grants and funds managed by the State Water Board; 3) redesign and maintain the San Diego Water Board's website for recycled water to promote effective communication with recycled water project proponents; and 4) evaluate and comment on salt and nutrient management plans submitted for the San Diego Water Board's consideration. Staff will also continue to provide annual Board updates.

4. Update on the Basin Plan Amendment for Biological Objectives

Staff Contact: Chad Loflen

The San Diego Water Board adopted [Resolution R9-2020-0234](#) at its December 2020 public meeting to amend the Water Quality Control Plan for the San Diego Region (Basin Plan) to include biological water quality objectives for freshwater streams with some exemptions ("biological objectives amendment"). When in place, the amendment would establish a numerical objective for freshwater aquatic life uses in streams based on the [California Stream Condition Index](#). The biological objectives amendment is still pending consideration by the State Water Board as the next step in the Basin Plan amendment process.

One statutory purpose of the Basin Plan is to establish water quality objectives for the designated beneficial uses of surface and ground water bodies. All Basin Plan amendments are subject to a full public participation and hearing process prior to adoption by the San Diego Water Board. Amendments that establish or modify water quality objectives are also subject to formal rulemaking procedures and therefore must be approved by the State Water Board and Office of Administrative Law (OAL). To be applicable to federal waters, the biological objectives must also be accepted by the US Environmental Protection Agency (USEPA).

Status of the Biological Objectives Amendment

State Water Board staff are currently preparing responses to public comments they received on the San Diego Water Board's adopted Basin Plan amendment. To prepare for the State Water Board's consideration of the biological objectives amendment, San Diego Water Board staff assembled the administrative record, hearing transcripts and recordings, and updated the Regional Board website with final adopted documents. Staff have also helped with the State Water Board's public comment and response process.

¹⁶ The Draft Regulations can be found at the following webpage:
https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/direct_potable_reuse.html

Under California's Code of Regulations (CCR 23 §3779) the State Water Board is required to allow for the public to submit comments on its consideration of the biological amendment. The State Water Board released a [Public Notice](#) of the opportunity to comment on July 19, 2021, with comments initially due on August 23, 2021. The State Water Board later extended that deadline to September 22, 2021. The State Water Board received timely written comment letters from ten entities and individuals that included state and local agencies, non-governmental organizations, and a member of the public.

The review and response to comments has faced challenges competing for State Water Board technical and legal resources against its many priorities. Therefore, a timeline for scheduling the consideration of approval at a State Water Board meeting is not available. After the State Water Board staff finalize a response to comments document, we expect the item to be scheduled for consideration of approval at a State Water Board public meeting. San Diego Water Board staff will deliver a presentation at that meeting and may be asked to help prepare additional supporting agenda documents.

Staff Efforts to Support use of Biological Objectives

Concurrent with the State Water Board's process, San Diego Water Board staff have continued to use bioassessment and take steps to support the eventual use of biological objectives. These include continued assessment of stream reference sites, supporting causal assessment studies, placing bioassessment monitoring requirements and/or performance objectives in permits, teaching stream bioassessment courses for Water Board and external parties (e.g. other agencies, no-governmental organizations), assessing bioassessment data for the Clean Water Act sections 305(b) and 303(d) Integrated Report, and supporting the development of new indices of biotic integrity for types of water bodies not covered by Resolution R9-2020-0234.

Reference Site Monitoring

Staff continue to conduct bioassessment sampling of State of California stream reference sites under California's Reference Condition Management Program (RCMP). This effort supports long-term biological objective implementation through assessment of changes to biotic communities from climate change. The San Diego Water Board also funds support of the RCMP using regional SWAMP allocations.

Causal Assessment Monitoring

Staff have participated in and supported causal assessment work for bioassessment sites as part of the Stormwater Monitoring Coalition's (SMC) regional bioassessment program. Staff participated in the SMC's causal assessment workgroup, conducted sampling, and provided supplemental analysis funding to assist in causal assessment work for a number of streams in the San Diego Region.

Bioassessment in Permits

The San Diego Water Board continues to require biological monitoring and assessment as a core requirement in applicable permits, such as the Regional Phase I NPDES Municipal Stormwater permit, the Padre Dam NPDES permit, and select Clean Water Act Section 401 Water Quality Certifications.

Teaching Bioassessment

The California Water Boards Training Academy has developed a Bioassessment for Managers in-person training class which provides an overview of stream bioassessment as well as a field observation portion to show sampling methods. The course was developed by the State of California Bioassessment Workgroup, including Water Board staff, California Department of Fish and Wildlife, California State University at Chico, and Southern California Coastal Water Research Group. Staff (Chad Loflen) co-taught the two classes held to date in Chico and Costa Mesa.

Clean Water Act Sections 305(b) and 303(d) Integrated Report (Integrated Report)

Staff assessed stream bioassessment data using the California Stream Condition Index (CSCI) as an on-cycle region for the 2020-2022 Integrated Report. Consistent with the State of California's [Listing Policy](#) the threshold used for impairment determination for the CSCI is 0.79, which is the same as that proposed for the Biological Objectives amendment. Staff used CSCI scores to identify high quality waters (e.g. CSCI > 0.79 and no other known impairments) and impaired waters (CSCI < 0.79 with a known aquatic life pollutant impairment).

Support for the Potential Development of New Biological Criteria

While the San Diego Water Board adopted a biological objective for streams based on the CSCI, it also found the use of biological integrity assessments to be a critical need for all waters in the region with aquatic life uses (R9-2020-0234). Therefore, staff have been working to develop new and/or improve existing biological indices for different water body types throughout the region, primarily through use of regional SWAMP funding, including:

- Development of molecular-based indices of biotic integrity based on perennial and intermittent stream algae
- Development of biological indices for ephemeral and intermittent streams during their dry phase
- Development of bioassessment methods for eelgrass beds
- Evaluation of molecular methods for detection of sensitive aquatic organisms (e.g. southern California steelhead)

Staff will continue to provide biological objective updates to the Board annually and to highlight significant events.

Figure 5 San Diego Water Board and State Water Board SWAMP staff sampling Agua Caliente Creek, a long-term reference site under the State's Reference Condition Management Program.



5. Sanitary Sewer Overflows in the San Diego Region – June 2023 (Attachment B-5)

Staff Contact: Fisayo Osibodu

Sanitary sewer systems experience periodic failures resulting in sanitary sewer overflow (SSO) discharges that may affect waters of the United States and/or the State of California (State). There are many factors (including factors related to geology, design, construction methods and materials, age of the system, population growth, and system operation and maintenance), that can influence the likelihood of an SSO and the volume of the discharge. Major causes of SSOs include: grease blockages, root blockages, sewer line flood damage, manhole structure failures, vandalism, pump station failures, power outages, excessive stormwater inflow or groundwater infiltration, debris blockages, failures due to aging sanitary sewer systems, lack of proper operation and maintenance, insufficient capacity, and contractor-caused damages. Many SSOs are preventable with adequate and appropriate facilities, source control measures, and proper operation and maintenance of the sanitary sewer system.

SSO discharges from public sewage collection systems and private laterals in the San Diego Region can contain high levels of suspended solids, pathogens, toxic pollutants, nutrients, and oil and grease. SSO discharges can pollute surface and ground waters, thereby threatening public health, adversely affecting aquatic life, and impairing the recreational use and aesthetic enjoyment of surface waters. Typical impacts of SSO discharges include closure of beaches and other recreational areas, inundation of property, and pollution of rivers, estuaries, and beaches.

State agencies, municipalities, counties, districts, and other entities (collectively referred to as public entities) that own or operate sewage collection systems report SSO spills through an on-line database system, the *California Integrated Water Quality System* (CIWQS). These SSOs are required to be reported under the [Statewide General SSO Order](#),¹⁷ the [San Diego Regional General SSO Order](#),¹⁸ and/or individual National Pollutant Discharge Elimination System (NPDES) permit requirements. Some federal entities¹⁹ report this information voluntarily. Most SSO reports are available to the public on a real-time basis at the [State Water Board Public SSO Report Database](#).

Details on the reported SSOs and private lateral sewage discharges (PLSDs) for June 2023 are provided in the following attached tables:

- Table 1: June 2023- Summary of Public and Federal Sanitary Sewer Overflow Events
- Table 2: June 2023 - Summary of Private Lateral Sewage Discharge Events
- Table 3: June 2023 - Summary of Sewage Discharges by Source

A summary view of information on sewage spill trends from June 2022 to June 2023 are provided in the following attached figures:

- Figure 1: Number of Spills per Month
- Figure 2: Volume of Public SSOs per Month
- Figure 3: Volume of Federal SSOs per Month

¹⁷ State Water Board Order WQ 2022-0103-DWQ , *Statewide General Waste Discharge Requirements General Order for Sanitary Sewer Systems*. State Water Board Order WQ 2022-0103-DWQ was adopted on December 9, 2022, and became effective on June 5, 2023. State Water Board Order WQ 2022-0103-DWQ supersedes Order 2006-0003-DWQ, the previous statewide waste discharge requirements for sanitary sewer systems.

¹⁸ San Diego Water Board Order No. R9-2007-0005, *Waste Discharge Requirements for Sewage Collection Agencies in the San Diego Region*.

¹⁹ Marine Corp Base Camp Pendleton reports sewage spills to CIWQS as required by its individual NPDES permit, Order No R9-2019-0167, NPDES Permit No. CA0109347, *Waste Discharge Requirements for the Marine Corps Base, Camp Pendleton, Southern Regional Tertiary Treatment Plant and Advanced Water Treatment Plant at Haybarn Canyon, Discharge to the Pacific Ocean through the Oceanside Ocean Outfall*. The United States Marine Corps Recruit Depot and the United States Navy voluntarily report sewage spills through CIWQS.

- Figure 4: Volume of PLSDs per Month

The Statewide General SSO Order which became effective on June 5, 2023, no longer requires agencies to submit electronic spill reports for public SSOs that are less than 50 gallons in volume that do not reach surface waters. Some agencies may still voluntarily report that information. As a result, tables 1 and 3, and figures 1 and 2 may not include information from public SSOs that are less than 50 gallons in volume that did not reach surface waters. Some agencies are still voluntarily submitting electronic spill reports for spills from private laterals less than 50 gallons in volume that do not reach surface waters.

From June 2022 to June 2023, 38 of the 64 collection systems in the San Diego Region reported one or more sewage spills. Twenty-six collection systems did not report any sewage spills. A total of 234 sewage spills were reported with about 10,281,434 gallons of sewage reaching surface waters.

Additional information about the San Diego Water Board sewage overflow regulatory program is available on the [San Diego Water Board's SSO Website](#).

6. Transboundary Flows from Mexico into the San Diego Region – June 2023 (Attachment B-6)

Staff Contact: Vicente Rodriguez

Water and wastewater in the Tijuana River and from canyons located along the international border ultimately drain from the City of Tijuana, Baja California, Mexico (Tijuana) into the United States. The water and wastewater flows are collectively referred to as transboundary flows. The United States Section of the International Boundary and Water Commission (USIBWC) has built canyon collectors that capture dry weather transboundary flows for treatment at the South Bay International Wastewater Treatment Plant (SBIWTP) located at the United States/Mexico border. Dry weather transboundary flows that are not captured by the canyon collectors for treatment at the SBIWTP, such as flows within the main channel of the Tijuana River,²⁰ are reported by the USIBWC pursuant to [Order No. R9-2021-0001](#), the National Pollutant Discharge Elimination System (NPDES) permit for the SBIWTP discharge. These uncaptured flows can enter waters of the United States and/or the State of California (State), potentially polluting the Tijuana River Valley and Estuary, and south San Diego beach coastal waters.

²⁰ Tijuana River transboundary flows typically consist of a mixture of groundwater, urban runoff, storm water, treated sewage wastewater, and untreated sewage wastewater from infrastructure deficiencies and other sources in Mexico.

According to the 1944 *Water Treaty for the Utilization of Waters of the Colorado and Tijuana Rivers and of the Rio Grande* and stipulations established in [IBWC Minute No. 283](#), the USIBWC and the Comisión Internacional de Límites y Aguas (CILA)²¹ share responsibility for addressing border sanitation problems, including transboundary flows. Efforts on both sides of the border have led to the construction and ongoing operation of several pump stations and treatment plants to reduce the frequency, volume, and pollutant levels of transboundary flows. This infrastructure includes but is not limited to the following:

- The SBIWTP, located just north of the United States/Mexico border, which provides secondary treatment for a portion of the sewage from Tijuana and transboundary flows conveyed from canyon collectors located in Smuggler's Gulch, Goat Canyon, Canyon del Sol, Stewart's Drain, and Silva Drain. The secondary-treated wastewater is discharged to the Pacific Ocean through the South Bay Ocean Outfall, in accordance with USIBWC's NPDES permit, Order No. R9-2021-0001.
- Several pump stations and wastewater treatment plants (WWTPs) in Tijuana, including the San Antonio de los Buenos WWTP, the La Morita WWTP and the Arturo Herrera WWTP.
- The River Diversion Structure and Pump Station CILA in Tijuana which diverts dry weather transboundary flows from the Tijuana River. The flows are diverted to a discharge point at the Pacific Ocean shoreline, approximately 5.6 miles south of the United States/Mexico border; or the flows can be diverted to SBIWTP or another wastewater treatment plant in Tijuana, depending on how Tijuana's public utility department (CESPT) directs the flow into the collection system. The River Diversion Structure is not designed to collect wet weather river flows and any river flows over 1,000 liters per second (35.3 cubic feet per second, 22.8 million gallons per day).

In June 2023, there were a total of 5 reported transboundary flows resulting in more than 123 million gallons of contaminated water flowing from Mexico into the United States.

Details on the transboundary flows reported in June are provided in the attached tables:

- Table 1: June 2023 - Summary of Transboundary Flows from Mexico by Event
- Table 2: June 2023 - Summary of Transboundary Flows from Mexico

A summary view of information on transboundary flow trends are provided in the following attached figures:

- Figure 1: Number of Transboundary Flows per Month
- Figure 2: Tijuana River Transboundary Flow Volume per Month
- Figure 3: Canyon Collector Transboundary Flow Volume per Month

These figures show the number and volume of transboundary flows per month from June 2022 through June 2023. During this period, there were a total of 18 reported transboundary flows

²¹ The Mexican section of the IBWC.

resulting in more than 39.26 billion gallons of contaminated water flowing from Mexico into the United States.

The 42-inch pipeline from the pump station PB1A in Tijuana, Mexico has been out of service since July 30, 2022, due to a piping rupture in Matadero Canyon. As a result, PB1 pumping capacity remains reduced and excess flows are being diverted to the SBIWTP. The excess flows include sand, trash, and debris that have overwhelmed all five primary sedimentation tanks (PSTs) and rendered them out of service pending cleaning and rehabilitation. The lack of solids removal in the primary treatment system has resulted in biological overloading of the secondary treatment system and solids washout within the effluent. Excess flows are expected to continue until pipeline PB1A repairs are completed in November 2023.

The 72-inch and 96-inch valves at Junction Box 1 (JB1) remain inoperable. A concept design has been completed, and final design and replacement construction work is under procurement. Construction completion is estimated to be sometime in 2024.

Part C – Statewide Issues of Importance to the San Diego Region

1. State Water Board Policy Notices

Staff Contact: Jeremy Haas

Notices of opportunity for public comment regarding potential State Water Resources Control Board actions are posted online at [Documents for Public Comment | California State Water Resources Control Board](#).

While Regional Water Board staff do not provide comments during the public comment period for potential State Water Board Policy or rule-making actions, staff generally have opportunities to participate in the development of proposed actions prior to the public comment period. In deciding to expend resources to participate when such opportunities arise, San Diego Water Board staff consider the stated priorities and interests of the Board, as expressed in the Practical Vision and annual Operational Plan, and the potential effects on priorities within programs.

The following is a list of recent policy notices of interest provided by the State Water Board:

- Direct Potable Reuse Regulations. As the Board heard at its August 2023 public meeting, the State Water Board is [accepting public comments](#) regarding the draft Direct Potable Reuse Regulations until September 8, 2023, and is holding a public hearing on September 7, 2023.
- Proposed Amendments to the Water Quality Enforcement Policy. The State Water Board postponed its August 15, 2023 consideration of this item to a later date. Written public comments were accepted until April 18, 2023. More information is available online at [Office of Enforcement - Proposed Amendments | California State Water Resources Control Board](#)

- Draft Seawater Desalination Siting and Streamlining Report to Expedite Permitting. The State Water Board accepted public comments through July 28, 2023 and held a public webinar on this topic on July 21, 2023. More information is available online at [Ocean Plan Requirements for Seawater Desalination Facilities | California State Water Resources Control Board](#)
- Making Conservation a Way of Life. The State Water Board began a rulemaking process for this item on August 18, 2023. Public comments will be accepted through October 17, 2023. State Water Board staff will host a public hearing on October 4, 2023. The hearing will include an overview of the proposed regulation, the regulatory timeline and process, and presentations from interested parties. In addition, anyone may present oral or written comments. More information is available online at the [rulemaking webpage](#).

Draft Water Quality Control Policy for Standardized Cost Reporting in Municipal Stormwater Permits. The State Water Board will hold a public workshop for this draft Policy at its September 7, 2023 meeting. Public comments will be accepted until October 3, 2023. More information is available online at [Standardizing Cost Reporting in Municipal Stormwater Permits | California State Water Resources Control Board](#).

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

Significant NPDES Permits,
WDRs, and Actions of the
San Diego Water Board

September 13, 2023
APPENDED TO EXECUTIVE OFFICER'S REPORT

**TENTATIVE SCHEDULE
SIGNIFICANT NPDES PERMITS, WDRs, AND ACTIONS
OF THE SAN DIEGO WATER BOARD**

**October 11, 2023
San Diego Water Board Meeting Room**

Action Agenda Item	Action Type	Written Comments Due
Rescission of Order Nos. 88-15, 88-75, and 95-86 Waste Discharge Requirements for Shamrock Sand and Rock Corporation Aguanga Plant, Escondido Ready-Mix Concrete, Inc. in the City of Escondido, and Superior Ready Mix Concrete, L.P. Fallbrook Plant (Tentative Order No. R9-2023-0130) <i>(Brandon Bushnell)</i>	Waste Discharge Requirement Rescission	TBD
A Sediment Investigation and Cleanup Strategy Update for San Diego Bay <i>(Sarah Mearon)</i>	Informational Item	N/A
United States Coast Guard Incident Management Activities in San Diego Bay <i>(Chiara Clemente)</i>	Informational Item	N/A
Waste Discharge Requirements for Genentech Inc., Industrial Wastewater Reuse for Irrigation, San Diego County (Tentative Order No. R9-2023-0014). <i>(Mahsa Izadmehr)</i>	Waste Discharge Requirements	28-Aug-23
Cease and Desist Order for Pine Hill Egg Ranch and Demler Brothers' Pullet Farm (Tentative Order No. R9-2023-0129). <i>(Christina Arias)</i>	Cease and Desist Order	28-Aug-23

**November 8, 2023
Rancho California Water District, Temecula**

Action Agenda Item	Action Type	Written Comments Due
Presentation for the City of San Diego on its Asset Management Program <i>(TBD)</i>	Informational Item	N/A

Action Agenda Item	Action Type	Written Comments Due
Cleanup and Abatement Order for Lake San Marcos and San Marcos Creek (Tentative Order No. R9-2023-0102). (<i>Lara Quetin</i>)	Cleanup and Abatement Order	TBD
Addendum No. 5 to Order No. 90-09 for Republic Services, Otay Annex Landfill (<i>Erin Schmitt</i>)	Waste Discharge Requirements Amendment	TBD

December 13, 2023
San Diego Water Board Meeting Room

Action Agenda Item	Action Type	Written Comments Due
Rescission of Order No. 95-15, Waste Discharge Requirements for Mrs. Sue Latimer and Mr. Jim Shafer of Sallows-Sun Island Club Near Harbison Canyon (Tentative Order No. R9-2023-0103) (<i>Mahsa Izadmehr</i>)	Rescission of Waste Discharge Requirements	TBD
Recission of Order No. 93-47, Waste Discharge Requirements for County of Orange, Joplin Youth Center, Orange County (Tentative Order No. R9-2023-0042 (<i>Mahsa Izadmehr</i>))	Rescission of Waste Discharge Requirements	TBD
Waste Discharge Requirements for the Prima Deshecha Landfill, Zone 1, San Juan Capistrano, County of Orange, Orange County (Tentative Order No. R9-2023-0001) (<i>Josh Hufferd</i>)	Waste Discharge Requirements	TBD
Resolution for South Orange County Wastewater Authority Salt and Nutrient Management Plan (Tentative Resolution No. R9-2023-XXXX) (<i>Brandon Bushnell</i>)	Tentative Resolution	TBD
Waste Discharge Requirements for the City of Escondido Membrane Filtration/Reverse Osmosis Facility, San Diego County (Tentative Order No. R9-2023-0131) (<i>Brandon Bushnell</i>)	Waste Discharge Requirements	TBD

Agenda Items Requested by Board Members**March 10, 2021**

Requested Agenda Item	Board Member	Status
Region-wide workshop regarding the water quality issues in the Tijuana River Valley, including a discussion of water quality objectives and steps needed to achieve them.	Abarbanel	Summer 2023

May 11, 2022

Requested Agenda Item	Board Member	Status
Lockheed Martin Tow Basin Cleanup Updates	Abarbanel, Olson	Ongoing
Environmental Justice outreach event	Warren	Winter 2023-24
Agricultural effects resulting from Colorado River water allocation reductions.	Olson	September 2023

November 9, 2022

Requested Agenda Item	Board Member	Status
Update on monitoring and debris removal associated with the NPDES permit for discharges from fireworks	Various	Fall 2023
Annual progress reports on implementation of the Strategic Water Quality Assessment Approach for San Diego Bay	Olson, Warren	September 2023

March 8, 2023

Requested Agenda Item	Board Member	Status
Update regarding the Southern California ROMS-BEC coastal water-quality model	Abarbanel	Fall 2023

May 10, 2023

Requested Agenda Item	Board Member	Status
Information regarding agricultural water quality best practices that are working in other regions and other topics raised during the agricultural workshop	Olson, Warren	Summer 2023

June 14, 2023

Requested Agenda Item	Board Member	Status
Update regarding determination process for transferring an onsite wastewater treatment system (OWTS) from WDRs to the General Order	Warren	Summer 2023
Update on the accuracy of various storm events, given the new weather patterns we are experiencing	Warren	October 2023
Update on the volume of sewage from spills that reached a surface water	Olson	October 2023
Regular updates from the City of San Diego regarding progress assessing and repairing the sewage collection systems identified during the ACL hearing	Olson, Warren	October 2023
A tour of the Harbor Island Living Shoreline Project	Warren	October 2023
Identify options for the Board to address the San Diego City Council about concerns regarding the City's sanitary sewer overflow issues and other sewer-related concerns	Olson	September 2023

August 9, 2023

Requested Agenda Item	Board Member	Status
Update on the status of the Lake Cuyamaca fish advisory signs	Warren	December 2023



San Diego Regional Water Quality Control Board

September 5, 2023

Dr. Maria-Elena Giner, P.E.
Commissioner
International Boundary and Water
Commission, United States Section
4191 N. Mesa
El Paso, Texas 79902
mariaelena.giner@ibwc.gov

Sent by Email Only

In reply refer to:
257821:VRodriguez

Subject: Notice of Violation No. R9-2023-0162 to the United States International Boundary and Water Commission for Violations of Order No. R9-2021-0001, NPDES No. CA0108928, *Waste Discharge Requirements for the United States Section of the International Boundary and Water Commission, South Bay International Wastewater Treatment Plant Discharge to the Pacific Ocean through the South Bay Ocean Outfall*

Dr. Maria-Elena Giner:

As detailed in the attached Notice of Violation (NOV) No. R9-2023-0162, the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) alleges that the United States International Boundary and Water Commission (USIBWC or Discharger) has violated Order No. R9-2021-0001, NPDES No. CA0108928, *Waste Discharge Requirements for the United States Section of the International Boundary and Water Commission, South Bay International Wastewater Treatment Plant Discharge to the Pacific Ocean through the South Bay Ocean Outfall* (Order).

The San Diego Water Board appreciates USIBWC's transparency and open communication regarding the state of the South Bay International Wastewater Treatment Plant (SBIWTP). The San Diego Water Board acknowledges the operational challenges presented in treating wastewater from a collection system in Mexico outside the USIBWC's direct control or authority and appreciates the efforts to coordinate operations and improvements with agencies in Mexico through Minute 320 and Minute 328. During our meeting with USIBWC staff on August 16, 2023, the pathway to return to compliance with the Order and Cease and Desist Order R9-2021-0709 (CDO) was described in detail.

Tropical Cyclone Hilary (Hilary) brought significant inflow and infiltration with excessive sedimentation and debris into the SBIWTP. Throughout the storm itself and in the day following, USIBWC staff kept the San Diego Water Board informed regarding operations and impacts. The damage to the SBIWTP is extensive and serious throughout the

Dr. Maria-Elena Giner
USIBWC

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treatment plant. The San Diego Water appreciates the detailed plans USIBWC shared on August 31, 2023, to make emergency repairs and restore operations.

Nonetheless, it is imperative that USIBWC take note of the secondary exceedances pre- and post-Hilary and overdue reports and continue to make every possible effort to restore the SBIWTP to operational status and compliance with the Order and CDO in the shortest possible time. It should be noted that at other, non-federal facilities, the 86 Chronic Violations and 125 Serious Violations reported would constitute 211 Minimum Mandatory Penalty Violations and would result in assessment of Administrative Civil Liabilities of \$633,000. Implementation of the plan shared on August 16, 2023, to restore compliance with the Order and CDO in the shortest possible time is a critical environmental responsibility.

Regarding the overdue submission of the Tijuana River Valley Monitoring Program Work Plan (Att. E, section 4.2.4 (pp.E-62,E-63), it has been indicated that this is planned as a binational project being developed as a Minute 320 project. In the interest of the most useful and informative monitoring and assessment of water quality in the Tijuana River watershed, please work with the Minute 320 Secretariats and Commissioner Resendez of the Comisión Internacional de Limites y Aguas (CILA, the Mexican Section of the IBWC) to expedite completion of the draft plan and a schedule for implementation to achieve compliance with the Order at the soonest date.

For questions or concerns regarding this NOV, please contact Vicente Rodriguez by phone at 619-521-3966 or by email at Vicente.Rodriguez@waterboards.ca.gov. In the subject line of any written response, please include the following: 257821:VRodriguez.

Respectfully,

David W. Gibson
Executive Officer

Attachment: Notice of Violation (NOV) No. R9-2023-0162

Copies to:

Laurie Walsh, San Diego Water Board, Laurie.Walsh@waterboards.ca.gov

Brandi Outwin-Beals, San Diego Water Board, Brandi.Outwin-Beals@waterboards.ca.gov

Morgan Rogers, Commissioner, International Boundary and Water Commission, U.S. Section, morgan.roger@ibwc.gov

Dr. Maria-Elena Giner
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Tech Staff Info & Use	
Technical Information	Number
Order No.	R9-2021-0001
NPDES No.	CA0108928
CW Place ID (South Bay International WTP)	CW-257821
CW Party/Organization ID (IBWC-US & Mexico Section)	21523
CW Party/Person ID (Dr. Maria-Elena Giner)	634777
CW Regulatory Measure (Order No. R9-2021-0001)	442331
CW Regulatory Measure (NOV R9-2023-0162)	453821
WDID	9 000000732

Dr. Maria-Elena Giner
USIBWC

September 5, 2023

Tech Staff Info & Use (continued)	
Violation IDs	1095194, 1095195, 1095939, 1095941, 1095942, 1095943, 1098935, 1098937, 1100628, 1103622, 1103623, 1103624, 1103625, 1103626, 1103628, 1103629, 1103630, 1103631, 1103632, 1103633, 1103634, 1103635, 1103636, 1103637, 1103638, 1103943, 1103944, 1103945, 1103947, 1103948, 1103949, 1103950, 1103951, 1103952, 1103953, 1103954, 1103955, 1103956, 1103957, 1103958, 1104355, 1104356, 1104357, 1104358, 1104359, 1104360, 1104361, 1104362, 1104363, 1104364, 1104365, 1104366, 1104368, 1104369, 1105851, 1105852, 1105853, 1105854, 1105855, 1105856, 1105857, 1105858, 1105860, 1105861, 1105862, 1105863, 1105864, 1105865, 1106693, 1108811, 1108812, 1108814, 1108815, 1108816, 1108817, 1108819, 1108820, 1108821, 1108822, 1109623, 1109624, 1109625, 1109626, 1109627, 1109628, 1109630, 1109631, 1109632, 1109633, 1110722, 1110723, 1110724, 1110725, 1110726, 1110727, 1110729, 1110731, 1110732, 1110733, 1110734, 1110735, 1110736, 1111588, 1111589, 1111590, 1111591, 1111592, 1111593, 1111595, 1111597, 1111598, 1111599, 1111600, 1111601, 1112867, 1112868, 1112869, 1112870, 1112871, 1112872, 1112873, 1112874, 1112875, 1112877, 1112878, 1112879, 1112881, 1112882, 1112883, 1113382, 1114378, 1114380, 1114381, 1114382, 1114383, 1114384, 1114385, 1114386, 1114387, 1114388, 1114390, 1114391, 1114392, 1114393, 1114394, 1114947, 1114948, 1114949, 1114950, 1114951, 1114953, 1114954, 1114955, 1114956, 1114957, 1114959, 1114960, 1114961, 1114962, 1114963, 1114964, 1115867, 1115868, 1115869, 1115870, 1115871, 1115872, 1115873, 1115874, 1115875, 1115876, 1115877, 1115879, 1115880, 1117391, 1117392, 1117393, 1117394, 1117395, 1117396, 1117397, 1117398, 1117399, 1117400, 1117401, 1117402, 1117403, 1118212, 1118213, 1118215, 1118216, 1118217, 1118218, 1118219, 1118220, 1118221, 1118222, 1118223, 1118224, 1118225, 1118890, 1118892, 1118893, 1118894, 1118895, 1118896, 1118897, 1118898, 1118899, 1118900, 1118901, 1118902, 1118903, 1118904

Notice of Violation No. R9-2023-0162**to the United States International Boundary and Water Commission for Violations of Order No. R9-2021-0001, NPDES No. CA0108928, *Waste Discharge Requirements for the United States Section of the International Boundary and Water Commission, South Bay International Wastewater Treatment Plant, Discharge to the Pacific Ocean through the South Bay Ocean Outfall***

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) hereby issues Notice of Violation (NOV) No. R9-2023-0162 to the United States International Boundary and Water Commission (USIBWC or Discharger) for violations of Order No. R9-2021-0001, NPDES No. CA0108928, *Waste Discharge Requirements for the United States Section of the International Boundary and Water Commission, South Bay International Wastewater Treatment Plant, Discharge to the Pacific Ocean through the South Bay Ocean Outfall* (Order). These violations are a result of the Discharger's failure to comply with the Order.

1. Background

The Discharger is required to maintain and operate the South Bay International Wastewater Treatment Plant (SBIWTP) in compliance with requirements contained in the Order. Consistent with the Order, the Discharger is required to submit self-monitoring reports and other technical reports. Between September 30, 2021, and June 30, 2023, the Discharger self-reported 208 violations, and the San Diego Water Board identified six missing or late reports. The Discharger reported that most of the violations were caused by the inflow of sewage from Tijuana, Mexico exceeding the design flow capacity of the SBIWTP.

2. Summary of Alleged Violations the Order

The Discharger is alleged to have violated the following sections of the Order:

2.1. Section 4 of the Order: The Discharger is required to maintain compliance with effluent limitations in section 4.1.1.1.

Observation: The Discharger self-reported 208¹ exceedances of the effluent limitations in the California Integrated Water Quality System (CIWQS) database.

2.2. Section 6.3.2.1 of the Order: The Discharger was required to submit an Updated Flow Prevention/Response Plan Section 6.3.2.1.2 by December 28, 2021.

Observation: This Discharger submitted the Updated Flow Prevention/Response Plan Section 6.3.2.1.2 on December 15, 2022.

2.3. Section 6.3.2.5.1 of the Order: The Discharger was required to submit an Asset Management Plan by December 28, 2021.

Observation: This Discharger submitted the Asset Management Plan on December 5, 2022.

2.4. Section 6.3.3.2.5 of the Order: The Discharger was required to submit a Pollutant Minimization Program Annual Status Report by February 1, 2022.

¹ Exhibit 1, List of Violations

Notice of Violation No. R9-2023-0162 -2-
USIBWC

September 5, 2023

Observation: This Discharger submitted the Pollutant Minimization Program Annual Status Report on December 15, 2022.

- 2.5. Section 6.3.3.2.5 of the Order:** The Discharger was required to submit a Pollutant Minimization Program Annual Status Report by February 1, 2023.

Observation: This Discharger submitted the Pollutant Minimization Program Annual Status Report on February 21, 2023.

- 2.6. Attachment D, Section 1.1 of the Order:** The Discharger is required to comply with all terms, requirements, and conditions of the Order. Any noncompliance constitutes a violation of the Clean Water Act (CWA) and the California Water Code (Water Code) and is grounds for enforcement action including permit termination, revocation and reissuance, or modification; denial of a permit renewal application; or a combination thereof.

Observation: The Discharger had 214 violations of the Order.

- 2.7. Attachment E, Section 4.2.4 of the Order:** The Discharger was required to submit a Tijuana River Valley Monitoring Plan (TRVMP) Work Plan by September 29, 2021.

Observation: This Discharger has not submitted the TRVMP Work Plan.

- 2.8. Attachment E, Section 3.3.6 of the Order:** The Discharger was required to submit an Initial Investigation TRE Work Plan by September 29, 2021.

Observation: This Discharger submitted the Initial Investigation TRE Work Plan on March 8, 2022.

3. Potential Enforcement Actions

The alleged violations may potentially subject the Discharger to additional enforcement by the San Diego Water Board or the State Water Resources Control Board (State Water Board). The San Diego Water Board intends and desires to continue to engage proactively and constructively with the Discharger through judicious and progressive enforcement efforts.

Notice of Violation R9-2023-0162**Exhibit 1, List of Violations**

No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
1	1095939	09/05/21 through 09/11/21	OEV	Settleable Solids concentration exceeded the weekly average effluent limitation of 1.5 milliliters per liter (ml/L) with a result of 1.8 ml/L.
2	1095943	9/8/2021	OEV	Settleable Solids concentration exceeded the instantaneous maximum effluent limitation of 3 ml/L with a result of 3.4 ml/L.
3	1095941	9/9/2021	OEV	Settleable Solids concentration exceeded the instantaneous maximum effluent limitation of 3 ml/L with a result of 4 ml/L.
4	1095942	9/10/2021	OEV	Settleable Solids concentration exceeded the instantaneous maximum effluent limitation of 3 ml/L with a result of 4 ml/L.
5	1095194	09/30/21 through ongoing	Late Report	Tijuana River Valley Work Plan (Doc ID:2523482), due 09/29/2021, has not been submitted.
6	1095195	09/30/21 through 03/08/22	Late Report	Initial Investigation TRE Work Plan (Doc ID:2523481), due 09/29/2021, was submitted on 3/8/2022.
7	1098935	12/29/21 through 12/15/22	Late Report	Updated Flow Prevention/Response Plan Section 6.3.2.1.2 (Doc ID:2528203), due 12/28/2021, was submitted on 12/15/2022.
8	1098937	12/29/21 through 12/05/22	Late Report	Asset Management Plan (Doc ID:2528204), due 12/28/2021, was submitted on 12/5/2022.
9	1103943	02/01/22 through 02/28/22	CAT1	Carbonaceous Biochemical Oxygen Demand 5-day @ 20°C (CBOD) concentration exceeded the monthly average effluent limitation of 25 milligram per liter (mg/L) with a result of 55 mg/L.

Notice of Violation R9-2023-0162**Exhibit 1, List of Violations**

No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
10	1103945	02/01/22 through 02/28/22	CAT1	Total Suspended Solids (TSS) percent removal did not meet the monthly average minimum requirement of 85% with a result of 63.59%.
11	1103951	02/01/22 through 02/28/22	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 100 mg/L.
12	1103952	02/01/22 through 02/28/22	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 pounds per day (lb/day) with a result of 14,151 lb/day.
13	1103954	02/01/22 through 02/28/22	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 26,591 lb/day.
14	1103955	02/01/22 through 02/28/22	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85 % with a result of 76.21 %
15	1103958	02/01/22 through 02/28/22	OEV	Settleable Solids concentration exceeded the monthly average effluent limitation of 1 ml/L with a result of 2.68 ml/L.
16	1100628	02/02/22 through 12/15/22	Late Report	Pollutant Minimization Program Annual Status Report (Doc ID:2528201), due 02/01/2022, was submitted on 12/15/2022.
17	1103948	02/13/22 through 02/19/22	OEV	Settleable Solids concentration exceeded the weekly average effluent limitation of 1.5 ml/L with a result of 5.8 ml/L.
18	1103956	2/16/2022	OEV	Settleable Solids concentration exceeded the instantaneous maximum effluent limitation of 3 ml/L with a result of 40 ml/L.
19	1103944	02/20/22 through 02/26/22	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 142.09 mg/L.

Notice of Violation R9-2023-0162**Exhibit 1, List of Violations**

No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
20	1103947	02/20/22 through 02/26/22	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 264 mg/L.
21	1103949	02/20/22 through 02/26/22	OEV	Turbidity concentration exceeded the weekly average effluent limitation of 100 Nephelometric Turbidity Units (NTU) with a result of 169.6 NTU.
22	1103950	02/20/22 through 02/26/22	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 79,454 lb/day.
23	1103953	02/20/22 through 02/26/22	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 41,591 lb/day.
24	1103957	2/23/2022	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 800 NTU.
25	1104360	02/27/22 through 03/05/22	OEV	Turbidity cloudiness exceeded the weekly average effluent limitation of 100 NTU with a result of 146.33 NTU.
26	1103622	03/01/22 through 03/31/22	OEV	Settleable Solids concentration exceeded the monthly average effluent limitation of 1 ml/L with a result of 1.78 ml/L.
27	1103624	03/01/22 through 03/31/22	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 57.1%.
28	1103629	03/01/22 through 03/31/22	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 143 mg/L.
29	1103631	03/01/22 through 03/31/22	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 33,887 lb/day.

Notice of Violation R9-2023-0162**Exhibit 1, List of Violations**

No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
30	1103636	03/01/22 through 03/31/22	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 48 mg/L.
31	1103637	03/01/22 through 03/31/22	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 82.06%.
32	1103638	03/01/22 through 03/31/22	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 11,102 lb/day.
33	1103625	03/06/22 through 03/12/22	OEV	Settleable Solids concentration exceeded the weekly average effluent limitation of 1.5 ml/L with a result of 1.94 ml/L.
34	1103630	03/13/22 through 03/19/22	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 40,701 lb/day.
35	1103632	03/13/22 through 03/19/22	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 194 mg/L.
36	1103634	03/13/22 through 03/19/22	OEV	Turbidity cloudiness exceeded the weekly average effluent limitation of 100 NTU with a result of 124.19 NTU.
37	1103623	03/27/22 through 04/02/22	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 13,722 lb/day.
38	1103633	03/27/22 through 04/02/22	OEV	Turbidity cloudiness exceeded the weekly average effluent limitation of 75 NTU with a result of 83.4 NTU.
39	1103635	03/27/22 through 04/02/22	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 65.29 mg/L.

Notice of Violation R9-2023-0162
Exhibit 1, List of Violations

No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
40	1104358	03/27/22 through 04/02/22	OEV	Settleable Solids concentration exceeded the weekly average effluent limitation of 1.5 ml/L with a result of 5.51 ml/L.
41	1103626	3/29/2022	OEV	Settleable Solids concentration exceeded the instantaneous maximum effluent limitation of 3 ml/L with a result of 38 ml/L.
42	1103628	3/29/2022	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 797 NTU.
43	1104355	04/01/22 through 04/30/22	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 62.39%.
44	1104356	04/01/22 through 04/30/22	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 128 mg/L.
45	1104357	04/01/22 through 04/30/22	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 77.91%.
46	1104359	04/01/22 through 04/30/22	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 25,897 lb/day.
47	1104364	04/01/22 through 04/30/22	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 61 mg/L.
48	1104366	04/01/22 through 04/30/22	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 12,351 lb/day.
49	1104363	4/16/2022	OEV	Settleable Solids concentration exceeded the instantaneous maximum effluent limitation of 3 ml/L with a result of 5 ml/L.

Notice of Violation R9-2023-0162**Exhibit 1, List of Violations**

No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
50	1104361	04/24/22 through 04/30/22	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 267 mg/L.
51	1104362	04/24/22 through 04/30/22	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 65,429 lb/day.
52	1104368	04/24/22 through 04/30/22	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 135.29 mg/L.
53	1104369	04/24/22 through 04/30/22	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 27,819 lb/day.
54	1104365	4/26/2022	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 227 NTU.
55	1105852	05/01/22 through 05/31/22	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 77 mg/L.
56	1105853	05/01/22 through 05/31/22	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 45 mg/L.
57	1105854	05/01/22 through 05/31/22	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 14,442 lb/day.
58	1105857	05/01/22 through 05/31/22	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 82.3%.
59	1105860	05/01/22 through 05/31/22	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 8,325 lb/day.

Notice of Violation R9-2023-0162
Exhibit 1, List of Violations

No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
60	1105862	05/01/22 through 05/31/22	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 76.87%.
61	1105851	05/08/22 through 05/14/22	OEV	Settleable Solids concentration exceeded the weekly average effluent limitation of 1.5 ml/L with a result of 1.67 ml/L.
62	1105856	05/08/22 through 05/14/22	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 173 mg/L.
63	1105861	05/08/22 through 05/14/22	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 18,794 lb/day.
64	1105863	05/08/22 through 05/14/22	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 31,258 lb/day.
65	1105864	05/08/22 through 05/14/22	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 104 mg/L with a result of 40 mg/L.
66	1105865	05/08/22 through 05/14/22	OEV	Turbidity cloudiness exceeded the weekly average effluent limitation of 100 NTU with a result of 113.84 NTU.
67	1105855	5/10/2022	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 286 NTU.
68	1105858	5/10/2022	OEV	Settleable Solids concentration exceeded the instantaneous maximum effluent limitation of 3 ml/L with a result of 11 ml/L.
69	1106693	06/05/22 through 06/11/22	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 45.57 mg/L.

Notice of Violation R9-2023-0162**Exhibit 1, List of Violations**

No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
70	1108811	08/01/22 through 08/31/22	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 32 mg/L.
71	1108814	08/01/22 through 08/31/22	OEV	Flow volume rate exceeded the monthly average effluent limitation of 25 MGD with a result of 31.31 MGD.
72	1108815	08/01/22 through 08/31/22	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 15,890 lb/day.
73	1108820	08/01/22 through 08/31/22	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 8,327 lb/day.
74	1108821	08/01/22 through 08/31/22	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 78.78%.
75	1108822	08/01/22 through 08/31/22	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 62 mg/L.
76	1108812	08/21/22 through 08/27/22	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 49.4 mg/L.
77	1108819	08/21/22 through 08/27/22	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 12,175 lb/day.
78	1108816	08/28/22 through 09/03/22	CAT1	TSS concentration exceeded the monthly average effluent limitation of 45 mg/L with a result of 82 mg/L.
79	1108817	08/28/22 through 09/03/22	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 9,383 lb/day with a result of 20,267 lb/day.
80	1109623	09/01/22 through 09/30/22	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 84.37%.

Notice of Violation R9-2023-0162**Exhibit 1, List of Violations**

No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
81	1109624	09/01/22 through 09/30/22	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 39 mg/L.
82	1109627	09/01/22 through 09/30/22	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 72 mg/L.
83	1109628	09/01/22 through 09/30/22	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 19,365 lb/day.
84	1109631	09/01/22 through 09/30/22	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 76.7%.
85	1109633	09/01/22 through 09/30/22	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 10,372 lb/day.
86	1109625	09/25/22 through 10/01/22	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 54.46 mg/L.
87	1109626	09/25/22 through 10/01/22	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 15,122 lb/day.
88	1109630	09/25/22 through 10/01/22	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 27,487 lb/day.
89	1109632	09/25/22 through 10/01/22	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 99 mg/L.
90	1110722	10/01/22 through 10/31/22	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 46 mg/L.
91	1110724	10/01/22 through 10/31/22	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 12,355 lb/day.

Notice of Violation R9-2023-0162**Exhibit 1, List of Violations**

No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
92	1110725	10/01/22 through 10/31/22	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 70.5%.
93	1110727	10/01/22 through 10/31/22	OEV	Flow volume rate exceeded the monthly average effluent limitation of 25 MGD with a result of 32.17 MGD.
94	1110731	10/01/22 through 10/31/22	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 88 mg/L.
95	1110735	10/01/22 through 10/31/22	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 23,519 lb/day.
96	1110736	10/01/22 through 10/31/22	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 80.46%.
97	1110723	10/30/22 through 11/05/22	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 81.81 mg/L.
98	1110729	10/30/22 through 11/05/22	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 151 mg/L.
99	1110732	10/30/22 through 11/05/22	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 21,821 lb/day.
100	1110733	10/30/22 through 11/05/22	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 40,368 lb/day.
101	1110734	10/30/22 through 11/05/22	OEV	Turbidity cloudiness exceeded the weekly average effluent limitation of 100 NTU with a result of 104.51 NTU.
102	1111591	10/30/22 through 11/05/22	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 159 mg/L.

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No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
103	1111593	10/30/22 through 11/05/22	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 41,982 lb/day.
104	1111595	10/30/22 through 11/05/22	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 88.43 mg/L.
105	1110726	10/31/2022	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 389 NTU.
106	1111588	11/01/22 through 11/30/22	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 130 mg/L.
107	1111589	11/01/22 through 11/30/22	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 36,536 lb/day.
108	1111590	11/01/22 through 11/30/22	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 19,647 lb/day.
109	1111592	11/01/22 through 11/30/22	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 70 mg/L.
110	1111597	11/01/22 through 11/30/22	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 72.08%.
111	1111598	11/01/22 through 11/30/22	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 61.1%.
112	1111600	11/06/22 through 11/12/22	OEV	Settleable Solids concentration exceeded the weekly average effluent limitation of 1.5 ml/L with a result of 2.51 ml/L.
113	1111601	11/06/22 through 11/12/22	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 23,468 lb/day.

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No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
114	1111599	11/9/2022	OEV	Settleable Solids concentration exceeded the instantaneous maximum effluent limitation of 3 mg/L with a result of 17 mg/L.
115	1112868	12/01/22 through 12/31/22	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 67 mg/L.
116	1112869	12/01/22 through 12/31/22	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 17,511 lb/day.
117	1112871	12/01/22 through 12/31/22	OEV	Flow volume rate exceeded the monthly average effluent limitation of 25 MGD with a result of 28.64 MGD.
118	1112877	12/01/22 through 12/31/22	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 77.07%.
119	1112878	12/01/22 through 12/31/22	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 68.06%.
120	1112879	12/01/22 through 12/31/22	OEV	Settleable Solids concentration exceeded the monthly average effluent limitation of 1 ml/L with a result of 1.39 ml/L.
121	1112882	12/01/22 through 12/31/22	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 117 mg/L.
122	1112883	12/01/22 through 12/31/22	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 31,147 lb/day.
123	1112867	12/25/22 through 12/31/22	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 31,849 lb/day.
124	1112870	12/25/22 through 12/31/22	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 121.91 mg/L.

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No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
125	1112872	12/25/22 through 12/31/22	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 184 mg/L.
126	1112873	12/25/22 through 12/31/22	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 49,021 lb/day.
127	1112875	12/25/22 through 12/31/22	OEV	Settleable Solids concentration exceeded the weekly average effluent limitation of 1.5 ml/L with a result of 5.8 ml/L.
128	1112874	12/28/2022	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 283 NTU.
129	1112881	12/28/2022	OEV	Settleable Solids concentration exceeded the instantaneous maximum effluent limitation of 3 ml/L with a result of 40 ml/L.
130	1114378	01/01/23 through 01/31/23	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 37 mg/L.
131	1114380	01/01/23 through 01/31/23	OEV	Flow volume rate exceeded the monthly average effluent limitation of 25 MGD with a result of 27.46 MGD.
132	1114381	01/01/23 through 01/31/23	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 75 mg/L.
133	1114382	01/01/23 through 01/31/23	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 86.86%.
134	1114386	01/01/23 through 01/31/23	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 78.31%.
135	1114387	01/01/23 through 01/31/23	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 21,856 lb/day.

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No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
136	1114388	01/01/23 through 01/31/23	OEV	Settleable Solids concentration exceeded the monthly average effluent limitation of 1 ml/L with a result of 1.6 ml/L.
137	1114392	01/01/23 through 01/31/23	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 10,748 lb/day.
138	1114383	01/15/23 through 01/21/23	CAT1	TSS concentration exceeded the weekly average effluent limitation of 9,383 mg/L with a result of 39,877 mg/L.
139	1114384	01/15/23 through 01/21/23	OEV	Settleable Solids concentration exceeded the weekly average effluent limitation of 1.5 ml/L with a result of 1.51 ml/L.
140	1114391	01/15/23 through 01/21/23	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 54.61 mg/L.
141	1114385	01/29/23 through 02/04/23	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 19,840 lb/day.
142	1114393	01/29/23 through 02/04/23	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 112 mg/L.
143	1114951	01/29/23 through 02/04/23	OEV	Settleable Solids concentration exceeded the weekly average effluent limitation of 1.5 ml/L with a result of 3.74 ml/L.
144	1114390	1/31/2023	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 314 NTU.
145	1114394	1/31/2023	OEV	Settleable Solids concentration exceeded the instantaneous maximum effluent limitation of 3 ml/L with a result of 25 ml/L.
146	1114948	02/01/23 through 02/28/23	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 47.94%.

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No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
147	1114949	02/01/23 through 02/28/23	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 39,243 lb/day.
148	1114954	02/01/23 through 02/28/23	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 146 mg/L.
149	1114959	02/01/23 through 02/28/23	OEV	Flow volume rate exceeded the monthly average effluent limitation of 25 MGD with a result of 28.83 MGD.
150	1114960	02/01/23 through 02/28/23	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 84 mg/L.
151	1114961	02/01/23 through 02/28/23	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 22,471 lb/day.
152	1114963	02/01/23 through 02/28/23	OEV	Turbidity cloudiness exceeded the monthly average effluent limitation of 75 NTU with a result of 87.99 NTU.
153	1114964	02/01/23 through 02/28/23	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 63.25%.
154	1113382	02/02/23 through 02/21/23	Late Report	Pollutant Minimization Program Annual Status Report (Doc ID:2528232), due 02/01/2023, was submitted on 2/21/23.
155	1114947	02/12/23 through 02/18/23	OEV	Turbidity cloudiness exceeded the weekly average effluent limitation of 100 NTU with a result of 167.09 NTU.
156	1114950	02/12/23 through 02/18/23	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 242 mg/L.
157	1114953	02/12/23 through 02/18/23	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 123 mg/L.

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No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
158	1114955	02/12/23 through 02/18/23	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 35,298 lb/day.
159	1114962	02/12/23 through 02/18/23	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 70,259 lb/day.
160	1114957	2/13/2023	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 620 NTU.
161	1114956	2/23/2023	OEV	Settleable Solids concentration exceeded the instantaneous maximum 3 ml/L with a result of 5 ml/L.
162	1115870	02/26/23 through 03/04/23	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 20,801 lb/day.
163	1115871	02/26/23 through 03/04/23	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 84.54 mg/L.
164	1115867	03/01/23 through 03/31/23	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 63 mg/L.
165	1115868	03/01/23 through 03/31/23	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 14,957 lb/day.
166	1115872	03/01/23 through 03/31/23	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 145 mg/L.
167	1115873	03/01/23 through 03/31/23	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 34,885 lb/day.
168	1115877	03/01/23 through 03/31/23	OEV	Settleable Solids concentration exceeded the monthly average effluent limitation of 1 ml/L with a result of 1.82 ml/L.

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No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
169	1115879	03/01/23 through 03/31/23	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 44.17%.
170	1115869	03/05/23 through 03/11/23	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 174 mg/L.
171	1115876	03/05/23 through 03/11/23	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 47,873 lb/day.
172	1115880	3/11/2023	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 279 NTU.
173	1115874	03/12/23 through 03/18/23	OEV	Settleable Solids concentration exceeded the weekly average effluent limitation of 1.5 ml/L with a result of 5.8 ml/L.
174	1115875	3/15/2023	OEV	Settleable Solids concentration exceeded the instantaneous maximum effluent limitation of 3 ml/L with a result of 40 ml/L.
175	1117403	04/01/23 through 04/30/23	OEV	Turbidity cloudiness exceeded the monthly average effluent limitation of 75 NTU with a result of 93.35 NTU.
176	1117393	04/01/23 through 04/30/23	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 198 mg/L.
177	1117395	04/01/23 through 04/30/23	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 116 mg/L.
178	1117398	04/01/23 through 04/30/23	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 34.41%.
179	1117399	04/01/23 through 04/30/23	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 19.81%.

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No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
180	1117400	04/01/23 through 04/30/23	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 20,602 lb/day.
181	1117401	04/01/23 through 04/30/23	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 35,389 lb/day.
182	1117396	04/09/23 through 04/15/23	OEV	Turbidity cloudiness exceeded the weekly average effluent limitation of 100 NTU with a result of 115.43 NTU.
183	1117397	4/21/2023	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 236 NTU.
184	1117391	04/23/23 through 04/29/23	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 142.29 mg/L.
185	1117392	04/23/23 through 04/29/23	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 25,628 lb/day.
186	1117394	04/23/23 through 04/29/23	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 41,825 lb/day.
187	1117402	04/23/23 through 04/29/23	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 232 mg/L.
188	1118212	04/30/23 through 05/06/23	OEV	Turbidity cloudiness exceeded the weekly average effluent limitation of 100 NTU with a result of 125.86 NTU.
189	1118220	04/30/23 through 05/06/23	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 188 mg/L.
190	1118221	04/30/23 through 05/06/23	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 26,431 lb/day.

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No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
191	1118222	04/30/23 through 05/06/23	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 108.86 mg/L.
192	1118225	04/30/23 through 05/06/23	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 42,864 lb/day.
193	1118215	05/01/23 through 05/31/23	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 130 mg/L.
194	1118216	05/01/23 through 05/31/23	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 29,778 lb/day.
195	1118217	05/01/23 through 05/31/23	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 53.36%.
196	1118218	05/01/23 through 05/31/23	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 17,513 lb/day.
197	1118219	05/01/23 through 05/31/23	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 76 mg/L.
198	1118223	05/01/23 through 05/31/23	OEV	Flow volume rate exceeded the monthly average effluent limitation of 25 MGD with a result of 26.89 MGD.
199	1118224	05/01/23 through 05/31/23	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 63.17%.
200	1118213	5/1/2023	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 409 NTU.
201	1118892	06/01/23 through 06/30/23	OEV	Flow volume rate exceeded the monthly average effluent limitation of 25 MGD with a result of 29.43 MGD.

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No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
202	1118894	06/01/23 through 06/30/23	CAT1	TSS concentration exceeded the monthly average effluent limitation of 30 mg/L with a result of 161 mg/L.
203	1118895	06/01/23 through 06/30/23	CAT1	CBOD mass emission rate exceeded the monthly average effluent limitation of 5,213 lb/day with a result of 20,850 lb/day.
204	1118896	06/01/23 through 06/30/23	CAT1	TSS mass emission rate exceeded the monthly average effluent limitation of 6,255 lb/day with a result of 40,187 lb/day.
205	1118898	06/01/23 through 06/30/23	CAT1	CBOD percent removal did not meet the monthly average minimum requirement of 85% with a result of 65.07%.
206	1118901	06/01/23 through 06/30/23	CAT1	CBOD concentration exceeded the monthly average effluent limitation of 25 mg/L with a result of 83 mg/L.
207	1118903	06/01/23 through 06/30/23	CAT1	TSS percent removal did not meet the monthly average minimum requirement of 85% with a result of 44.71%.
208	1118904	06/01/23 through 06/30/23	OEV	Turbidity cloudiness exceeded the monthly average effluent limitation of 75 NTU with a result of 80.94 NTU.
209	1118893	06/11/23 through 06/17/23	CAT1	CBOD mass emission rate exceeded the weekly average effluent limitation of 8,340 lb/day with a result of 25,202 lb/day.
210	1118897	06/11/23 through 06/17/23	CAT1	TSS concentration exceeded the weekly average effluent limitation of 45 mg/L with a result of 199 mg/L.
211	1118899	06/11/23 through 06/17/23	CAT1	TSS mass emission rate exceeded the weekly average effluent limitation of 9,383 lb/day with a result of 49,968 lb/day.
212	1118900	06/11/23 through 06/17/23	OEV	Turbidity cloudiness exceeded the weekly average effluent limitation of 100 NTU with a result of 107.78 NTU.

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No.	Violation ID	Occurrence Date(s)	Violation Type	Violation Description
213	1118902	06/11/23 through 06/17/23	CAT1	CBOD concentration exceeded the weekly average effluent limitation of 40 mg/L with a result of 101.29 mg/L.
214	1118890	6/13/2023	OEV	Turbidity cloudiness exceeded the instantaneous maximum effluent limitation of 225 NTU with a result of 278 NTU.

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TERM	DEFINITION
CAT1	Category 1 violation type. This violation type is identified when the water quality effluent parameter is part of the Group I pollutant.
CAT2	Category 2 violation type. This violation type is identified when the water quality effluent parameter is part of the Group II pollutant.
CIWQS	California Integrated Water Quality System database.
GROUP	The list of pollutants is based on Appendix A to section 123.45 of title 40 of the Code of Federal Regulations.
Occurrence Date(s)	Date that a violation occurred. For continuing violations, such as a monthly average, the days of the reporting period are used. If the occurrence date is unknown, the date is entered as the day it was first discovered by staff, the discharger, or a third party. For deficient or late reports, the occurrence date is the day after the report was due.
OEV	Violation of any constituent-specific effluent limitation not included in Group I or Group II.
Violation Description	Narrative description of the violation.
Violation ID	Identification number assigned to a violation in CIWQS.

Table 1: June 2023 – Summary of Public and Federal Sanitary Sewer Overflow Events¹

Responsible Collection System Agency	Total Volume (Gallons) ²	Total Recovered (Gallons) ³	Total Reaching Surface Waters (Gallons) ⁴	Total Reaching Separate Storm Drain and Recovered (Gallons) ⁵	Total Discharged to Land (Gallons) ⁶	Surface Water Body Affected ⁷	Miles of Pressure Sewer	Miles of Gravity Sewer	Population in Service Area ⁸
Buena Sanitation District	477	0	477	0	0	Not Reported	3.3	93.4	41,000
California Department of Parks and Recreation Winterhaven	200	200	0	0	200	Not Applicable	1.2	0.6	1,350
City of Lemon Grove	235	235	0	235	0	Not Applicable	0.04	68.0	25,800
United States Marine Corps Base Camp Pendleton	3,000	300	2,700	300	300	Pacific Ocean	39.2	125	83,340

¹ Table 1 may not include information on public SSOs that were less than 50 gallons in volume and that did not reach surface waters.

² Total Volume = total amount that discharged from sanitary sewer system to a separate storm drain, drainage channel, surface water body, and/or land.

³ Total Recovered = total amount recovered from a separate storm drain, drainage channel, surface water body, and/or land.

⁴ Total Reaching Surface Waters = total amount reaching separate storm drain (not recovered), drainage channel, and/or surface water body, but does not include amount reaching separate storm drain that was recovered.

⁵ Total Reaching Separate Storm Drain and Recovered = total amount reaching separate storm drain that was recovered.

⁶ Total Discharged to Land = total amount reaching land.

⁷ Agencies are only required to note the surface water body affected if the discharge reaches or has the potential to reach a surface water. If the discharge did not reach a surface water and does not have a potential to reach a surface water (i.e., a discharge to land or a discharge to a separate storm drain that is fully recovered) the surface water body affected is listed as "Not Applicable." If the discharge was to a surface water body or to a separate storm drain and was not fully recovered, and the surface water body was not reported, the surface water body affected is listed as "Not Reported."

⁸ As reported in the Collection System Questionnaire required under Order No. 2006-0003-DWQ.

Responsible Collection System Agency	Total Volume (Gallons) ²	Total Recovered (Gallons) ³	Total Reaching Surface Waters (Gallons) ⁴	Total Reaching Separate Storm Drain and Recovered (Gallons) ⁵	Total Discharged to Land (Gallons) ⁶	Surface Water Body Affected ⁷	Miles of Pressure Sewer	Miles of Gravity Sewer	Population in Service Area ⁸
United States Marine Corps Base Camp Pendleton	250	30	220	0	30	San Onofre Creek	39.2	125	83,340

Table 2: June 2023 – Summary of Private Lateral Sewage Discharge Events

Responsible Collection System Agency	Total Volume (Gallons) ¹	Total Recovered (Gallons) ²	Total Reaching Surface Waters (Gallons) ³	Total Reaching Separate Storm Drain & Recovered and/or Discharged to Land (Gallons) ⁴	Surface Water Body Affected ⁵	Population in Service Area ⁶	Number of Lateral Connections
City of El Cajon	50	50	0	50	Not Applicable	101,709	17,100
City of Poway	38	4	0	38	Not Applicable	43,216	12,290

¹ Total Volume = total amount that discharged from private lateral to a separate storm drain, drainage channel, surface water body, and/or land.

² Total Recovered = total amount recovered from a separate storm drain, drainage channel, surface water body, and/or land.

³ Total Reaching Surface Waters = total amount reaching separate storm drain (not recovered), drainage channel, and/or surface water body, but does not include amount reaching separate storm drain that was recovered.

⁴ Total Reaching Separate Storm Drain & Recovered and/or Discharged to Land = total amount reaching separate storm drain that was recovered and/or total amount reaching land.

⁵ Agencies are only required to note the surface water body affected if the discharge reaches or has the potential to reach a surface water. If the discharge did not reach a surface water and does not have a potential to reach surface water (i.e., a discharge to land or a discharge to a separate storm drain that is fully recovered) the surface water body affected is listed as “Not Applicable.” If the discharge was to a surface water body or to a separate storm drain and was not fully recovered, and the surface water body was not reported, the surface water body affected is listed as “Not Reported.”

⁶ As reported in the Collection System Questionnaire required under Order No. 2006-0003-DWQ.

Responsible Collection System Agency	Total Volume (Gallons) ¹	Total Recovered (Gallons) ²	Total Reaching Surface Waters (Gallons) ³	Total Reaching Separate Storm Drain & Recovered and/or Discharged to Land (Gallons) ⁴	Surface Water Body Affected ⁵	Population in Service Area ⁶	Number of Lateral Connections
City of Vista	45	45	0	45	Not Applicable	90,000	17,109
City of Laguna Beach	80	0	2	0	Storm Drain Tributary to Beach	18,000	6,650
Vallecitos Water District	585	0	585	0	Not Reported	108,392	20,756

Table 3: June 2023 – Summary of Sewage Discharges by Source¹

Spill Type	Month/Year	Number of Spills	Total Volume (Gallons) ²	Total Recovered (Gallons) ³	Total Reaching Surface Waters (Gallons) ⁴	Total Reaching Separate Storm Drain & Recovered and/or Discharged to Land (Gallons) ⁵
Public Spills	June 2023	3	912	435	477	435
Federal Spills	June 2023	2	3,250	330	2,920	630
Private Spills	June 2023	5	798	99	587	133
All Spills	June 2023	10	4,960	855	3,984	1,198

¹ Information displayed may not include public SSOs that were less than 50 gallons in volume that did not reach surface waters.

² Total Volume = total amount that discharged from sanitary sewer system to a separate storm drain, drainage channel, surface water body, and/or land.

³ Total Recovered = total amount recovered from a separate storm drain, drainage channel, surface water body, and/or land.

⁴ Total Reaching Surface Waters = total amount reaching separate storm drain (not recovered), drainage channel, and/or surface water body, but does not include amount reaching separate storm drain that was recovered.

⁵ Total Reaching Separate Storm Drain & Recovered and/or Discharged to Land = total amount reaching separate storm drain that was recovered and/or total amount reaching land.

Figure 1: Number of Spills per Month

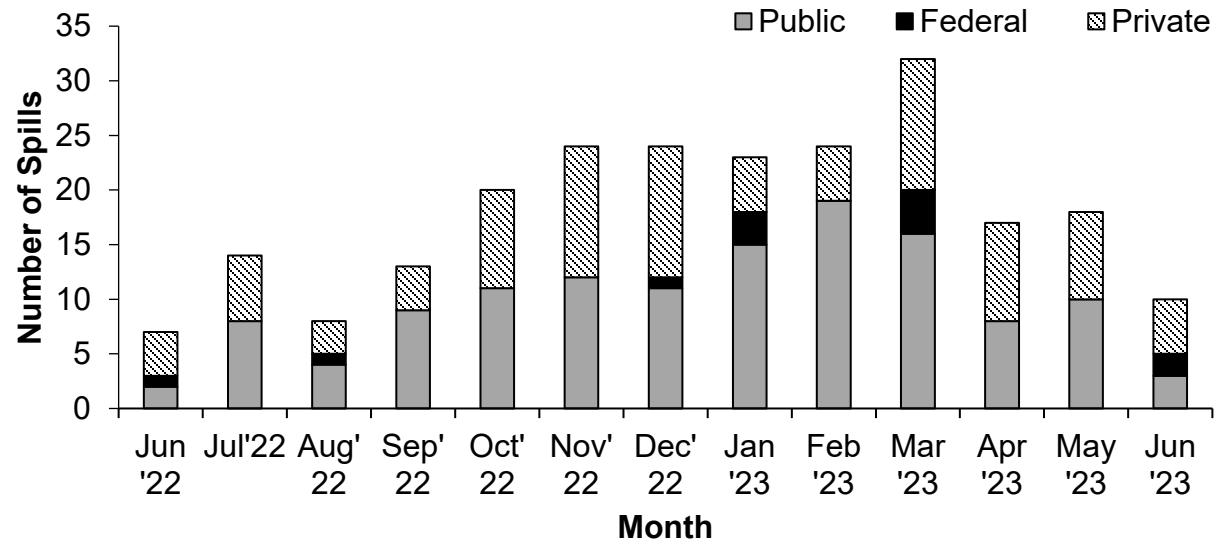


Figure 1: The number of public, federal, and private sewage spills per month from June 2022 through June 2023. Note total number of spills per month may not include public SSOs that were less than 50 gallons in volume that did not reach surface waters.

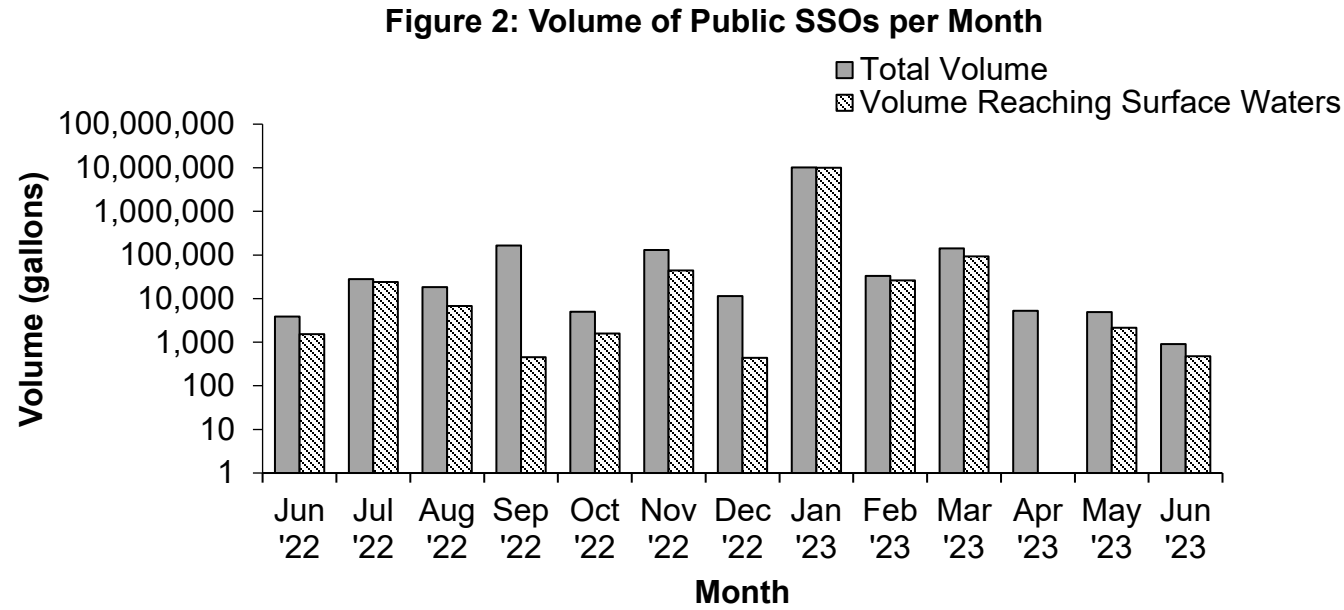


Figure 2: The volume of SSOs from public agencies per month from June 2022 through June 2023. Note, spill totals may not include public SSOs that were less than 50 gallons in volume that did not reach surface waters. Also, note the logarithmic scale on the vertical axis showing the wide variation in spill volumes.

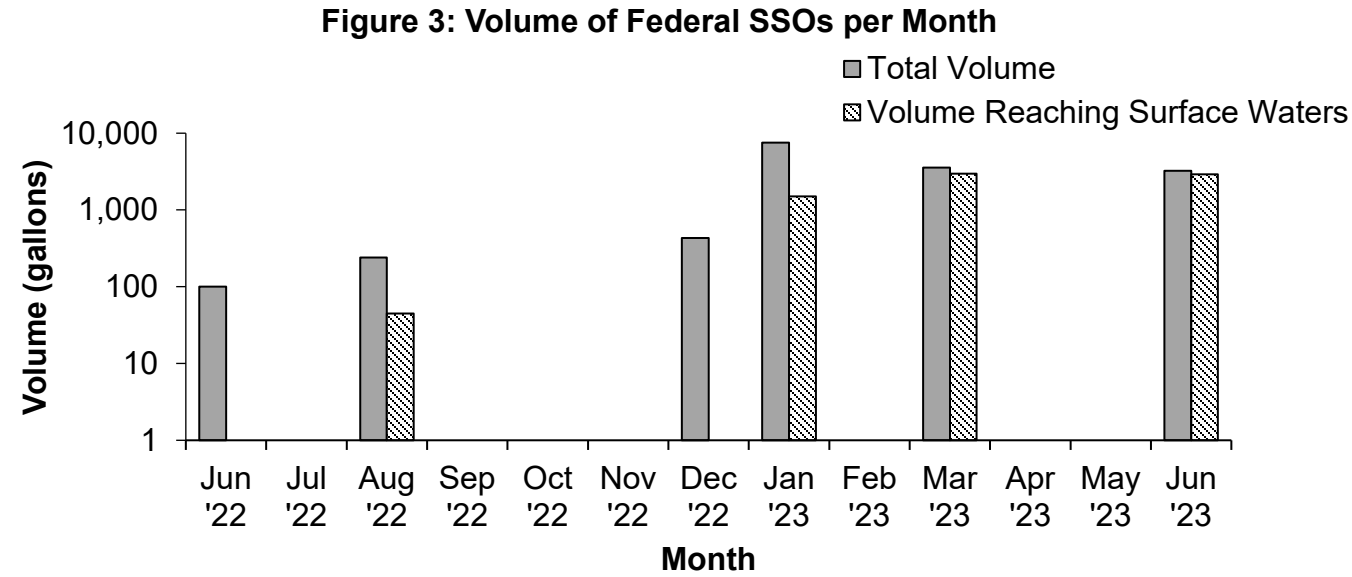


Figure 3: The volume of SSOs from federal agencies per month from June 2022 through June 2023. Note the logarithmic scale on the vertical axis showing the wide variation in spill volumes.

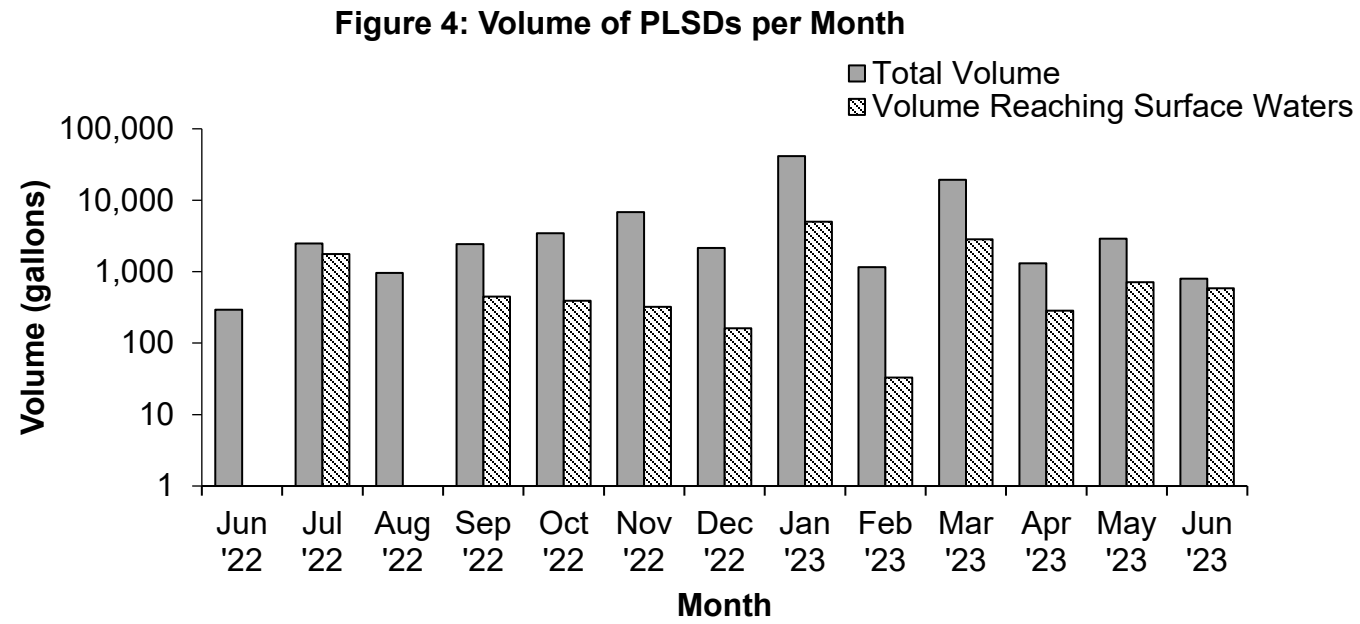


Figure 4: The volume of PLSDs per month from June 2022 through June 2023. Note the logarithmic scale on the vertical axis showing the wide variation in spill volumes.

Table 1: June 2023 – Summary of Transboundary Flows from Mexico by Event¹

Location	Transboundary Flow Start Date	Transboundary Flow End Date	Weather Condition ²	Total Volume (Billion Gallons) ³	Total Volume Recovered (Million Gallons) ³	Total Volume Reaching Surface Waters (Billion Gallons) ³	Additional Details Reported By USIBWC
Tijuana River Main Channel	12/28/2022	6/20/2023	Wet	34	0	34	Rain Event
Tijuana River Main Channel	6/20/2023	6/27/2023	Dry	89.998 (million gallons)	0	89.998 (million gallons)	Rain Event plus dry weather flows
Tijuana River Main Channel	6/27/2023	6/28/2023	Dry	5.248 (million gallons)	0	5.248 (million gallons)	Dry weather flows above system capacity
Tijuana River Main Channel	6/28/2023	6/29/2023	Dry	3.628 (million gallons)	0	3.628 (million gallons)	Dry weather flows above system capacity
Tijuana River Main Channel	6/29/2023	6/30/2023	Dry	4.917 (million gallons)	0	4.917 (million gallons)	Dry weather flows above system capacity
Tijuana River Main Channel	6/30/2023	7/5/2023	Dry	19.384 (million gallons)	0	19.384 (million gallons)	Dry weather flows above system capacity

¹ Transboundary flow volumes are obtained from self-monitoring reports submitted by USIBWC pursuant to Order No. R9-2021-0001.

² Order No. R9-2021-0001 defines wet weather as the period of time when a storm event produces 0.1 inches or greater within a 24-hour period plus 72 hours after, based on the Goat Canyon Pump Station rain gauge. USIBWC reported that there was no precipitation as recorded at Marron Valley in June 2023. The rain gauges at Goats Canyon and Smugglers Gulch were not operable and are scheduled for maintenance and repair.

³ Total transboundary flow volume, total volume recovered, and total volume reaching surface waters is an estimate provided by USIBWC.

Table 2: June 2023 - Summary of Transboundary Flows from Mexico¹

Location	Month/Year	Number of Transboundary Flows	Total Volume (Million Gallons)	Total Volume Recovered (Gallons)	Total Volume Reaching Surface Waters (Million Gallons)
Tijuana River Main Channel	June 2023	5	123.175	0	123.175
Canyon Collectors	June 2023	0	0	0	0
South Bay International Wastewater Treatment Plant	June 2023	0	0	0	0
All Locations	June 2023	5	123.175	0	123.175

¹ For transboundary flows that start and end in different months, Table 2 includes the transboundary flow in the month the transboundary flow started. For June, there are only five flows because the 12/28/2022 event started in December 2022.

Figure 1: Number of Transboundary Flows

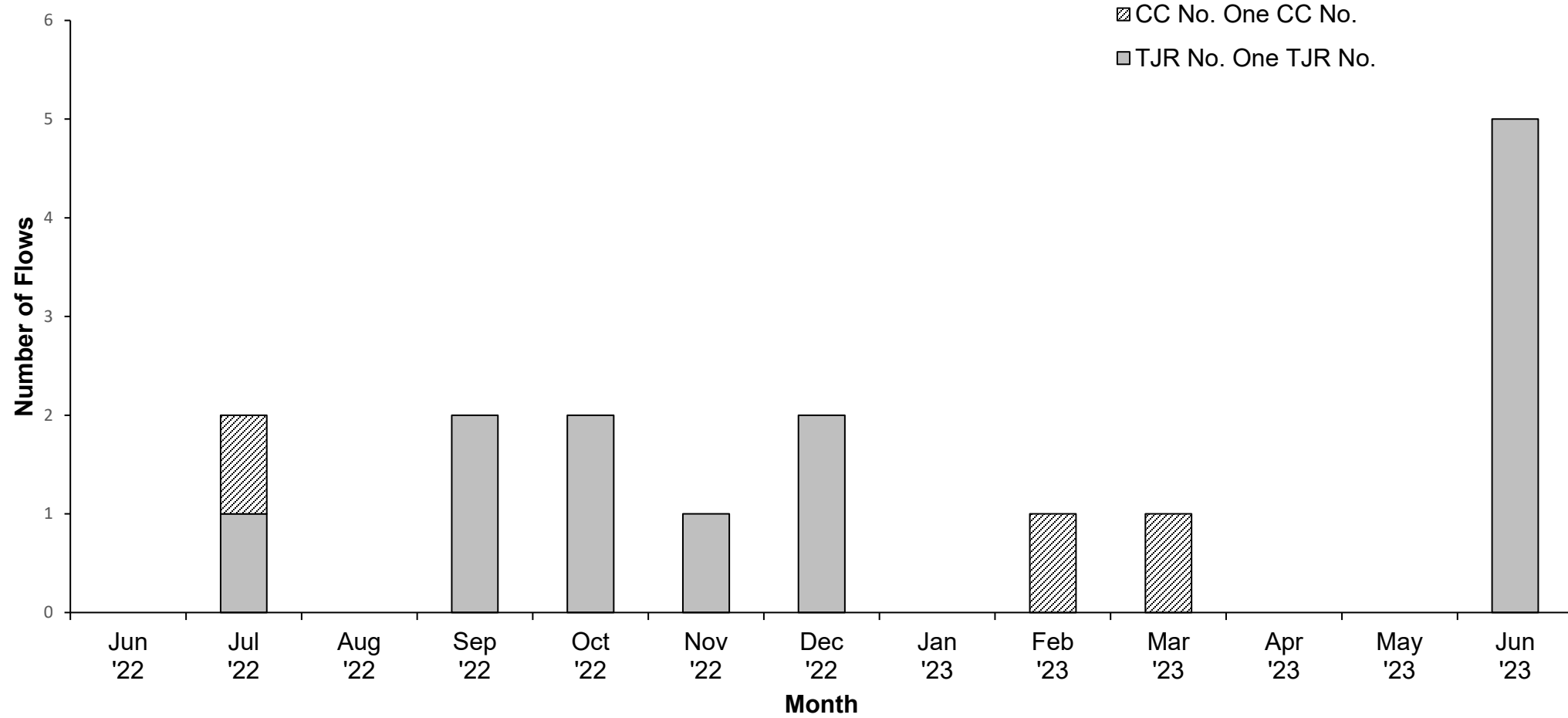


Figure 1: Number of reported transboundary flows per month from June 2022 through June 2023 at the canyon collector systems and the Tijuana River main channel. For transboundary flows that start and end in different months, the figure includes the transboundary flow in month the transboundary flow started. For example, flows in January through June 2023 that started in December 2022 are only shown in December 2022.

Figure 2: Tijuana River Transboundary Flow Volume

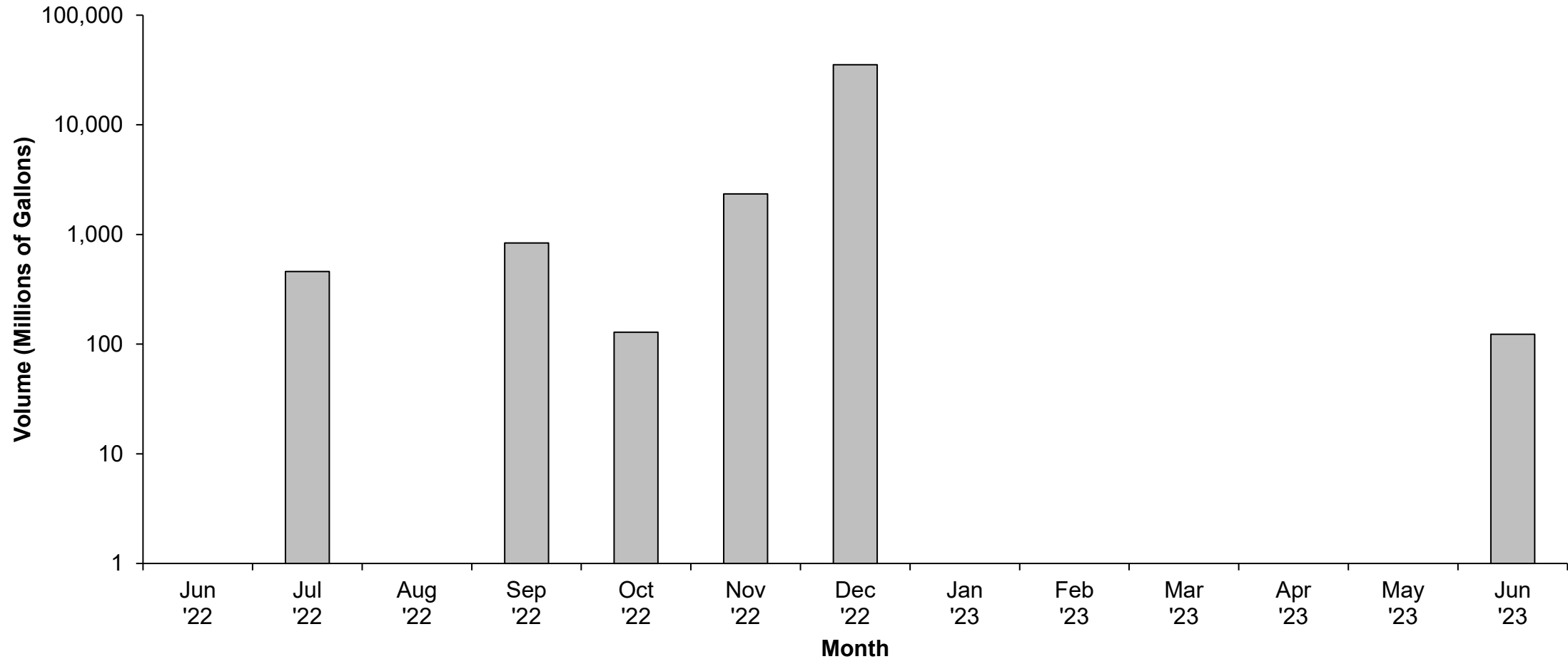


Figure 2: Volume of reported transboundary flows per month from June 2022 through June 2023 at the Tijuana River main channel. For transboundary flows that start and end in different months, the figure includes the total volume of the transboundary flow in the month the transboundary flow started. For example, flows in January through June 2023 that started in December 2022 are only shown in December 2022. Note the logarithmic scale on the vertical axis to accommodate the variation in transboundary flow volumes.

Figure 3: Canyon Collector Transboundary Flow Volume

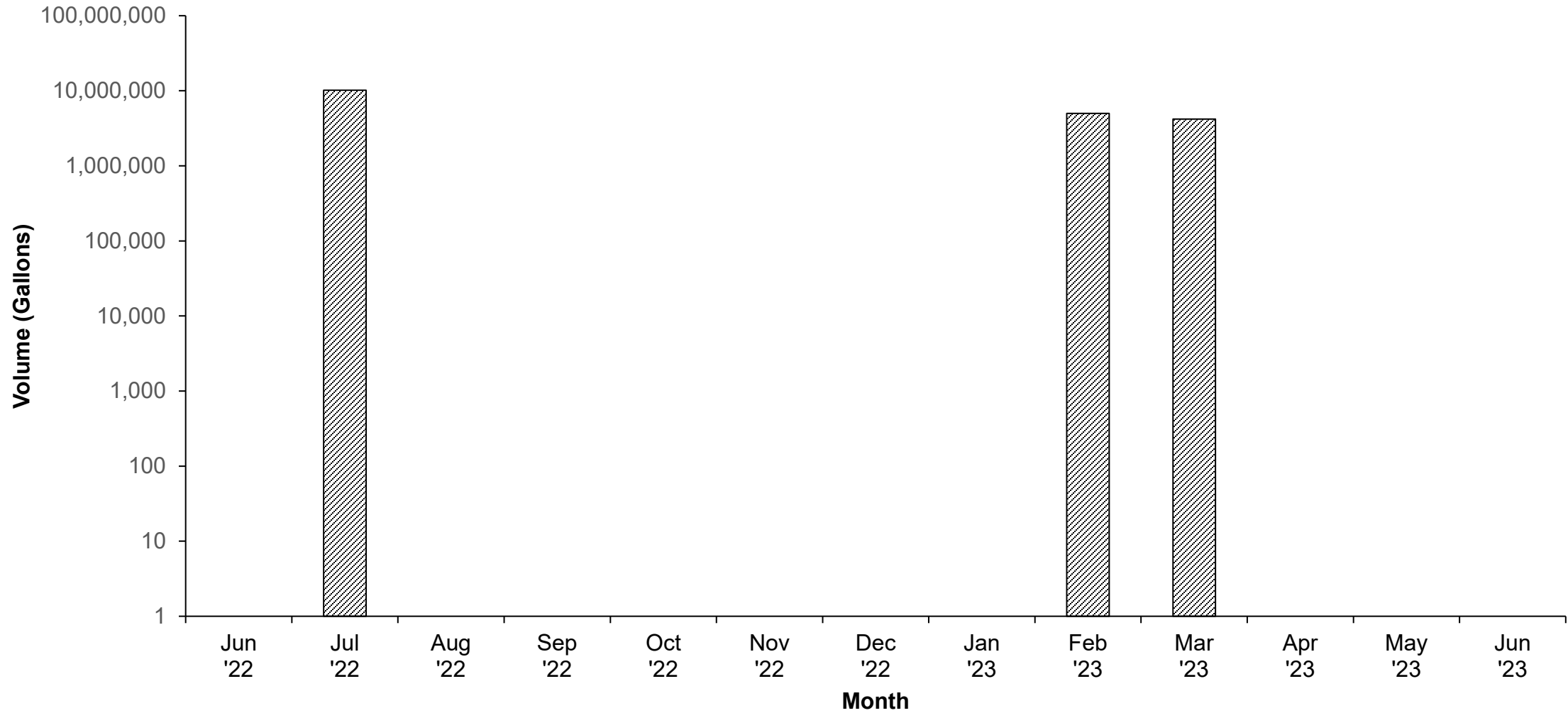


Figure 3: Volume of reported transboundary flows per month from June 2022 through June 2023 at the canyon collector systems. Note the logarithmic scale on the vertical axis to accommodate variation in transboundary flow volumes.