

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

**EXECUTIVE OFFICER SUMMARY REPORT**

**October 8, 2025**

**ITEM NO. 7**

**SUBJECT**

Consideration of Tentative Order No. R9-2025-0012, *Waste Discharge Requirements for Demler Brothers LLC, Pine Hill Egg Ranch and Pullet Farm, Ramona, San Diego County* (Tentative Order No. R9-2025-0012). (Dr. Mahsa Izadmehr)

**STAFF RECOMMENDATION**

Staff recommend adoption of Tentative Order No. R9-2025-0012 (Tentative Order, **Supporting Document 1**).

**KEY ISSUES**

- 1) Tentative Order No. R9-2025-0012, if adopted, establishes waste discharge requirements (WDRs) for Demler Brothers LLC (Discharger) to: 1) operate and maintain an onsite treatment and disposal system for egg wash process water,<sup>1</sup> and 2) manage animal waste and chicken carcasses.<sup>2</sup> Tentative Order No. R9-2025-0021 also establishes monitoring and reporting requirements to ensure water quality and beneficial uses are protected.
- 2) Tentative Order No. R9-2025-0012, if adopted, supports the Discharger's compliance with Cease and Desist Order No. R9-2023-0129 (CDO No. R9-2023-0129). The San Diego Water Board adopted CDO No. R9-2023-0129 for the Discharger on November 8, 2023. CDO No. R9-2023-0129 directs the Discharger, in part, to:
  - Immediately stop discharging and threatening to discharge unpermitted wastes at the Facilities.
  - Submit a complete report of waste discharge to the San Diego Water Board.

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<sup>1</sup> The generation and management of egg wash process water is limited to the Pine Hill Egg Ranch.

<sup>2</sup> Animal waste includes manure, soiled bedding, urine, eggs, feathers generated from the Pine Hill Egg Ranch and Pullet Farm (collectively, Facilities). Chicken carcasses are limited to those generated at the Facilities. Animal waste and chicken carcasses are centrally managed at the Pine Hill Egg Ranch.

- Receive and implement site-specific WDRs, adopted by the San Diego Water Board, for the discharge of egg wash process water and management of animal waste and chicken carcasses.

## PRACTICAL VISION

Tentative Order No. R9-2025-0012 is consistent with the following chapters of the San Diego Water Board Practical Vision:<sup>3</sup>

- Strategize for Healthy Waters: Adoption of Tentative Order No. R9-2025-0012 enables the San Diego Water Board to address discharges from the Facilities through enforceable prohibitions, specifications, and monitoring requirements that are designed to protect groundwater and surface water quality. Tentative Order No. R9-2025-0012 prioritizes environmental outcomes to prevent waste discharges from creating conditions of pollution, contamination, or nuisance.
- Monitor and Assess: Tentative Order No. R9-2025-0012 includes a comprehensive Monitoring and Reporting Program. Assessment of data collected will help the San Diego Water Board identify potential impacts to water quality and assess effectiveness of the Discharger's waste management practices.
- Strategize to Achieve Resilient Local Water Supply: Tentative Order No. R9-2025-0012 supports protection of groundwater basins that serve as domestic water sources for nearby communities, including Rancho Santa Teresa Estates. By requiring proper treatment and disposal of egg wash process water, and requiring implementation of management measures, Tentative Order No. R9-2025-0012 advances the Practical Vision objective of sustaining local water supplies.

## DISCUSSION

The purpose of this item is to provide the San Diego Water Board with information to assist in its consideration of Tentative Order No. R9-2025-0012. Tentative Order No. R9-2025-0012, if adopted, establishes requirements for discharges of waste to land at the Facilities. The Facilities are located in San Diego County (**Supporting Document 2**). The Pine Hill Egg Ranch is located at 25818 Highway 78 in Ramona, and the Pullet Farm is located at 24555 Old Julian Highway in Ramona.

### Pine Hill Egg Ranch Overview

The Pine Hill Egg Ranch occupies 362 acres, has the capacity to house up to two million chickens, and produces approximately 800,000 eggs per day. The Pine Hill Egg Ranch also disposes of approximately 1,500 gallons per day of egg washing process water and generates approximately 375 tons of manure per week.

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<sup>3</sup> Practical Vision:

[https://www.waterboards.ca.gov/sandiego/water\\_issues/programs/practical\\_vision/](https://www.waterboards.ca.gov/sandiego/water_issues/programs/practical_vision/)

*Pullet Farm Overview*

The Pullet Farm occupies 200 acres, houses approximately 400,000 pullets (young chickens), and generates approximately 50 tons of manure per week. The Pullet Farm does not dispose of any wastewater (i.e., process water).

*Cease and Desist Order No. R9-2023-0129 Overview*

The San Diego Water Board adopted CDO No. R9-2023-0129 on November 8, 2023. CDO No. R9-2023-0129 required the Discharger to immediately cease and desist from discharging and threatening to discharge wastes in violation of: 1) title 40, section 122.42(e)(1) of the Code of Federal Regulations, 2) the California Water Code, 3) Order No. 2014-0057-DWQ, *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities* (Industrial General Permit), 4) the *Water Quality Control Plan for the San Diego Basin* (9) (Basin Plan). Further, CDO No. R9-2023-0129 required the Discharger to: seek regulatory coverage for discharges of waste and stormwater; and implement best management practices (BMPs) and infrastructure improvements to comply with appropriate regulatory requirements.

In accordance with CDO No. R9-2023-0129, the Discharger:

- 1) Enrolled Pine Hill Egg Ranch and Pullet Farm in the Industrial General Permit on February 7, 2022 and March 18, 2024, respectively;
- 2) Developed and submitted initial Nutrient Management Plans (NMPs) for the Facilities on May 22, 2024, pursuant to the Industrial General Permit, with updated NMPs submitted on September 9, 2024;
- 3) Implemented stormwater BMPs and management measures for handling, storage, and disposal of animal waste, in accordance with the NMPs approved by the San Diego Water Board;
- 4) Suspended onsite treatment and disposal operations of egg wash process water and initiated off-site hauling and disposal operations;
- 5) Terminated and removed all onsite composting operations; and
- 6) Submitted a report of waste discharge (i.e., application) to the San Diego Water Board on May 22, 2024, for the development of site specific WDRs, with supplemental information submitted on August 26, 2024.

*Waste Management Operations Overview*

The Discharger's report of waste discharge proposed reactivating operations associated with the onsite treatment and disposal of egg wash process water at the Pine Hill Egg Ranch. The treatment system is designed to receive up to 1,240 gallons per day and consists of: a wet well with an effluent filter, 34 lined above ground evaporation ponds, and four onsite storage tanks. The Discharger will store approximately 260 gallons per day of egg wash process water in one of the onsite storage tanks. The remaining three tanks will be kept empty and used for contingency storage.

Animal waste includes manure, soiled bedding, urine, eggs, and feathers generated from the Pine Hill Egg Ranch or the Pullet Farm. The Discharger manages animal waste through a combination of on-site containment, daily monitoring, and offsite disposal. Broken eggs are collected in 55-gallon trashcans, stored in a refrigerated building, and hauled offsite weekly for composting. A concrete pad beneath the egg conveyor belt allows for cleanup of fallen eggs by a designated employee, preventing contact with bare soil. Manure is loaded onto trucks from concrete pads and hauled offsite regularly for disposal. Feathers and litter are collected from the henhouses and surrounding areas and combined with manure which is hauled offsite for disposal. In addition, the Discharger implements BMPs for animal waste management identified in its NMPs.

As described in the Discharger's NMPs, chicken carcasses are bagged and placed in covered trash cans before being stored in freezers prior to offsite disposal.

#### *Tentative Order Key Components*

San Diego Water Board staff developed Tentative Order No. R9-2025-0012 to include the following key components to ensure water quality and beneficial uses are protected:

- 1) Specifications for proper operation and maintenance of the evaporation ponds, which include measures to mitigate nuisance conditions (i.e., odors).
- 2) Requirements for proper storing, handling, and disposal of animal waste and chicken carcasses.
- 3) Requirements for routine groundwater monitoring and reporting, which includes an assessment of the effectiveness of the Discharger's treatment and waste management systems.
- 4) Requirements for routine facility inspection and reporting, which includes an assessment of compliance with the Discharger's WDRs.

#### *California Environmental Quality Act (CEQA) Overview*

San Diego Water Board staff prepared a Mitigated Negative Declaration to assess potential environmental impacts associated with the adoption of Tentative Order No. R9-2025-0012, in accordance with CEQA. The San Diego Water Board will consider approval of Tentative Resolution No. R9-2025-0054, *Approval of a Mitigated Negative Declaration Regarding Potential Environmental Impacts for Waste Discharge Requirements for Demler Brothers LLC, Pine Hill Egg Ranch and Pullet Farm, Ramona, San Diego County* (Tentative Resolution No. R9-2025-0054), prior to considering adoption of Tentative Order No. R9-2025-0012.

#### *Public Comments Overview*

The San Diego Water Board initially released a draft Negative Declaration, a draft Initial Study, Tentative Resolution No. R9-2025-0054, and Tentative Order No. R9-2025-0012 for public review on May 21, 2025. San Diego Water Board staff received thirteen (13) comment letters related to the draft documents during the 30-day comment period,

which are provided in **Supporting Document 3**. San Diego Water Board staff received comment letters from members of the public, the Discharger, and the California Department of Transportation (Caltrans). The primary focus of these letters, with respect to Tentative Order No. R9-2025-0012, are summarized below:

- Public comments expressed concerns related to: 1) odor and air quality impacts; 2) alleged nitrate contamination in groundwater; 3) alleged unauthorized discharges to Santa Teresa Creek; 4) the Discharger's poor compliance history; and 5) the need for additional regulatory oversight. Some letters also requested enhanced air quality protections, additional monitoring requirements, independent inspections, and an improved public complaint process.
- The Discharger's comments requested Board staff: 1) clarify the scope of the discharge prohibitions, 2) make corrections to the animal waste and manure management specifications, 3) adjust the groundwater monitoring requirements to accommodate for the site specific geology, 4) allow the Discharger time to install concrete pads for manure loading areas, and 5) make corrections to the evaporation ponds description.

San Diego Water Board staff prepared a single Response to Comments Report which contains responses to all written comments received on the draft and tentative documents (**Supporting Document 4**). The Response to Comments Report also describes any substantive changes made to the Negative Declaration, Initial Study, Tentative Resolution No. R9-2025-0054, and Tentative Order No. R9-2025-0012.

Staff prepared a Mitigated Negative Declaration, to replace the Negative Declaration, in response to revisions made to the Initial Study and Tentative Order No. R9-2025-0012. Staff circulated the Mitigated Negative Declaration, revised Initial Study, revised Tentative Resolution No. R9-2025-0054, revised Tentative Order No. R9-2025-0012, and Response to Comments Report on August 29, 2025, for a 30-day public review period. The Initial Study and Tentative Order No. R9-2025-0012 displayed additions as red-underline text and deletions as ~~red-strikeout text~~.

## **PUBLIC NOTICE**

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 known interested persons by email on May 21, 2025 (**Supporting Document 5**). These actions satisfy the 30-day public notification and comment period requirements of Water Code section 13167.5.

## **SUPPORTING DOCUMENTS**

1. Revised Tentative Order
2. Pine Hill Egg Ranch and Pullet Farm Vicinity Maps
3. Comment Letters

4. Response to Comments Report
5. Notice of Public Hearing and Written Comment Period