

Item Number 6a

Supporting Document 3

January 13, 2020

Eastern Municipal Water District
Letter

March 5, 2020



January 13, 2020

Mr. David W. Gibson, Executive Officer
California Regional Water Quality Control Board
San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108

Subject: REQUEST TO RESCIND ORDER NO. R9-2000-165 FOR TEMECULA VALLEY REGIONAL WATER RECLAMATION FACILITY

Dear Mr. Gibson:

Eastern Municipal Water District (EMWD) has been in consultation with your staff and the staff of the Santa Ana Regional Water Quality Control Board (RWQCB) regarding changes in the regulatory permitting structure for EMWD's Temecula Valley Regional Water Reclamation Facility (RWRF). As part of this proposed permitting structure change, which is explained more fully below, EMWD is formally requesting rescission of the permit issued under San Diego RWQCB Order No. R9-2000-165 for EMWD's Temecula Valley RWRF.

As background, the Temecula Valley RWRF is currently permitted under both SDRWQCB Order No. R9-2000-165 and Santa Ana RWQCB Order No. R8-2008-0008. By rescinding the San Diego RWQCB permit, the Temecula Valley RWRF would be exclusively permitted for treatment of wastewater and production of recycled water under Santa Ana RWQCB Order No. R8-2008-0008. To fully effectuate this permitting transition, the Santa Ana RWQCB will require a permit addendum to reflect the recently completed expansion of the Temecula Valley RWRF from 18 to 23 MGD. Additionally, Temecula Valley RWRF will need to be enrolled in the State Water Resource Control Board Order WQ 2016-0068, *Water Reclamation Requirements for Recycled Water Use* (General WRR) for the recycled water distribution and uses within Region 9.

EMWD's recycled water system is an integrated distribution system that connects all EMWD RWRFs (San Jacinto, Moreno Valley, Perris Valley and Temecula Valley) and serves recycled water

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users in both the Region 8 and 9. These RWRFs are permitted under the Santa Ana Order No. R8-2008-0008. This past year, the RWRFs produced an average of approximately 43 MGD of recycled water. Temecula Valley contributed 13.4 MGD or 31% of the recycled water produced. Recycled water users in Region 9 utilized 5,633 AF of recycled water which was 11% of the total recycled water produced. Since most of the recycled water produced by Temecula Valley is utilized within Region 8, staff of both RWQCB's and EMWD concur it is appropriate for the Santa Ana RWQCB to be the primary local regulatory agency overseeing wastewater treatment and the production recycled water at this facility.

For this past year, Temecula Valley RWRf has had permit exceedances for Total Dissolved Solids (Daily Maximum), Manganese (Daily Maximum and Monthly Average) and Chloride (12-Month Average). This is due to elevated mineral content in the potable source water, specifically deliveries of imported from Metropolitan Water District of Southern California with a higher blend of Colorado River supply, and local groundwater. This is shown in more detail in the published Southern California Salinity Coalition report: *Study to Evaluate Long-Term Trends and Variations in the Average Total Dissolved Solids (TDS) Concentration in Wastewater and Recycled Water*.

For this past year, Temecula Valley RWRf TDS average was 720 mg/L, which although elevated is still below the water quality objective of hydrologic sub-areas of Wolf, Murrieta, French, Wildomar and Domenigoni. The hydrologic sub-area Gertrudis has a water quality objective of 500 mg/L, however, the recycled water usage is very limited in this area and considered *de minimis* under the current permit Order No. R9-2000-165. It should be noted the EMWD has a water-wheeling agreement with Ranch California Water District to provide recycled water to the Pechanga Reservation which is the only recycled water user in the hydrologic sub-area of Wolf. This past year, Pechanga utilized 485 AF of recycled water.

As previously noted, the Santa Ana RWQCB agrees with the proposed permitting structure change for the Temecula Valley RWRf. Therefore, EMWD requests the rescission of San Diego RWQCB Order No. R9-2000-165. Concurrently with this action, EMWD will enroll under the statewide SWRCB Order No. WQ 2016-0068-DDW for the recycled water use in Region 9. Additionally, a *Use Area Monitoring Report* will be submitted, and EMWD will participate in a Salt and Nutrient Management Plan issued by the San Diego RWQCB.

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Thank you for your consideration and if you have any questions, please contact Al Javier at (951) 928-3777 x6327 or email at javiera@emwd.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul D. Jones II". The signature is stylized with a large initial "P" and "J".

Paul D. Jones II, P.E.
General Manager

c: Mrs. Hope Smythe, Santa Ana RWQCB