

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

EXECUTIVE OFFICER SUMMARY REPORT

MARCH 11, 2025

ITEM NO. 4

SUBJECT

Consideration of Tentative Order No. R9-2026-0001, *Amending Order No. R9-2010-0032, Waste Discharge Requirements and Master Reclamation Permit for the City of Escondido, Hale Avenue Resource Recovery Facility and Order No. R9-2023-0131, Waste Discharge Requirements for the City of Escondido Membrane Filtration and Reverse Osmosis Facility* (Tentative Order R9-2026-0001). (Brandon Bushnell)

STAFF RECOMMENDATION

Staff recommend adoption of Tentative Order No. R9-2026-0001 (**Supporting Document 1**).

KEY ISSUES

- 1) Tentative Order No. R9-2026-0001 modifies Order No. R9-2010-0032, *Waste Discharge Requirements and Master Reclamation Permit for the City of Escondido Hale Avenue Resource Recovery Facility* (Order No. R9-2010-0032) and Order No. R9-2023-0131, *Waste Discharge Requirements for the City of Escondido Membrane Filtration and Reverse Osmosis Facility, San Diego County* (Order No. R9-2023-0131) to remove the color effluent limitations and monitoring requirements.
- 2) The City of Escondido (Discharger) submitted a request to the San Diego Water Board on October 3, 2025, to remove the color effluent limitations from Order Nos. R9-2010-0032 and R9-2023-0131 along with supporting documentation and data.

PRACTICAL VISION

Tentative Order No. R9-2026-0001 is consistent with the Strategize to Achieve Resilient Local Water Supply chapter of the San Diego Water Board Practical Vision,¹ as it modifies requirements to produce recycled water while still being protective of water quality. The use of sustainable local water supply sources such as recycled water helps reduce the San Diego Region's dependence on imported water and increases the reliability of water supplies.

¹ Practical Vision:

https://www.waterboards.ca.gov/sandiego/water_issues/programs/practical_vision/

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. R9-2026-0001. Tentative Order No. R9-2026-0001, if adopted, will modify Order Nos. R9-2010-0032 and R9-2023-0131 to remove the color effluent limitations and corresponding monitoring requirements. Tentative Order No. R9-2026-0001 shows the exact changes made to Order Nos. R9-2010-0032 and R9-2023-0131 in redline/strikeout format.

The Discharger owns and operates the Hale Avenue Resource Recovery Facility (HARRF). The HARRF treats domestic wastewater to tertiary treatment standards to produce recycled water. The Discharger distributes recycled water produced at the HARRF for non-potable reuse, predominately for industrial uses (e.g., power generation) and landscape irrigation. The San Diego Water Board adopted Order No. R9-2010-0032, on July 14, 2010. The HARRF is located at 1521 Hale Avenue in Escondido (**Supporting Document 2**). Order No. R9-2010-0032 established waste discharge requirements (WDRs) for the production and purveyance of tertiary treated recycled water from the HARRF.

The Discharger also owns and operates the Membrane Filtration and Reverse Osmosis Facility which demineralizes tertiary treated recycled water from the HARRF for reuse at commercial agricultural operations. The Membrane Filtration and Reverse Osmosis Facility is located at 901 Washington Avenue in Escondido (**Supporting Document 3**). The San Diego Water Board adopted Order No. R9-2023-0131 on December 13, 2023. Order No. R9-2023-0131 established WDRs for the production and purveyance of demineralized recycled water to irrigate salt-sensitive crops at commercial agricultural operations.

The Discharger submitted a request to the San Diego Water Board on October 3, 2025, to remove the color effluent limitations from Order Nos. R9-2010-0032 and R9-2023-0131. The Discharger's request included documentation summarizing and comparing effluent color concentrations at the HARRF, and groundwater color concentrations at a recycled water use site. The comparison of data showed no correlation between the effluent color concentration and the resulting groundwater color concentration. The Discharger also submitted results from a chemical dosing study conducted by its chemical provider. The study evaluated dosing strategies to meet the color effluent limitation and concluded the dosing rate needed to meet the limit is economically infeasible.

San Diego Water Board staff reviewed and concurred with the Discharger's request to remove the color effluent limitations from both Order Nos. R9-2010-0032 and R9-2023-0131. Additionally, staff determined the continued monitoring of effluent color does not provide meaningful data regarding water quality. Color is an aesthetic parameter that can be affected by a variety of factors. Therefore, staff removed the color effluent limitations and monitoring requirements in both Order Nos. R9-2010-0032 and R9-2023-0131.

COMPLAINT RECORD

The San Diego Water Board staff issued six staff enforcement letters and two notices of violation to the Discharger for the following violations of Order Nos. R9-2010-0032 and R9-2023-0131:

- One exceedance of the daily maximum limitation for total coliform.
- One failure to sample the effluent for Total Dissolved Solids (TDS).
- One unauthorized discharge of demineralized recycled water from the Hogback Recycled Water Reservoir.
- Two exceedances of the daily maximum limitation for TDS.
- 66 exceedances of the 12-month average limitation for color.

The Discharger, with the exception to color exceedances, resolved the violations of Order Nos. R9-2010-0032 and R9-2023-0131.

PUBLIC NOTICE

San Diego Water Board staff notified the Discharger and known interested parties of this action on December 10, 2025 (**Supporting Documents 4 and 5**). Additionally, Board staff posted Tentative Order No. R9-2026-0001 on its website on December 10, 2025. The public comment period closed on January 9, 2025. These actions satisfy the 30-day public notification and comment period requirements of Water Code section 13167.5.

San Diego Water Board staff did not receive any written comments on Tentative Order No. R9-2026-0001 during the 30-day comment period.

SUPPORTING DOCUMENTS

1. Tentative Order No. R9-2026-0001
2. Hale Avenue Resource Recovery Vicinity and Facility Map
3. Membrane Filtration and Reverse Osmosis Vicinity and Facility Map
4. Transmittal Letter
5. Notice of Public Hearing and Written Comment Period