

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

STAFF REPORT FOR REGULAR MEETING OF JANUARY 30-31, 2020

Prepared on December 31, 2019

ITEM NUMBER: 12

SUBJECT: Revision of Waste Discharge Requirements, Reissuance of National Pollutant Discharge Elimination System Permit No. CA0049417 for the Ragged Point Inn and Resort, San Luis Obispo County, Order No. R3-2020-0003

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ACTION: Adopt Order No. R3-2020-0003

KEY INFORMATION

Location: 19019 Coast Highway One, San Simeon, CA, 93452, San Luis Obispo County

Type of Discharge: Secondary-treated domestic and commercial wastewater and undisinfected secondary-treated recycled water.

Permitted Flow: 0.015 million gallons per day (MGD) dry weather flow design capacity.

Water Reclamation: The proposed order covers the production of undisinfected secondary-treated recycled water for onsite surface irrigation of the top bluff using drip irrigation.

Type of Treatment: Wastewater treatment for ocean outfall discharge is accomplished by secondary treatment, which includes screening and grinding, a flow equalization tank, an extended aeration package treatment plant with secondary clarification, followed by chlorine disinfection and dechlorination.

Disposal Method: Disinfected secondary effluent is discharged to the Pacific Ocean via a discharge pipe at the top of a steep cliff face approximately 200 feet above the mean high tide line. Treated effluent cascades down the rocky, vegetated cliff face to an inaccessible portion of the shoreline. Discharge of undisinfected secondary effluent to land is

through a surface drip irrigation system and is consistent with the uniform statewide reclamation criteria contained within title 22 of the California Code of Regulations. The bluff drip irrigation areas are fenced off and signed to prevent public access.

Solid Wastes: Biosolids from the clarification tank are pumped to a sludge bagger unit for drying prior to offsite disposal at a landfill.

Existing Orders: The facility was previously regulated by Order No. R3-2009-0020, National Pollutant Discharge Elimination System (NPDES) Permit No. CA0049417, which became effective June 1, 2009, and expired on June 1, 2014. The terms and conditions of that Order were automatically continued and remain in effect until new waste discharge requirements and NPDES permit are adopted.

SUMMARY

This agenda item proposes reissuance of an existing NPDES permit. The proposed order regulates the discharge of secondary-treated wastewater to the Pacific Ocean. The proposed order also regulates the production of undisinfected secondary-treated wastewater for recycling and use as irrigation water. The proposed order implements new 2019 California Ocean Plan bacteria standards. Additionally, the proposed order includes requirements related to climate change. The Fact Sheet, Attachment F of the proposed order, includes the legal requirements and technical rationale that serve as the basis for the proposed order's requirements. Central Coast Water Board staff recommends adoption of the proposed order.

DISCUSSION

The Ramey Family Trust (hereinafter discharger) is the owner and operator of the Ragged Point Inn and Resort (facility). The facility currently treats domestic and commercial wastewaters generated by guests, employees, and a restaurant at the Ragged Point Inn and Resort. Wastewater is treated at the facility by secondary treatment, which includes screening and grinding, a flow equalization tank, an extended aeration package treatment plant with secondary clarification, followed by chlorine disinfection (with liquid chlorine), and dechlorination (with sodium bisulfite). An expanded capacity chlorination/dechlorination system was installed in May 2019.

The proposed order applies to a Pacific Ocean discharge of secondary treated wastewater from Discharge Point EFF-001 via a discharge pipe at the top of a steep cliff face approximately 200 feet above the mean high tide line. The permitted and design flow of the facility is 0.015 MGD (15,000 gallons per day).

The minimum initial dilution ratio of the Pacific Ocean discharge is 5 to 1 (seawater to effluent ratio). The minimum initial dilution ratio for this facility was established in the previous 2009 order based on similarities with an ocean discharge located at Avalon on Catalina Island, which discharges to riprap within a coastal surf zone. The 5 to 1 dilution ratio is assumed to be conservative given the rapid and turbulent mixing of effluent with seawater along the cliff face below the discharge point subject to wave and tidal action.

The proposed order additionally applies to the production and use of recycled wastewater. Undisinfected secondary-treated recycled water is used for surface irrigation of the bluff top using drip irrigation. Recycled water design requirements and use requirements are specified in the proposed order. The drip irrigation system is intended to be the primary disposal alternative, and this facility has not discharged effluent to the Pacific Ocean via Discharge Point EFF-001 since 2011.

CHANGES FROM THE EXISTING ORDER

The proposed order is structured in accordance with the State Water Board's NPDES permit template. The proposed order includes the following changes and modifications to the existing order:

- An updated reasonable potential analysis found that the discharge has a reasonable potential to cause an exceedance of water quality standards for hexavalent chromium, ammonia, and zinc. As such, the proposed order includes effluent requirements for these pollutants.
- Due to insufficient data, the reasonable potential analysis was inconclusive for many pollutants. In these circumstances, effluent limitations from the previous order remain in the proposed order.
- The proposed order implements the 2019 Water Quality Control Plan for Ocean Waters of California (Ocean Plan) bacterial objectives.
- The chronic toxicity effluent limit was changed from 1 chronic toxicity unit (TUc) in the previous order to 6 TUc in the proposed order. This change was made because chronic toxicity is a water quality objective in Table 3 of the Ocean Plan, and effluent limitations derived from Ocean Plan Table 3 objectives are subject to the application of dilution.
- The acute toxicity effluent limitation was removed from the proposed order based on the Ocean Plan toxicity testing requirements for discharges having a minimum initial dilution ratio of 100:1 or less (Ocean Plan III.C.4.c). In this case, the facility has a minimum initial dilution ratio of 5:1, so the Ocean Plan requires dischargers to conduct chronic toxicity testing only.
- The proposed order updates the CIWQS reporting schedule.
- The proposed order includes provisions that ensure adaptation strategies are implemented for climate change.

COMPLIANCE HISTORY

The facility is generally operated in compliance with the existing order. A summary of the discharger's violations of effluent limitations and facility incidents during the term of the previous order is in the Fact Sheet on page F-19. The discharger has reported 16 effluent violations during the existing order's term. Most of the exceedances were for total coliform and discharge flow rate between July 2009 and June 2018. The discharger has taken several precautions to prevent future violations, including the installation of an expanded chlorination/dechlorination system in May 2019.

COMMENTS

The Central Coast Water Board notified the discharger and interested agencies and persons of its intent to prescribe WDRs for the discharge and provided an opportunity

for the submittal of written comments and recommendations. Notification was provided through posting on the Central Coast Water Board's website on November 15, 2019. Written comments were due at the Central Coast Water Board office by 5:00 p.m. on December 16, 2019. Central Coast Water Board staff did not receive any public comments on the proposed order. Following the public comment period, Central Coast Water Board staff made minor edits to the fact sheet of the proposed order to clarify the discussion of Recycled Water Policy-related monitoring. These edits to the fact sheet do not alter the requirements of the proposed order or the monitoring and reporting program.

CLIMATE CHANGE

The proposed order requires the Discharger to develop and implement a Coastal Hazards Monitoring Plan to assess coastal hazards, sea-level rise, and other climate change-related issues at the facility. Using the information gathered during implementation of the Coastal Hazards Monitoring Plan, the Discharger must then develop a Coastal Hazards Response Plan that identifies steps the Discharger will take to address coastal hazards and sea-level rise at the facility.

HUMAN RIGHT TO WATER

Discharges from the facility do not affect drinking water. Consistent with the human right to water law and Central Coast Water Board Resolution R3-2017-0004, the proposed order regulates discharges to minimize loading to attain the highest water quality, which is reasonable, considering all demands being made on those waters and the total values involved.

DISADVANTAGED COMMUNITY STATUS

The facility does not provide service to a disadvantaged community and is not located within a disadvantaged community. The nearest disadvantaged community to the facility, San Simeon, is located approximately 15 miles south of the facility.

RECOMMENDATION

Adopt Order No. R3-2020-0003, as proposed.

ATTACHMENTS

For copies, please refer to the Central Coast Water Board's internet website at: https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2020/2020_agendas.html

1. Proposed Order No. R3-2020-0003, including the following associated attachments:
 - Attachment A – Definitions
 - Attachment B – Map
 - Attachment C – Flow Schematic
 - Attachment D – Standard Provisions
 - Attachment E – Monitoring and Reporting Program (MRP)
 - Attachment F – Fact Sheet