



SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

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TO: David W. Gibson, Executive Officer
San Diego Regional Water Quality Control Board

FROM: 
Jonathan Bishop
Chief Deputy Director
STATE WATER RESOURCES CONTROL BOARD

DATE: March 8, 2012

SUBJECT: COMPLIANCE POINT FOR SOUTH COAST WATER
DISTRICT'S BRINE DISCHARGE

As you know, staff of the State Water Resources Control Board (State Water Board) is currently in the process of developing amendments to the California Ocean Plan that will, among other things, specifically address discharges of brine waste from desalination facilities. The State Water Board recognizes that brine waste discharges have significantly different impacts to ocean water quality than other industrial wastes, and the State Water Board is very interested in exploring alternatives that promote the availability of new water supplies. Consequently, this Ocean Plan amendment has been identified as a high priority by the State Water Board, and staff currently projects that the Ocean Plan amendment will be completed within a year.

I understand that the brine discharge from South Coast Water District's Groundwater Recovery Facility, which treats brackish groundwater for potable uses, may not be capable of consistently meeting the current Ocean Plan technology-based effluent limitations at the point that it discharges into the South Orange County Wastewater Authority joint ocean outfall due to naturally occurring elevated levels of iron and magnesium in the groundwater. After the brine discharge from the Groundwater Recovery Facility is commingled with the other wastewater discharges in the joint ocean outfall, however, the combined discharge has historically met the effluent limitations.

Given the immediate pendency of the Ocean Plan amendment, I believe that an

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acceptable interim approach would be to measure compliance with the technology-based effluent limitations after the point where the brine discharge from the Groundwater Recovery Facility is commingled with the joint ocean outfall discharges, prior to the discharge to the ocean. While this is a departure from the current practice of applying those effluent limitations, I believe that a limited, short-term approach to defer, and possibly avoid, any significant expenditures is warranted, due to the pending completion of the Ocean Plan amendment, the comparatively lower impacts to ocean water quality from brine discharges, and our common desire to facilitate water availability.

If the San Diego Regional Water Quality Control Board determines that it is appropriate to temporarily move the compliance point for the technology-based effluent limitations for the Groundwater Recovery Facility to a location where it has commingled with other wastewater discharges, it should also ensure that (1) a reopener is included so that the permit can be modified as necessary to reflect the final terms of the Ocean Plan once the amendment is completed, (2) performance data is collected from the Groundwater Recovery Facility for the purpose of determining the current treatment capabilities, (3) a feasibility study is completed to assess the costs of providing additional treatment to meet the technology-based effluent limitations at the point that it discharges into the joint outfall, and (4) the joint outfall permittee, the South Orange County Wastewater Authority, is responsible for any penalties or liabilities for exceedances of the technology-based effluent limitations, subject to any internal agreements between the joint dischargers.

If you have any questions about this, please don't hesitate to call me at (916) 341-5165 or Phil Wyels, Assistant Chief Counsel, at (916) 341-5178.

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