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Secretary for  
Environmental Protection

# California Regional Water Quality Control Board San Diego Region

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[http:// www.waterboards.ca.gov/sandiego](http://www.waterboards.ca.gov/sandiego)

July 8, 2009

CERTIFIED MAIL  
7009 0820 0001 7183 6626

Mr. Matt Estrin  
Associate Director of Facilities  
San Diego Wild Animal Park  
15500 San Pasqual Valley Road  
Escondido, CA 92027-8702

In reply refer to:  
255446:adai

Dear Mr. Estrin:

**SUBJECT: NOTICE OF VIOLATION NO. R9-2009-0108  
SAN DIEGO WILD ANIMAL PARK SEWAGE TREATMENT PLANT**

Enclosed is Notice of Violation (NOV) No. R9-2009-0108 for San Diego Wild Animal Park Sewage Treatment Plant (STP). The basis for this NOV was the monitoring data contained in the following self monitoring reports submitted by the Zoological Society of San Diego in accordance with Order No. 99-04:

1. The 16 monthly reports submitted for the October 2007 through April 2009 monitoring period.
2. The 8 quarterly reports submitted for the October - December 2007 through the January - March 2009 monitoring periods.
3. The 2 annual reports for the 2007 and 2008 monitoring periods.

Please take steps to implement the follow-up actions necessary to ensure that the violations noted do not occur in the future. These violations subject the Society to possible further enforcement action by the California Regional Water Quality Control Board, San Diego Region (Regional Board), including administrative enforcement orders requiring the Society to cease and desist from violations, or to clean up waste and abate existing or threatened conditions of pollution or nuisance; administrative assessment of civil liability in amounts of up to \$5,000 per day per violation;<sup>1</sup> referral to the State Attorney General for injunctive relief; and referral to the District Attorney for criminal prosecution.

<sup>1</sup> Under authority of California Water Code section 13350.

The Regional Board has the following comments regarding the reports referenced above:

1. The NOV cites violations of the requirement that the discharge from the wastewater treatment plant shall not exceed a peak daily flow rate of 0.150 million gallons per day (MGD). These violations were based upon the flow data reported for the month of June 2008. This data might be erroneous because the flow reported is ten times greater than any other monthly period. Please review and notify us of any corrections.
2. Order Reporting Requirement G.5.c as amended requires you to notify orally to the Regional Board within 24 hours from the time you become aware of an effluent total coliform bacteria most probable number (MPN) greater than 1,600/100 milliliters (mL) or an effluent total coliform bacteria MPN greater than 240/100mL in any two consecutive samples.
3. The next monitoring report due is the May 2009 monthly monitoring report due by June 30, 2009.

In the subject line of any response, please include the requested "in reply refer to:" information located in the heading of this letter. For questions pertaining to the subject matter, please contact Ms. Cathryn Henning at (858)-636-3161 or at [chenning@waterboards.ca.gov](mailto:chenning@waterboards.ca.gov).

Sincerely,



Julie Chan P.G.  
Supervising Engineering Geologist  
Groundwater Basins Branch

JC:rwm:clh:ad

IN THE MATTER OF	)	NOTICE OF VIOLATION
	)	NO. R9-2009-0108
County of San Diego	)	
San Diego Wild Animal Park	)	
15500 San Pasqual Valley Road	)	In reply refer to:
Escondido, CA 92027-8702	)	255446: adai

**Waste Discharge Requirements: Order No. 99-04**  
**Facility: San Pasqual Wild Animal Park Sewage Treatment Plant**

**YOU ARE HEREBY NOTIFIED THAT:**

The Zoological Society of San Diego (Society) violated Order No. 99-04, *Waste Discharge Requirements for Zoological Society of San Diego, San Diego Wild Animal Park, San Diego County*. These violations subject the Society to possible further enforcement action by the California Regional Water Quality Control Board, San Diego Region (Regional Board), including administrative enforcement orders requiring the Society to cease and desist from violations, or to clean up waste and abate existing or threatened conditions of pollution or nuisance; administrative assessment of civil liability in amounts of up to \$5,000 per day per violation;<sup>2</sup> referral to the State Attorney General for injunctive relief; and referral to the District Attorney for criminal prosecution.

The Regional Board reviewed the following monthly, quarterly and annual monitoring reports required by Order No. 99-04:

PERIOD	REPORT DATE	DATE RECEIVED
October 2007	November 12, 2007	November 13, 2007
November 2007	December 13, 2007	December 13, 2007
December 2007	January 11, 2008	January 14, 2008
October – December 2007	January 11, 2008	January 14, 2008
January – December 2007	January 14, 2008	January 14, 2008
January 2008	February 8, 2008	February 28, 2008
February 2008	March 12, 2008	March 12, 2008
March 2008	April 9, 2008	April 9, 2008
January – March 2008	April 9, 2008	April 9, 2008
April 2008	May 14, 2008	May 15, 2008
May 2008	June 12, 2008	June 13, 2008

<sup>2</sup> Under authority of California Water Code section 13350.

PERIOD	REPORT DATE	DATE RECEIVED
June 2008	July 10, 2008	unknown
April – June 2008	July 11, 2008	July 11, 2008
July 2008	August 13, 2008	August 15, 2008
August 2008	November 17, 2008	November 17, 2008
September 2008	November 17, 2008	November 17, 2008
July – September 2008	November 17, 2008	November 17, 2008
October 2008	November 17, 2008	November 17, 2008
November 2008	December 10, 2008	December 17, 2008
December 2008	January 10, 2009	January 12, 2009
October – December 2008	January 10, 2009	January 12, 2009
January – December 2008	January 10, 2009	January 12, 2009
January 2009	February 10, 2009	February 13, 2009
February 2009	March 13, 2009	March 13, 2009
March 2009	April 17, 2009	April 22, 2009
January – March 2009	March 26, 2009	April 22, 2009
April 2009	May 15, 2009	May 18, 2009

**Summary of Violations**

1. There were 30 violations of Discharge Specification B.1, which states: *The discharge from the wastewater treatment plant shall not exceed a peak daily flow rate of 0.150 million gallons per day (MGD).*

For each day during the month of June 2008, the peak daily flow rate was reported in excess of Discharge Specification B.1. The daily values ranged from a low of 0.42 MGD to a high of 0.86 MGD.

2. There were 7 violations of Discharge Specification B.4 for total coliform, which states: *Effluent shall not exceed a total coliform bacteria [most probable number] MPN of 240/100 [milliliters] mL in more than one sample in any 30-day period.*

Violation Date	MPN/100mL
November 11, 2008	1,600
November 12, 2008	1,600
November 23, 2008	1,600
November 24, 2008	1,600

Violation Date	MPN/100mL
December 16, 2008	1,600
February 10, 2009	1,600
April 17, 2009	1,600

3. There were 63 violations of Discharge Specification B.4 for total coliform, which states: [Effluent shall not exceed a] *total coliform bacteria MPN of 23/100mL based on the median of the results for the last seven days.*

Seven times in the month of June 2008

Seven times in the month of July 2008

Five times in the month of August 2008

Sixteen times in the month of November 2008

Seven times in the month of December 2008

Eleven times in the month of February 2009

Ten times in the month of April 2009

Questions pertaining to the issuance of this Notice of Violation are to be directed to Cathryn Henning at (858)-636-3161 via e-mail at [chenning@waterboards.ca.gov](mailto:chenning@waterboards.ca.gov).  
Written correspondence should be directed to the following address:

Ms. Julie Chan  
Supervising Engineering Geologist  
California Regional Water Quality Control Board, San Diego Region  
9174 Sky Park Court, Suite 100  
San Diego, CA 92123-4340



Julie Chan, P.G.  
Supervising Engineering Geologist  
Groundwater Basins Branch

July 8, 2009  
DATE

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Sent To Matt Estrin  
 Street, Apt. No., or PO Box No. 15500 San Pasqual Valley Rd  
 City, State, ZIP+4 Escondido, CA 92027-8702  
 PS Form 3800, August 2006 See Reverse for Instructions

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Matt Estrin  
San Diego Wild Animal Park  
15500 San Pasqual Valley Rd  
Escondido, CA 92027-8702

2. Article Number  
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