

EXECUTIVE OFFICER SUMMARY REPORT
November 12, 2014

ITEM: 7

SUBJECT: NPDES Permit Revision: An amending order to modify the receiving water monitoring requirements in Order No. R9-2013-0006, NPDES Permit No. CA0109045, *Waste Discharge Requirements for the City of San Diego South Bay Water Reclamation Plant, Discharge to the Pacific Ocean via the South Bay Ocean Outfall* (Tentative Order No. R9-2014-0071). (Joann Lim)

PURPOSE: To consider adopting Tentative Order No. R9-2014-0071, amending Order No. R9-2013-0006.

RECOMMENDATION: Adoption of Tentative Order No. R9-2014-0071 is recommended.

KEY ISSUES: The Tentative Order will make the receiving water monitoring program for the City of San Diego's (City's) South Bay Water Reclamation Plant consistent with the receiving water monitoring program for the U.S. Section of the International Boundary Commission's (USIBWC's) South Bay International Wastewater Treatment Plant.

PRACTICAL VISION: National Pollutant Discharge Elimination System (NPDES) permits, such as Order No. R9-2013-0006, are the chief regulatory approach for controlling point source pollutant discharges to surface waters for the protection of human health and the environment. Consistent with the mission of the *Strategy for Healthy Waters* chapter of the Practical Vision, Order No. R9-2013-0006 integrates all applicable technology-based and water quality-based standards to optimize protection of water quality and beneficial uses in ocean waters.

Also, by ensuring that the City and USIBWC can continue the joint monitoring effort for the South Bay Ocean Outfall, the Tentative Order achieves maximum efficiency and economy of resources through sharing of technical

resources, trained personnel, and associated costs, consistent with *Strategy for Healthy Waters* chapter of the Practical Vision: “The Board will ensure its staff and funding are put to the best possible use by (1) establishing and implementing priorities for its work and the work it requires of the entities it regulates.”

DISCUSSION:

Because the City’s South Bay Water Reclamation Plant and USIBWC’s South Bay International Wastewater Treatment Plant discharge to the Pacific Ocean via the South Bay Ocean Outfall, the City and USIBWC have jointly conducted their receiving water monitoring programs to characterize the ocean receiving waters and to monitor the effects of the combined discharge on the ocean receiving waters since 1996.

On February 13, 2013, the San Diego Water Board adopted Order No. R9-2013-0006 (NPDES No. CA0109045), establishing waste discharge requirements for the City to discharge up to 15 million gallons per day (MGD) of secondary-treated wastewater from the South Bay Water Reclamation Plant into the Pacific Ocean via the South Bay Ocean Outfall. During the adoption proceedings, the San Diego Water Board agreed to conduct a comprehensive review of the receiving water monitoring program at the South Bay Ocean Outfall utilizing the San Diego Regional Monitoring Framework as part of the NPDES permit reissuance for USIBWC’s South Bay International Wastewater Treatment Plant and to modify the receiving water monitoring program in Order No. R9-2013-0006, accordingly, to ensure that the receiving water monitoring programs are consistent for the shared outfall.

On June 26, 2014, the San Diego Water Board adopted Order No. R9-2014-0009 (NPDES No. CA0108928), establishing waste discharge requirements for USIBWC to discharge up to 25 MGD of secondary-treated wastewater from the South Bay International Wastewater Treatment Plant into the Pacific Ocean via the South Bay Ocean Outfall. Order No. R9-2014-0009 modified the receiving water monitoring program for the South Bay Ocean Outfall to mirror similar requirements at the City’s

Point Loma Ocean Outfall. During the adoption proceedings, several commenters requested that the receiving water monitoring program be modified to include a broad assessment of the Pacific Ocean from Point Loma south into Mexico. While it was ultimately determined that the receiving water monitoring programs in NPDES permits must be limited in scope to the effects of the permitted discharge, the San Diego Water Board is committed to initiating a separate effort to evaluate and coordinate monitoring activities in the Pacific Ocean from Point Loma south into Mexico. The Board will be updated as progress is made on this effort.

If adopted, the Tentative Order will make the receiving water monitoring program in the City's permit consistent with the same program in IBWC's permit, including the corrections addressed by Agenda Item No. 8.

The only comment letter received regarding this item was from the City, in support of the Tentative Order.

A Revised Tentative Order was mailed out on October 29, 2014, to add findings clarifying the scope and purpose of the amending order (see Supporting Document 1).

LEGAL CONCERNS:

None

SUPPORTING DOCUMENTS:

1. Tentative Order No. R9-2014-0071
2. Comment letter from City of San Diego

PUBLIC NOTICE:

On September 11, 2014, the Tentative Order was sent to the City of San Diego and all known interested parties. The Tentative Order was also posted on the San Diego Water Board website. Notice was also provided in the Meeting Notice and Agenda for the November 12, 2014 Board meeting.