

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION

ADMINISTRATIVE CIVIL LIABILITY COMPLAINT R5-2009-0522  
IN THE MATTER OF

CANADA COVE LIMITED PARTNERSHIP  
FRENCH CAMP RV PARK AND GOLF COURSE  
SAN JOAQUIN COUNTY

This Complaint is issued to the Canada Cove Limited Partnership (hereafter Discharger) pursuant to California Water Code (CWC) section 13350, which authorizes the imposition of Administrative Civil Liability, and CWC section 13323, which authorizes the Executive Officer to issue this Complaint. This Complaint is based on findings that the Discharger violated Waste Discharge Requirements (WDRs) Order R5-2006-0039 (NPDES No. CA0083682) and Cease and Desist Order (CDO) R5-2006-0040.

The Executive Officer of the Central Valley Regional Water Quality Control Board (Central Valley Water Board or Board) finds the following:

**Background**

1. The Discharger owns a wastewater collection, treatment, and disposal system, and provides sewerage service to French Camp RV Park and Golf Course (hereafter Park).
2. The Discharger is permitted to discharge up to 0.40 million gallons per day (mgd) of treated wastewater at two locations at the Park. The first discharge location is to Lone Tree Creek, but this has reportedly never been utilized. The second discharge location is to specific portions of the golf course. Wastewater discharged to the golf course must be treated to comply with the statewide water recycling criteria in California Code of Regulations, title 22, section 60301 et seq. ("Title 22 Requirements").
3. On 5 May 2006, the Central Valley Water Board issued WDRs Order R5-2006-0039 to regulate the collection, treatment, and disposal of waste from the Park's wastewater treatment plant. The WDRs contain, inter alia, Prohibitions, Effluent Limitations, Reclamation Specifications, and Monitoring and Reporting Program (MRP) requirements. On the same day, the Board issued CDO R5-2006-0040, which gave the discharger until 1 May 2008 to come into full compliance with the Effluent Limitations for total coliform and turbidity.

**Violations Chronology**

4. On 16 January 2009, the Central Valley Water Board issued a Notice of Violation (NOV) to the Discharger for violations of WDRs Order R5-2006-0039 and of CDO R5-2006-0040 (Attachment A, a part of this Order). The NOV included a Memorandum, prepared by staff, that discussed the violations of Reclamation Specifications; Construction, Operation, and Maintenance Specifications; deadlines for submittal of a Compliance

Workplan/Implementation Schedule, Pollution Prevention plans, and Progress Reports; and MRP requirements.

5. The 16 January 2009 NOV included a CWC section 13267 Order for Information that required that the Discharger: submit monitoring reports in compliance with its MRP; submit a technical report describing the changes made to ensure that each monitoring report would contain all of the required information, and submit plans and a time schedule designed to achieve full compliance with WDRs Order R5-2006-0039 and CDO R5-2006-0040. Board staff received the latter two reports by the 9 March 2009 submittal deadline.
6. On 30 January 2009, the Park General Manager, Dave Arana, met with Board staff to discuss the 16 January 2009 NOV/13267 Order for Information. Mr. Arana indicated that he would consider hauling the Park's wastewater offsite in order to bring the facility into compliance with the WDRs Order R5-2006-0039 and CDO R5-2006-0040. Mr. Arana stated that the wastewater is currently conveyed to an on-site holding pond for percolation/evaporation with no discharge of reclaimed wastewater to the golf course. It is unclear when reclaimed wastewater was last discharged to the golf course.
7. Mr. Arana notified Board staff on 10 February 2009 that the Park's wastewater treatment system had been shut down, and that all wastewater generated at the Park was being hauled offsite for disposal. The hauling is to continue either until the treatment system is upgraded to meet discharge conditions in WDRs Order R5-2006-0039 or until the facility obtains a land discharge permit. The Discharger submitted a Report of Waste Discharge (RWD) to the Board's Land Discharge Program in July 2008. In a letter dated 10 February 2009, the Discharger requested that the Central Valley Water Board expedite its review of the RWD.
8. In a letter dated 17 February 2009, the Discharger submitted an amendment to its monitoring report for January 2009 that contained previously missing information that met the requirements of the MRP. The Discharger has indicated that future monitoring reports will meet MRP requirements. In addition, as part of correspondence dated 27 February 2009, Mr. Arana indicated that fencing and signage had just been installed around the perimeter of the holding pond to comply with the WDRs and to protect the public.

### **Regulatory Considerations**

9. The *Water Quality Control Plan Central Valley Region—Sacramento River and San Joaquin River Basins, Fourth Edition* (hereafter Basin Plan), designates beneficial uses, establishes water quality objectives, and contains implementation plans and policies for all waters of the Basin.
10. The beneficial uses of the underlying groundwater, which is a water of the State, are municipal and domestic water supply, agricultural supply, industrial service supply, and

industrial process supply.

11. Issuance of this Complaint is exempt from the provisions of the California Environmental Quality Act (Pub. Resources Code § 21000 et seq.), in accordance with California Code of Regulations, title 14, section 15321(a)(2).

### **Violations under CWC section 13350**

12. Administrative civil liability may be imposed for violations of WDRs Order R5-2006-0039 and CDO R5-2006-0040 pursuant to CWC section 13350(a) which states, in relevant part,

(a) Any person who ... in violation of any waste discharge requirement ... or other order or prohibition issued, reissued, or amended by a regional board or the state board, discharges waste, or causes or permits waste to be deposited where it is discharged, into the waters of the state... shall be liable civilly, and remedies may be proposed, in accordance with subdivision (d) or (e).

13. CWC section 13350(e) states, in relevant part,

(e) The state board or a regional board may impose civil liability administratively ... either on a daily basis or on a per gallon basis, but not both.

(1) The civil liability on a daily basis may not exceed five thousand dollars (\$5,000) for each day the violation occurs.

14. CWC section 13327 states,

In determining the amount of civil liability, the regional board ... shall take into consideration the nature, circumstance, extent, and gravity of the violation or violations, whether the discharge is susceptible to cleanup or abatement, the degree of toxicity of the discharge, and, with respect to the violator, the ability to pay, the effect on ability to continue in business, any voluntary cleanup efforts undertaken, any prior history of violations, the degree of culpability, economic benefit or savings, if any, resulting from the violation, and other matters as justice may require.

15. WDRs Order R5-2006-0039 requires that the Discharger comply with the Statewide water recycling criteria in California Code of Regulations, title 22, section 60301 et seq. for the treatment, use, and distribution of reclaimed water at the Park. These criteria are implemented through effluent limitations contained in WDRs Order R5-2006-0039, specifically, Part IV.C, labeled Reclamation Specifications.

16. WDRs Order R5-2006-0039, IV.C Reclamation Specifications – Discharge Point 002 states, in relevant part:

1. Beginning **Permit Effective Date** (5 May 2006), the discharge of treated domestic wastewater to land for reclamation purposes shall maintain compliance with the following limitations at Discharge Point 002, as described in the Monitoring and Reporting Program (Attachment E).

Parameter	Units	Effluent Limits				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Min	Instantaneous Max
BOD 5-day @ 20°C	mg/L	10	20	50		
Total Suspended Solids	mg/L	10	20	50		
pH	standard units				6.5	8.5

2. **Percent Removal:** The average monthly percent removal of BOD 5-day at 20°C and total suspended solids shall not be less than 85 percent.
3. **Total Coliform:** The median concentration of total coliform bacteria measured in the disinfected effluent shall not exceed an MPN of 2.2 per 100 milliliters utilizing the bacteriological results of the last seven days for which analyses have been completed (7-day median). The number of total coliform bacteria shall not exceed an MPN of 23 per 100 milliliters in more than one sample in any 30-day period. No sample shall exceed an MPN of 240 total coliform bacteria per 100 milliliters.
4. **Turbidity:** The turbidity in the effluent shall not exceed a daily average of 2 NTUs and shall not exceed 5 NTUs more than 5 percent of the time during any 24-hour period, and shall not exceed 10 NTUs at any time.

17. CDO R5-2006-0040, Hereby Ordered provision 1 states, in relevant part:

1. Pursuant to California Water Code Section 13301, Canada Cove Limited Partnership, French Camp RV Park and Golf Course shall comply with the following time schedule to ensure compliance with the organochlorine pesticides, aluminum, ammonia, boron, iron, manganese, nitrate (as N), electrical conductivity, total coliform, and turbidity effluent limitations contained in WDRs Order No. R5-2006-0039 as described in the above Findings:

Task  
 Full compliance with total coliform and turbidity

Date  
**1 May 2008**

18. A list of reported violations dating from 5 May 2006 through 31 September 2008, the period analyzed for this Complaint, found 45 days of violation of the wastewater Reclamation Specifications. Reclamation Specifications exceedances are summarized in Attachment B, a part of this Complaint. Attachment B does not include violations of limits for total coliform and turbidity before 1 May 2008 (the CDO compliance date).

19. Pursuant to CWC section 13350, up to \$5,000 may be assessed per violation, per day. Attachment B, a part of this Complaint, lists 77 violations, which occurred on 45 different days. The maximum penalty for these 77 violations under CWC section 13350 is **three hundred and eighty-five thousand dollars (\$385,000)**. Should a hearing on the matter be conducted, the Central Valley Water Board may also find that the Discharger violated the terms of the CDO R5-2006-0040 by failing to attain full compliance with the total coliform and turbidity requirements by 1 May 2008, which would allow administrative civil liability to be imposed for every day in which the facility was inadequate. This Complaint, however, does not propose additional liability for these failures.

**CANADA COVE LIMITED PARTNERSHIP IS HEREBY GIVEN NOTICE THAT:**

1. The Executive Officer of the Central Valley Water Board charges the Discharger with an administrative civil liability in the amount of **twenty two thousand five hundred dollars (\$22,500)**. The amount of the proposed liability is based upon a review of the factors cited in California Water Code section 13327, as well as the State Water Resources Control Board's Water Quality Enforcement Policy.
2. A hearing on this matter will be held at the Central Valley Water Board meeting scheduled on **11/12 June 2009**, unless the Discharger does either of the following by **16 April 2009**:
  - a) Waives the hearing by completing the attached form (checking off the box next to item #4) and returning it to the Central Valley Water Board, along with payment for the proposed civil liability of **twenty two thousand five hundred dollars (\$22,500)**; or
  - b) Agrees to enter into settlement discussions with the Central Valley Water Board and requests that any hearing on the matter be delayed by signing the enclosed waiver (checking off the box next to item #5) and returning it to the Central Valley Water Board along with a letter describing the issues to be discussed.
3. If a hearing is held, the Central Valley Water Board will consider whether to affirm, reject, or modify the proposed Administrative Civil Liability, or whether to refer the matter to the Attorney General for recovery of judicial civil liability.

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PAMELA C. CREEDON, Executive Officer

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17 March 2009

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**WAIVER OF 90-DAY HEARING REQUIREMENT FOR  
ADMINISTRATIVE CIVIL LIABILITY COMPLAINT**

By signing this waiver, I affirm and acknowledge the following:

1. I am duly authorized to represent the Canada Cove Limited Partnership (hereinafter "Discharger") in connection with Administrative Civil Liability Complaint R5-2009-0522 (hereinafter the "Complaint");
2. I am informed that California Water Code section 13323, subdivision (b), states that, "a hearing before the regional board shall be conducted within 90 days after the party has been served" with the Complaint;
3. I hereby waive any right the Discharger may have to a hearing before the Central Valley Regional Water Quality Control Board (Central Valley Water Board) within ninety (90) days of service of the Complaint; and
4.  **(Check here if the Discharger will waive the hearing requirement and will pay the fine)**
  - a. I certify that the Discharger will remit payment for the proposed civil liability in the amount of **twenty two thousand five hundred dollars (\$22,500)** by check, which will contain a reference to "ACL Complaint R5-2009-0522" and will be made payable to the "Waste Discharge Permit Fund." Payment must be received by the Central Valley Water Board by **16 April 2009** or this matter will be placed on the Central Valley Water Board's agenda for adoption at the **11/12 June 2009** Central Valley Water Board meeting.
  - b. I understand the payment of the above amount constitutes a settlement of the Complaint, and that any settlement will not become final until after a 30-day public notice and comment period expires. Should the Central Valley Water Board receive new information or comments during this comment period, the Central Valley Water Board's Executive Officer may withdraw the complaint, return payment, and issue a new complaint. New information or comments include those submitted by personnel of the Central Valley Water Board who are not associated with the enforcement team's issuance of the Complaint.
  - c. I understand that payment of the above amount is not a substitute for compliance with applicable laws and that continuing violations of the type alleged in the Complaint may subject the Discharger to further enforcement, including additional civil liability.

-or-

5.  **(Check here if the Discharger will waive the 90-day hearing requirement, but will not pay at the current time. The Central Valley Water Board must receive information from the Discharger indicating a controversy regarding the assessed penalty at the time this waiver is submitted, or the waiver may not be accepted.)** I certify that the Discharger will promptly engage the Central Valley Water Board staff in discussions to resolve the outstanding violation(s). By checking this box, the Discharger is *not* waiving its right to a hearing on this matter. By checking this box, the Discharger requests that the Central Valley Water Board delay the hearing so that the Discharger and Central Valley Water Board staff can discuss settlement. It remains within the discretion of the Central Valley Water Board to agree to delay the hearing. A hearing on the matter may be held before the Central Valley Water Board if these discussions do not resolve the liability proposed in the Complaint. The Discharger agrees that this hearing may be held after the 90-day period referenced in California Water Code section 13323 has elapsed.
6. If a hearing on this matter is held, the Central Valley Water Board will consider whether to issue, reject, or modify the proposed Administrative Civil Liability Order, or whether to refer the matter to the Attorney General for recovery of judicial civil liability. Modification of the proposed Administrative Civil Liability Order may include increasing the dollar amount of the assessed civil liability.

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(Print Name and Title)

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(Signature)

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(Date)



Linda S. Adams  
Secretary for  
Environmental Protection

## California Regional Water Quality Control Board Central Valley Region

Karl E. Longley, ScD, P.E., Chair

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Arnold  
Schwarzenegger  
Governor

16 January 2009

Jack Verderame  
Canada Cove Limited Partnership  
French Camp RV Park and Golf Course  
P.O. Box 1500  
French Camp, CA. 95231

CERTIFIED MAIL  
7006 0810 0002 9650 8329

### **NOTICE OF VIOLATION AND CALIFORNIA WATER CODE SECTION 13267 ORDER FOR TECHNICAL REPORT, CANADA COVE LIMITED PARTNERSHIP, FRENCH CAMP RV PARK AND GOLF COURSE, SAN JOAQUIN COUNTY**

This Notice of Violation and California Water Code Section 13267 Order to submit information is issued to Canada Cove Limited Partnership (Discharger) for violations of Waste Discharge Requirements Order R5-2006-0039 (NPDES CA0083682) and Cease and Desist Order (CDO) R5-2006-0400 at the French Camp RV Park and Golf Course. The violations discussed in the enclosed memorandum include:

1. The Discharger has consistently violated the Reclamation Specifications for turbidity, total coliform organisms, biochemical oxygen demand, total suspended solids, and pH. A CDO provided a two-year time schedule to comply with the turbidity and total coliform organism limits by 1 May 2008. However, the facility is unable to comply with the requirements.
2. The Discharger is in violation of the Construction, Operation, and Maintenance Specifications, Section C.5.a.i, which requires: *"Wastewater shall be oxidized, disinfected, and in this situation filtered (to assure effectiveness of the ozone disinfection process) or equivalent pursuant to DHS criteria for the use of recycled water at a Golf Course with restricted access in Title 22, CCR, Division 4, Chapter 3 (Title 22)."*
3. The Discharger is in violation of compliance deadlines pursuant to its CDO by failing to submit its Compliance Workplan/Implementation Schedule, Pollution Prevention plans, and Progress Reports.
4. The Discharger is also in violation of the Monitoring and Reporting Program by:
  - a. Failing to report the percent removal for biochemical oxygen demand and total suspended solids pursuant to Section X.B.3.
  - b. Failing to report the minimum level and method detection limit for each constituent pursuant to Section X.B.7.

***California Environmental Protection Agency***

- c. Failing to identify violations in the cover letter or to describe corrective actions and provide a time schedule for implementation of corrective actions pursuant to Section X.B.8.

### **Water Code Section 13267 Request for Technical Reports**

Section 13267 of the California Water Code states, in part:

*In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.*

Section 13268 of the California Water Code states, in part:

*(a) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of Section 13267, or failing or refusing to furnish a statement of compliance as required by subdivision (b) of Section 13399.2, or falsifying and information provided therein, is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).*

*(b)(1) Civil liability may be administratively imposed by a regional board in accordance with Article 2.5 (commencing with section 13323) of Chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars (\$1,000) for each day in which the violation occurs.*

The French Camp RV Park and Golf Course is continuing to violate permit conditions intended to protect public health and is not submitting adequate monitoring reports. In order to ensure that staff has sufficient information to determine whether further enforcement action is appropriate, and to ensure compliance with applicable laws and regulations, Canada Cove Limited Partnership is hereby directed to submit the following technical reports. This request is made pursuant to Section 13267 of the California Water Code. Canada Cove Limited Partnership owns and operates the facility cited herein and is responsible for all waste generated at the facility.

Beginning with the **January 2009 monitoring report, due by 1 March 2009**, Canada Cove Limited Partnership shall ensure that each monitoring report contains all of the information required by Monitoring and Reporting Program No. R5-2006-0039.

By **9 March 2009**, Canada Cove Limited Partnership shall submit a technical report describing the changes it has made to ensure that each monitoring report will contain all of the information required by Monitoring and Reporting Program No. R5-2006-0039.

By **9 March 2009**, Canada Cove Limited Partnership shall submit a technical report indicating its plans and a time schedule to achieve full compliance with Waste Discharge Requirements Order R5-2006-0039 and CDO R5-2006-0400. The report shall fully describe why the Reclamation Specifications for turbidity, total coliform organisms, biochemical oxygen demand, total suspended solids, and pH have been violated and the specific changes that will be made to prevent future violations. In addition, the report shall provide a proposed timeline for the improvements.

Any technical report required herein that involves planning, investigation, evaluation, engineering design, or other work requiring interpretation and proper application of engineering or geologic sciences shall be prepared by or under the direction of persons registered to practice in California pursuant to California Business and Professions Code sections 6735, 7835, and 7835.1. As required by these laws, completed technical reports must bear the signature(s) and seal(s) of the registered professional(s) in a manner such that all work can be clearly attributed to the professional responsible for the work.

Staff are evaluating enforcement actions, which may include civil liabilities, for the continuing failure to comply with the conditions of your Waste Discharge Requirements and Cease and Desist Order. Failure to submit the technical reports required by this request may result in additional enforcement action, including civil liabilities of up \$1,000 per day for late or inadequate technical or monitoring reports.

If you have any questions in this matter or would like to schedule a meeting to discuss this matter, please contact Ann M. Hopkinson at (916) 464-4825 or at [ahopkinson@waterboards.ca.gov](mailto:ahopkinson@waterboards.ca.gov).

PAMELA C. CREEDON  
Executive Officer

Enclosure: Memorandum

cc: Patrick Pulupa, SWRCB, Office of Chief Counsel, Sacramento  
Donna Heran, San Joaquin County Environmental Health, Stockton

CIWQS Violation ID: 760769, 761098, 761104, 781439, 781445, 781446, 761110, 761115, 761107, 781448, 781450, 781452, 761119, 761124, 781453, 781454, 781455, 781457, 781460, 761129, 761132, 781461, 781462, 781464, 781465, 761136, 761139, 761142, 781466, 781468, 781469, 781472, 761145, 761181, 761148, 761189, 781474, 761150, 761151, 761152, 781594, 781595, 781596, 761154, 761157, 761156, 781597, 781598, 781599, 761159, 761162, 781600, 781601, 781602, 761163, 761164, 781603, 781604, 781605, 761183, 761166, 761193, 761168, 781606, 781607, 781609, 781610, 781613, 781614, 781615, 781617, 781618, 781620, 761173, 781622, 761176, 761186, 761196, 781624, 781627, 781628, 781629, 781630, 781631, 761178, 761187, 761203, 781632, 781633, 781634, 781635, 781638, 781642, 781645, 781647, 781648, 781650, 781652, 781653, 781655, 781657, 794753, 794754, 794976, 794985, 794987, 794991, 794999, 795000, 795014, 795001, 795006, 795010, 795015, 795011, 795027, 795021, 795013, 794995, 794992



# California Regional Water Quality Control Board Central Valley Region

Karl E. Longley, ScD, P.E., Chair



Arnold  
Schwarzenegger  
Governor

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Linda S. Adams  
Secretary for  
Environmental Protection

**TO:** Patricia Leary  
Senior Engineer  
NPDES Compliance &  
Enforcement

**FROM:** Ann M. Hopkinson  
WRC Engineer  
NPDES Compliance &  
Enforcement

**DATE:** 16 January 2009

**SIGNATURE:** \_\_\_\_\_

**SUBJECT: VIOLATIONS FOR CANADA COVE LIMITED PARTNERSHIP, FRENCH CAMP  
RV PARK AND GOLF COURSE, SAN JOAQUIN COUNTY**

Canada Cove Limited Partnership (Discharger) owns and operates the French Camp RV Park and Golf Course (Park). Park facilities include a golf course, 196 RV spaces, mobile home, pro shop/café, office/general store, swimming pool, clubhouse, and laundry rooms. All of these facilities generate wastewater flow to the Park's wastewater treatment plant. The Park was previously regulated by Waste Discharge Requirements (WDRs) Order 95-054 (NPDES No. CA0083682), and is currently regulated by Order R5-2006-0039 and Cease and Desist Order (CDO) R5-2006-0040. The Discharger is permitted to discharge up to 0.40 mgd of treated wastewater at two locations at the Park. The first discharge point is Lone Tree Creek, however, this discharge point has reportedly not been utilized. The second discharge point is on specified portions of the golf course with treated wastewater in compliance with the statewide water recycling criteria in Title 22, California Code of Regulations, Section 60301 et.seq. This is the discharge point utilized for the Park.

The Discharger has a history of non-compliance under its WDRs for discharges to land at the Park. Violations include reclamation specification exceedances for several constituents, particularly related to compliance with reclamation specifications to meet Title 22 requirements specified in the Order. The Discharger also violated its monitoring and reporting program requirements and time schedules to submit several reports. The remainder of this memorandum will provide a violation background, a description of current violations, and the permit requirements violated.

## **HISTORY OF VIOLATIONS**

On 9 September 2003, the Regional Water Board issued a Notice of Violation (NOV) for reclamation specifications violations at the Park's wastewater treatment plant. The Waste Discharge Requirements of Order 95-054 contained reclamation specifications for total coliform organisms of 2.2 MPN/100 mL as a weekly median and 23 MPN/100 mL as a daily maximum. Self-monitoring reports (SMRs) indicated 28 exceedances of the total coliform reclamation specifications, from March 2003 through August 2003.

*California Environmental Protection Agency*



The NOV also included a request for the Discharger to submit a report, pursuant to California Water Code (CWC) Section 13267, that outlined the actions taken to:

1. Protect public health through compliance with reclamation specifications for total coliform organisms.
2. Cease all irrigation with inadequately disinfected sewage effluent.
3. Prevent windblown drift of effluent into public areas from spray irrigation.
4. Develop and implement a contingency plan for any future non-compliance.
5. Post the public areas and mark the irrigation system components to assure adequate notification of the use of reclaimed water at the Park.

On 19 September 2003, the Discharger submitted a report that indicated the ozonation system had been replaced to meet total coliform reclamation specifications and provided a list of actions the Discharger has taken to minimize public contact with the substandard effluent at the Park and address the other violations discussed in the NOV.

In a Regional Water Board Inspection Report dated 7 February 2005, staff indicated that the Discharger has been *“unable to meet the 2.2 MPN/100 mL coliform requirement 16 out of the past 24 months.”* After a review of SMRs conducted at that time, Regional Water Board staff also concluded that the Discharger *“is unable to consistently meet NPDES Permit requirements”*. Based on these findings, the Discharger does not appear to have adequately addressed the violations defined in the NOV that was issued on 9 September 2003.

On 5 May 2006, the Regional Water Board adopted Order R5-2006-0039 (NPDES No. CA0083682). Due to on-going violations of permit reclamation specifications for Title 22 constituents, and the inability of the Discharger to comply with several new reclamation specifications, the Order was adopted with Cease and Desist Order (CDO) R5-2006-0040. The CDO included a time schedule for the Discharger to comply with reclamation specifications for several constituents by 1 May 2011. However, the time schedule deadline for compliance with total coliform and turbidity reclamation specifications was 1 May 2008.

### **RECLAMATION SPECIFICATION VIOLATIONS**

A recent review of the monthly SMRs submitted by the discharger from January 2008 through September 2008, indicate that there were 121 violations of final reclamation specifications, pursuant to Order R5-2006-0039, for total suspended solids (TSS), biochemical oxygen demand (BOD), pH, turbidity, and total coliform organisms, fifty of which were not subject to the CDO time schedule. The Reclamation Specifications include:

#### *“C. Reclamation Specifications – Discharge Point 002*

1. Beginning **Permit Effective Date** (5 May 2006), the discharge of treated domestic wastewater to land for reclamation purposes shall maintain compliance with the

following limitations at Discharge Point 002, as described in the Monitoring and Reporting Program (Attachment E).

Parameter	Units	Effluent Limits				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Min	Instantaneous Max
BOD 5-day @ 20°C	mg/L	10	20	50		
Total Suspended Solids	mg/L	10	20	50		
pH	standard units				6.5	8.5

3. **Total Coliform:** *The median concentration of total coliform bacteria measured in the disinfected effluent shall not exceed an MPN of 2.2 per 100 milliliters utilizing the bacteriological results of the last seven days for which analyses have been completed (7-day median). The number of total coliform bacteria shall not exceed an MPN of 23 per 100 milliliters in more than one sample in any 30-day period. No sample shall exceed an MPN of 240 total coliform bacteria per 100 milliliters.*
4. **Turbidity:** *The turbidity in the effluent shall not exceed a daily average of 2 NTUs and shall not exceed 5 NTUs more than 5 percent of the time during any 24-hour period, and shall not exceed 10 NTUs at any time.”*

The CDO states, in part:

*“1. Pursuant to California Water Code Section 13301, Canada Cove Limited Partnership, French Camp RV Park and Golf Course shall comply with the following time schedule to ensure compliance with the organochlorine pesticides, aluminum, ammonia, boron, iron, manganese, nitrate (as N), electrical conductivity, total coliform, and turbidity effluent limitations contained in WDRs Order No. R5-2006-0039 as described in the above Findings:*

<u>Task</u>	<u>Date</u>
Submit Compliance Workplan/Implementation Schedule	1 September 2006
Submit Pollution Prevention plan (PPP) pursuant to Section 13263.3 of the Water Code for Ops, Al, Ammonia, B, Fe, Mn, nitrate (as N), and EC Progress Reports	1 December 2006 1 July each year
Full compliance with total coliform and turbidity	1 May 2008
Full compliance all other new limitations	1 May 2011”

The Discharger reported exceedances of the final reclamation specifications prescribed by the Order (and not subject to the CDO) from January 2008 through September 2008. The reported exceedances include turbidity and total coliform violations, occurring after the CDO time schedule for compliance passed, beginning 1 May 2008 through

31 September 2008. Other violations of final reclamation specifications include: total suspended solids, BOD, and pH. The list of violations is included with this memorandum as Attachment A.

Several time schedule deadlines have passed without completion of the task by the Discharger. In addition to the failure to comply with the 1 May 2008 compliance date prescribed for total coliform and turbidity, the Discharger has failed to submit its Compliance Workplan/Implementation Schedule, Pollution Prevention plans for all required constituents, and Progress Reports. It appears that the Discharger is still unable to meet reclamation specifications pursuant to its Order and CDO.

### **MONITORING AND REPORTING PROGRAM VIOLATIONS**

Additional violations of the Monitoring and Reporting Program (MRP) defined in Attachment E of the Order include:

1. The Discharger has failed to report the average monthly percent removal for BOD and TSS in its SMRs as prescribed by IV.C.2:

*"2. **Percent Removal:** The average monthly percent removal of BOD 5-day at 20°C and total suspended solids shall not be less than 85 percent."*

2. As shown by the frequent occurrences of reclamation specification exceedances, the Discharger is in violation of the Construction, Operation, and Maintenance Specifications, Section C.5.a.i, which requires:

*"Wastewater shall be oxidized, disinfected, and in this situation filtered (to assure effectiveness of the ozone disinfection process) or equivalent pursuant to DHS criteria for the use of recycled water at a Golf Course with restricted access in Title 22, CCR, Division 4, Chapter 3 (Title 22)."*

3. The applicable Minimum Level and the current Method Detection Limit are not provided in the Discharger's SMRs for any of the constituents.

#### VI.B. MRP Requirements, X.B.7

*"The Discharger shall report with each sample result the applicable Minimum Level (ML) and the current Method Detection Limit (MDL), as determined by the procedure in 40 CFR Part 136"*

4. While the Discharger provides a cover letter to its SMRs, the cover letters are deficient to meet the requirements of the Order. The cover letters do not: (1) clearly identify violations of the WDRs, (2) discuss corrective actions taken or planned, (3) provide a proposed time schedule for corrective actions, (4) include a description of the requirement violated, and (5) include a description of the violation.

#### VI.B. MRP Requirements, X.B.8

*"The Discharger shall attach a cover letter to the SMR. The information contained in the cover letter shall clearly identify violations of the WDRs; discuss corrective actions taken or planned; and the proposed time schedule for corrective actions."*

*Identified violations must include a description of the requirement that was violated and a description of the violation.”*

## **SUMMARY**

The Discharger has a history of non-compliance with the requirements of its Order, which prescribe the manner in which reclaimed wastewater may be utilized at the Park with methods that protect human health and the environment. The Discharger is also in violation of several requirements specified in its Monitoring and Reporting Program including: not reporting both the Minimum Level and the current Method Detection Limit for any of the constituents, and deficiencies in meeting the requirements for the SMR cover letters. Additionally, the Discharger is non-compliant with its CDO time schedule deadlines to submit several reports to the Central Valley Regional Water Board.

CDO R5-2006-0040 provided a time schedule for the Discharger to comply with reclamation specifications for total coliform organisms and turbidity by 1 May 2008. The Discharger has reported reclamation specification violations at the Park from 1 May 2008 through 31 September 2008. Based on the Discharger's SMRs submitted from May 2008 through September 2008, the Park remains unable to meet the reclamation specifications and is in violation of WDRs Order R5-2006-0039 and CDO R5-2006-0040.

The following is a summary of violations at the Park:

1. The Discharger has consistently violated the Reclamation Specifications for turbidity, total coliform organisms, biochemical oxygen demand, total suspended solids, and pH. A Cease and Desist Order provided a two-year time schedule to comply with the turbidity and total coliform organism limits by 1 May 2008. However, the facility continues to be unable to comply with the requirements.
2. The Discharger is in violation of the Construction, Operation, and Maintenance Specifications, Section C.5.a.i, which requires: *“Wastewater shall be oxidized, disinfected, and in this situation filtered (to assure effectiveness of the ozone disinfection process) or equivalent pursuant to DHS criteria for the use of recycled water at a Golf Course with restricted access in Title 22, CCR, Division 4, Chapter 3 (Title 22).”*
3. The Discharger is in violation of compliance deadlines pursuant to its CDO by failing to submit its Compliance Workplan/Implementation Schedule, Pollution Prevention plans for all required constituents, and Progress Reports.
4. The Discharger is also in violation of the Monitoring and Reporting Program by:
  - a. Failing to report the percent removal for biochemical oxygen demand and total suspended solids pursuant to Section X.B.3.
  - b. Failing to report the minimum level and method detection limit for each constituent pursuant to Section X.B.7.

- c. Failing to identify violations in the cover letter or to describe corrective actions and provide a time schedule for implementation of corrective actions pursuant to Section X.B.8.

Attachment A: Reclamation Specification Exceedances/Reporting Violations from January through September 2008

## Attachment A

### Reclamation Specification Exceedances/Reporting Violations from January to September 2008 French Camp RV Park and Golf Course

<u>Violation #</u>	<u>Date</u>	<u>Violation Type</u>	<u>Units</u>	<u>Measured</u>	<u>Limit Violated</u>	<u>CIWQS Violation #</u>
1	1/2/08	BOD	mg/L	40	Average Weekly	760769
2	1/2/08	TSS	mg/L	78	Average Weekly	761098
3	1/2/08	TSS	mg/L	78	Daily Maximum	761104
4	1/2/08	Turbidity <sup>1</sup>	NTU	58	Daily Average	781439
5	1/2/08	Turbidity <sup>1</sup>	NTU	58	24-hr Instantaneous	781445
6	1/2/08	Turbidity <sup>1</sup>	NTU	58	Instantaneous	781446
7	1/9/08	BOD	mg/L	30	Average Weekly	761110
8	1/9/08	TSS	mg/L	26	Average Weekly	761115
9	1/9/08	pH	Standard	6.4	Instantaneous	761107
10	1/9/08	Turbidity <sup>1</sup>	NTU	18	Daily Average	781448
11	1/9/08	Turbidity <sup>1</sup>	NTU	18	24-hr Instantaneous	781450
12	1/9/08	Turbidity <sup>1</sup>	NTU	18	Instantaneous	781452
13	1/15/08	BOD	mg/L	24	Average Weekly	761119
14	1/15/08	TSS	mg/L	23	Average Weekly	761124
15	1/15/08	Turbidity <sup>1</sup>	NTU	14	Daily Average	781453
16	1/15/08	Turbidity <sup>1</sup>	NTU	14	24-hr Instantaneous	781454
17	1/15/08	Turbidity <sup>1</sup>	NTU	14	Instantaneous	781455
18	1/15/08	Total Coliform <sup>1</sup>	MPN/100 mL	2400	Weekly Median	781457
19	1/15/08	Total Coliform <sup>1</sup>	MPN/100 mL	2400	Instantaneous	781460
20	1/24/08	BOD	mg/L	24	Average Weekly	761129
21	1/24/08	TSS	mg/L	28	Average Weekly	761132
22	1/24/08	Turbidity <sup>1</sup>	NTU	22	Daily Average	781461
23	1/24/08	Turbidity <sup>1</sup>	NTU	22	24-hr Instantaneous	781462
24	1/24/08	Turbidity <sup>1</sup>	NTU	22	Instantaneous	781464
25	1/24/08	Total Coliform <sup>1</sup>	MPN/100 mL	7	Weekly Median	781465
26	1/29/08	BOD	mg/L	29	Average Weekly	761136
27	1/29/08	TSS	mg/L	69	Average Weekly	761139
28	1/29/08	TSS	mg/L	69	Daily Maximum	761142
29	1/29/08	Turbidity <sup>1</sup>	NTU	37	Daily Average	781466
30	1/29/08	Turbidity <sup>1</sup>	NTU	37	24-hr Instantaneous	781468
31	1/29/08	Turbidity <sup>1</sup>	NTU	37	Instantaneous	781469
32	1/29/08	Total Coliform <sup>1</sup>	MPN/100 mL	4	Weekly Median	781472
33	1/31/08	BOD	mg/L	29	Average Monthly	761145
34	1/31/08	BOD Removal	%	not reported	Percent Removal	761181
35	1/31/08	TSS	mg/L	45	Average Monthly	761148
36	1/31/08	TSS Removal	%	not reported	Percent Removal	761189
37	1/31/08	Total Coliform <sup>1</sup>	MPN/100 mL	612	Average Monthly	781474
38	2/6/08	BOD	mg/L	37	Average Weekly	761150

**Attachment A**  
**French Camp RV Park and Golf Course**

<u>Violation #</u>	<u>Date</u>	<u>Violation Type</u>	<u>Units</u>	<u>Measured</u>	<u>Limit Violated</u>	<u>CIWQS Violation #</u>
39	2/6/08	TSS	mg/L	108	Average Weekly	761152
40	2/6/08	TSS	mg/L	108	Daily Maximum	761151
41	2/6/08	Turbidity <sup>1</sup>	NTU	71	Daily Average	781594
42	2/6/08	Turbidity <sup>1</sup>	NTU	71	24-hr Instantaneous	781595
43	2/6/08	Turbidity <sup>1</sup>	NTU	71	Instantaneous	781596
44	2/12/08	BOD	mg/L	32	Average Weekly	761154
45	2/12/08	TSS	mg/L	52	Average Weekly	761157
46	2/12/08	TSS	mg/L	52	Daily Maximum	761156
47	2/12/08	Turbidity <sup>1</sup>	NTU	28	Daily Average	781597
48	2/12/08	Turbidity <sup>1</sup>	NTU	28	24-hr Instantaneous	781598
49	2/12/08	Turbidity <sup>1</sup>	NTU	28	Instantaneous	781599
50	2/19/08	BOD	mg/L	33	Average Weekly	761159
51	2/19/08	TSS	mg/L	48	Average Weekly	761162
52	2/19/08	Turbidity <sup>1</sup>	NTU	42	Daily Average	781600
53	2/19/08	Turbidity <sup>1</sup>	NTU	42	24-hr Instantaneous	781601
54	2/19/08	Turbidity <sup>1</sup>	NTU	42	Instantaneous	781602
55	2/27/08	BOD	mg/L	38	Average Weekly	761163
56	2/27/08	TSS	mg/L	35	Average Weekly	761164
57	2/27/08	Turbidity <sup>1</sup>	NTU	34	Daily Average	781603
58	2/27/08	Turbidity <sup>1</sup>	NTU	34	24-hr Instantaneous	781604
59	2/27/08	Turbidity <sup>1</sup>	NTU	34	Instantaneous	781605
60	2/29/08	BOD Removal	%	not reported	Percent Removal	761183
61	2/29/08	BOD	mg/L	35	Average Monthly	761166
62	2/29/08	TSS Removal	%	not reported	Percent Removal	761193
63	2/29/08	TSS	mg/L	61	Average Monthly	761168
64	3/4/08	Turbidity <sup>1</sup>	NTU	15	Daily Average	781606
65	3/4/08	Turbidity <sup>1</sup>	NTU	15	24-hr Instantaneous	781607
66	3/4/08	Turbidity <sup>1</sup>	NTU	15	Instantaneous	781609
67	3/4/08	Total Coliform <sup>1</sup>	MPN/100 mL	11	Weekly Median	781610
68	3/11/08	Turbidity <sup>1</sup>	NTU	10	Daily Average	781613
69	3/11/08	Turbidity <sup>1</sup>	NTU	10	24-hr Instantaneous	781614
70	3/11/08	Total Coliform <sup>1</sup>	MPN/100 mL	4	Weekly Median	781615
71	3/18/08	Turbidity <sup>1</sup>	NTU	12	Daily Average	781617
72	3/18/08	Turbidity <sup>1</sup>	NTU	12	24-hr Instantaneous	781618
73	3/18/08	Turbidity <sup>1</sup>	NTU	12	Instantaneous	781620
74	3/18/08	TSS	mg/L	21	Average Weekly	761173
75	3/26/08	Turbidity <sup>1</sup>	NTU	5	Daily Average	781622
76	3/31/08	TSS	mg/L	13	Average Monthly	761176
77	3/31/08	BOD Removal	%	not reported	Percent Removal	761186
78	3/31/08	TSS Removal	%	not reported	Percent Removal	761196

**Attachment A**  
**French Camp RV Park and Golf Course**

<u>Violation #</u>	<u>Date</u>	<u>Violation Type</u>	<u>Units</u>	<u>Measured</u>	<u>Limit Violated</u>	<u>CIWQS Violation #</u>
79	4/1/08	Turbidity <sup>1</sup>	NTU	3.2	Daily Average	781624
78	4/8/08	Turbidity <sup>1</sup>	NTU	2.9	Daily Average	781627
79	4/15/08	Turbidity <sup>1</sup>	NTU	4.5	Daily Average	781628
80	4/22/08	Turbidity <sup>1</sup>	NTU	5.2	Daily Average	781629
81	4/22/08	Turbidity <sup>1</sup>	NTU	5.2	24-hr Instantaneous	781630
82	4/29/08	Turbidity <sup>1</sup>	NTU	3.5	Daily Average	781631
83	4/30/08	BOD	mg/L	11	Average Monthly	761178
84	4/30/08	BOD Removal	%	not reported	Percent Removal	761187
85	4/30/08	TSS Removal	%	not reported	Percent Removal	761203
86	5/6/08	Turbidity	NTU	2.6	Daily Average	781632
87	5/13/08	Turbidity	NTU	2.5	Daily Average	781633
88	5/20/08	Turbidity	NTU	5	Daily Average	781634
89	5/27/08	Turbidity	NTU	2.9	Daily Average	781635
90	5/31/08	BOD	mg/L	11	Average Monthly	781638
91	5/31/08	BOD Removal	%	not reported	Percent Removal	781642
92	5/31/08	TSS Removal	%	not reported	Percent Removal	781645
93	6/4/08	Turbidity	NTU	4.1	Daily Average	781647
94	6/10/08	Total Coliform	MPN/100 mL	240	Weekly Median	781648
95	6/17/08	Turbidity	NTU	4.7	Daily Average	781650
96	6/25/08	Turbidity	NTU	2.5	Daily Average	781652
97	6/30/08	Total Coliform	MPN/100 mL	234	Average Monthly	781653
98	6/30/08	BOD Removal	%	not reported	Percent Removal	781655
99	6/30/08	TSS Removal	%	not reported	Percent Removal	781657
100	7/29/08	Turbidity	NTU	2.8	Daily Average	794754
101	7/31/08	BOD Removal	%	not reported	Percent Removal	794976
102	7/31/08	TSS Removal	%	not reported	Percent Removal	794985
103	8/31/08	BOD Removal	%	not reported	Percent Removal	794987
104	8/31/08	TSS Removal	%	not reported	Percent Removal	794991
105	9/3/08	Turbidity	NTU	4.3	Daily Average	794999
106	9/9/08	Turbidity	NTU	4.2	Daily Average	795000
107	9/19/08	Total Coliform	MPN/100 mL	50	Weekly Median	795014
108	9/19/08	Turbidity	NTU	17	Daily Average	795001
109	9/19/08	Turbidity	NTU	17	24-hr Instantaneous	795006
110	9/19/08	Turbidity	NTU	17	Instantaneous	795010
111	9/19/08	TSS	mg/L	30	Average Weekly	795015
112	9/22/08	Total Coliform	MPN/100 mL	130	Weekly Median	795016
113	9/22/08	Turbidity	NTU	5.1	Daily Average	795011

**Attachment A**  
**French Camp RV Park and Golf Course**

<u>Violation #</u>	<u>Date</u>	<u>Violation Type</u>	<u>Units</u>	<u>Measured</u>	<u>Limit Violated</u>	<u>CIWQS Violation #</u>
114	9/22/08	Turbidity	NTU	5.1	24-hr Instantaneous	795027
115	9/30/08	Total Coliform	MPN/100 mL	1600	Instantaneous	795021
116	9/30/08	Total Coliform	MPN/100 mL	1600	Weekly Median	795018
117	9/30/08	Total Coliform	MPN/100 mL	1600	Average Monthly	795020
118	9/30/08	Turbidity	NTU	2.9	Daily Average	795012
119	9/31/08	BOD Removal	%	not reported	Percent Removal	794995
120	9/31/08	TSS Removal	%	not reported	Percent Removal	794992

1. Violation of the reclamation specification limitations of WDR R5-2006-0039 (NPDES CA0083682). However, CDO R5-2006-0400 provides a time schedule until 1 May 2008 to comply with this limitation.

## Attachment B to ACLC R5-2009-0522

### Reclamation Specification Exceedances from 5 May 2006 to 31 September 2008 French Camp RV Park and Golf Course

<u>Violation Number</u>	<u>Date</u>	<u>Constituent Violated</u>	<u>Units</u>	<u>Measured</u>	<u>Constituent Limit Violated</u>	<u>Type of Violation</u>	<u>CIWQS Violation Number</u>
1	5/30/06	BOD	mg/L	28	20	Average Weekly	806693
2	5/31/06	BOD	mg/L	13.8	10	Average Monthly	806964
3	6/30/06	BOD	mg/L	13.8	10	Average Monthly	806965
4	11/30/06	BOD	mg/L	10.725	10	Average Monthly	806966
5	12/31/06	BOD	mg/L	12.65	10	Average Monthly	806967
6	1/31/07	BOD	mg/L	12.3	10	Average Monthly	806968
7	2/28/07	BOD	mg/L	12.35	10	Average Monthly	806969
8	3/8/07	BOD	mg/L	22	20	Average Weekly	806970
9	3/31/07	BOD	mg/L	15.95	10	Average Monthly	806971
10	4/30/07	BOD	mg/L	15	10	Average Monthly	806972
11	7/3/07	BOD	mg/L	22	20	Average Weekly	806973
12	7/17/07	BOD	mg/L	22	20	Average Weekly	806974
13	7/31/07	BOD	mg/L	14.88	10	Average Monthly	806975
14	8/31/07	BOD	mg/L	14.25	10	Average Monthly	806976
15	11/30/07	BOD	mg/L	11.025	10	Average Monthly	806977
16	12/7/07	BOD	mg/L	22	20	Average Weekly	806979
17	12/26/07	BOD	mg/L	34	20	Average Weekly	806980
18	12/31/07	BOD	mg/L	21.75	10	Average Monthly	806981
19	12/7/07	TSS	mg/L	50	20	Average Weekly	806982
20	12/12/07	TSS	mg/L	30	20	Average Weekly	806983
21	12/26/07	TSS	mg/L	65	20	Average Weekly	806984
22	12/26/07	TSS	mg/L	65	50	Maximum Daily	807000
23	12/31/07	TSS	mg/L	39	10	Average Monthly	806986
24	1/2/2008	BOD	mg/L	40	20	Average Weekly	760769
25	1/2/2008	TSS	mg/L	78	20	Average Weekly	761098
26	1/2/2008	TSS	mg/L	78	50	Daily Maximum	761104
27	1/9/2008	BOD	mg/L	30	20	Average Weekly	761110
28	1/9/2008	TSS	mg/L	26	20	Average Weekly	761115
29	1/9/2008	pH	Standard	6.4	6.5	Instantaneous	761107
30	1/15/2008	BOD	mg/L	24	20	Average Weekly	761119
31	1/15/2008	TSS	mg/L	23	20	Average Weekly	761124
32	1/24/2008	BOD	mg/L	24	20	Average Weekly	761129
33	1/24/2008	TSS	mg/L	28	20	Average Weekly	761132
34	1/29/2008	TSS	mg/L	69	20	Average Weekly	761139
35	1/29/2008	TSS	mg/L	69	50	Daily Maximum	761142
36	1/31/2008	BOD	mg/L	29	10	Average Monthly	761145
37	1/31/2008	TSS	mg/L	45	10	Average Monthly	761148

**Attachment B to ACLC R5-2009-0522  
French Camp RV Park and Golf Course**

38	2/6/2008	BOD	mg/L	37	20	Average Weekly	761150
39	2/6/2008	TSS	mg/L	108	20	Average Weekly	761152
40	2/6/2008	TSS	mg/L	108	50	Daily Maximum	761151
41	2/12/2008	BOD	mg/L	32	20	Average Weekly	761154
42	2/12/2008	TSS	mg/L	52	20	Average Weekly	761157
43	2/12/2008	TSS	mg/L	52	50	Daily Maximum	761156
44	2/19/2008	BOD	mg/L	33	20	Average Weekly	761159
45	2/19/2008	TSS	mg/L	48	20	Average Weekly	761162
46	2/27/2008	BOD	mg/L	38	20	Average Weekly	761163
47	2/27/2008	TSS	mg/L	35	20	Average Weekly	761164
48	2/29/2008	BOD	mg/L	35	10	Average Monthly	761166
49	2/29/2008	TSS	mg/L	61	10	Average Monthly	761168
50	3/18/2008	TSS	mg/L	21	20	Average Weekly	761173
51	3/31/2008	TSS	mg/L	13	10	Average Monthly	761176
52	4/30/2008	BOD	mg/L	11	10	Average Monthly	761178
53	5/6/2008	Turbidity	NTU	2.6	2	Daily Average	781632
54	5/13/2008	Turbidity	NTU	2.5	2	Daily Average	781633
55	5/20/2008	Turbidity	NTU	5	2	Daily Average	781634
56	5/27/2008	Turbidity	NTU	2.9	2	Daily Average	781635
57	5/31/2008	BOD	mg/L	11	10	Average Monthly	781638
58	6/4/2008	Turbidity	NTU	4.1	2	Daily Average	781647
59	6/10/2008	Total Coliform	MPN/100 mL	240	2.2	Weekly Median	781648
60	6/17/2008	Turbidity	NTU	4.7	2	Daily Average	781650
61	6/25/2008	Turbidity	NTU	2.5	2	Daily Average	781652
62	6/30/2008	Total Coliform	MPN/100 mL	234	23	Average Monthly	781653
63	7/29/2008	Turbidity	NTU	2.8	2	Daily Average	794754
64	9/3/2008	Turbidity	NTU	4.3	2	Daily Average	794999
65	9/9/2008	Turbidity	NTU	4.2	2	Daily Average	795000
66	9/19/2008	Total Coliform	MPN/100 mL	50	2.2	Weekly Median	795014
67	9/19/2008	Turbidity	NTU	17	2	Daily Average	795001
68	9/19/2008	Turbidity	NTU	17	5	24-hr Instantaneous	795006
69	9/19/2008	Turbidity	NTU	17	10	Instantaneous	795010
70	9/19/2008	TSS	mg/L	30	20	Average Weekly	795015
71	9/22/2008	Total Coliform	MPN/100 mL	130	2.2	Weekly Median	795016
72	9/22/2008	Turbidity	NTU	5.1	2	Daily Average	795011
73	9/22/2008	Turbidity	NTU	5.1	5	24-hr Instantaneous	795027
74	9/30/2008	Total Coliform	MPN/100 mL	1600	240	Instantaneous	795021
75	9/30/2008	Total Coliform	MPN/100 mL	1600	2.2	Weekly Median	795018
76	9/30/2008	Total Coliform	MPN/100 mL	1600	23	Average Monthly	795020
77	9/30/2008	Turbidity	NTU	2.9	2	Daily Average	795012