

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

EXECUTIVE OFFICER SUMMARY REPORT

November 18, 2020

ITEM NO. 7

SUBJECT

Consideration of Tentative Order No. R9-2020-0188, *An Order Rescinding Order No. 99-04, Waste Discharge Requirements for the Zoological Society of San Diego, San Diego Wild Animal Park, San Diego County* (Tentative Order No. R9-2020-0188).
(Brandon Bushnell)

STAFF RECOMMENDATION

Adoption of Tentative Order No. R9-2020-0188 is recommended.

KEY ISSUES

Tentative Order No. R9-2020-0188 (**Supporting Document 1**), if adopted, rescinds Order No. 99-04, *Waste Discharge Requirements for the Zoological Society of San Diego, San Diego Wild Animal Park, San Diego County* and Addendum No. 1 to Order No 99-04, *Waste Discharge Requirements for the Zoological Society of San Diego, San Diego Wild Animal Park, San Diego County* (Collectively, Order No. 99-04). The onsite wastewater treatment systems (OWTS) at the San Diego Wild Animal Park (Facility), owned and operated by Zoological Society of San Diego (Discharger), will be regulated under State Water Resources Control Board Order WQ 2014-0153-DWQ, *General Waste Discharge Requirement for Small Domestic Wastewater Treatment Systems* (General Order).¹

PRACTICAL VISION

Tentative Order No. R9-2020-0188 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.

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/

DISCUSSION

The Facility is located at 15500 San Pasqual Valley Road, Escondido, in San Diego County (**Supporting Document 2**). San Diego Water Board staff reviewed the Discharger's Report of Waste Discharge for enrollment of the Facility in the General Order and the requirements specified in Order No. 99-04. San Diego Water Board staff determined the Facility OWTS is eligible for enrollment in the General Order. Furthermore, Order No. 99-04 is outdated and is not as protective of water quality as the requirements specified in the General Order.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. 99-04 are:

1. Order No. 99-04 includes 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. 99-04. The monitoring and reporting program required by the General Order, however, is more appropriate and consistent with facilities of similar size and discharge across the state.

COMPLIANCE RECORD

The San Diego Water Board issued twenty-one staff enforcement letters and two notices of violation for the following 392 violations of Order No. 99-04:

- 297 violations for exceeding flow rates in 1999, 2000, 2001, 2002, 2003, and 2009.
- 33 violations for exceeding total coliform limits in 2004, 2005, 2008, 2009, 2011, 2013, 2016, 2017, and 2019.
- 17 violations for exceeding chloride limits in 2009, 2010, 2016, 2017, 2018.
- 22 violations for deficient or late monitoring in 2000, 2001, 2002, 2003, 2006, 2007, 2010, 2015 and 2017.

- 20 violations for exceeding total dissolved solids, total suspended solids, and pH limits in 2000, 2015, 2016, and 2018.
- 1 violation for exceeding biochemical oxygen demand limits in 2011.
- 1 violation for discharging waste to waters of the United States in 1999.
- 1 violation for an unauthorized discharge of 300 gallons of partially treated wastewater in 2020.

The Discharger is currently installing an upgraded treatment system to improve its ability to meet the prescribed effluent limits more consistently and limit the number of violations.

PUBLIC NOTICE

Notification of this action was provided to the Discharger and known interested parties on September 14, 2020 (**Supporting Documents 3 and 4**). Additionally, the San Diego Water Board posted Tentative Order No. R9-2020-0188 on its website on September 14, 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. R9-2020-0188
2. Vicinity and Facility Map
3. Tentative Order No. R9-2020-0188 Transmittal Letter
4. Notice of Public Hearing and Comment Period