

EXECUTIVE OFFICER SUMMARY REPORT
September 8, 2010

- ITEM: 14
- SUBJECT: Waste Discharge Requirements: San Vicente Wastewater Treatment Plant, Ramona Municipal Water District (An addendum to incorporate requirements for the discharge of brine and to clarify existing requirements) (Tentative Addendum No. 1 to Order No. R9-2009-0005) (*Cathryn Henning*)
- PURPOSE: To adopt tentative Addendum No. 1 to Order No. R9-2009-0005.
- PUBLIC NOTICE: All interested parties were notified of the action to adopt tentative Addendum No. 1 to Order No. R9-2009-0005 on July 21, 2010 with mailings of the tentative Order. In addition, the tentative Order was published on the San Diego Water Board's website. These public notification actions satisfy the requirements of California Water Code section 13167.5.
- DISCUSSION: Order No. R9-2009-0005 prescribes waste discharge requirements to the Ramona Municipal Water District (RMWD) for the treatment and disposal at the San Vicente Wastewater Treatment Plant of 0.8 million gallons per day of disinfected secondary recycled water for irrigation of groves and disinfected tertiary recycled water for landscape irrigation. As part of the treatment process, the RMWD operates a reverse osmosis treatment system. Due to the expense of hauling the brine from the reverse osmosis unit to an offsite location for disposal, RMWD proposes to build a brine evaporation pond at the facility.
- Tentative Addendum No. 1 to Order No. R9-2009-0005 (Supporting Document No. 1) establishes discharge and monitoring requirements for the discharge of brine to an evaporation pond. In adopting the Addendum, the San Diego Water Board will conclude that the brine disposal is exempt from California Code of Regulations, Title 27, *Consolidated Regulations for Treatment, Storage,*

Processing, or Disposal of Solid Waste. Although the project qualifies for the exemption, many of the requirements in CCR Title 27 are applicable to the discharge. These requirements for operation and maintenance of the evaporation pond, precipitation and drainage control, leachate collection and removal, construction, and liner specifications are contained in the tentative addendum.

The preparation of the tentative Addendum provided an opportunity to make minor changes to the Order and Monitoring and Reporting Program. These changes will facilitate the assessment of compliance of the recycled water with discharge specifications.

Additional information supporting the findings and requirements of the tentative Addendum can be found in the Information Sheet. (Supporting Document No. 2)

On August 11, 2010, the RMWD submitted written comments (Supporting Document No. 3) on the tentative Addendum. These comments are addressed in the response to comments (Supporting Document No. 4) and are incorporated into the tentative Addendum via the errata sheet. (Supporting Document No. 5) No additional comments have been received.

All changes will be incorporated into Order No. R9-2009-0005 in accordance with the underline/strikeout version of the Order. (Supporting Document No. 6)

The history of this recycled water project is illustrative of the salinity management problems that exist in many of Region 9's groundwater basins. Staff will give a brief presentation on the salinity management issues and lessons learned as we implement the Recycled Water Policy in Region 9.

KEY ISSUES:

The discharge of brine is exempted for regulation under California Code of Regulation Title 27 pursuant to section 20900(b) because the discharge as proposed in the report of waste discharge 1) is regulated under Waste Discharge Requirements, 2) is in compliance with the Basin Plan, and 3) does not need to be managed as a hazardous waste.

LEGAL CONCERNS:

None.

SUPPORTING DOCUMENTS:

1. Tentative Addendum No. 1 to Order No. R9-2009-0005
2. Information Sheet for Tentative Addendum No. 1 to Order No. R9-2009-0005
3. Ramona Municipal Water District's Comments
4. Response to Comments
5. Errata Sheet
6. Underline/Strike-Out Version of Proposed Revisions to Order No. R9-2009-0005

SIGNIFICANT CHANGES:

1. The tentative Addendum establishes requirements for the discharge of brine.
2. The tentative Addendum modifies Monitoring and Reporting Program No. R9-2009-0005 to clarify monitoring points and establish compliance determination sections.

COMPLIANCE RECORD:

Since adoption of Order No. R9-2009-0005, the San Diego Water Board has issued a staff enforcement letter to the Ramona Municipal Water District on July 7, 2010 citing several effluent violations. Because compliance is determined annually, effluent concentrations factor in recycled water quality prior to operation of the reverse osmosis system. The most recent effluent results indicate the effluent is in compliance with discharge specifications.

RECOMMENDATION:

Adoption of tentative Addendum No. 1 to Order No. R9-2009-0005.