

State of California  
Regional Water Quality Control Board  
San Diego Region

EXECUTIVE OFFICER SUMMARY REPORT  
August 10, 2016

- ITEM: 7
- SUBJECT: Water Reclamation Requirements Reissuance: City of Poway, San Diego County (Tentative Order No. R9-2016-0117) (*Fisayo Osibodu*)
- PURPOSE: To consider adoption of Tentative Order No. R9-2016-0117.
- RECOMMENDATION: Adoption of Tentative Order No. R9-2016-0117 is recommended (Supporting Document No. 1).
- KEY ISSUES:
1. Tentative Order No. R9-2016-0117 establishes requirements for the City of Poway (City) to distribute recycled water and conserve potable water supplies that would normally be used for non-potable uses within the Poway Hydrologic Area (Poway HA). The City of San Diego's North City Water Reclamation Plant (NCWRP) provides recycled water to the City for distribution within the Poway HA. The NCWRP's effluent treatment and discharge specifications for recycled water are established in a separate Master Recycling Permit that covers the jurisdiction of the City of San Diego. The Tentative Order establishes requirements for the purveyance and distribution of recycled water only within the jurisdiction of the City of Poway. Tentative Order No. R9-2016-0117 replaces Order No. 97-62, Master Reclamation Permit for City of Poway, adopted by the San Diego Water Board on October 15, 1997.
  2. The Total Dissolved Solids (TDS) discharge specification for the recycled water supplied to the City exceeds the water quality objective for a portion of the Poway HA.
  3. The Tentative Order requires the City to develop a Salt and Nutrient Management Plan (SNMP) for the Poway groundwater basin.

**PRACTICAL VISION:** Tentative Order No. R9-2016-0117 implements Chapter 5 of the Practical Vision,<sup>1</sup> Strategy for Achieving a Sustainable Local Water Supply, because it allows the City to continue to distribute recycled water thereby conserving its potable water supplies. Continuing potable water conservation efforts facilitates the goal of increasing regional uses of recycled water as envisioned by the State Recycled Water Policy.<sup>2</sup>

**DISCUSSION:** The City relies on two sources for potable water supplies: water that is imported from the San Diego County Water Authority and local rainfall captured by Lake Poway. The imported water comprises 99% of the raw water supply for the community. The raw water received from the Northern California Aqueduct and Colorado River Systems is delivered to Lake Poway for storage. These potable water supplies are pumped to the Lester J. Bergland Water Treatment Plant where approximately 4 billion gallons of drinking water are treated every year for the citizens of Poway.

Tentative Order No. R9-2016-0117 allows the City to continue diversifying its water supply and conserve potable water supplies by establishing requirements for the City to distribute recycled water within its service area for non-potable use (Supporting Document No. 2). The distribution of recycled water occurs within the Poway HA.

The City receives the recycled water from the NCWRP, which is regulated by Waste Discharge Requirements Order No. R9-2015-0091, *Master Recycling Permit for the City of San Diego, North City Water Reclamation Plant, San Diego County*. The NCWRP provides recycled water to the City with a TDS concentration of 1,000 mg/L. The concentration of TDS exceeds the groundwater quality objective of 750 mg/L for a portion of the Poway HA. Groundwater data from the Department of Water Resources (2004)<sup>3</sup> concluded that in 1967 groundwater in this basin ranged in TDS content from about 750 to 1,500 mg/L. The use of recycled water for irrigation purposes in this portion of the Poway HA has the potential to cause receiving groundwater to exceed the TDS

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<sup>1</sup> Practical Vision: [http://www.waterboards.ca.gov/sandiego/water\\_issues/Practical\\_Vision/index.shtml](http://www.waterboards.ca.gov/sandiego/water_issues/Practical_Vision/index.shtml)

<sup>2</sup> Recycled Water Policy: [http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/resolutions/2013/rs2013\\_0003\\_a.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2013/rs2013_0003_a.pdf)

<sup>3</sup> Poway Valley Groundwater Basin Fact Sheet: <http://www.water.ca.gov/groundwater/bulletin118/basindescriptions/9-13.pdf>

water quality objective. Pursuant to Water Code section 13523.5, the San Diego Water Board may not deny issuance of water reclamation requirements for a project which violates only a salinity standard in the Basin Plan.

Recycled water distributed by the City is primarily used by commercial and industrial establishments for landscape irrigation. Tentative Order No. R9-2016-0117 also allows the City to distribute recycled water for additional uses such as: fire suppression; industrial processes (including cooling towers); street sweeping; agricultural irrigation; landscape and/or recreational impoundments; construction use (including soil compaction, dust control, concrete mixing, etc.); commercial uses (including toilet and urinal flushing); and all other approved uses of recycled water in title 22 of the California Code of Regulations.

The City has developed rules and regulations, pursuant to Water Code section 13523.1(b) (3), that govern the design, construction, and use of recycled water distribution systems by its customers. These rules and regulations are necessary for the protection of public health, and are consistent with rules and regulations developed by other recycled water agencies. Tentative Order No. R9-2016-0117 also adds new provisions for the safe transport and reuse of recycled water from future recycled water fill stations. If the City chooses to establish recycled water fill stations, it must amend the rules and regulations and implement measures to ensure that the use and transport of recycled water from the fill stations is protective of public health and the environment.

Tentative Order No. R9-2016-0117 requires the City to develop an SNMP for the Poway groundwater basin in compliance with the State Water Board's Recycled Water Policy. The SNMP will contain an assessment of sources of salts and nutrients into the basin, develop a basin wide groundwater monitoring plan, and develop implementation measures for management of all sources of salts and nutrients in the basin.

The City requested via email that the San Diego Water Board extend the deadline for submitting the SNMP from August 17, 2017 to August 17, 2018 (Supporting Document No. 4). The extended time period will give the City more time to coordinate its planning efforts with the City of San Diego which supplies recycled water to the City of Poway.

The Order has been revised to set the deadline for submitting the SNMP at August 17, 2018.

**LEGAL CONCERNS:**

None.

**SIGNIFICANT CHANGES:**

Tentative Order No. R9-2016-0017 requires the City to develop a Salt and Nutrient Management Plan, as required by the State Water Board's Recycled Water Policy. The Tentative Order also adds new provisions for the safe transport and use of recycled water from possible future recycled water fill stations.

**COMPLIANCE RECORD:**

No violations of the City's current Water Reclamation Requirements have occurred since the San Diego Water Board adopted Order No. 97-62 in October 1997.

**SUPPORTING DOCUMENTS:**

1. Tentative Order No. R9-2016-0117.
2. Map Showing City of Poway's Recycled Water Service Area.
3. Transmittal Letter and Public Notice.
4. Email from the City of Poway

**PUBLIC NOTICE:**

Notification of this action was sent to known interested parties by mail and email on May 18, 2016 (Supporting Document No. 3). The tentative Order was also posted on the San Diego Water Board website on May 17, 2016. These actions satisfy the public notification requirements of California Water Code, Division 7, and section 13167.5 for a 30-day notice.