



California Regional Water Quality Control Board San Diego Region



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March 8, 2010

In reply refer to:
705319:cpowell

Mr. Hiram Romero
Stantec Consulting Corporation
19 Technology Drive
Irvine CA, 92618

Dear Mr. Romero:

**SUBJECT: FOURTH QUARTER 2009 OPERATIONS AND MAINTENANCE
REPORT, ORDER NO. R9-2008-0138, FORMER 76 SERVICE STATION
NO. 5965, SAN MARCOS, CALIFORNIA**

This letter provides comments regarding the above referenced report (the Report), which was submitted to the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) on January 28, 2010. The next quarterly report is due on **April 30, 2010**.

1. **Presentation of Data.** Monitoring and Reporting Requirement E.2 of the Waste Discharge Requirements (WDR) Order No. R9-2008-0138 requires that the data be summarized to demonstrate compliance with the waste discharge requirements. The data tables in the report did not summarize the average concentrations or standard deviations of inorganic constituents needed to determine compliance with Discharge Specification C.2. Please revise the tables or add a new table to clearly summarize the data in a way that demonstrates whether the concentration of each non-VOC constituent that is monitored in effluent does not exceed the average influent concentration by more than one standard deviation. Data was presented in Appendix A for numerous inorganic constituents that were not presented in any summary tables; the summary tables should present all monitored constituents or the report should explain why some constituents were not evaluated.
2. **Violations of Discharge Specifications.** Based on the data presented in Table 2, the total dissolved solids¹ in the effluent on December 1, 2009 (4,500 mg/L) exceeded the average influent measurement (2,500 mg/L) by more than one standard deviation (530 mg/L). Similarly, the sodium absorption ratio (SAR) in the effluent exceeded the average influent SAR by more than one standard deviation in three samples from November 12, 2009 to December 1, 2009. Zinc concentrations measured in effluent on

¹ Table 2 incorrectly labeled this constituent "Electrical Conductivity @ 180 C"

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November 5, 2009 and November 12, 2009 also exceeded the concentration in influent by more than one standard deviation. These violations of Discharge Specification C.2 were not discussed in the cover letter. Please discuss any actions taken or planned to correct these violations as required by Monitoring and Reporting Requirement E.16.

3. **Reduction of Analyte List.** Eligibility Requirement A.4.c. requires the discharger to develop a Sampling and Analysis Plan (SAP) specifying the monitoring parameters, which at a minimum shall include the constituents of concern, anticipated byproducts, and any other geochemical parameters potentially impacted by the treatment or reinjection, and any other constituents needed to assess impacts to water quality. Based on the data presented in Table 2, the only geochemical parameters that are potentially impacted by the treatment or reinjection are SAR, total dissolved solids, and zinc. Please consider submitting a revised SAP to reduce the analyte list.
4. **Reduction of Monitoring Frequency.** Monitoring and Reporting Requirement E.1 requires monitoring on a monthly basis. Monitoring was conducted on a weekly basis. Please consider revising the SAP to reduce the sampling frequency or provide rationale for the increased frequency.
5. **Site Plan.** Please clearly indicate the groundwater extraction locations and the groundwater gradient on the site plan.

Please address these comments in the next quarterly report, due **April 30, 2010**. A revised SAP may be submitted at any time and implemented as soon as the San Diego Water Board concurs with the proposed changes.

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 me at (858) 467-2745 or cpowell@waterboards.ca.gov.

Sincerely,



CHERYL L. PROWELL, P.E.
Water Resource Control Engineer
Groundwater Basins Branch

CLP:jpa:clp

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