REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

INTERNAL MEMO

File Ref. 2411.02 (FHI

O: Mrs. Carla Bard, Chairwoman
State Water Resources Control Board

FROM: John Keker, Chairman
San Francisco Bay Regional Water Quality Control Board

ATE: March 19, 1980

SIGNATURE:

UBJECT: CLEAN WATER GRANT FUNDING FOR OCEAN DISCHARGES

Your public workshop notice re this subject states that the Key Issue is:

> "Should the Board limit grant funding for ocean discharges to that required to meet Ocean Plan requirements?"

The notice states that it is your Board's intent to consider adopting a resolution which would limit Clean Water Grant funding for ocean discharges to projects needed to meet Ocean Plan requirements. Also interested parties are invited to present their views on this at your April 22 workshop. Formal action by your Board will not be taken until your meeting on May 15, 1980.

The position of this Regional Board is:

- The discretion relative to the level of treatment required in any particular case is, and should continue to be, with the appropriate Regional Board.

- When a Regional Board has found a secondary level of treatment is needed for a particular ocean discharge, that level of treatment should be grant funded unless the State Board has, subsequent to Regional Board action, reviewed the Regional Board action and found it to be inappropriate for that particular waste discharge.

Implementation of the critically important subregional Water Quality Management plan in the Half Moon Bay area is finally making acceptable progress after several Regional Board enforcement actions culminating in a court ordered time schedule in 1979. A new ocean outfall to serve the Half Moon Bay area is nearing completion. This outfall will discharge all wastewater from the City of Half Moon Bay and Granada and Montara Sanitary Districts into an area that was determined, after extensive oceanographic study, to be the most desirable location. The selected area is, however, a biologically sensitive location and the Regional Board has determined that secondary treatment is necessary. This decision was strongly supported by the State Department of Fish and Game and this level of treatment is prescribed by the Coastal Commission as a condition for its ocean outfall permit.

The final task that must be accomplished to complete the Half Moon Bay area plan is the construction of a new secondary treatment plant to serve Half Moon Bay, Granada, and Montara. We believe that this treatment plant should be grant funded as soon as the design work is completed and all permits are obtained.

WRCB 326A (4/75)

RNAME:

If your Board adopts a policy position similar to that stated in your workshop notice, you should at the same time clarify the enforcement posture that Regional Boards are to take with ocean dischargers that presently have secondary treatment facilities which have been grant funded and have Regional Board permits requiring secondary treatment. Some of these dischargers may desire to save operation and maintenance costs by meeting only Ocean Plan conditions. If such discharges were to be reexamined in the light of your new policy, and found to require less than secondary treatment, would it still be incumbent on the Regional Board to enforce the secondary requirements?

The concepts of this memorandum were discussed and concurred in by the Regional Board at its regular meeting on March 13th. If there should be questions about the memorandum please call Fred Dierker, Roger James, or me.

cc: State Board Members
Clint Whitney, Executive Director