

EXECUTIVE OFFICER SUMMARY REPORT
May 13, 2015

- ITEM: 8
- SUBJECT: Public Hearing: NPDES Permit Reissuance: Padre Dam Municipal Water District, Ray Stoyer Water Recycling Facility, Discharge to Sycamore Creek (Tentative Order No. R9-2015-0002, NPDES No. CA0107492). (*Joann Lim*)
- PURPOSE: To receive public testimony and consider adoption of Tentative Order No. R9-2015-0002 (Tentative Order).
- RECOMMENDATION: Adoption of the Tentative Order (**Supporting Document No. 1**) is recommended.
- KEY ISSUES:
1. The Tentative Order incorporates bacteria wasteload allocations in accordance with the requirements of the *Bacteria Total Maximum Daily Load for Beaches and Creeks in the San Diego Region* (Bacteria TMDL).
 2. The Tentative Order modifies the effluent limitations and monitoring requirements based on the State Water Resources Control Board's *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (State Implementation Policy or SIP), including a statistical analysis of the monitoring data collected over the previous permit cycle (also known as the reasonable potential analysis or RPA).
 3. The Tentative Order requires use of the Test of Significant Toxicity (TST) approach to determine whether or not a discharge is toxic.

PRACTICAL VISION:

The Padre Dam Municipal Water District (Padre Dam, District, or Discharger) has been effectively recycling its wastewater for over fifty years. The tertiary-treated wastewater is currently used to maintain the water levels of the Santee Lakes or is delivered to customers, who primarily use it for irrigating landscape for schools, street medians, and other commercial and residential uses. Padre Dam is also currently moving forward with implementation of an Advanced Water Purification demonstration facility. If the demonstration facility is deemed successful and the program moves forward, the water would be injected into the Santee groundwater basin, withdrawn, and treated again prior to being distributed as drinking water. The program would satisfy approximately 20 percent of current drinking water demands within the District. All of these facets of Padre Dam's recycled water use program save drinking water supplies consistent with Governor Brown's recent mandate to achieve a 25 percent reduction in potable urban water use statewide. The recycled water use program is also entirely consistent with the *Strategy for a Sustainable Local Water Supply* chapter of the Practical Vision document.

The Tentative Order serves an essential role in regulating the discharge of Padre Dam's recycled water into Santee Lakes and the periodic overflow of the lakes into Sycamore Creek. The Santee Lakes are extensively used by the public for recreational activities, including boating and fishing. 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 public health for recreational activities within Santee Lakes as well as water quality and beneficial uses in Sycamore Creek. Additionally, the Tentative Order has provisions allowing for future modification of monitoring requirements to allow Padre Dam 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*.

DISCUSSION:

Padre Dam owns and operates the Ray Stoyer Recycling Facility (Facility), a publicly-owned treatment works (POTW) that produces up to 2.0 million gallons per day (MGD) of recycled water. The source wastewater is primarily residential and commercial sewage collected from the City of Santee, the City of El Cajon, and the unincorporated community of Lakeside in San Diego County (**Supporting Document 2, Location Map**). The Facility produces tertiary-treated wastewater that meets the requirements for reuse as specified in Title 22 of the California Code of Regulations.

The Tentative Order will, if adopted, regulate the discharge of recycled water produced at the Facility to the Santee Lakes, a recreational park consisting of seven lakes that ultimately discharges to Sycamore Creek, a tributary of the San Diego River. Both the Facility and the Santee Lakes are considered part of the wastewater treatment system. Discharges from the Facility through Santee Lakes to Sycamore Creek are currently regulated by Order No. R9-2009-0037. Recycled water from the Facility is also delivered to reuse sites within the Santee Hydrologic Subarea (907.12) and the El Cajon Hydrologic Subarea (907.13) under separate waste discharge requirements.

The Tentative Order was developed based on information in Padre Dam's reissuance application; Padre Dam's self-monitoring reports; and other available sources, such as Facility inspection reports. If adopted, the Tentative Order will supersede Order No. R9-2009-0037.

The Tentative Order was noticed and released for formal public comment on March 13, 2015. Comments were received from two entities, the U.S. Environmental Protection Agency (USEPA), Region IX on April 8, 2015 (**Supporting Document No. 3**) and Padre Dam on April 13, 2015 (**Supporting Document No. 4**). A Response to Comments document containing the San Diego Water Board responses to these comments is provided as **Supporting Document No. 5**.

Below is a summary of the most significant comments:

- 1. USEPA supports the numeric effluent limitations and monitoring requirements for chronic whole effluent toxicity contained in the Tentative Order.*

2. *Padre Dam commented that they concur with requirements of the Tentative Order, that they support the San Diego Water Board's regional monitoring framework approach, and that they stand ready to coordinate with the San Diego Water Board to implement the core monitoring, receiving water monitoring, and receiving water studies proposed within the Tentative Order.*
3. *Padre Dam requested several modifications to the monitoring and reporting program (Tables E-3 and E-4, Attachment E of the Tentative Order) to be consistent with the Tentative Order.*

Modifications to the Tentative Order have been made to address the monitoring program inconsistencies identified by Padre Dam 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. USEPA, Region IX April 8, 2015 comment letter
4. Padre Dam Municipal Water District April 13, 2015 comment letter
5. San Diego Water Board Response To Comments document
6. Compliance Record

COMPLIANCE RECORD:

During the term of Order No. R9-2009-0037, according to the Discharger's self-monitoring reports, there were four monitoring/reporting violations and seven effluent limitation violations. Details and enforcement actions taken on each violation are provided in **Supporting Document No. 6**.

PUBLIC NOTICE:

The Tentative Order was noticed and released for formal public review and comment on March 13, 2015. On March 13, 2015, a public notice was published in the San Diego Union Tribune. Notice was also provided in the meeting notice and agenda for the May 13, 2015 Board meeting, which is posted on the San Diego Water Board's website.