STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION

STAFF REPORT FOR REGULAR MEETING OF DECEMBER 12-13, 2024
Prepared on November 12, 2024

ITEM NUMBER: **11**

SUBJECT: **Consideration of Proposed Order R3-2024-0045, Waste Discharge Requirements for the Monterey One Water Regional Wastewater Treatment Plant and Advanced Water Purification Facility, National Pollutant Discharge Elimination System (NPDES) Permit CA0048551, Monterey County**

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KEY INFORMATION

Discharger:	Monterey One Water
Location:	14811 Del Monte Boulevard, Marina, Monterey County
Type of Discharge:	Secondary-treated wastewater produced at the regional treatment plant, hauled saline waste, and reverse osmosis concentrate produced at the Advanced Water Purification Facility (AWPF).
Permitted Flow:	75.6 million gallons per day (MGD) (peak wet weather flow); 29.6 MGD (average daily dry weather flow)
Types of Treatment:	Secondary wastewater treatment at the regional treatment plant consists of screening, aerated grit removal, primary sedimentation, trickling filters, solids contact (i.e., bio-flocculation), and secondary clarification. The Salinas Valley Reclamation Project (SVRP) provides tertiary treatment through coagulation, flocculation, filtration, and disinfection. The AWPF provides full advanced treatment including ozone, membrane filtration, reverse osmosis, advanced oxidation using ultraviolet light and hydrogen peroxide, and finished water stabilization.

Water Reclamation:	*SVRP:* Up to 29.6 MGD of secondary effluent from the regional treatment plant undergoes tertiary treatment at the SVRP and is used to irrigate approximately 12,000 acres of farmland in the northern Salinas valley. This reuse offsets groundwater pumping and helps to slow seawater intrusion in the aquifer. Production of tertiary-treated effluent at the SVRP is authorized by this Order; however, its use for irrigation is regulated via separate water reclamation requirements. *AWPF:* Additional secondary effluent from the regional treatment plant is delivered to the AWPF for full advanced treatment. The resulting purified recycled water is injected into the Seaside groundwater basin. AWPF operation and groundwater injection are regulated via separate waste discharge and water recycling requirements.
Disposal Method:	Secondary-treated wastewater from the regional treatment plant, hauled saline waste, and reverse osmosis concentrate from the AWPF are discharged through a 11,260-foot outfall/diffuser system to Monterey Bay National Marine Sanctuary in the Pacific Ocean at a depth of approximately 100 feet.
Solid Wastes:	Biosolids are anaerobically digested and sent to two screw presses. Dried solids are then hauled to the Monterey Regional Waste Management District's landfill adjacent to the regional treatment plant where they are used for daily cover.
Existing Orders:	Monterey One Water's existing NPDES permit, Waste Discharge Requirements Order R3-2018-0017, authorized ocean disposal of secondary-treated wastewater from the regional treatment plant, hauled saline waste, and reverse osmosis concentrate from the AWPF. The groundwater injection operations of the Pure Water Monterey AWPF groundwater replenishment project are governed by WDRs-WRRs Order R3-2017-0003. Water Reclamation Requirements Order 97-52 authorizes the distribution and use of tertiary treated recycled wastewater from the SVRP.
ACTION:	**Consider adopting waste discharge requirements for the Monterey One Water Regional Treatment Plant and AWPF**

SUMMARY

This staff report provides an overview of the proposed revision of waste discharge requirements and reissuance of the existing National Pollutant Discharge Elimination System (NPDES) permit for the Monterey One Water regional treatment plant and AWPF. The Facility is a publicly owned treatment works owned and operated by Monterey One Water (Discharger), a joint powers authority comprising the cities of Monterey, Pacific Grove, Del Rey Oaks, Sand City, Seaside, and Salinas; Marina Coast Water District, Castroville Community Services District; Boronda County Sanitation District; and Monterey County. The proposed order (Attachment 1) includes requirements that ensure the discharge of treated wastewater is protective of water quality and beneficial uses and that recycled water is treated to a standard that is protective of public health and the environment. Additional information and detail can be found in the Fact Sheet, Attachment F of the proposed order.

DISCUSSION

Background

In operation since 1990, the regional treatment plant, which is owned and operated by the Discharger, treats domestic, commercial, and industrial wastewaters from a population of approximately 279,000 within the jurisdictions of the member entities. In 1998, the Salinas Valley Reclamation Project (SVRP) was established to produce tertiary-treated recycled water for agricultural irrigation in the northern Salinas Valley.

In 2019, the AWPF was brought online, expanding Monterey One Water's treatment capacity to include full advanced treatment, which consists of ozone, membrane filtration, reverse osmosis, advanced oxidation using ultraviolet light and hydrogen peroxide, and finished water stabilization. A portion of secondary-treated effluent from the regional treatment plant is routed to the AWPF for advanced treatment. The produced purified water is injected into the Seaside groundwater basin for drinking water supply augmentation, and a small portion is used for landscape irrigation by users in Marina Coast Water District. Reverse osmosis concentrate produced at the AWPF is mixed with hauled saline waste (if present) and secondary effluent (when available) from the regional treatment plant and discharged via outfall into the Monterey Bay. The AWPF is currently undergoing an expansion to increase production capacity from 5 MGD to 7.6 MGD. The AWPF expansion is expected to be complete by late 2025.

On September 15, 2023, the Discharger submitted an application for renewal of Order R3-2018-0017 for continued authorization to discharge secondary-treated effluent from the regional treatment plant, hauled saline waste, and reverse osmosis concentrate from the AWPF. The application considers changes to the flow and composition of the waste discharged to Monterey Bay resulting from the increase in RO concentrate associated with the AWPF expansion from 5 MGD to 7.6 MGD.

The proposed order applies to the discharge of secondary treated wastewater, hauled saline waste,[1] and reverse osmosis concentrate from Discharge Point No. 001 to the Pacific Ocean, approximately 2.5 miles from shore at a depth of approximately 100 feet below sea level. The outfall diffuser achieves a minimum initial dilution of at least 145 parts seawater for every part effluent (145:1). As discussed in the Fact Sheet, the minimum initial dilution changes as the ratio of hauled saline waste plus reverse osmosis concentrate to total effluent changes. The order also authorizes production of tertiary-treated effluent at the SVRP. The production of advanced-treated effluent at the AWPF is governed by a separate order.

Compliance History

During the five-year term of the previous permit, the Discharger had one effluent limitation violation for heptachlor on February 13, 2023. The effluent limitation exceedance occurred during extreme wet-weather conditions and around the time when the Discharger accepted trucked wastewater from the neighboring community of Pajaro and diverted Salinas River flood waters by way of the Salinas Industrial Wastewater Treatment Facility.

The Discharger experienced one spill at the regional treatment plant and two sanitary sewer overflows between 2017 and 2019 that spilled untreated wastewater to Monterey Bay. One of these sanitary sewer overflow events—the discharge of 5,607 gallons on October 17, 2019—occurred during the five-year term of the pervious permit; the other two occurred in the previous permit's term. In response to these spills, the Central Coast Water Board adopted Administrative Civil Liability Order R3-2021-0005, which imposed a liability of $800,000, $790,000 of which was suspended pending completion of a supplemental environmental project referred to as the Private Lateral Rehabilitation Project for the Castroville Community Services District.[2] That project is currently on schedule for completion by the end of December 2024.

Proposed Order Considerations

The proposed order includes a comprehensive monitoring program tailored to the Facility that is consistent with similar NPDES-permitted facilities with ocean discharges. The monitoring program is designed to collect water quality data necessary for

[1] The Facility is permitted to accept hauled saline waste delivered by truck from business entities that would otherwise be discharging to the sanitary sewer collection system tributary to the Facility. The saline waste is diverted from the sewer collection system to improve the quality of recycled water for agricultural irrigation in the northern Salinas valley. Although it had accepted up to 50,000 gallons of hauled saline waste in a single day previously, more recently the regional treatment plant currently accepts negligible amounts of hauled saline waste.

[2] Central Coast Water Board staff presented additional information regarding the Private Lateral Rehabilitation Project for the Castroville Community Services District at the June 20-21, 2024 Board meeting. The staff report and associated attachments can be viewed online at: https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2024/jun/agenda_jun_v3.pdf (See Item 10 Enforcement Report and Enforcement Program Update)

evaluating compliance with the proposed order, ensuring Facility performance, and verifying that beneficial uses of the receiving water are protected.

The proposed order is structured in accordance with the statewide NPDES permit template. The following summarizes the significant differences between proposed Order R3-2024-0045 and existing Order R3-2018-0017. These changes are also discussed in detail in the Fact Sheet found in Appendix F of the proposed order:

Accessibility updates. The State Water Resources Control Board (State Water Board) template for NPDES permits has been updated and revised to accommodate document accessibility needs associated with text styles and formatting to facilitate the use of document reader software for persons with visual impairments or learning disabilities. Most notably, there are numerous changes to table formatting and outline structures from the previous order.

Updated references. Many guidance documents, policies, and orders referenced in the previous order have been updated, amended, or superseded since 2018. The proposed order includes updated citations and provides website links with direct access to the current references.

Maps and Process Flow Diagrams. Attachments B and C consist of updated maps for the area and process flow diagrams for the Facility.

Order Findings. New findings for Response to Climate Change, Human Right to Water, and Disadvantaged Community status.

Reasonable Potential Analysis. NPDES permits must incorporate water quality-based effluent limitations for all pollutants that are determined to have reasonable potential to cause or contribute to an excursion above a water quality objective in the receiving water, as specified in Table 3 of *Water Quality Control Plan for Ocean Waters of California* (Ocean Plan). To determine the need for water quality-based effluent limitations, the Central Coast Water Board conducted a reasonable potential analysis (RPA) in accordance with Section III.C and Appendix VI of the Ocean Plan.

The Ocean Plan identifies a multi-step, scientifically defensible statistical method for the RPA that accounts for averaging periods, sparce data sets, censored data,[3] and long-term data variability. In addition, the Ocean Plan allows an RPA to consider best professional judgment (Ocean Plan at p. 99, Section III.C and Appendix VI, Steps 2 and 13) using alternative criteria that may include, but are not limited to, facility type, discharge type, potential toxic impact of discharge, and water quality and beneficial uses of the receiving water. The RPA for the proposed order employed both the statistical method using effluent monitoring

[3] Censored data indicates cases where the exact value is unknown, as may be the case when a pollutant is present at a level too low to be reliability detected by the analytical testing methods employed.

data reported for January 1, 2018, through January 31, 2024, and best professional judgment.

Water Quality Based Effluent Limitation Changes. As discussed in Fact Sheet Section 4.3.3 of the proposed order, the statistical RPA found reasonable potential (e.g., endpoint 1) for DDT/DDD/DDE, heptachlor, total residual chlorine, and ammonia. Effluent limits for heptachlor, total residual chlorine, and ammonia are retained from previous Order R3-2017-0018, and the proposed order includes a new water quality-based effluent limitation at Discharge Point 001 for DDT/DDD/DDE.

Standing alone, the statistical RPA found no reasonable potential (e.g., endpoint 2) for 71 pollutants.[4] Of these, 62 pollutants had effluent limits in the previous order. However, because of the variability of flow conditions, increasing complexity of the discharge, and sensitivity of the receiving water,[5] and in accordance with Step 13 of Section III.C and Appendix VI of the Ocean Plan, staff reviewed additional information to determine if a water quality-based effluent limitations are required to protect beneficial uses. Based on the results of this analysis, and in coordination with the Discharger and U.S.EPA, staff concluded that water quality-based effluent limitations must remain at Discharge Point 001 for the 62 pollutants for which there were existing effluent limits and where the statistical approach to the RPA otherwise concluded effluent limits were not required. The RPA yielded inconclusive results (e.g., endpoint 3) for six pollutants and effluent limitations are retained in the proposed order for each of these.

In accordance with the statewide bacteria water quality objectives established in the Ocean Plan, the proposed order retains effluent limitations at Discharge Point 001 for fecal coliform and enterococci only, and the effluent limitation for total coliform at Discharge Point 001 is not retained.

Recycled water effluent limitations at REC-001 have been modified at the request of the Discharger to include a limitation for total dissolved solids (TDS) to support the Discharger's pretreatment program.

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[4] The robust dataset of effluent water quality developed by the Discharger over the past permit term contributed to the relatively more conclusive statistical RPA results (e.g., relatively more pollutants demonstrated either reasonable potential (endpoint 1) or no reasonable potential (endpoint 2) rather than inconclusive results (endpoint 3) than is typically seen in the Central Coast Water Board's NPDES permits.

[5] As described in Monterey Bay National Marine Sanctuary's 2021 management plan, the sanctuary includes a variety of habitats that support extensive marine life, including 34 species of marine mammals, over 180 species of seabirds and shorebirds, at least 525 fish species, 4 sea turtle species, 31 different invertebrate phyla, and over 450 species of marine algae. The sanctuary's highly productive biological communities host one of the highest levels of marine biodiversity in the world, including 27 federally listed threatened and endangered species. The MBNMS management plan can be accessed online at: https://montereybay.noaa.gov/intro/mp/mp.html

Impaired Water Bodies on the Clean Water Action Section 303(d) List: The *2020-2022 Integrated Report for Clean Water Act 303(d) List and 305(b) Report*[6] was approved by U.S. EPA on May 11, 2022, and is the current integrated report. The main body of Monterey Bay, where the discharges occur, is not identified in the 2020-2022 303(d) list as impaired. However, the 2024 California integrated report,[7] which revises the 2020-2022 version, identifies impairments in Monterey Bay for the following pollutants: chlordane, dieldrin, polychlorinated biphenyls (PCBs), toxaphene, and DDT. The State Water Board adopted the 2024 California integrated report on February 6, 2024, and it was submitted to U.S. EPA for approval on March 26, 2024. The 2024 integrated report is expected to be approved by U.S. EPA and in effect by the effective date of this permit.

Updated Dilution Scenarios: Because of the variability in composition and flow of the effluent (e.g., summer months experience little to no secondary effluent when demand for recycled water is highest), four expected ratios of reverse osmosis concentrate to total effluent and the associated modeled mixing rates were established in the previous order to implement water quality standards. To inform development of the previous order, in 2017 the Discharger submitted a near-field mixing zone analysis, which determined available dilution for discharges through the outfall diffuser based on an AWPF production rate of 5 MGD. On September 15, 2023, the Discharger submitted an update to the near-field mixing zone analysis to reflect the AWPF expansion and to include the updated ambient water quality dataset. The minimum dilution values (Dms) in the proposed order have been updated to reflect the increased volume of reverse osmosis concentrate (to a maximum of 1.78 MGD) that is associated with the Pure Water Monterey expansion. The most restrictive Dm in Order R3-2018-0017 is retained in this order. The Dms in this proposed order that correspond with higher concentrate waste dilution ratios are slightly more stringent as compared to those of the previous order, and therefore are at least as protective.

Climate Change Adaptation: In accordance with State Water Board Resolution 2017-0012, *Comprehensive Response to Climate Change*, which requires a proactive response to climate change in all California Water Board actions, the proposed order (see Section 6.3.6.2, Other Special Provisions) includes a requirement for the Discharger to submit a Climate Change Response Hazards and Vulnerabilities Plan to the Central Coast Water Board. The Climate Change Response Hazards and Vulnerabilities Plan must describe the Discharger's long-term approach for identifying and addressing climate change hazards and vulnerabilities at the Facility, including all associated infrastructure (e.g., treatment

[6] *2020-2022 California Integrated Report for 303(d) List and 305(b) Report* can be accessed online: https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html

[7] The 2024 California integrated report can be accessed online at: https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html

facilities, conveyances to discharge points, collection components, and discharge facilities).

Test of Significant Toxicity and Whole Effluent Toxicity: The Ocean Plan establishes water quality objectives for protection of marine aquatic life in Table 3, including objectives for toxicity that are currently expressed in terms of toxicity units based on the no-observed-effect-level (NOEL) statistical approach. However, the Ocean Plan expressly allows regional water quality control boards to "establish more restrictive[8] objectives and effluent limitations than set forth in this Plan as necessary for the protection of beneficial uses of ocean waters." In 2010, U.S. EPA endorsed the Test of Significant Toxicity (TST) approach in *TST Implementation Document* (EPA 833-R-10-003, 2010). As discussed in Section 4.3.6.1 of the Fact Sheet, the TST performs better than the NOEL in identifying toxic and nontoxic samples and provides increased assurances that statistical error rates are more directly addressed and accounted for in decision regarding toxicity in the discharge. The TST approach was incorporated into the previous order in place of the NOEL statistical approach. Because of the variable nature of the discharge, sensitivity of the receiving water, and increasing complexity of the effluent as brine discharges may be introduced to the outfall due to the development of additional water supply projects on the Monterey Peninsula, the proposed order retains the TST statistical approach.

Public Comment Period

The draft order was released for public comment on September 26, 2024, and comments were due by October 28, 2024. During the comment period, Central Coast Water Board staff worked with Monterey One Water to incorporate non-substantive edits, including corrections of typos and minor clarifications. Monterey One Water submitted a formal comment letter on October 28, 2024, with substantive comments. The comments, staff responses, and descriptions of changes made to the draft order in response to Monterey One Water's October 28, 2024 comment letter are provided as Attachment 2 to this staff report. No other comments were received in response to the proposed order.

During the public comment period, Central Coast Water Board staff identified an inaccuracy in Fact Sheet Table F-15, RPA Results for Discharges to the Pacific Ocean. Table F-15 in the draft order incorrectly indicated that effluent limits were required for the nine pollutants (arsenic, chromium (VI), copper, mercury, nickel, selenium, zinc, and non-chlorinated phenolic compounds) for which the statistical RPA concluded no reasonable potential (e.g., endpoint 2) and that did not have existing effluent limitations in previous Order R3-2018-0017. Table F-15 has been updated to reflect that no effluent limitation is required for these pollutants, based on the statistical RPA conclusion of no reasonable potential (e.g., endpoint 2). This inaccuracy was limited to

[8] The higher level of confidence in toxicity testing due to the use of the TST statistical approach instead of the NOEL statistical approach can result in more certain protection of beneficial uses. This is equivalent to a more "restrictive" requirement within the meaning of Chapter III, section F.1 of the Ocean Plan.

Table F-15. The effluent limitations presented in the proposed order (seen in Tables 4 through 6) were accurate in the draft order and have not changed since it was released for public comment.

Human Right to Water

California Water Code section 106.3, subdivision (a) states that it is the policy of the State of California "that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitation purposes." On January 26, 2017, the Central Coast Water Board adopted Resolution R3-2017-0004, which affirms the realization of the human right to water and the protection of human health as the Central Coast Water Board's top priorities.

The proposed order incorporates requirements for the Facility to beneficially reuse treated effluent to improve water supply resiliency and to prepare for uncertainties in water resources due to the changing climate. The proposed order establishes effluent discharge limitations to protect the municipal and domestic supply (MUN) drinking water beneficial use and improve drinking water quality for those that depend on groundwater and surface waters as their drinking water sources.

Environmental Justice

Environmental justice principles call for the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income in the development, adoption, implementation, and enforcement of all environmental laws, regulations, and policies that affect every community's natural resources and the places people live, work, play, and learn. The Central Coast Water Board implements regulatory activities and water quality projects in a manner that ensures the fair treatment of all people, including Underrepresented Communities. Underrepresented Communities include but are not limited to Disadvantaged Communities (DACs), Severely Disadvantaged Communities (SDACs), Economically Distressed Areas (EDAs), Tribes, Environmentally Disadvantaged Communities (EnvDACs), and members of Fringe Communities.[9]

[9] Disadvantaged Community: a community with an annual median household income that is less than 80% of the statewide annual median household income (Public Resources Code section 80002(e)); Severely Disadvantaged Community: a community with a median household income of less than 60% of the statewide average. (Public Resources Code section 80002(n)); Economically Distressed Area: a municipality with a population of 20,000 persons or less, a rural county, or a reasonably isolated and divisible segment of a larger municipality where the segment of the population is 20,000 persons or less with an annual median household income that is less than 85% of the statewide median household income and with one or more of the following conditions as determined by the department: (1) financial hardship, (2) unemployment rate at least 2% higher than the statewide average, or (3) low population density. (Water Code section 79702(k)); Tribes: federally recognized Indian Tribes and California State Indian Tribes listed on the Native American Heritage Commission's California Tribal Consultation List; EnvDACs: CalEPA designates the top 25 percent scoring census tracts as DACs. Census tracts that score the highest five percent of pollution burden scores but do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data are also designated as DACs (refer to the CalEnviroScreen 3.0 Mapping Tool or Results Excel Sheet); Fringe Community: a community that does not meet the established DAC, SDAC, and EDA definitions but can show that it scores in the top 25 percent of either the Pollution Burden or Population Characteristics score using the CalEnviroScreen 3.0.

Furthermore, the Central Coast Water Board is committed to providing all persons the opportunity to participate in the public process and provide meaningful input to decisions that affect their communities.

The proposed order regulates the production of recycled water and discharge of treated domestic wastewater. Using 2020 census data, the California Department of Water Resources Disadvantaged Community (DAC) Mapping Tool[10] identifies the areas at and downstream of the Facility as not disadvantaged and 43 block groups within the communities served, representing approximately 25 percent of the population, as disadvantaged communities. Operation of this publicly owned treatment works in compliance with the proposed order will not pose a significant threat to water quality and is therefore unlikely to impact DACs. If impacts to surface water result from the discharges regulated by the proposed order, Central Coast Water Board staff will work with the Discharger to rectify the water quality impacts and help facilitate outreach and education to inform affected communities and connect them with available resources.

Although the Facility is not expected to impact a disadvantaged or tribal community, the Central Coast Water Board has satisfied the outreach requirements set forth in Water Code section 189.7 by conducting outreach to potentially interested groups representing disadvantaged communities and tribal communities. Through the development of an outreach plan, Central Coast Water Board staff identified interested groups representing disadvantaged communities and included them in the distribution list (i.e., interested parties list) for notifications related to development and consideration of this order for adoption. In addition, 30 outreach letters were distributed to tribal communities which provided general information about the Facility and an invitation to provide input and participate in the permit development process.

Climate Change

The Central Coast faces the threat and the effects of climate change for the foreseeable and distant future. To proactively prepare and respond, the Central Coast Water Board has launched the Central Coast Water Board's Climate Action Initiative, which identifies how the Central Coast Water Board's work relates to climate change and prioritizes actions that improve water supply resiliency through water conservation and wastewater reuse and recycling; mitigate for and adapt to sea level rise and increased flooding; improve energy efficiency; and reduce greenhouse gas production. The Climate Action Initiative is consistent with the Governor's Executive Order B-30-15 and the State Water Board's Climate Change Resolution 2017-0012.

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[10] The DAC Mapping Tool is used to inform statewide Integrated Water Resources Management (IRWM), Sustainable Groundwater Monitoring Act (SGMA), and California Water Plan implementation efforts and can be found at the following website: https://gis.water.ca.gov/app/dacs/. The tool defines a DAC as a census block with a median household income between $50,458 and $67,278 and a severely disadvantaged community (SDAC) as a census block with a median household income below $50,458. The SDAC census blocks in the community served have median household incomes between $14,683 and $49,732. The DAC census blocks in the community served have median household income between $51,893 and $61,250.

The proposed order aligns with the Climate Action Initiative's objectives and aligns with State Water Board Resolution 2017-0012 by increasing water supply reliability through beneficial reuse of treated effluent. Additionally, to proactively plan for the future, the proposed order requires the Discharger to continue to identify and plan for hazards and vulnerabilities at the Facility including flooding, extreme temperature, and influent flow and loading fluctuations exacerbated by climate change.

CONCLUSION

Proposed Order R3-2024-0045 is a renewal of the existing NPDES permit for the Facility and incorporates increase reverse osmosis concentrate wastes from the Pure Water Monterey expansion. The proposed order has been drafted and prepared in compliance with the Ocean Plan and state and federal guidance and regulations. The proposed order is protective of water quality, requires a monitoring and reporting program sufficient to demonstrate compliance with the proposed order's effluent limitations and other requirements, and supports efforts to produce and reuse recycled water.

RECOMMENDATION

Adopt Order R3-2024-0045 as proposed.

ATTACHMENTS

1. Proposed Order R3-2024-0045
2. Response to Comments