

**San Diego Regional Water Quality Control Board**

April 4, 2017

Mr. Alfred Oquendo  
Plant Manager  
Whispering Palms Community Service District  
605 Third Street  
Encinitas, CA. 92024

**In reply refer to / attn:**  
**272418:BBushnell**

**Subject: Review of Monitoring Reports for Order No. 94-80, Whispering Palms Water Pollution Control Facility**

Mr. Oquendo:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has reviewed the monitoring reports listed below in Table 1. The Whispering Palms Community Service District (Discharger) submitted the monitoring reports as required by the Monitoring and Reporting Program No. 94-80.

**Table 1. List of Monitoring Reports Reviewed**

Report Type	Report Date
Quarterly Monitoring Reports	January-March 2015, April-June 2015 July-September 2015 October-December 2015, January-March 2016, April-June 2016 July-September 2016 and October-December 2016
Semiannual Groundwater Monitoring Reports	January-June 2015, July-December 2015, January-June 2016 and July-December 2016
Annual Monitoring Reports	2015 and 2016

Violations of Section B.1 (Discharge Specifications) of Order No. 94-80 were identified in the monitoring reports are described below:

1. The daily maximum discharge specification for total dissolved solids (TDS) is established at 1200 milligrams per liter (mg/L) was exceeded on the following dates:

**Table 2. Daily Maximum TDS Exceedances**

Date	Value (mg/L)
March 3, 2015	1230
June 29, 2016	1216

2. The monthly average discharge specification for total dissolved solids (TDS) is established at 1100 milligrams per liter (mg/L) was exceeded on the following dates:

**Table 3. Monthly Average TDS Exceedances**

Date	Value (mg/L)
March 24, 2015	1230
May 9, 2015	1153
June 29, 2016	1216

- The daily maximum discharge specification for chloride is established at 350 mg/L and was exceeded on May 9, 2015 with a sample value of 390 mg/L.

Violations of the Basin Plan's water quality objectives for groundwater in the Solano Beach Hydrological Area 905.10 were also identified in the reports reviewed:

- In section 15 of Order No. 94-80 it states that concentration of TDS shall not exceed 1500 mg/L more than 10 percent of the time. The water quality objective was exceeded on the following dates:

**Table 4. Groundwater TDS Exceedances**

Date	Value (mg/L)
January 7, 2015	2392
July 8, 2015	2588
January 16, 2016	2412
July 6, 2016	2488

- In section 15 of Order No. 94-80 it states that concentration of chloride shall not exceed 500 mg/L more than 10 percent of the time. The water quality objective was exceeded on the following dates:

**Table 5. Groundwater Chloride Exceedances**

Date	Value (mg/L)
January 7, 2015	1000
July 8, 2015	1000
January 16, 2016	980
July 6, 2016	990

The San Diego Water Board has the following comments regarding the reports reviewed:

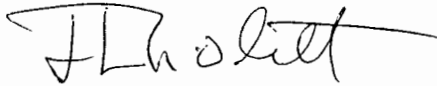
- In the next monitoring report please include a discussion evaluating the groundwater monitoring network and if it is sufficient to assess the impact of the discharge on the groundwater.
- Provide an explanation for the elevated concentrations in TDS and chloride observed in groundwater sample collected from wells associated with the facility.
- Provide an explanation for the elevated concentrations in TDS and chloride observed in effluent samples and why they are higher than original findings in section 12 of Order No. 94-80.

- 4. The next monitoring report due is the January-March 2017 quarterly report, which is due by April 30, 2017.

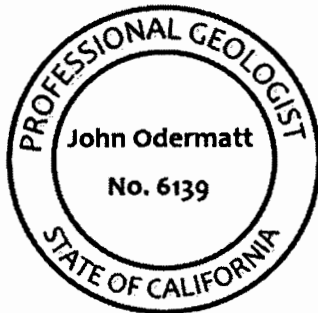
Please continue to implement follow-up actions necessary to ensure that the violations noted above do not occur in the future. These violations may subject the Discharger to possible further enforcement action by the San Diego Water Board including but not limited to: administrative enforcement orders requiring the Discharger to cease and desist from violations, or administrative assessments of civil liabilities in amounts of up to \$5,000 per day per violation; referral to the State Attorney General for injunctive relief; and referral to the District Attorney for criminal prosecution..

In the subject line of any response, please include reference **272418:BBushnell**. Please contact Mr. Brandon Bushnell at 619-521-8044, or at [brandon.bushnell@waterboards.ca.gov](mailto:brandon.bushnell@waterboards.ca.gov) if you have any questions or comments.

Respectfully,



John R. Odermatt, M.Sc., P.G., Senior Engineering Geologist  
Land Discharge Unit



JRO: ac: bb

Tech Staff Info & Use	
Place ID	272418
Reg. Measure ID	142238
SEL Reg. Measure ID	412393
Violation ID	1022664, 1022687, 1022666, 1022677, 1022685, 1022680, 1022707, 1022709, 1022712, 1022714, 1022708, 1022711, 1022713, 1022715