

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

**EXECUTIVE OFFICER SUMMARY REPORT
December 11, 2019**

ITEM 13

SUBJECT

NPDES Permit Reissuance: Waste Discharge Requirements for the Marine Corps Base, Camp Pendleton, Southern Regional Tertiary Treatment Plant and Advanced Water Treatment Plant at Haybarn Canyon Discharge to the Pacific Ocean through the Oceanside Ocean Outfall (Tentative Order No. R9-2019-0167, NPDES No. CA0109347).
(*Joann Lim and Keith Yaeger*)

STAFF RECOMMENDATION

Adoption of Tentative Order No. R9-2019-0167 (Tentative Order) is recommended.

KEY ISSUE

The Tentative Order (**Supporting Document No. 1**) includes a requirement to investigate alternatives for tracking the location and movement of the Oceanside Ocean Outfall (OOO) wastewater plume and its potential encroachment on shoreline water contact recreational areas. The question of where the OOO plume is going also has a regional component for determining when and where multiple plumes from different outfalls comingle. The San Diego Water Board has previously included similar requirements to investigate wastewater plume tracking in the National Pollutant Discharge Elimination System (NPDES) permits for the San Elijo Ocean Outfall and Encina Ocean Outfall, with the goal of using the findings from these studies to develop a unified regional monitoring program for all three ocean outfalls. The San Diego Water Board also included similar plume tracking investigative requirements in the NPDES permits for the Point Loma Ocean Outfall and the South Bay Ocean Outfall in support of coordinated regional monitoring at those outfalls.

PRACTICAL VISION

Consistent with the mission of the Strategy for Healthy Waters chapter of the Practical Vision, the Tentative Order integrates all applicable technology-based requirements, water quality-based effluent limitations, and receiving water quality standards to optimize protection of water quality and beneficial uses in the Pacific Ocean. Additionally, the Tentative Order has provisions allowing for participation in regional monitoring and assessment programs in keeping with San Diego Water Board Resolution No. R9-2012-0069, *Resolution in Support of a Regional Monitoring Framework*.

DISCUSSION

The Marine Corps Base, Camp Pendleton (MCBCP) is the owner and operator of the Southern Regional Tertiary Treatment Plant (SRTTP) and Advanced Water Treatment (AWT) Plant at Haybarn Canyon. The SRTTP and AWT Plant currently discharge secondary-treated wastewater and waste brine, respectively, to the Pacific Ocean through the OOO, which is owned and operated by the City of Oceanside (City). A description of each of these facilities can be found in **Supporting Document No. 1**, Attachment F, section II.A. The location of these facilities is shown in **Supporting Document No. 2**.

The SRTTP and AWT Plant have a combined discharge of up to 3.6 MGD to the OOO. The OOO also receives discharges from 1) the City's San Luis Rey Water Reclamation Facility, La Salina Wastewater Treatment Plant, and Mission Basin Groundwater Purification Facility; 2) Fallbrook Public Utility District's Fallbrook Water Reclamation Plant; and 3) Genentech, Inc. These discharges are regulated by separate individual NPDES permits for each of these agencies. The reissuance of these three separate NPDES permits are also being considered by the San Diego Water Board at today's meeting under Agenda Item Nos. 11, 12, and 14. The total permitted flow from all dischargers to the OOO is 41.5 million gallons per day (MGD).

The SRTTP treats wastewater from the southern portion of the MCBCP to secondary standards for discharge to the OOO and to tertiary treatment standards for beneficial reuse. Reuse (under the Master Recycling Permit Order No. R9-2018-0023) includes landscape irrigation and injection into a seawater intrusion barrier. From January 2014 to June 2019, the MCBCP sent an annual average 0.4 MGD to reuse sites for irrigation.

The AWT Plant treats groundwater for municipal potable water supply and discharges waste brine from the treatment process to the OOO. The AWT Plant has a potable water production design capacity of 8.64 MGD which results in less than 2 MGD of waste brine. In 2018, the Discharger produced an annual average 4.5 MGD of potable water at the AWT Plant.

The MCBCP discharges to the OOO are currently regulated by Order No. R9-2013-0112, NPDES No. CA0109347. The Tentative Order will, if adopted, supersede Order No. R9-2013-0112 and reissue the NPDES Permit for the MCBCP's discharge to the OOO for a five-year term. The Tentative Order was developed based on information in the MCBCP's reissuance application, self-monitoring reports, and other available sources (e.g. inspection reports, meetings, and emails with the MCBCP).

The Tentative Order was noticed for a public hearing and released for public review and comment for a 30-day period on September 27, 2019. The public comment period closed on October 28, 2019. The San Diego Water Board received no comment letters on the Tentative Order.

The Revised Tentative Order (Supporting Document No. 1) displays the changes made after the September 27, 2019 public release in red-underline for added text and ~~red-strikeout~~ for deleted text. Revisions were made to the Tentative Order to be consistent with revisions in response to comments made to the other three Tentative Orders for the OOO being considered by the San Diego Water Board at today's meeting under Agenda Item Nos. 11, 12, and 14.

SIGNIFICANT CHANGES

The following are the significant differences between the Tentative Order and the current Order:

1. The Tentative Order requires the MCBCP to evaluate the chronic toxicity in the discharge using USEPA's 2010 Test of Significant Toxicity (TST) hypothesis testing approach as described in Supporting Document No. 1, Attachment E, section III.C.
2. The Tentative Order adds a requirement to conduct a Plume Tracking Monitoring

Program consistent with the other Tentative Orders regulating the other discharges to the OOO.

3. The Tentative Order reduces the receiving water monitoring frequency at nearshore and offshore stations from monthly to quarterly for fecal coliforms and enterococci, and removes the requirement to monitor for total coliform at nearshore and offshore stations, to help offset the costs of additional monitoring requirements and the development of a Plume Tracking Monitoring Program.
4. The Tentative Order adds a requirement to prepare and submit a Climate Change Action Plan within three years of the effective date of the Order.

COMPLIANCE RECORD

From April 2013 through August 2019, the MCBCP reported two illicit discharges, five effluent violations for the SRTTP, one late report, and five deficient monitoring violations. The compliance record also includes a violation for a contained sludge spill and a violation for missing spill logs in MCBCP's monthly self-monitoring reports. Details on these violations are contained in the compliance summary information provided in the Fact Sheet of the Tentative Order in Attachment F, section II.D. To address these violations, staff enforcement letters were sent to MCBCP on July 9, 2015; January 5, 2017; August 16, 2016; and April 8, 2016.

PUBLIC NOTICE

The Tentative Order was noticed and released for public review and comment on September 27, 2019, with comments due October 28, 2019. The Notice of Public Hearing and Comment Period was posted on the San Diego Water Board website for the duration of the comment period and sent to all interested parties. The Notice announced a public hearing to be held on December 11, 2019; availability of the Tentative Order for review; and provided instructions for submittal of written comments. A copy of the Notice is provided in **Supporting Document No. 3**. Notice of the public hearing on the Tentative Order was also provided in the Meeting Notice and Agenda for the December 11, 2019 San Diego Water Board meeting, which is posted on the Board website.

SUPPORTING DOCUMENTS

1. Revised Tentative Order
2. Location Map
3. Notice of Public Hearing and Comment Period