

EXECUTIVE OFFICER SUMMARY REPORT
June 24, 2015

- ITEM: 13.a
- SUBJECT: Public Hearing: City of Escondido, Hale Avenue Resource Recovery Facility (HARRF), Escondido, California. (*Vicente Rodriguez*)
- a. NPDES Permit Reissuance - Intermittent Wet Weather Discharge to Escondido Creek (Tentative Order No. R9-2015-0026, NPDES No. CA0108944)
- PURPOSE: To receive public testimony and consider adoption of Tentative Order No. R9-2015-0026 (Tentative Order).
- RECOMMENDATION: Adoption of the Tentative Order (**Supporting Document No. 1**) is recommended.
- KEY ISSUES:
1. The Tentative Order provides that the discharge of effluent from the City of Escondido, Hale Avenue Resource Recovery Facility (Facility) to Escondido Creek is to be limited to rare instances of extreme wet weather in accordance with defined criteria. The Tentative Order also modifies the permitted flow based on the City of Escondido's (City) anticipated population growth; however, the maximum flow limitation of 6.4 million gallons per day (MGD) is less than the previous permit limitation of 9 MGD.
 2. The Tentative Order requires that the discharge of treated wastewater be adequately disinfected, oxidized, coagulated, clarified, and filtered pursuant to California Code of Regulations (CCR) Title 22, prior to discharge. This requirement is incorporated into the bacteria and turbidity effluent limitations in sections IV.A.1 c. and d. of the Tentative Order.
 3. The Tentative Order requires use of the Test of Significant Toxicity (TST) approach to determine whether or not a discharge is toxic.

4. Although the City cannot immediately comply with effluent limitations for several constituents in the Tentative Order, they have submitted a plan to expand their recycled water system, eliminating the need to discharge into Escondido Creek in the long-term. Item 13.b on today's agenda is the proposed adoption of a Time Schedule Order (TSO) that will establish interim effluent limitations for the discharge, a compliance schedule to implement the recycled water expansion project, and conditions to protect the City from mandatory minimum penalties until July 31, 2020.

PRACTICAL VISION: Consistent with the mission of the *Strategy for Healthy Waters* chapter of the Practical Vision strategy document, the Tentative Order integrates all applicable technology-based requirements, water quality-based effluent limitations, and receiving water quality standards in order to optimize protection of the water quality and beneficial uses in the watershed. Additionally, the Tentative Order has provisions allowing for future modification of monitoring requirements to allow the City to participate in regional monitoring and assessment programs in keeping with San Diego Water Board Resolution No. R9-2012-0069, *Resolution in Support of a Regional Monitoring Framework*. The recycled water use program is also entirely consistent with the *Strategy for a Sustainable Local Water Supply* chapter of the Practical Vision document.

DISCUSSION: The City owns and operates the Facility, a publicly-owned treatment works (POTW) in Escondido, California (**Supporting Document No. 2**). The Facility treats up to 18 million gallons per day (MGD) to at least secondary treatment standards. Up to 9 MGD of the 18 MGD is treated to tertiary treatment standards and is delivered to recycled water customers for use as industrial supply and irrigation water. The remaining secondary treated effluent is discharged to the San Elijo Ocean Outfall (SEOO). During extreme rain events, when effluent flows exceed the hydraulic capacity of the SEOO, the excess flows are treated to tertiary treatment standards and discharged to Escondido Creek.

These discharges are regulated separately under the following three permits:

- Discharge to SEOO: Order No. R9-2010-0086

regulates the discharge of HARRF secondary treated effluent to San Elijo Ocean Outfall.

- Discharge to Escondido Creek: Order No. R9-2003-0394 regulates the intermittent wet-weather discharge of disinfected and dechlorinated tertiary effluent to Escondido Creek during extreme hydrologic events when the Facility flows exceed the hydraulic capacity of the SEOO. If adopted, the Tentative Order will replace Order No. R9-2003-0394.
- Applications of Recycled Water: Order No. R9-2010-0032 (Waste Discharge Requirements and Master Reclamation Permit) regulates the discharge of disinfected tertiary recycle water to qualified customers within the service areas of the City of Escondido and Rincon del Diablo Municipal Water District.

The City has been recycling its treated wastewater since 2001. The tertiary-treated wastewater is currently used as industrial supply water and as irrigation water at golf courses, parks, schools, green belts, roadway medians, and other open spaces.

The City plans to increase its recycled water flow volume to 12 MGD by 2021. The City is in the process of expanding the recycled water system to serve agricultural users in the eastern part of the City of Escondido. This plan is known as the Recycled Water Easterly Main Extension Project. Completion of the Project will enable the City to create 12.0 MGD of net reuse or storage of the tertiary effluent and eliminate the need to discharge tertiary treated effluent to Escondido Creek during extreme wet weather events. The termination of this discharge will eliminate the need to maintain NPDES permit coverage for the discharge and the Tentative Order could then be rescinded.

The Tentative Order was developed based on information in the City's reissuance application; the City's self-monitoring reports; and other available sources, such as Facility inspection reports. If adopted, the Tentative Order will supersede Order No. R9-2003-0094.

The Tentative Order was noticed on April 17, 2015, and released for formal public comment on April 20, 2015.

Comments were received from the City on May 12, 2015 (**Supporting Document No. 3**). A Response to Comments document containing the San Diego Water Board responses to these comments is provided as **Supporting Document No. 4**.

Modifications to the Tentative Order have been made to address some of the comments received by the City and to correct a few other minor errors. The modifications are shown in Supporting Document No. 1 in underline/strikeout format.

LEGAL CONCERNS:

None

SUPPORTING DOCUMENTS:

1. Tentative Order No. R9-2015-0002 (as revised in responses to comments)
2. Location Map
3. Comment letter from City of Escondido
4. San Diego Water Board Response to Comments Report

COMPLIANCE RECORD:

There have been no discharges from the Facility to Escondido Creek under the previous Order since 2005.

PUBLIC NOTICE:

On April 17, 2015, a public notice was published in the San Diego Union Tribune. The Tentative Order was released for formal public review and comment on April 20, 2015. Notice was also provided in the meeting notice and agenda for the June 24, 2015 Board meeting which is posted on the San Diego Water Board's website.