

San Diego Regional Water Quality Control Board

March 14, 2017

Mr. Peter Vroom
Public Utilities Deputy Director
San Diego County
2392 Kincaid Road,
San Diego, CA 92101

In reply refer to / attn:
244506:BBushnell

Subject: Review of Monitoring Reports for Order No. R9-2015-0091, North City Reclamation Plant

Mr. Vroom:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has reviewed the monitoring reports listed in the Table 1 below. The City of San Diego (City) submitted the monitoring reports as required by the Monitoring and Reporting Program of Order No. R9-2015-0091.

Table 1. List of Monitoring Reports Reviewed

Report Type	Report Date
Monthly Monitoring Reports	January 2016 through January 2017
Quarterly Recycled Water User Reports	January-March 2016, April-June 2016, July-September 2016 and October-December 2016
Annual Monitoring Reports	2015 Annual Report and 2016 Annual report

The following violations of Discharge Specifications in Order No. R9-2015-0091 section IV.B were identified in the monitoring reports:

1. The discharge specification for total coliform bacteria concentration exceeded the value of 23 Most Probable Number/100 milliliters (MPN/100mL) on April 19, 2016, April 20, 2016 and April 22, 2016 with reported values of 350 MPN/100mL, 240 MPN/100mL, and 33 MPN/100mL respectively. Discharge Specifications in Section IV.B of Order No. R9-2015-0091 requires that the concentration of total coliform bacteria in effluent shall not exceed 23 MPN/100 mL in more than one sample in a 30-day period. Therefore both the April 20 and April 22, 2016 values are in violation of the discharge specifications.
2. The discharge specification for total coliform bacteria concentration exceeded 240 MPN/100mL on March 11, 2016 and April 19, 2016 with reported values of 540 MPN/100mL and 350 MPN/100mL respectively. Discharge Specifications in

Section IV.B of Order No. R9-2015-0091 requires that the concentration of total coliform bacteria in effluent shall not exceed 240 MPN/100 mL at any point.

3. The seven day median discharge specification for total coliform, established at 2.2 MPN/100 mL, was exceeded on the following dates:

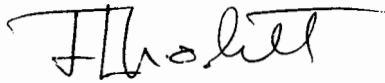
Date	Value (MPN/100 mL)
April 20, 2016	13
April 21, 2016	13
April 22, 2016	13
April 29, 2016	13
April 30, 2016	13
May 1, 2016	11

The City reported that the coliform violations above were due to ammonia breakthrough in the secondary treatment process which affected the plant's disinfection process. The City also reported that it has since taken steps to correct the violations. Please continue to implement follow-up actions necessary to ensure that the violation(s) noted above do not occur in the future. These violations may subject the City to possible further enforcement action by the San Diego Water Board including but not limited to: administrative enforcement orders requiring the City 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.

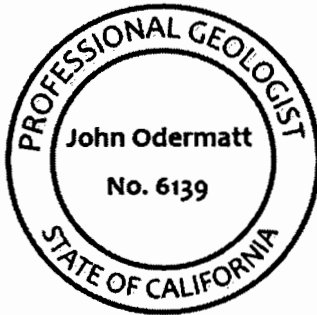
The next monitoring report required to be submitted is the February monthly monitoring report, which is due by April 1, 2017.

In the subject line of any response, please include reference **244506:BBushnell**. Please contact Mr. Brandon Bushnell at 619-521-8044, or at brandon.bushnell@waterboards.ca.gov if you have any questions or comments.

Respectfully,



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



JRO: oo: bb

Tech Staff Info & Use	
Place ID	244506
Reg. Measure ID	402158
SEL	412102
Violation ID	1019447, 1019451, 1019445, 1019446, 1019448, 1019449, 1019450, 1019452, 1019453, 1019454