MALAGA COUNTY WATER DISTRICT

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BOARD OF DIRECTORS

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James D. Anderson, General Manager

October 27, 2014

California Regional Water Quality Control Board
Central Valley Region
Attention: Aide Ortiz
1685 "E" Street
Fresno, California 93706
Via email: aide.ortiz@waterboards.ca.gov

Re: Comments on Renewal of Waste Discharge Requirements and NPDES Permit Number CA0084239 and Adoption of Cease and Desist Order.

Public Hearing
Date: 4/5 December 2014
Time: 8:30 a.m. or 9:00 a.m.
Place: Central Valley Region Water Quality Control
11020 Sun Center Drive, Suite 200
Rancho Cordova , California 95670

The Malaga County Water District ("District") submits the following comments/objections to the Central Valley Water Board's ("CVWB") Notice of Public Hearing concerning the renewal of Waste Discharge Requirements and the draft NPDES Permit No. CA0084239 and adoption of a Cease and Desist Order for the Malaga County Water District Wastewater Treatment Facility, the draft WDRs Order R5-2014-XXXX, Draft Cease and Desist Order and the draft Alternative for Discharge Restrictions to Central Canal:

1. NPDES No. CA0084239 order R5-2014-XXXX-IV (A)(1)(b). This section restricts the District's effluent flow at discharge point at 002 to 0.49 mgd "unless the Executive Officer approves a higher flow, of up to 0.85 mgd, as allowed by provision VI. C.2.b." The District's current discharge limitation at discharge point 002 is 0.85 mgd. Although unclear, this limitation appears to be based on attachment F section II (B)(3) which recites various

background information and states “[b]ased on the available data, the estimated capacity of the disposal pond is approximately 0.49 mgd, which is less than the average flow which is treated by the Facility between 2010-2013 of 0.65 mgd. This order restricts the flow to the disposal ponds (Discharge Point 002) to 0.49 mgd as a monthly average.” There is no evidence showing how the Central Valley Board calculated the disposal capacity other than the statement that “[t]he Central Valley Water Board calculated the disposal capacity of the ponds based on one hundred-year rainfall and evaporation, assuming half of the storage capacity available at the beginning of the water year (1 October), and a percolating rate of 0.6 inch per day. The rainfall, evaporation, and percolation rates used for calculation were obtained from the Study. The Study assumed the percolation rate initially increase to 1.0 inch per day if, and when, the Discharger preformed maintenance...” (The “Study” referred to a July 28, 2008, treatment and disposal capacity study prepared by the District and submitted to the Central Valley Water Board which includes data from 2005 and 2007.) The Study anticipated that pond percolation rates would increase once pond maintenance (scraping and raking) was performed and that the pond would maintain higher percolation rates with regular maintenance. Since 2008, the District has developed and implemented a pond maintenance program which included raking (not scraping) 7 of its 8 percolation ponds in 2014 (1 pond was raked in 2013). Based on current information the District’s ponds have adequate percolation to accept 0.85mgd of discharge while complying with the requirements of sections VI (C)(4)(d)(v) and (vi) of the Draft MPDES permit without any discharge into the Central Canal. The District will, as required by task 2b of the Proposed Cease and Desist Order R-2014-XXXX (“CDO”), submit a complete analysis of the disposal capacity of the on-site ponds unless the preparation of the analysis is made impossible by the 0.49 mgd limit (see below).

Evidence of the current conditions of the District’s percolation ponds and data supporting maintaining the current 0.85 mgd discharge limit is set forth in the form of a memorandum from the District’s Engineer dated October 24, 2014, which is submitted herewith and attached hereto as Attachment A and referred to as the “Memorandum.”

It must be noted that the District has not discharged into the Central Canal in 2014. With the current percolation rates and without discharging into the Central Canal, the District has been restricted to filling and isolating its 8 percolation ponds one at a time and the imposition of the 0.49 mgd discharge limit would likely interfere with, frustrate or impair the District’s ability to comply with the requirements of CDO Order No. 2.

Additionally, the proposed discharge limit of 0.49 mgd would have the unintended effect of requiring the District to discharge tertiary treated water into the Central Canal due to the 0.49 mgd limit rather than lack of capacity. In fact, as stated above and in the Memorandum, the District has not discharged into the Central Canal in 2014 and does not plan and has no need to discharge any treated water into Central Canal in 2015 or into the future. This required discharge into the Central Canal would be in direct contradiction to the June 25, 2014 letter from Fresno Irrigation District (owner and operator of the Central Canal) which the CVWB appears to be relying on in support of imposing the 0.49 mgd limit. As proposed, the 0.49 mgd limit would place the District in a position of either

unnecessarily discharging into the Central Canal or violating the conditions of its permit in spite of the fact that the District has available capacity.

The draft order R5-2014-XXXX should be amended (at section (A)(1)(b) and throughout) to set the District's discharge limit to its percolation ponds via discharge point 002 at the current level of 0.85 mgd.

2. The Malaga County Water District objects to Cease and Desist Order R5-2001-XXXX as follows:

a. Finding (paragraph) 3 of the CDO is merely a restatement of the NPDES Permit condition objected to above and, for the same reasons set forth above, is objected to herein.

b. Finding (paragraph) 5 of the CDO states that Order R5-2014-XXXX, provision VI.C.6.b requires discharge into the Central Canal to cease during months when there are no irrigation water deliveries beginning on [permit expiration date] based on a June 25, 2014, letter from the Fresno Irrigation District to the Central Valley Board. The District objects to this finding as the aforementioned June 25, 2014 letter was, apparently, the result of a meeting requested by the CVWB which did not include a representative of or input from the District which has led, in part, to the 0.49 mgd discharge limit which will have the opposite of the desired effect of increasing discharge into the Central Canal. Further, this finding and provision VI.C.6.b of the WDR Order R5-2014-XXXX is objected to on the ground that the CVWB has not set forth and does not have the authority to interpret or enforce an agreement between the District and Fresno Irrigation District. Therefore, and for the reasons stated above, the June 25, 2014, letter referred to in finding No. 5 of the CDO is irrelevant and improper. Any order that the District "cease" discharge into the Central Canal should be stricken from the CDO and/or from the draft order R5-2014-XXXX.

c. Finding (paragraph(s)) Nos. 6 and 7. These findings merely restate provisions of WDR Order R5-2014-XXXX related to maintaining sufficient discharge capacity and not exceeding the freeboard limit. The District is in compliance with these provisions and has sufficient capacity available to maintain the current 0.85 mgd discharge limit. These findings are based on outdated and inaccurate information, are irrelevant and improper and as such should be stricken.

d. Finding (paragraph(s)) Nos. 20 thru 24. of the CDO claim to be a recitation of "enforcement history." These findings are a selective and out of context narrative of what CVWB believes to be the enforcement history related to the disposal ponds. As the caption implies, the Facts and Findings recited in paragraph 20-24 are history and do not accurately reflect the current conditions or operations of the Districts Wastewater Treatment Facility and current discharge capacity based on current percolation rates and water balance reports as set forth in the Memorandum. Because the information recited in findings (paragraphs) 20-24 are

"history" and not reflective of current data or conditions they are improper and irrelevant and should be stricken from the CDO along with the identical language set forth in the draft order R5-2014-XXXX and attachments.

e. Finding (paragraph(s)) Nos.36 and 37. For the reasons set forth herein, these findings are based on outdated and inaccurate information, are irrelevant and improper and as such should be stricken.

3. The proposed "Alternative for Discharge Restrictions to Central Canal" offers an alternative to the Draft NPDES Permit by modifying various provisions of the NPDES to require The District to cease all discharge into the Central Canal by the permit expiration date, which is unknown. For the reason set forth above, particularly that the information relied upon by the CVWB being outdated and not representative of current conditions and operations at the District's WWTF, among others, this alternative should not be considered by the Board.

4. The District objects to the Notice of Public Hearing on the matter because the Notice is ambiguous and fails to define the nature of the proceeding and as such the District cannot adequately prepare for the proceeding or is otherwise being denied due process.

The Notice states that it is a Notice of Public Hearing but fails to state whether the Public Hearing is a contested or non-contested item or, if a contested item whether it is quasi-legislative or quasi-judicial or, if quasi-judicial, whether it will be a formal or informal hearing. The CVWBs meeting procedures tend to indicate that this type of hearing is quasi-judicial and the Notice does identify the District as a designated party which would tend to indicate that the matter will be a formal adjudicative proceeding. The Notice gives a deadline for the submission of testimony, evidence, and/or written comments by interested persons and other persons of 5:00 p.m. on 27 October 2014, but does not set forth a deadline for submission of testimony, evidence, and/or written comments for designated parties and does not "set the process for the hearing" as required by the CVWB's meeting procedures. Therefore, the District reserves the right to present testimony, evidence, and/or written comments after the final meeting agenda is available; after the Administrative Record is prepared; after the Draft NPDES Permit, Draft Cease and Desist Order or Draft Alternative Cease and Desist Order are amended; at such time as a deadline for such submissions is given by the CVWB; or anytime up to and including at the hearing.

For the reasons set forth above and in the Memorandum submitted herewith, the CVWB should amend the draft permit Order R5-2014-XXXX to set the District's discharge limit into its percolation ponds (discharge point 002) at the current level of 0.85 mgd and amend all references thereto in the Order and CDO to reflect a discharge limit at discharge point 002 as 0.85 mgd. Further, the CVWB should amend the draft order R5-2014-XXXX and CDO to remove any order requiring that the District "cease" discharging into the Central Canal and not consider the Alternative for Discharge Restrictions to Central Canal. The District's discharge into the Central Canal is by agreement between the District and

the Fresno Irrigation District. The CVWB lacks jurisdiction to interpret or enforce any such agreement.

Respectfully Submitted.

_____
Charles Garabedian Jr. President,
Malaga County Water District

cc: Laurence Kimura, Fresno Irrigation District

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MEMORANDUM

To: Malaga County Water District, Jim Anderson

From: Michael Taylor

Subject: WWTP Water Balance

Date: October 24, 2014

Based on the recent monitoring of actual water level changes in Ponds 5, 6, and 7, which were isolated during portions of the months of July through October, 2014, the estimated percolation rate in the wastewater disposal ponds is 1.66 inches per day. It is noted that the previous estimated percolation rate (from 2008) was 0.60 inches per day. This updated percolation rate demonstrates a significant improvement in pond percolation rates. This improvement is a direct result of Malaga County Water District commitment during the previous six (6) years to scrape and rip the disposal ponds at the WWTP.

When the percolation rate of 1.66 inches per day is applied to a 100 Year Rainfall Water Balance, the existing ponds at the WWTP may be able to dispose of approximately 1.085 mgd (see attached water balance).

It is noted that the percolation rate of the ponds will decrease with use as dust and other particulates will settle on the pond bottom. When a factor of 75 percent is applied to the measured percolation rate, a resulting conservative value is 1.24 inches per day. When the percolation rate of 1.24 inches per day is applied to the 100 Year Rainfall Water Balance, the existing ponds at the WWTP may be able to dispose of approximately 0.821 mgd (see attached water balance).

It is recommended that this information is reviewed and forwarded to the RWQCB for consideration in establishing discharge limits for the new Waste Discharge Requirements to be adopted for the facilities. The efforts taken by the District over the past six (6) years has had significant impact in improving the on-site disposal capacity at the site, as evidenced by the recent pond percolation tests.

Also attached with this memorandum is a spreadsheet that allows the District to readily check that the necessary Available Capacity in the disposal ponds is available prior to each winter. For example, information regarding freeboard in the disposal ponds as of October 22, 2014 have been entered into the table. The ponds presently have approximately 34,825,885 gallons of capacity available. The 100 Year Rainfall Water

Balance indicates that the District must have at least 13,700,000 gallons of available capacity. The actual available capacity greatly exceeds the minimum requirement.

In addition, please refer to the attached Table 1 that includes monthly influent flowrates. Based on the current influent flowrates, and an estimated annual growth rate of 2 percent, the Malaga County Water District would not rely upon discharge to the Central Canal for approximately 23 years. It is recommended that the flowrate projection is updated each calendar year.

It is recommended that the District continue the annual rotation of scraping and ripping the existing ponds. In addition, it is recommended that the District isolate a pond every two years and monitor the actual change of water level so as to be able to update the estimated pond percolation rate.

Based on the information associated with current pond percolation rates, it is recommended that the present discharge flowrate limitation of 0.85 mgd to the disposal ponds is still viable for the Malaga County Water District.

Please contact me if you need additional information or if you have any questions.

Thank you.

Malaga County Water District
Wastewater Treatment & Disposal Facilities
Estimated Capacity Wastewater Disposal - 100 Year Rainfall Water Balance, Discharge and Storage

DATA:

Month	Number of Days per Month	100 Yr. Rainfall [1/] (in/month)	100 Yr. Evaporation [3/] (in/month)
January	31	5.14	0.90
February	28	3.70	1.46
March	31	4.53	2.09
April	30	2.76	3.71
May	31	0.01	6.21
June	30	0.31	6.85
July	31	0.00	8.14
August	31	0.00	6.99
September	30	1.10	4.68
October	31	1.58	3.09
November	30	3.16	1.20
December	31	1.59	0.85
Total	365	23.88	46.17

Discharge to canal		0	MGD
Daily Effluent Production [5/]	=	1,085,000	gpd
Pond Wet Area [7]	=	23.24	acres
Pond Storage	=	185.9	ac-ft
Pond Percolation Rate	=	1.66	in/day
Additional Pond Wet Area	=		acres
Additional Pond Storage	=	0.0	ac-ft
Estimated Pond Percolation Rate	=	1.00	in/day
Total Storage	=	185.9	ac-ft
Total Storage	=	60,582,302	gal
Total Area	=	*23.2*	*acres*

8 ft deep

6 ft deep

WWTF POND CALCULATIONS:

Effluent Produced (gal/month)	Effluent To Canal (gal/month)	Effluent to Ponds (gal/month)	Surface Rainfall [19/] (gal/month)	Surface Evaporation [20/] (gal/month)	Pond Percolation [21/] (gal/month)	Monthly Change in Storage (gal/month)	Required Storage Capacity [23/] (gal)	
33,635,000	0	33,635,000	3,243,677	567,959	32,474,638	3,836,080	8,030,702	
30,380,000	0	30,380,000	2,334,943	921,356	29,331,931	2,461,656	10,492,358	
33,635,000	0	33,635,000	2,858,727	1,318,927	32,474,638	2,700,162	13,192,520	
32,550,000	0	32,550,000	1,741,741	2,341,254	31,427,069	523,418	13,715,938	
33,635,000	0	33,635,000	6,311	3,918,918	32,474,638	(2,752,245)	10,963,693	
32,550,000	0	32,550,000	195,630	4,322,800	31,427,069	(3,004,239)	7,959,454	
33,635,000	0	33,635,000	0	5,136,874	32,474,638	(3,976,512)	3,982,942	
33,635,000	0	33,635,000	0	4,411,149	32,474,638	(3,250,787)	732,155	
32,550,000	0	32,550,000	694,172	2,953,387	31,427,069	(1,136,284)	0	*
33,635,000	0	33,635,000	997,084	1,949,993	32,474,638	207,453	207,453	
32,550,000	0	32,550,000	1,994,167	757,279	31,427,069	2,359,819	2,567,272	
33,635,000	0	33,635,000	1,003,394	536,406	32,474,638	1,627,350	4,194,622	
396,025,000	0	396,025,000	15,069,846	29,136,302	382,362,673	-404,129		* *Start at 0 Stored*
1,215.4	0.0	1,215.4	46.2	89.4	1,173.4	-1.2		*September 1st*
						-404,129		

Total (gal)
Total (ac-ft)

1/ Rainfall Data per the Western Regional Climate Center.
3/ Evaporation data per WRCC X 0.75
5/ Design Capacity Effluent Production
7/ Total existing wet area of the existing lagoons.
19/ Surface Rainfall = Volume of 100 Year rainfall on the existing WWTF treatment and storage ponds and proposed storage ponds.
20/ Surface Evaporation = Volume of effluent and rain water evaporating from the existing WWTF treatment and disposal ponds.
21/ Pond Percolation = Volume of effluent and rain water percolating into the ground for existing ponds 1 through 8.
23/ Required Storage = Theoretical starting point Sept. 1st where pond storage starts at zero with monthly contributions.

36/ Maximum Storage Needed = Peak end of month pond storage volume needed (gallons & ac-ft).
37/ Storage Available from all ponds = Total volume of available storage.
39/ Check Balance = Comparison of this value with total wastewater processed.

Maximum Required storage		13,715,938
Total Storage Available [37/]:		60,582,302 gal
Extra Storage:	**46,866,364**	gal
	144	ac-ft
Total Effluent Production:		396,025,000 gal
Total Effluent Exported:		0 gal
Total Surface Rainfall [19/]:		15,069,846 gal
Total Evaporation [20/]:		29,136,302 gal
Total Percolation [21/]:		382,362,673 gal
Effluent Applied to Crop:		0 gal
Check Balance [39/]:		396,429,129 gal

Updated: **10/24/14**
Print Date: *10/24/14*

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Malaga County Water District
Wastewater Treatment & Disposal Facilities
Estimated Capacity Wastewater Disposal - 100 Year Rainfall Water Balance, Discharge and Storage

DATA:

Month	Number of Days per Month	100 Yr. Rainfall [1/] (in/month)	100 Yr. Evaporation [3/] (in/month)
January	31	5.14	0.90
February	28	3.70	1.46
March	31	4.53	2.09
April	30	2.76	3.71
May	31	0.01	6.21
June	30	0.31	6.85
July	31	0.00	8.14
August	31	0.00	6.99
September	30	1.10	4.68
October	31	1.58	3.09
November	30	3.16	1.20
December	31	1.59	0.85
Total	365	23.88	46.17

Discharge to canal		0	MGD	
Daily Effluent Production [5/]	=	821,000	gpd	
Pond Wet Area [7]	=	23.24	acres	
Pond Storage	=	185.9	ac-ft	*8 ft deep*
Pond Percolation Rate	=	1.24	in/day	
Additional Pond Wet Area	=		acres	
Additional Pond Storage	=	0.0	ac-ft	*6 ft deep*
Estimated Pond Percolation Rate	=	1.00	in/day	
Total Storage =		185.9	ac-ft	
Total Storage =		60,582,302	gal	
Total Area =		*23.2*	*acres*	

WWTF POND CALCULATIONS:

Effluent Produced (gal/month)	Effluent To Canal (gal/month)	Effluent to Ponds (gal/month)	Surface Rainfall [19/] (gal/month)	Surface Evaporation [20/] (gal/month)	Pond Percolation [21/] (gal/month)	Monthly Change in Storage (gal/month)	Required Storage Capacity [23/] (gal)	
25,451,000	0	25,451,000	3,243,677	567,959	24,258,163	3,868,555	8,159,554	
22,988,000	0	22,988,000	2,334,943	921,356	21,910,599	2,490,988	10,650,542	
25,451,000	0	25,451,000	2,858,727	1,318,927	24,258,163	2,732,637	13,383,179	
24,630,000	0	24,630,000	1,741,741	2,341,254	23,475,642	554,845	13,938,024	
25,451,000	0	25,451,000	6,311	3,918,918	24,258,163	(2,719,770)	11,218,254	
24,630,000	0	24,630,000	195,630	4,322,800	23,475,642	(2,972,812)	8,245,442	
25,451,000	0	25,451,000	0	5,136,874	24,258,163	(3,944,037)	4,301,405	
25,451,000	0	25,451,000	0	4,411,149	24,258,163	(3,218,312)	1,083,093	
24,630,000	0	24,630,000	694,172	2,953,387	23,475,642	(1,104,857)	0	*
25,451,000	0	25,451,000	997,084	1,949,993	24,258,163	239,928	239,928	
24,630,000	0	24,630,000	1,994,167	757,279	23,475,642	2,391,246	2,631,174	
25,451,000	0	25,451,000	1,003,394	536,406	24,258,163	1,659,825	4,290,999	
299,665,000	0	299,665,000	15,069,846	29,136,302	285,620,308	-21,764		*Total (gal)*
919.6	0.0	919.6	46.2	89.4	876.5	-0.1		*Total (ac-ft)*
						-21,764		

* *Start at 0 Stored September 1st*

1/ Rainfall Data per the Western Regional Climate Center.
3/ Evaporation data per WRCC X 0.75
5/ Design Capacity Effluent Production
7/ Total existing wet area of the existing lagoons.
19/ Surface Rainfall = Volume of 100 Year rainfall on the existing WWTF treatment and storage ponds and proposed storage ponds.
20/ Surface Evaporation = Volume of effluent and rain water evaporating from the existing WWTF treatment and disposal ponds.
21/ Pond Percolation = Volume of effluent and rain water percolating into the ground for existing ponds 1 through 8.
23/ Required Storage = Theoretical starting point Sept. 1st where pond storage starts at zero with monthly contributions.

36/ Maximum Storage Needed = Peak end of month pond storage volume needed (gallons & ac-ft).
37/ Storage Available from all ponds = Total volume of available storage.
39/ Check Balance = Comparison of this value with total wastewater processed.

Maximum Required storage		13,938,024
Total Storage Available [37/]:		60,582,302 gal
Extra Storage:	**46,644,278**	gal
	143	ac-ft
Total Effluent Production:		299,665,000 gal
Total Effluent Exported:		0 gal
Total Surface Rainfall [19/]:		15,069,846 gal
Total Evaporation [20/]:		29,136,302 gal
Total Percolation [21/]:		285,620,308 gal
Effluent Applied to Crop:		0 gal
Check Balance [39/]:		299,686,764 gal

Updated: **10/24/14**
Print Date: *10/24/14*

Malaga County Water District
Available Disposal Pond Capacity as of October 22, 2014

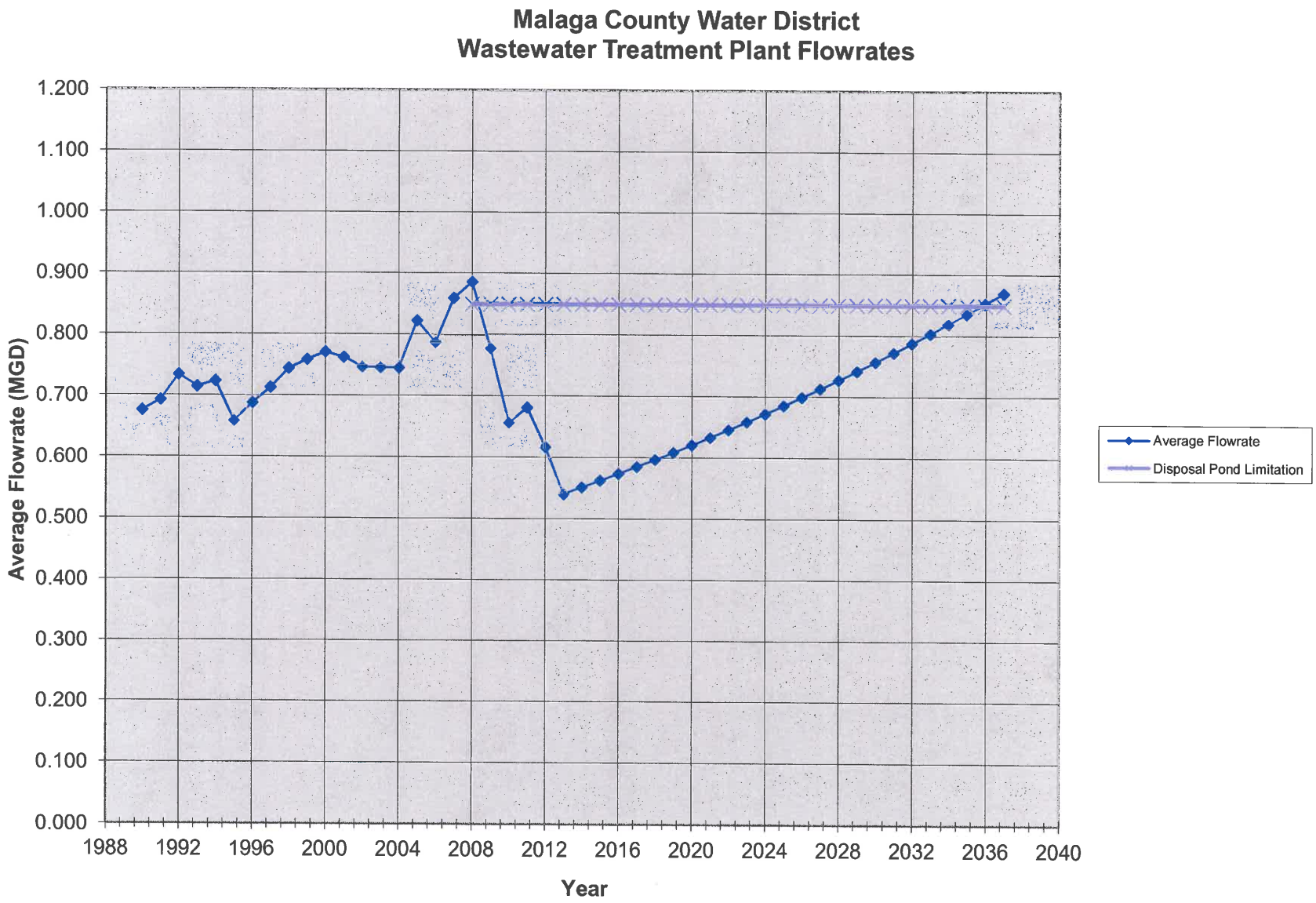
Pond	Freeboard (ft)	Available Depth (ft)	Acreage (acres)	Available Capacity (acre-ft)	Available Capacity (gal)	Total Depth (ft)
1	2.5	0.5	1.29	0.645	210,160	8
2	8	6	0.76	4.56	1,485,779	8
3	8	6	2.59	15.54	5,063,380	8
4	8	6	2.5	15	4,887,432	8
5	3.2	1.2	3.07	3.684	1,200,353	8
6	5.5	3.5	4.29	15.015	4,892,319	8
7	8	6	4.79	28.74	9,364,320	8
8	8	6	3.95	23.7	7,722,143	8
		Total	23.24	106.884	34,825,885	

Note: A minimum of 2 ft. of freeboard is required. 2 ft. freeboard equates to O AF available capacity.

TABLE 1

MALAGA COUNTY WATER DISTRICT
WASTEWATER TREATMENT PLANT
MONITORING AND REPORTING PROGRAM NO. 2008-0033
NPDES NO. CA 0084239

YEAR	AVERAGE FLOWRATE	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
		31	28	31	30	31	30	31	31	30	31	30	31
		31	29	31	30	31	30	31	31	30	31	30	31
1990	0.677	0.660	0.667	0.694	0.610	0.688	0.709	0.652	0.664	0.679	0.726	0.741	0.632
1991	0.694	0.642	0.651	0.694	0.687	0.684	0.697	0.682	0.703	0.728	0.712	0.713	0.731
1992	0.735	0.727	0.741	0.735	0.681	0.679	0.740	0.753	0.768	0.743	0.768	0.756	0.729
1993	0.716	0.727	0.720	0.724	0.721	0.715	0.703	0.705	0.712	0.714	0.703	0.709	0.734
1994	0.724	0.748	0.739	0.743	0.743	0.745	0.740	0.739	0.737	0.731	0.722	0.669	0.636
1995	0.660	0.638	0.635	0.621	0.614	0.626	0.636	0.641	0.695	0.699	0.705	0.709	0.699
1996	0.688	0.671	0.680	0.676	0.690	0.690	0.689	0.692	0.691	0.686	0.694	0.696	0.705
1997	0.714	0.686	0.681	0.681	0.690	0.704	0.715	0.711	0.740	0.756	0.722	0.734	0.749
1998	0.745	0.744	0.743	0.737	0.772	0.755	0.756	0.738	0.775	0.740	0.739	0.706	0.738
1999	0.760	0.753	0.753	0.735	0.746	0.765	0.762	0.778	0.780	0.770	0.761	0.760	0.751
2000	0.772	0.723	0.744	0.738	0.754	0.783	0.767	0.772	0.808	0.770	0.795	0.797	0.810
2001	0.763	0.776	0.771	0.701	0.810	0.755	0.780	0.750	0.770	0.773	0.759	0.760	0.756
2002	0.748	0.742	0.750	0.737	0.748	0.745	0.737	0.746	0.740	0.755	0.754	0.753	0.763
2003	0.747	0.752	0.752	0.737	0.750	0.740	0.746	0.758	0.742	0.740	0.750	0.747	0.745
2004	0.746	0.760	0.737	0.722	0.717	0.734	0.760	0.750	0.750	0.770	0.750	0.750	0.750
2005	0.823	0.860	0.780	0.760	0.770	0.763	0.870	0.960	0.935	0.964	0.740	0.778	0.700
2006	0.788	0.740	0.740	0.760	0.744	0.757	0.806	0.849	0.882	0.803	0.820	0.798	0.752
2007	0.860	0.785	0.820	0.805	0.867	0.770	0.964	1.001	0.960	1.020	0.823	0.746	0.763
2008	0.887	0.990	0.840	0.760	0.760	0.909	0.970	0.955	0.949	0.909	0.829	0.900	0.870
2009	0.778	0.830	0.800	0.820	0.740	0.800	0.900	0.830	0.750	0.800	0.720	0.670	0.680
2010	0.658	0.512	0.431	0.650	0.580	0.640	0.720	0.740	0.750	0.740	0.710	0.710	0.710
2011	0.683	0.670	0.640	0.690	0.690	0.630	0.740	0.710	0.730	0.730	0.700	0.640	0.620
2012	0.618	0.630	0.600	0.630	0.690	0.620	0.680	0.660	0.640	0.610	0.590	0.520	0.540
2013	0.541	0.560	0.450	0.520	0.570	0.560	0.530	0.600	0.610	0.550	0.560	0.510	0.490
2014	0.552												
2015	0.563												
2016	0.574												
2017	0.585												
2018	0.597												
2019	0.609												
2020	0.621												
2021	0.634												
2022	0.646												
2023	0.659												
2024	0.673												
2025	0.686												
2026	0.700												
2027	0.714												
2028	0.728												
2029	0.743												
2030	0.757												
2031	0.773												
2032	0.788												
2033	0.804												
2034	0.820												
2035	0.836												
2036	0.853												
2037	0.870												


Malaga County Water District
Wastewater Treatment Plant Flowrates
Average Flowrate (MGD)
1.200
1.100
1.000
0.900
0.800
0.700
0.600
0.500
0.400
0.300
0.200
0.100
0.000
1988
1992
1996
2000
2004
2008
2012
2016
2020
2024
2028
2032
2036
2040
Year
Average Flowrate
Disposal Pond Limitation