

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

**EXECUTIVE OFFICER SUMMARY REPORT  
September 9, 2020**

**ITEM NO. 9**

**SUBJECT**

Consideration of Tentative Order No. R9-2020-0177, *An Order Rescinding Order No. 95-89, Waste Discharge Requirements for Thomas Sarrantos, Pair-A-Dice Mobile Home Park, San Diego County* (Tentative Order No. R9-2020-0177). (Brandon Bushnell)

**STAFF RECOMMENDATION**

Adoption of Tentative Order No. R9-2020-0177 is recommended.

**KEY ISSUES**

Tentative Order No. R9-2020-0177 (**Supporting Document 1**), if adopted, rescinds Order No. 95-89, *Waste Discharge Requirements for Thomas Sarrantos, Pair-A-Dice Mobile Home Park, San Diego County* (Order No. 95-89). The Pair-A-Dice Mobile Home Park currently operates as the Heavenly Oaks Residential Community (Facility). The onsite wastewater treatment systems (OWTS) at the Facility, owned and operated by Mr. Anthony Windle (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).<sup>1</sup>

**PRACTICAL VISION**

Tentative Order No. R9-2020-0177 is consistent with the Strategizing for Healthy Waters chapter of the *San Diego Water Board Practical Vision*.<sup>2</sup> The use of statewide general permits, like the General Order, help the San Diego Water Board to 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 26835 Old Highway 80, Guatay in San Diego County (**Supporting Document 2**). San Diego Water Board staff conducted an inspection of

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<sup>1</sup> General Order:

[https://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2014/wqo2014\\_0153\\_dwq.pdf](https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf)

<sup>2</sup> Practical Vision:

[https://www.waterboards.ca.gov/sandiego/water\\_issues/programs/practical\\_vision/docs/PV-WQCC\\_Version.pdf](https://www.waterboards.ca.gov/sandiego/water_issues/programs/practical_vision/docs/PV-WQCC_Version.pdf)

the Facility OWTS and did not observe any violations of the requirements specified in Order No. 95-89.

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. 95-89. San Diego Water Board staff determined the Facility OWTS is eligible for enrollment in the General Order. Furthermore, Order No. 95-89 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, 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. 95-89 are:

1. Order No. 95-89 includes specific individual Waste Discharge Requirements for the Facility and the General Order regulates small domestic wastewater facilities statewide.
2. The monitoring required by the General Order is less stringent than the monitoring included in Order No. 95-89, however the monitoring and reporting program required by the General Order is more appropriate and consistent with facilities of similar size and discharge across the State.

### **COMPLIANCE RECORD**

A total of four staff enforcement letters have been issued to the Facility for the following violations of Order No. 95-89:

- Failure to submit Annual Monitoring Reports by the due date for the years 1991, 1992, 1995, 1997, 1998, 1999, 2001, 2002 and 2009.
- Failure to pay annual fee in 1999 and 2001.
- Failure to prevent the surfacing of wastewater in 1995.

Since the issuance of a Staff Enforcement Letter in March 2002, no violations of Order No. 95-89 have occurred.

## **PUBLIC NOTICE**

Notification of this action was sent to the Discharger and known interested parties by mail on July 1, 2020 (**Supporting Documents 3 and 4**). Additionally, Tentative Order No. R9-2020-0177 was posted on the San Diego Water Board website on July 1, 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, division 7, section 13167.5.

## **SUPPORTING DOCUMENTS**

1. Tentative Order No. R9-2020-0177
2. Vicinity and Facility Map
3. Tentative Order No. R9-2020-0177 Transmittal Letter
4. Notice of Public Hearing and Comment Period