

**REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION**

**EXECUTIVE OFFICER SUMMARY REPORT
December 8, 2020**

ITEM NO. 7

SUBJECT

Consideration of Tentative Order No. R9-2020-0179, *An Order Rescinding Order No. R9-2004-0409, Waste Discharge Requirements for the Ramona Unified School District, Hanson Elementary School, San Diego County* (Tentative Order No. R9-2020-0179). (Sherrie Komeylyan)

STAFF RECOMMENDATION

Adoption of Tentative Order No. R9-2020-0179 is recommended.

KEY ISSUES

Tentative Order No. R9-2020-0179 (**Supporting Document 1**), if adopted, rescinds Order No. R9-2004-0409, *Waste Discharge Requirements for the Ramona Unified School District, Hanson Elementary School, San Diego County* (Order No. R9-2004-0409). The onsite wastewater treatment systems (OWTS) at the Hanson Elementary School (Facility), owned and operated by Ramona Unified School District (Discharger), will be regulated under State Water Resources Control Board Order WQ 2014-0153-DWQ *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order).¹

PRACTICAL VISION

Tentative Order No. R9-2020-0179 is consistent with the Strategizing for Healthy Waters chapter of the *San Diego Water Board Practical Vision*.² The use of statewide permits, like the General Order, help the San Diego Water Board focus staff resources on larger projects and facilities within the region that pose a greater threat to water quality. Additionally, enrolling dischargers in the General Order maintains consistent regulation of small domestic wastewater systems throughout the state.

DISCUSSION

The Facility is located at 2520 Boundary Avenue, Ramona, San Diego County (**Supporting Document 2**). San Diego Water Board staff conducted an inspection of the Facility on February 7, 2020, and did not observe any violations of the requirements specified in Order No. R9-2004-0409.

¹ General Order:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf

² Practical Vision: https://www.waterboards.ca.gov/sandiego/water_issues/programs/practical_vision/

San Diego Water Board staff reviewed the requirements specified in Order No. R9-2004-0409 and determined the Facility OWTS is eligible for enrollment in the General Order. Furthermore, Order No. R9-2004-0409 is outdated and is not as protective of water quality as the requirements specified in the General Order. Implementation of the General Order provides a more appropriate, consistent, and streamlined statewide approach to regulating small domestic wastewater treatment systems. Discharges from small domestic wastewater treatment systems have certain common characteristics, such as similar constituents, concentrations of constituents, disposal techniques, and flow ranges, and require the same or similar treatment standards. While the Discharger may request to be regulated under individual waste discharge requirements, the Facility's enrollment in the General Order allows the San Diego Water Board to effectively and efficiently regulate discharges from small domestic wastewater treatment systems, while prioritizing the agency's limited resources.

SIGNIFICANT CHANGES

The significant differences between the General Order and Order No. R9-2004-0409 are:

1. Order No. R9-2004-0409 includes specific individual waste discharge requirements for the Facility, whereas the General Order regulates small domestic wastewater facilities statewide.
2. The monitoring required by the General Order is less stringent than the monitoring required by Order No. R9-2004-0409. The monitoring and reporting program required by the General Order, however, is more appropriate because it is consistent with the monitoring and reporting requirements for facilities of similar size and discharge across the state.

COMPLIANCE RECORD

A total of six staff enforcement letters and three Notices of Violation have been issued to the Facility for the following 370 violations of Order No. R9-2004-0409:

- Failure to meet the daily maximum effluent monitoring limit for iron in August 2005, April 2006, July – December 2006, January – August 2007, October – November 2007, January 2008, April 2008, June 2008, October 2008, November 2008, April – July 2009, January 2010, January - February 2012, June 2015, and September 2015.
- Failure to meet the 12-month average effluent monitoring limit for iron in December 2006, November 2007, and December 2007 – 2009.
- Failure to meet the daily maximum effluent monitoring limit for nitrate in August 2005, November 2005, February 2005, April 2006, July – December 2006, January – December 2007, January – June 2008, August – December 2008, January – December 2009, January – December 2010, January – November 2011, January –

March 2012, June 2013, September 2013, December 2013, March 2014, June 2014, September 2014, December 2014, March 2015, June 2015, September 2015, March 2016, June 2016, September 2016, December 2016, March 2017, June 2017, September 2017, December 2017, and March 2018.

- Failure to meet the 12-month average effluent monitoring limit for nitrate in December 2006 – 2009, March 2013, June 2013, September 2013, December 2013, March 2014, June 2014, September 2014, December 2014, June 2015, September 2015, March 2016, June 2016, September 2016, December 2016, January 2017, March 2017, June 2017, September 2017, December 2017, and March 2018.
- Failure to meet the daily maximum effluent monitoring limit for manganese in August 2005, April 2006, August 2006, October – November 2006, July 2007, October - November 2007, October 2008, April 2009, and May – June 2009.
- Failure to meet the 12-month average effluent monitoring limit for manganese in December 2006 and 2007.
- Failure to implement monthly effluent monitoring in September 2005, December 2005, and June 2006.
- Failure to submit a complete monitoring report in April 2006, December 2015, January 2018, and March 2018.

Since March 2018, no violations of Order No. R9-2004-0409 have occurred.

PUBLIC NOTICE

Notification of this action was sent to the Discharger and known interested parties on October 12, 2020 (**Supporting Documents 3 and 4**). Additionally, Tentative Order No. R9-2020-0179 was posted on the San Diego Water Board website on October 12, 2020. No comments were received during the public comment period. These actions satisfy the 30-day public notification and comment period requirements of Water Code section 13167.5.

SUPPORTING DOCUMENTS

1. Tentative Order No. R9-2020-0179
2. Vicinity and Facility Map
3. Tentative Order No. R9-2020-0179 Transmittal Letter
4. Notice of Public Hearing and Comment Period