### CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN DIEGO REGION

IN THE MATTER OF:	
SOUTH ORANGE COUNTY	) )
WASTEWATER AUTHORITY	
SAN JUAN CREEK OCEAN OUTFALL	
:	COMPLAINT NO. R9-2009-0028
SOUTH COAST WATER DISTRICT	FOR
GROUNDWATER RECOVERY FACILITY	ADMINISTRATIVE CIVIL LIABILITY
	) WITH
VIOLATIONS OF EFFLUENT	MANDATORY MINIMUM PENALTIES
LIMITATIONS IN ORDER NO.	
R9-2006-00054, NPDES NO CA0107417,	February 27, 2009
WASTE DISCHARGE REQUIREMENTS	
AND NPDES PERMIT FOR THE SOUTH	)
ORANGE COUNTY WASTEWATER	
AUTHORITY DISCHARGE TO THE	) Place ID 704670
PACIFIC OCEAN VIA SAN JUAN CREEK	) WDID No. 9 00000175
OCEAN OUTFALL ORANGE COUNTY,	
CALIFORNIA	

# SOUTH ORANGE COUNTY WASTEWATER AUTHORITY IS HEREBY GIVEN NOTICE THAT:

- 1. South Orange County Wastewater Authority (SOCWA) is alleged to have violated provisions of law for which the California Regional Water Quality Control Board, San Diego Region (Regional Board) may impose civil liability pursuant to Section 13385 of the California Water Code (CWC). The violations alleged herein include violations of effluent limitations in waste discharge requirements for discharges of pollutants from point sources to navigable waters for which the Regional Board must impose mandatory minimum penalties (MMP).
- 2. SOCWA owns and holds the NPDES permit for the San Juan Creek Ocean Outfall on behalf of all its member agencies (Order No. R9-2006-0054, NPDES No. CA0107417, Waste Discharge Requirement for the South Orange County Wastewater Authority, Discharge to the Pacific Ocean Via the San Juan Creek Ocean Outfall, Orange County). The South Coast Water District (SCWD) operates the Groundwater Recovery Facility and discharges brine to the San Juan Creek Ocean Outfall as a member agency under Order No. R9-2006-0054.

- 3. Treated effluent discharged from the SCWD Groundwater Recovery Facility into the Pacific Ocean through the San Juan Creek Ocean Outfall is subject to numeric effluent limitations contained in Order No. R9-2006-0054.
- 4. Every violation of an NPDES permit is subject to discretionary liability under CWC section 13385(a)(2), and certain violations are subject to MMPs under CWC sections 13385(h) or (i).
- 5. CWC section 13385(h) requires that an MMP of \$3,000 be imposed for each serious violation. CWC section 13385 subdivision (h)(2) defines a 'serious' violation as any waste discharge that violates an effluent limitation contained in waste discharge requirements (applying to surface water discharges) for a Group I pollutant by 40 percent or more or for a Group II pollutant by 20 percent or more.
- 6. CWC section 13385(i) requires that an MMP of \$3,000 be imposed for each violation (i.e. any waste discharge that violates an effluent limitation contained in waste discharge requirements) beginning with the fourth violation in any sixmonth period.
- 7. On February 26, 2008, the Regional Board issued a Notice of Violation to SOCWA for violations of Order No. R9-2006-0054 occurring between October 2007 and December 2007, including eight violations of effluent limitations from the SCWD Groundwater Recovery Facility.
- 8. On August 14, 2008, the Regional Board issued ACL Complaint No. R9-2008-0093 with MMPs to SOCWA for nineteen violations of effluent limitations from the SCWD Groundwater Recovery Facility that occurred from August 2007 through March 2008. The Complaint was withdrawn on October 6, 2008 by the Regional Board with the stated intent to reissue a Complaint with additional MMPs after review of subsequent monitoring reports and an expected operational resolution to ongoing violations.
- On December 30, 2008, SOCWA notified the Regional Board that the SCWD's Groundwater Recovery Facility began discharging its brine wastewater to the sanitary sewer in November 2008, rather than directly to the San Juan Creek Ocean Outfall.

February 27, 2009

#### **ALLEGATIONS**

- 10. <u>Effluent Limitation Violations</u>. SOCWA has reported, pursuant to the Monitoring and Reporting schedule for Order No. R9-2006-0054, effluent sampling results that document violations of effluent limitations prescribed by Order No. R9-2006-0054. Pursuant to CWC section 13385 subdivisions (h) and (i), sixty eight (68) reported effluent violations are subject to MMPs as described in Attachment 1, Calculation of Mandatory Minimum Penalties Based on Reported Monitoring Results from August 2007 through December 2008.
- 11. Fifty eight of the alleged violations subject to MMPs are considered serious violations pursuant to CWC Section 13385(h). Ten other alleged violations subject to the chronic MMPs provisions of CWC Section 13385(i) because they represent more than the third effluent limitation violation within a six month period, but do not exceed the respective effluent limitation enough to be considered an MMP pursuant to CWC Section 13385(h).

#### PROPOSED CIVIL LIABILITY

12. Pursuant to CWC section 13385(h), the Regional Board must impose mandatory minimum penalties in the amount of two hundred one thousand (\$204,000) on the South Orange County Wastewater Authority. Discretionary civil liability above the mandatory minimum for effluent violations alleged in this Complaint is not recommended.

Dated this 27th day of February 2009

BY THE EXECUTIVE OFFICER

MÍCHAEL P. McCANN Assistant Executive Officer

Signed pursuant to the authority delegated by the Executive Officer to the Assistant Executive Officer

### Attachments:

- 1. Calculation of Mandatory Minimum Penalties Based on Reported Monitoring Results from August 2007 through December 2008.
- 2. Excerpted Monitoring Report Pages from August 2007 through December 2008.

South Orange County Wastewater Authority Complaint No. R9-2009-0028

February 27, 2009

CIWQS Entries: Reg Msr: 360847

Related Reg Msr (NPDES): 309059

Place ID: 704670 Party ID: 41388

Violations: 660728, 689220, 689715, 689237, 689307, 689310, 689267, 689282, 698165, 715317, 715322, 715281, 754137, 724233, 724234, 724195, 724241, 755310, 755198, 755317, 805397, 805277, 805281, 805283, 805285, 805286, 805288, 805290, 805330, 805332, 805795, 805819, 805797, 805799, 805803, 805804, 805806, 805842, 805843, 805824, 805825, 805844, 805827, 805823, 805833, 805838, 805836, 805826, 805835, 805832, 805820, 805821, 805822, 805828, 805824, 805829, 805831, 805813, 805814, 805815, 805817, 805818, 805812, 805810, 805808, 805805, 805802, 805796, 805793.

Attachment 1: Calculation of Mandatory Minimum Penalties Based on Reported Monitoring Results from August 2007 through December 2008.

San Juan Creek Ocean Outfall South Coast Water District Groundwater Recovery Facility

Attachment 1 Complaint No. R9-2009-0028

## Calculation of Mandatory Minimum Penalties Based on Reported Monitoring Results from August 2007 through December 2008

		ign Decembe	1 16					Mandatory
Violation Date	Violation ID	Constituent <sup>i</sup>	Effluent Limitation	Unit	Permitted Limit	Reported Value	Serious Violation <sup>ii</sup>	Minimum Penalty <sup>iii</sup>
	689715	TSS	average monthly	mg/L	60	119	Yes	\$3,000
	660728	turbidity	instantaneous max	NTU	225	260	No	\$0
8/23/2007	689220	turbidity	average weekly	NTU	100	260	Yes	\$3,000
	689237	turbidity	average monthly	NTU	. 75	260	Yes	\$3,000
	805397	SS	average monthly	ml/L	1	1.4	yes	\$3,000
			<u> </u>					
	689307	SS	instantaneous max	mg/L	3.0	3.2	No	\$3,000
9/27/2007	689267	turbidity	average weekly	NTU	100	173	Yes	\$3,000
	689282	turbidity	average monthly	NTU	75	173	Yes	\$3,000
						-		
9/30/2007	689310	SS	average monthly	mg/L	1.0	1.1	No	\$3,000
10/31/2007	698165	TSS	average monthly	mg/L	60	71.0	No	\$3,000
44/04/0007	715317	turbidity	instantaneous max	NTU	225	273	No	\$3,000
11/21/2007	715322	turbidity	average weekly	NTU	100	273	Yes	\$3,000
	715001	TSS	avorage menthly	me/l	60	65.0	No	\$3,000
11/28/2007	715281 754137	turbidity	average monthly average monthly	mg/L NTU	75	120	Yes	\$3,000
	754137	ιμισιαπή	average monuny	NIO	75	120	res	\$3,000
	724195	TSS	average monthly	mg/L	60	114.0	Yes	\$3,000
	724233	turbidity	instantaneous max	NTU	225	393	Yes	\$3,000
12/21/2007	724234	turbidity	average weekly	NTU	100	393	Yes	\$3,000
	724241	turbidity	average monthly	NTU	75	393	Yes	\$3,000
	755198	TSS	average monthly	mg/L	60	85.9	Yes	\$3,000
3/24/2008	755310	turbidity	average weekly	NTU	100	177.1	Yes	\$3,000
	755317	turbidity	average monthly	NTU	75	177.1	Yes	\$3,000
								,
	805277	turbidity	instantaneous max	NTU	225	280.8	no	\$3,000
	805281	turbidity	average weekly	NTU	100	280.8	yes	\$3,000
4/29/2008	805283	turbidity	average monthly	NTU	75	280.8	yes .	\$3,000
4/29/2006	805285	SS	instantaneous max	ml/L	3.0	10.4	yes	\$3,000
	805286	SS	average weekly	ml/L	1.5	10.4	yes	\$3,000
	805288	SS	average monthly	ml/L	1.0	10.4	yes	\$3,000
	005000	Accorde i alido a	,   :==t==t===============================	NITLL	205	240.0		#2.000
5/3/2008	805290	turbidity	instantaneous max	NTU	225	249.0	no	\$3,000
	805330	turbidity	average weekly	NTU	100	249.0	yes	\$3,000
	805332	turbidity	instantaneous max	NTU	225	372.0	yes	\$3,000
5/16/2008	805795	turbidity	average weekly	NTU	100	372.0	yes	\$3,000
0,10,2000	805819	SS	average weekly	ml/L	1.5	1.6	no	\$3,000
	0000.0		arorago moonly					40,000
	805797	TSS	average monthly	mg/L	60	132.0	yes	\$3,000
	805799	turbidity	instantaneous max	NŤU	225	330.0	yes	\$3,000
	805803	turbidity	average weekly	NTU	100	330.0	yes	\$3,000
5/29/2008	805804	turbidity	average monthly	NTU	75	317.0	yes	\$3,000
	805806	SS	instantaneous max	ml/L	3.0	11.7	yes	\$3,000
	805842	SS	average weekly	ml/L	1.5	11.7	yes	\$3,000
	805843	SS	average monthly	ml/L	1.0	4.5	yes	\$3,000

Attachment 1 Complaint No. R9-2009-0028 San Juan Creek Ocean Outfall South Coast Water District Groundwater Recovery Facility

Violation Date	Violation ID	Constituent <sup>i</sup>	Effluent Limitation	Unit	Permitted Limit	Reported Value	Serious Violation <sup>ii</sup>	Mandatory Minimum Penalty <sup>iii</sup>
	805824	TSS	average monthly	mg/L	60	135.0	yes	\$3,000
6/6/2008	805825	turbidity	instantaneous max	NTU	225	381.0	yes	\$3,000
0/0/2008	805844	turbidity	average weekly	NTU	100	381.0	yes	\$3,000
	805827	turbidity	average monthly	NTU	75	381.0	yes	\$3,000
	·		• • • • • • • • • • • • • • • • • • • •					
	805823	TSS	average monthly	mg/L	60	131.0	yes	\$3,000
	805833	turbidity	instantaneous max	NTU	225	314.0	no	\$3,000
	805838	turbidity	average weekly	NTU	100	314.0	yes	\$3,000
7/31/2008	805836	turbidity	average monthly	NTU	75	314.0	yes	\$3,000
•	805826	SS	instantaneous max	ml/L	3.0	4.9	yes	\$3,000
	805835	SS	average weekly	ml/L	1.5	4.9	yes	\$3,000
	805832	SS	average monthly	ml/L	1.0	4.9	yes	\$3,000
	r					1000		
	805820	TSS	average monthly	mg/L	60	130.0	yes	\$3,000
	805821	turbidity	instantaneous max	NTU	225	348.0	yes	\$3,000
	805822	turbidity	average weekly	NTU	100	348.0	yes	\$3,000
8/27/2008	805828	turbidity	average monthly	NTU	75	348.0	yes	\$3,000
•	805824	SS	instantaneous max	ml/L	3.0	7.5	yes	\$3,000
	805829	SS	average weekly	ml/L	1.5	7.5	yes	\$3,000
	805831	SS	average monthly	ml/L	1.0	7.5	yes	\$3,000
<u></u>			44.1	,	1	000.0	· · · · · ·	<b>AO 000</b>
	805813	TSS	average monthly	mg/L	60	232.0	yes	\$3,000
0.000.000	805814	turbidity	instantaneous max	NTU	225	480.0	yes	\$3,000
9/30/2008	805815	turbidity	average weekly	NTU	100	480.0	yes	\$3,000
	805817	turbidity	average monthly	NTU	75	480.0	yes	\$3,000
	805818	SS	average monthly	ml/L	1.0	1.3	no	\$3,000
Access to the second	805812	TSS	average monthly	mg/L	60	211.0	yes	\$3,000
	805810	turbidity	instantaneous max	NTU	225	422.0	yes	\$3,000
	805808	turbidity	average weekly	NTU	100	422.0	yes	\$3,000
10/15/2008	805805	turbidity	average monthly	NTU	75	422.0	yes	\$3,000
10/10/2000	805802	SS	instantaneous max	ml/L	3.0	9.7	yes	\$3,000
	805796	SS	average weekly	ml/L	1.5	9.7	yes	\$3,000
	805793	SS	average monthly	ml/L	1.0	9.7	yes	\$3,000
	000700		avoluge monthly	1111/1	1	Total MMP		\$204,000

i. TSS = Total Suspended Solids; SS = Settleable Solids

ii. CWC Section 13385(h)(1) requires that an MMP of \$3,000 be imposed for each serious violation. A serious violation occurs when the discharge exceeds Group I effluent limitations by 40 percent or more or Group II effluent limitations by 20 percent or more. TSS, settleable solids, and turbidity are Group I pollutants.

iii. MMPs are required for Serious violations (CWC Sec. 13385(h) and for the fourth and subsequent effluent limitation violation in any six month period (CWC Section 13385(h)).

Attachment 2: Excerpted Monitoring Report Pages from August 2007 through December 2008.



September 27, 2007

John H. Robertus California Regional Water Quality Control Board San Diego Region 9174 Sky Park Court, Suite 100 San Diego, CA. 92123

SUBJECT: AUGUST 2007 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:

Five permit limits were exceeded at the South Coast Water District Groundwater Recovery Facility, monitoring location M-001F. The facility started preliminary test operations August 1, 2007. During this testing period, all RO brine, filter backwash, and product water was discharged to the San Juan Creek Ocean Outfall. The required monthly monitoring was performed on the discharge. The monthly average limits for suspended and settleable solids were both exceeded. All three turbidity limits were also exceeded. The South Coast Water District (SCWD) believes the sampling methodology used to collect the August monthly composite sample was in error. A review of the Groundwater Recovery System indicates that a more representative sample may be obtained from a standpipe which receives all of the component flows prior to discharge to the Chiquita Land Outfall. The August test results are substantially higher than the feed water from the source well. A sample station will be established at the standpipe where the flows are more homogeneous. SCWD has also indicated that they will conduct more frequent sampling during the month.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process has been extended to December 2007.

All bacterial objectives, except one total coliform single sample maximum, were exceeded at surfzone monitoring station C1. Single sample fecal coliform objectives were exceeded twice at S15 and once at S19. Single sample enterococcus objectives were exceeded once at S3 and six times at S15; the 30-day geometric mean objective was also exceeded at S15. These sites are located in or adjacent to large urban runoff channels. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances. At no time during August was there any surface water at Upper San Juan Creek monitoring station C2.

Section V.A. calls for calculation of a 30-day geometric mean using the five most recent samples from each surfzone monitoring site. Because Order R9-2006-0054 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30-day mean.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Thomas R. Rosales General Manager

34156 Del Obispo Street • Dana Point, CA 92629 • Phone: (949) 234-5400 • Fax: (949) 489-0130 • Website: www.socwa.com

Page 12 of 32

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT FOR: August 2007 REPORT DUE: October 01 2007 ANALYZED BY: Sierra Analytical

AMPLE SOURCE: SCWD GRF Brine/Backwash/Product

SAMPLE POINT: M-001F

•						
	Flow	Suspended Solids	Turbidity	Oil & Grease	рН	Settleable Solids
Sample Type		24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1,0
Aug-01	1.14				4 - 1. V	
Aug-02	1.14					
Aug-03	1.14					**************************************
Aug-04	1.14					
Aug-05	1.14		ą.		· · · · · · · · · · · · · · · · · · ·	
Aug-06	1.14			W		
Aug-07	1.14	<i>t</i> ,				
Aug-08	1.14			,	•	
Aug-09	1.14				4	
Aug-10	1.14	ı	r e			
Aug-11	1.14					
Aug-12	1.14					
Aug-13	1.14					
Aug-14	1.14					
Aug-15	1.14					
Aug-16	1.14					
Aug-17	1.14					
Aug-18	1.14	•				
Aug-19	1.14					
Aug-20	1.14	*				
Aug-21	1.14			•		
Aug-22	1.14					
Aug-23	1.14	119	260	0.00	7.00	4.4
Aug-24 Aug-25	1.14 1.14			2.90	7.06	1.4
-	1.14				•	
Aug-26 Aug-27	1.14					
Aug-27 Aug-28	1.14					
Aug-29	1.14					
Aug-29 Aug-30	1.14					
Aug-31	1.14					
,			· ·			

Comments: The facility began start-up operations with all RO Brine, filter backwash, and product water being discharged to the SJCOO.



October 29, 2007

John H. Robertus

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

SUBJECT: SEPTEMBER 2007 SUMMARY OF MONITORING OF ORDER NO. R9-2006-

0054, NPDES NO. CA0107417

Dear Mr. Robertus:

There were six exceedences of Order R9-2006-0054 effluent limits during October.

One settleable solids analysis at the Santa Margarita Water District Chiquita Water Reclamation Plant, monitoring location M-001B, had a value of 4.0ml/L; the instantaneous maximum limit is 3.0ml/L. Bob Jordan, Water Quality Manger for SMWD, notified Joann Cofrancesco of the violation on September 19<sup>th</sup>; the cause of the high result is unknown.

Five permit limits were exceeded at the South Coast Water District Groundwater Recovery Facility, monitoring location M-001F. The facility discharged RO brine, filter backwash, and product water to the San Juan Creek Ocean Outfall. The monitoring results from the facility exceed the settleable solids instantaneous limit, and the weekly and monthly average settleable solids and turbidity limits. Since the samples were collected, SCWD has redesigned the sampling location in order to obtain what they believe will be samples more representative of the discharge. The plant has been off-line since the change to the sampling location.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is December 2007.

All bacterial objectives, except one total coliform single sample maximum, were exceeded at surfzone monitoring station C1. The C2 site was dry for the first three weeks of monitoring; two samples collected the last week of the month exceeded all bacterial objectives. Single sample fecal coliform objectives were exceeded S0, S1, S2, S3 and S5. Single sample enterococcus objectives were exceeded at S0, S1, S2, S3 S5, S7, S9, S11, and S15; the 30-day geometric mean objective was also exceeded at S15. These sites are located in or adjacent to urban runoff channels. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Section V.A. calls for calculation of a 30-day geometric mean using the five most recent samples from each surfzone monitoring site. Because Order R9-2006-0054 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30-day mean.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Thomas R. Rosales General Manager

34156 Del Obispo Street • Dana Point, CA 92629 • Phone: (949) 234-5400 • Fax: (949) 489-0130 • Website: www.socwa.com

Page 12 of 32

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT FOR: September 2007

ANALYZED BY: Sierra Analytical

REPORT DUE: November 01 2007

SAMPLE POINT: M-001F

AMPLE SOURCE: SCWD GRF Brine/Backwash/Product

	Flow	Suspended Solids	Turbidity	Oil & Grease	ρН	Settleable Solids
Sample Type		24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
Sep-01	1.14			d .		. *
Sep-02	1.14					
Sep-03	1.14					.41.
Sep-04	1.14					
Sep-05	1.14					
Sep-06	1.14					
Sep-07	1.14					
Sep-08	1.14					
Sep-09	1,14				4	
Sep-10	1.14				·	
Sep-11	0.90					
Sep-12	1.14					
Sep-13	0.33		3 5	e de la companya de La companya de la co	\$	
Sep-14	0.00				•	
Sep-15	0.00					
Sep-16	0.00					
Sep-17	0.57			, ,		
Sep-18	1.14					
Sep-19	1.14			* * * * * * * * * * * * * * * * * * *		
Sep-20	1.14				ь	
Sep-21	1.14					
Sep-22	1.14				•	
Sep-23	1.14					
Sep-24	1.14				٠, .	
Sep-25	0.46					
Sep-26	0.79	73.0	204			
Sep-27	1.14	35.0	141	2.6	7.11	3.2
Sep-28	0.94				• •	<del></del>
Sep-29	0.94			1.4		0.2
Sep-30	0.94			<2.0	7.42	<0.1
Monthly Average	0.92	54.00	173	1.33	7.27	1.1

Comments: The facility is discharging RO Brine, filter backwash, and product water to the SJCOO.



November 27, 2007

John H. Robertus

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

SUBJECT: OCTOBER 2007 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054,

NPDES NO. CA0107417

Dear Mr. Robertus:

There was one exceedence of Order R9-2006-0054 effluent limits during October.

All three total suspended solids analyses performed on the South Coast Water District Groundwater Recovery Facility 24-hour composite effluent exceeded the monthly average limit of 60 mg/L. The facility discharged RO brine, filter backwash, and product water to the San Juan Creek Ocean Outfall.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is December 2007.

The total coliform single sample maximum objective was exceeded once at surfzone monitoring site S1 and six times at C1. The 30-day mean total coliform objective was exceeded at C1 and C2. The fecal coliform single sample maximum objective was exceeded once at surfzone monitoring sites S2, S17 and C2, twice at S0 and S15, and ten times at C1. The 30-day mean fecal coliform objective was exceeded at C1 and C2. The enterococcus single sample maximum objective was exceeded once at surfzone monitoring sites S3 and S9, twice at S1, S9, and S17, three times at S2, S13, and C2, four times at S0, seven times at S15, and ten times at C1. The 30-day mean enterococcus objective was exceeded at S0, S2, S13, S15, C1, and C2. Upper San Juan Creek was dry for the seven of the ten sampling days in October, so only three samples were collected at C2. These sites are located in or adjacent to urban runoff channels. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Section V.A. calls for calculation of a 30-day geometric mean using the five most recent samples from each surfzone monitoring site. Because Order R9-2006-0054 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30-day mean.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Page 12 of 34

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall REPORT FOR: October 2007

SAMPLED BY: ECO Resources

REPORT FOR: October 200

ANALYZED BY: Sierra Analytical

REPORT DUE: 1-Dec-07

SAMPLE POINT: M-001F

AMPLE SOURCE: SCWD GRF Brine/Backwash/Product

	Flow	Suspended Solids	Turbidity	Oil & Grease	рН	Settleable Solids
Sample Type		24-HC	24-HC	Grab	Grab	Grab
Method . Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
Oct-01	1.14			1.6	6.84	0.3
Oct-02	0.81		* Y		(x,y) = (x,y) + (x,y) + (y,y)	
Oct-03	0.00				and the second of the second	
Oct-04	0.71					
Oct-05	1.14					
Oct-06	0.43					•
Oct-07	0.00					
, Oct-08	0.29	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -				*
Oct-09	0.00	4		÷ - 6		
Oct-10	0.14	*				
Oct-11	0.00					
Oct-12	0.10					
Oct-13	0.00				•	
Oct-14	0.00					
Oct-15	0.00		•		i	
Oct-16	0.00				A Company of the Comp	
Oct-17	0.00			4.5		
Oct-18	0.00				<b>€</b> 15	
Oct-19	0.00					¥ ,
Oct-20	0.00					
Oct-21	0.00					4.4
Oct-22	0.00					
Oct-23	0.00					
Oct-24	0.00					<i>t</i>
Oct-25	0.67					
Oct-26	0.71					
Oct-27	0.00					
Oct-28	0.00	60.0	04.0	.4.00	6.04	40.4
Oct-29	0.71	66.0	21.2	<1.00	6.94	<0.1
Oct-30 Oct-31	0.67 0.76	85.0 62.0	150.0 53	<1.00	7.05	<0.1
			74.9		6.94	0.10
Monthly Average	0.27	71.0	74.9	0.53	Q. <del>94</del>	0.10

Comments: The facility began start-up operations with all RO Brine, filter backwash, and product water being discharged to the SJCOO.



December 27, 2007

John H. Robertus

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100.
San Diego, CA. 92123

SUBJECT: NOVEMBER 2007 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:

There were ten exceedences of Order R9-2006-0054 effluent limits during November 2007.

The discharge at site M-001F, the South Coast Water District Groundwater Recovery Facility, exceeded the monthly average total suspended solids limit of 60 mg/L. One of two turbidity results exceeded the instantaneous maximum limit, causing the weekly and monthly average turbidity limits to also be exceeded.

Three settleable solids results exceeded the instantaneous maximum limit at discharge site M-001D, the City of San Clemente RP; these high values caused 2 weekly average and one monthly average limit exceedences.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process has been pushed back to March 2008.

The total coliform single sample maximum objective was exceeded twice at surfzone monitoring site C1; the 30-day mean total coliform objective was exceeded at C1 and C2. The fecal coliform single sample maximum objective was exceeded once at surfzone monitoring sites S2 and S19, twice at C2, and four times at C1. The 30-day mean fecal coliform objective was exceeded at S15, C1 and C2. One or both of the enterococcus bacterial objectives were exceeded at least once at all sites except S4, S6, and S23. Upper San Juan Creek was dry for two of the four sampling days in November. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Michael J. Wilson

Assistant General Manager

Michael I Wit

SAN DIEGO REGIONAL SONTROL BUARD

Page 12 of 28

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT FOR: November 2007 REPORT DUE: January 10, 2008

Monthly Average

0.69

65

ANALYZED BY: Sierra Analytical

SAMPLE SOURCE: SCWD GRF Brine/Backwash/Product

SAMPLE POINT: M-001F

	Flow	Suspended Solids	Turbidity	Oil & Grease	pН	Settleable Solids
Sample Type		24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPÅ 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
<b>N</b> ov-01	0.71				.aa	
Nov-02	0.28					
Nov-03	e e e e e e e e e e e e e e e e e e e					
Nov-04						
Nov-05	0.61		•			
Nov-06	0.56					
Nov-07	0.56					
Nov-08	1.13		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	· · · · · · · · · · · ·	*	
Nov-09	0.71	54.0	56.5	0	7.26	. 0
Nov-10						
Nov-11			* *	•	A. 14 (1)	
Nov-12		•			A STATE OF THE STA	
Nov-13	0.65					
Nov-14	1.13					
Nov-15	1.13					
Nov-16	0.71				•	
Nov-17						
Nov-18	-				· y · · ·	•
Nov-19	0.56			· .		
Nov-20						
Nov-21	0.61	124	273	1.3	7.18	0
Nov-22						
Nov-23						
Nov-24						
Nov-25					•	*
Nov-26	0.61					
Nov-27	0.00	, , , , , , , , , , , , , , , , , , ,	20.0			0
Nov-28	0.33	15.7	29.6		* *	
Nov-29					•	
Nov-30						

Comments: The facility is in start-up operations with all RO Brine, filter backwash, and product water being discharged to the SJCOO.

0.65

7.22

0.00

120



January 24, 2008

John H. Robertus

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

SUBJECT: DECEMBER 2007 SUMMARY OF MONITORING OF ORDER NO. R9-2006-

0054, NPDES NO. CA0107417

Dear Mr. Robertus:

There were five exceedances of Order R9-2006-0054 effluent limits during December 2007.

The maximum daily Chronic Toxicity limit was exceeded at discharge site M-001 on December 10, 2007. SOCWA was not notified of the exceedance by the contract laboratory performing the analysis until January 15<sup>th</sup>. The regular monthly toxicity sample for January was sent on 1/14/08; a second sample, as required in the NPDES permit, was sent on 1/22/08.

There were four limits exceeded at discharge site M-001F, the South Coast Water District Groundwater Recovery Facility. The monthly average total suspended solids limit and instantaneous maximum, weekly average and monthly average turbidity limits were exceeded.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is March 2008.

The total coliform single sample maximum objective was exceeded at C1; the 30-day geometric mean objective was exceeded at both C1 and C2. The fecal coliform single sample maximum was exceeded at surfzone sites S2, C1, and C2; C1 and C2 also exceeded the 30-day geometric mean objective. The enterococcus daily maximum and 30-day geometric mean objectives were exceeded at S0, S1, S2, S3, S5, S7, S15, S17, C1 and C2. There were several days of heavy rainfall during December which increased urban runoff to the monitoring sites. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Page 12 of 28

DISCHARGE: San Juan Creek Ocean Outfall

NPDES No. CA0107417 SAMPLED BY: Ope

REPORT FOR: December 2007 REPORT DUE: January 10, 2008

Comments:

SAMPLED BY: Operator ANALYZED BY: Sierra Analytical

SAMPLE SOURCE: SCWD GRF Brine/Backwash

SAMPLE POINT: M-001F

	Flow	Suspended Solids	Turbidity	Oil & Grease	рН	Settleable Solids
Sample Type		24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
Dec-01						
Dec-02						
Dec-03	0.23					
Dec-04	0.23					
Dec-05	0.23	and the second second				
Dec-06	0.23					
Dec-07	0.23	*			*	
Dec-08						
Dec-09						
Dec-10	0.23	· ·				
Dec-11	0.23				8 v	
Dec-12	`					
Dec-13		e E		4	*	
Dec-14	0.05			•	:	
Dec-15						
Dec-16						
Dec-17	0.08				*	
Dec-18	0.23			5	the state of the s	
Dec-19	0.23	, fa	**	the second second		•
Dec-20	0.23		•			
Dec-21	0.23	114.0	393	0	6.47	8.0
Dec-22					•	
Dec-23						
Dec-24					•	
Dec-25						
Dec-26	0.23					
Dec-27	0.23		•	•		
Dec-28	0.23					
Dec-29					6.5	
Dec-30						
Dec-31						
Monthly Average	0.21	114.0	393	0	6.47	0.8

∞@@N/FW/F



February 27, 2008

John H. Robertus

California Regional Water Quality Control Board

San Diego Region

9174 Sky Park Court, Suite 100

San Diego, CA. 92123

SUBJECT: JANUARY 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:

There were two monitoring violations of Order R9-2006-0054 during January 2008.

In response to the Chronic Toxicity limit exceedance at site M-001 on December 10, 2007, two samples were collected and analyzed in January. The results of both samples were within acceptable limits and included in this report. Regular monthly testing was resumed in February.

There were two monitoring violations at discharge site M-001F, the South Coast Water District Groundwater Recovery Facility during January 2008. The total suspended solids and turbidity concentrations could not be determined due to inadequate sampling and analyses. All of the component flow streams which contribute to the total brine effluent were not analyzed concurrently making it impossible to provide flow weighted averages for these constituents.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is March 2008.

The total coliform single sample maximum objective was exceeded at C1; the 30-day geometric mean objective was exceeded at both C1 and C2. The fecal coliform single sample maximum was exceeded at surfzone sites S0, S2, S17, C1, and C2; S0, S2, C1 and C2 also exceeded the 30-day geometric mean objective. The enterococcus daily maximum and 30-day geometric mean objectives were exceeded at all sites except S6, S21, and S23. There were several days of heavy rainfall during January which increased urban runoff to the monitoring sites. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Thomas R. Rosales General Manager

34156 Del Obispo Street • Dana Point, CA 92629 • Phone: (949) 234-5400 • Fax: (949) 489-0130 • Website: www.socwa.com

Page 12 of 29

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: Operator

REPORT FOR: January 2008

ANALYZED BY: Lab

REPORT DUE: February 10, 2008

SAMPLE SOURCE: SCWD GRF Brine/Backwash

SAMPLE POINT: M-001F

Sample Type	Flow	Suspended Solids 24-HC	Turbidity 24-HC	Oil & Grease Grab	<b>pH</b> Grab	Settleable Solids Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
Jan-01	•					
Jan-02	0.08					
Jan-03	0.08					
Jan-04	0.08					
Jan-05		$\mathcal{L}_{i} = \{\mathcal{L}_{i}, \mathcal{L}_{i}\}$		4		
Jan-06					1	
Jan-07	0.08			1.4	6.92	0.2
Jan-08						
Jan-09	0.08					
Jan-10	0.08					
Jan-11	0.08					
Jan-12					•	
Jan-13						
Jan-14 Jan-15	0.08				0.,	
Jan-15 Jan-16	0.08					
Jan-16 Jan-17	0.08			3		
Jan-18	0.08				4	
Jan-19	0.00					
Jan-20						
Jan-21	0.08					
Jan-22	0.08					
Jan-23	80.0			1.4	6.74	0.15
Jan-24	0.08				•	
Jan-25	0.08					
Jan-26					2	
Jan-27						
Jan-28	80.0				*	
Jan-29	0.08					4
Jan-30	0.007		•	1.3	6.87	0.1
Jan-31	0.08					
Vionthly Average	0.08			1.37	6.84	0.15

Comments: The facility is in start-up operations with all RO Brine, and filter backwash water being discharged to the SJCOO. The facility is running 8 hrs a day, five days a week.

We are working with the Engineers to find a solution to the high levels of TSS and Turbidity

\* We collected component parts, for January, but do not have a single daily composite for this month.

We can provide grab samples data for suspended solids and turbidity for various days.



March 24, 2008

John H. Robertus

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

SUBJECT: FEBRUARY 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-

0054, NPDES NO. CA0107417

Dear Mr. Robertus:

There were five monitoring violations of Order R9-2006-0054 during February 2008.

No samples representative of the entire waste stream to the outfall were collected at discharge site M-001F, the South Coast Water District Groundwater Recovery Facility, during February 2008. Results of analyses shown on page twelve are from composite and grab samples of the RO Brine Reject, one component of the facilities discharge.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is March 2008.

The total coliform single sample maximum objective was exceeded at C1 and C2; the 30-day geometric mean objective was exceeded at S0, C1 and C2. The fecal coliform single sample maximum was exceeded at surfzone sites S0, S2, C1 and C2; C1 and C2 also exceeded the 30-day geometric mean objective. The enterococcus daily maximum and 30-day geometric mean objectives were exceeded at S0,, S1, S2, S3, S5, S7, S9, S11, S13, S15, S17, S19, S21, C1 and C2; S4 exceeded the enterococcus single sample limit once. There were several days of heavy rainfall during February which increased urban runoff to the monitoring sites. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Page 12 of 28

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT FOR: February 2008

ANALYZED BY: Sierra Analytical

REPORT DUE: April 01, 2008

SAMPLE SOURCE: SCWD GRF Brine/Backwash/Product

SAMPLE POINT: M-001F

	Flow	Suspended Solids	Turbidity	Oil & Grease	рН	Settleable Solids
Sample Type		24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
Feb-01	0.174					
Feb-02		•				•
Feb-03			V V	•		•
Feb-04	0.174				•	- 4
Feb-05	0.174					
Feb-06	0.174					
Feb-07	0.174				k sit	
Feb-08	0.174			,	•	•
Feb-09						
Feb-10						
Feb-11		416				
Feb-12	0.174			•		
Feb-13	0.174					
Feb-14	0.174					
Feb-15	0.174				•	•
Feb-16				×.	** *	
Feb-17			· ·		· · · · · · · · · · · · · · · · · · ·	
Feb-18						
Feb-19	0.174		•			
Feb-20	0.174	•				
Feb-21	0.174	·				•
Feb-22	0.174					
Feb-23						* 4
Feb-24						
Feb-25	0.174					
Feb-26	0.174					
Feb-27	0.174	5.00	11.90	ND	6.82	ND
Feb-28	0.174					
Feb-29	0.174					~ ~ ~ ~
Wonthly Average	0.174	5.00	11.90	0.00	6.82	0.00

Comments: The facility never ran 24-7 the whole month. We are still in start-up operation with all RO Brine, Iron & Manganese filter backwash and some product water being discharged to the SJCOO. The sample shown above is for the RO Brine Reject only composited over 24-hours.



April 23, 2008

John H. Robertus

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

SUBJECT: MARCH 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:

There were five monitoring violations and three limit exceedences of Order R9-2006-0054 during March 2008.

Site M-001E, the City of San Juan Capistrano RO Treatment Plant, was offline in March, except for March 10 when the RO train was flushed for twelve minutes to preserve the membranes. Approximately 7,000 gallons was discharged to the outfall, but no samples were collected.

The monthly and weekly average turbidity limits at site M-001F, the South Coast Water District Groundwater Recovery Facility, exceeded permit limits during March 2008. The single total suspended solids result exceeded the monthly average limit.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is late May 2008.

The total coliform single sample maximum objective was exceeded at C; the 30-day geometric mean objective was exceeded at S0, C1 and C2. The fecal coliform single sample maximum was exceeded at surfzone sites C1 and C2; S0, C1 and C2 exceeded the 30-day geometric mean objective. The enterococcus daily maximum and 30-day geometric mean objectives were exceeded at S0, S1, S2, S3, S5, S9, C1 and C2; S17 exceeded the enterococcus single sample limit once and S7 exceeded only the 30-day geometric mean. SOCWAs discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Page 12 of 28

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT FOR: March 2008

ANALYZED BY: Sierra Analytical

REPORT DUE: May 01, 2008

SAMPLE SOURCE: SCWD GRF Brine/Backwash/Product

SAMPLE POINT: M-001F

Sample Type	Flow	Suspended Solids 24-HC	Turbidity 24-HC	Oil & Grease Grab	pH Grab	Settleable Solids Grab
Method	Meter	EPA 160.2	EPA 180.1	EPA 413.1	EPA 150.1	EPA 160.5
Units	MGD	mg/L	NTU	mg/L	Standard Units	ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
Mar-01	Off Line					
Mar-02	Off Line					
Mar-03	0.221	0				
Mar-04	0.221	$\cdot = \cdot$				
Mar-05	0.221			1		
Mar-06	0.221			*		
Mar-07	0.221		4			
Mar-08	Off Line					
Mar-09	Off Line					
Mar-10	Off Line					
Mar-11	Off Line					
Mar-12	Off Line					* * * * * * * * * * * * * * * * * * *
Mar-13	Off Line		•			
Mar-14	Off Line					
Mar-15	Off Line					
Mar-16	Off Line					
Mar-17	Off Line					
Mar-18	Off Line		f. s	* *	•	
Mar-19	Off Line	<b>†</b> -				
Mar-20	Off Line			. • 1 ·	1	
Mar-21	0.221					
Mar-22	0.221					
Mar-23	0.221					
Mar-24	0.221	85.9	177.1	ND	6.92	0.35
Mar-25	0.221					
Mar-26	0.221					
Mar-27	0.221					•
Mar-28	0.221					
Mar-29	0.221					
Mar-30	0.221					
Mar-31	0.221		1 7 7 7		2.62	0.05
Monthly Avg.	0.221	85.9	177.1	0.00	6.92	0.35



May 28, 2008

7008 mi

.,

John H. Robertus

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

SUBJECT: APRIL 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054,

NPDES NO. CA0107417

Dear Mr. Robertus:

There was one monitoring violation and six limit exceedences of Order R9-2006-0054 during April 2008.

All settleable solids and turbidity limits were exceeded at site M-001F, the South Coast Water District Groundwater Recovery Facility. Total Suspended Solids was not analyzed due to a miscommunication with the laboratory.

Site M-001E, the City of San Juan Capistrano RO Treatment Plant, was offline all month.

There were no toxic effects observed in the three-species Chronic Toxicity screening performed in April. The Acute Toxicity test species was changed from Fathead minnow to Mysid for April and will continue to be used in future tests.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is late May 2008.

All bacterial objectives were exceeded at least once at C1; the fecal coliform single sample maximum was exceeded at surfzone site C2; S0 and S2 exceeded both the single sample maximum and the 30-day geometric mean Enterococcus objective. SOCWAs discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Thomas R. Rosales General Manager

General Manager

Page 12 of 29

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT FOR: April 2008

ANALYZED BY: Sierra Analytical

REPORT DUE: June 01, 2008

SAMPLE POINT: M-001F

SAMPLE SOURCE: SCWD GRF Brine/Backwash/Product

	Flow	Suspended Solids	Turbidity	Oil & Grease	ρΗ	Settleable Solids
Sample Type	•	24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
Apr-01 Apr-02 Apr-03	0.221 0.221 0.221					
Apr-03 Apr-04 Apr-05 Apr-06	0.221 Off Line Off Line		· · · · · · · · · · · · · · · · · · ·			
Apr-07 Apr-08 Apr-09	Off Line Off Line Off Line		***		4.	
Apr-10 Apr-11 Apr-12	Off Line Off Line Off Line		4		e gran	
Apr-13 Apr-14 Apr-15	Off Line Off Line Off Line	e v		·	u.	
Apr-16 Apr-17 Apr-18	Off Line Off Line 0.221					
Apr-19 Apr-20 Apr-21	0.221 Off Line 0.221				•	
Apr-22 Apr-23 Apr-24	0.221 0.221 0.221					
Apr-25 Apr-26 Apr-27 Apr-28	0.221 0.221 Off Line 0.221					L
Apr-29 Apr-30	0.221 0.221	NA	280.8	ND	7.3	10.4
Monthly Avg.	0.221	0.0	280.8	0.00	7.3	10.4

NA - Not analyzed due to miscommunication with the laboratory



WATER QUALITY CONTROL BOARD

June 27, 2008

2008 JUL -1 A 9: 25

John H. Robertus California Regional Water Quality Control Board San Diego Region 9174 Sky Park Court, Suite 100 San Diego, CA. 92123

SUBJECT: MAY 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054,

NPDES NO. CA0107417

Dear Mr. Robertus:

There was one monitoring violation and twelve limit exceedences of Order R9-2006-0054 during May 2008.

At site M-001B, only four cBOD analyses were performed for the week of May 4.

All total suspended solids, settleable solids and turbidity limits were exceeded at site M-001F, the South Coast Water District Groundwater Recovery Facility.

Site M-001E, the City of San Juan Capistrano RO Treatment Plant was offline all month.

The anticipated start date for M-001G, the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process, is the beginning of July 2008.

The three-species Chronic Toxicity screening performed March through May 2008 concluded with no toxic effects observed in any of the nine tests. Kelp was determined to be the most sensitive species in previous screenings and will continue to be monitored monthly, along with the Acute Mysid test.

All bacterial objectives were exceeded at least once at C1 and C2. S1, S2 and S4 all exceeded the Enterococcus single sample maximum once; S0 exceeded both the single sample maximum and 30-day geometric mean Enterococcus objective. S15 exceeded all single sample maximum bacterial objectives at least once, as well as the 30-day geometric mean for Enterococcus. SOCWAs discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Page 12 of 32

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT FOR: May 2008

REPORT DUE: July 01, 2008

ANALYZED BY: Sierra Analytical

SAMPLE SOURCE: SCWD GRF Brine/Backwash/Product

SAMPLE POINT: M-001F

	Flow	Suspended Solids	Turbidity	Oil & Grease	рН	Settleable Solids
Sample Type		24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
May-01	0.244		<u> </u>			÷ 2
. May-02	0.244			e e	*	
. May-02 May-03	0.244	96	240	1.8	7.0	0.2
May-04	0.244	90	249	1.0	7.0	U.Z
May-05	0.244					
May-06	0.244					
•		. ,	1.1			
May-07	0.244 0.244					•
May-08	0.244				14 - 14 - 14 - 14 - 14 - 14 - 14 - 14 -	
May-09 May-10	0.244		2 1 1 1 1 1 1 1 1	1		
May-10 May-11	0.244					
May-12	0.244					
May-12	0.244					
May-14	0.244		· ·			\$
May-15	0.244					
May-16	0.244	161	372	2.4	6.8	1.6
May-17	0.244	101	372	<b>2,</b> 4	<b>0.0</b>	1.0
May-18	0.244			ž.		
May-18	0.244	•				
May-19 May-20	0.244					
•	0.244			* .	V 8	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
May-21	0.244				•	
May-22 May-23	0.244					
May-23	0.244					•
May-25	0.244			7 *		
May-26	0:244					
May-27	0.244					
May-28	0.244					
May-29	0.244	138	330	1.9	7.1	11.7
May-30	0.244	100	550	1,3	1.1	11.7
May-31	0.244					
	TO FRANCE T					



July 24, 2008

John H. Robertus

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

SUBJECT: JUNE 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054,

NPDES NO. CA0107417

Dear Mr. Robertus:

There were three monitoring violations and four limit exceedences of Order R9-2006-0054 during June 2008.

For the week of June 15, cBOD was not analyzed at M-INFB and only four cBOD analyses were performed at M-001B. The analyses for the June 17<sup>th</sup> samples were run without the addition of nitrification inhibitor.

Chlorine was accidentally discharged to the outfall from the Chiquita Water Reclamation Plant on June 20, but no sample was collected at M-001B. A letter explaining the discharge is included with this report.

One sample collected at M-001F, the South Coast Water District Groundwater Recovery Facility, exceeded the suspended solids and all three turbidity limits for that discharge.

Site M-001E, the City of San Juan Capistrano RO Treatment Plant was offline all month.

The anticipated start date for M-001G, the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process, is the end of July or early August 2008.

All bacterial objectives were exceeded at least once at C1 and C2. The single sample maximum fecal coliform objective was exceeded once at S15. The single sample Enterococcus objective was exceeded at least once at S0, S1, S2, S3, and S15; S0 exceeded both the single sample maximum and 30-day geometric mean Enterococcus objective. SOCWAs discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Thomas R. Rosales General Manager WATER OUALITY
CONTROL BOARD

∞©©∨√∅∨√√

MRP R9-2006-0054 MONTHLY MONITORING REPORT

Page 12 of 33

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT FOR: June, 2008 REPORT DUE: Jul 01, 2008

Comments:

ANALYZED BY: Sierra Analytical

SAMPLE SOURCE: SCWD GRF Brine/Backwash

SAMPLE POINT: M-001F

•••	Flow	Suspended Solids	Turbidity	Oil & Grease	На	Settleable Solids
Sample Type		24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
06/01/08	0.24					
06/02/08	0.24	A				
06/03/08	0.24					
06/04/08	0.24					
06/05/08	0.24					
06/06/08	0.24	135	381	2.3	6.5	<0.1
06/07/08	0.24					
06/08/08	0.24	*	•		•	
06/09/08	0.24					
06/10/08						
06/11/08	£- '					•
06/12/08						
06/13/08	0.05					•
06/14/08 06/15/08	0.24 0.24		•			
06/16/08	0.24	•				
06/17/08	0.24					
06/18/08	0.24					
06/19/08	0.24					*
06/20/08	0.24					
06/21/08	0.24					
06/22/08	0.24					·
06/23/08	0.24					
06/24/08	0.24					
06/25/08	0.24					•
06/26/08	0.24					
06/27/08	0.24					
06/28/08	0.24					
06/29/08	0.24					
06/30/08	0.24					
Monthly Average	0.23	135	381	2.3	6.5	0.1



SAH DIEGO REGIONAL WATER QUALITY CONTROL BOARD

2008 AUG 29 P 1: 53;

August 26, 2008

John H. Robertus

California Regional Water Quality Control Board

San Diego Region

9174 Sky Park Court, Suite 100

San Diego, CA. 92123

SUBJECT: JULY 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054,

NPDES NO. CA0107417

Dear Mr. Robertus:

There were seven limit exceedences of Order R9-2006-0054 during July 2008. One composite sample collected at M-001F, the South Coast Water District Groundwater Recovery Facility, exceeded the suspended solids and all three turbidity limits for that discharge. A grab sample exceeded all three Settleable Solids limits.

The City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process was tested briefly on August 4. Modifications to the process will be made before further testing.

All bacterial objectives were exceeded at least once at C1. Site C2 exceeded the 30-day geometric mean total coliform and both enterococcus objectives. The daily maximum fecal coliform objective was exceeded at S0, S5, S15, and S21. At least one enterococcus objective was exceeded at S0, S11, S15, and S21. SOCWAs discharge from the outfall is not believed to be the cause of these exceedances.

Section V.A. calls for calculation of a 30-day geometric mean using the five most recent samples from each surfzone monitoring site. Because Order R9-2006-0055 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30-day mean.

Sincerely,

SOUTH ORANGE\_COUNTY WASTEWATER AUTHORITY

Page 12 of 33

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT FOR: July, 2008 REPORT DUE: Aug 01, 2008 ANALYZED BY: Sierra Analytical

SAMPLE SOURCE: SCWD GRF Brine/Backwash

SAMPLE POINT: M-001F

	Flow	Suspended Solids	Turbidity	Oil & Grease	р́Н	Settleable Solids
Sample Type		24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	. 25	6.0 to 9.0	1.0
07/01/08	0.24					
07/02/08	0.24					
07/03/08	0.24	r				
07/04/08	0.24					
07/05/08	0.24					
07/06/08	0.24					
07/07/08	0.24	W.		Section 1		
07/08/08	0.24					
07/09/08	0.24	· .			( ) P	
07/10/08	0.21				• •	
07/11/08	0.24			0		
07/12/08	0.24					
07/13/08	0.06					
07/14/08						
07/15/08	0.19					
07/16/08	0.24					
07/17/08	0.24	•				
07/18/08	0.24					<b>,</b>
07/19/08	0.24					
07/20/08	0.24				-	87
07/21/08	0.24	•				
07/22/08	0.13			٠		
07/23/08	0.12					
07/24/08	0.24				*	
07/25/08	0.24					
07/26/08	0.24				i	
07/27/08	0.24					
07/28/08	0.24					
07/29/08	0.24					
07/30/08	0.24					
07/31/08	0.24	131	314	2.7	6.9	4.9
Monthly Average	0.22	131	314	2.7	6.9	4.9

Comments:



September 26, 2008

John H. Robertus

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

SUBJECT: AUGUST 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:

There was one reporting omission and seven limit exceedences of Order R9-2006-0054 during August 2008.

At site M-001B, only four TSS analyses were reported for the week of August 17.

One composite sample collected at M-001F exceeded the suspended solids and all three turbidity limits for that discharge. A grab sample exceeded all three Settleable Solids limits.

The City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process was tested briefly on August 4, but no flow was sent to the outfall. Modifications to the process will be made before further testing.

All bacterial objectives were exceeded at least once at C1. Site S1 exceeded the daily Fecal Coliform and Enterococcus objectives. The daily Enterococcus limit was exceeded once at S3, S5, and S13; S15 exceeded both daily and 30-day objectives. C2 exceeded all enterococcus objectives. SOCWAs discharge from the outfall is not believed to be the cause of these exceedences.

Section V.A. calls for calculation of a 30-day geometric mean using the five most recent samples from each surfzone monitoring site. Because Order R9-2006-0055 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30-day geometric mean.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

160ales

Page 12 of 32

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources ANALYZED BY: Sierra Analytical

REPORT FOR: August, 2008 REPORT DUE: Sep 01, 2008

SAMPLE SOURCE: SCWD GRF Brine/Backwash

SAMPLE POINT: M-001F

Sample Type				Oil & Grease	рН	Solids
		24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
08/01/08	0.24					žv. <sup>11</sup>
08/02/08	0.24			•		
08/03/08	0.24					
08/04/08	0.23					
08/05/08	0.12			•	, d ,	
08/06/08	0.21	d				
08/07/08	0.24				•	
08/08/08	0.24					
08/09/08	0.24		ye.•			
08/10/08	0.24					
08/11/08	0.24					
08/12/08	0.24	•				
08/13/08	0.24	· .	•			
08/14/08	0.24	n e		and the second second		
08/15/08	0.24					
08/16/08	0.21					
08/17/08	0.24	1		*		
08/18/08	0.24			•	the state of the state of	, ·
08/19/08	0.24					
08/20/08	0.24					
08/21/08	0.21	,				
08/22/08	0.24			4.5	6.9	7.5
08/23/08 08/24/08	0.24 0.24					
08/25/08	0.24					
08/26/08	0.24					
08/27/08	0.24	130	348			• *
08/28/08	0.24	100	Ų TU			
08/29/08	0.24					
08/30/08	0.24					
08/31/08	0.24					•
Monthly Average	0.23	130	348	4.5	6.9	7.5

Comments:



October 22, 2008

John H. Robertus

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

SUBJECT: SEPTEMBER 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-

0054, NPDES NO. CA0107417

Dear Mr. Robertus:

There were five limit exceedences of Order R9-2006-0054 during September 2008. One composite sample collected at M-001F exceeded the suspended solids and all three turbidity limits for that discharge. A grab sample exceeded the monthly average Settleable Solids limit.

The City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process did not operate during September; no discharge is anticipated for October 2008.

The single sample maximum total coliform limit was exceeded at S9. The single sample maximum fecal coliform limit was exceeded at sites S1, S9, S15, and S19. The single sample maximum Enterococcus limit was exceeded at S0, S2, S3, S5, S7, S9, S11, S13, S15, S19, and S21; the 30-day geometric mean Enterococcus objective was also exceeded at S0, S2, S3, S5, S7, S9, S11, S13, S15, S19 and S21. C1 and C2 exceeded all bacterial objectives. SOCWAs discharge from the outfall is not believed to be the cause of these exceedences.

Section V.A. calls for calculation of a 30-day geometric mean using the five most recent samples from each surfzone monitoring site. Because Order R9-2006-0054 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30-day geometric mean.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Page 12 of 34

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT FOR: September, 2008

ANALYZED BY: Sierra Analytical

REPORT DUE: November 01, 2008

SAMPLE POINT: M-001F

SAMPLE SOURCE: SCWD GRF Brine/Backwash

Sample Type	Flow	Suspended Solids 24-HC	Turbidity 24-HC	Oil & Grease Grab	pH Grab	Settleable Solids Grab
. Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
09/01/08 09/02/08	0.24 0.24					
09/03/08 09/04/08	0.23 0.24	2 <u>1.</u> 1				
09/05/08 09/06/08	0.24 0.24					
09/07/08 09/08/08	0.24				4	
09/09/08 09/10/08 09/11/08	0.18 0.22 0.22					
09/12/08 09/13/08 09/14/08	0.22 0.22 0.22					
09/15/08 09/16/08 09/17/08	0.22 0.22 0.22	•				
09/18/08 09/19/08	0.22 0.22		•			
09/20/08 09/21/08 09/22/08	0.22 0.22 0.22					
09/23/08 09/24/08 09/25/08	0.22 0.22 0.22					
09/26/08 09/27/08 09/28/08	0.22 0.22 0.22					
09/29/08 09/30/08	0.22 0.22	232	480	1.6	7.0	1.3
Monthly Average Comments:	0.22	232	480	1.6	7.0	1.3



November 19, 2008

John H. Robertus

California Regional Water Quality Control Board

San Diego Region

9174 Sky Park Court, Suite 100

San Diego, CA. 92123

SUBJECT: OCTOBER 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:

There was one monitoring omission and seven limit exceedences of Order R9-2006-0054 during October 2008.

One composite sample collected at M-001F exceeded the suspended solids and all three turbidity limits for that discharge. A grab sample exceeded all three Settleable Solids limits.

For the week of October 19, only four cBOD analyses were reported for M-001B. The analyses for the October 24 sample was run without the addition of nitrification inhibitor.

The City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process did not operate during October; no discharge is anticipated for November 2008.

Surfzone sites S15 and S17 exceeded the single sample maximum objectives for both fecal coliform and Enterococcus. The single sample maximum Enterococcus objective was exceeded at sites S3, S5, and S9; S13 exceeded the 30-day geometric mean objective All bacterial objectives were exceeded at C1. Site C2 was dry the entire month of October. SOCWAs discharge from the outfall is not believed to be the cause of these exceedences.

Sincerely,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Page 12 of 32

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT FOR: October, 2008

ANALYZED BY: Sierra Analytical

REPORT DUE: December, 2008

SAMPLE SOURCE: SCWD GRF Brine/Backwash

SAMPLE POINT: M-001F

	Flow	Suspended Solids	Turbidity	Oil & Grease	рН	Settleable Solids
Sample Type		24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit		60	75	25	6.0 to 9.0	1.0
10/01/08	0.22	e e		•	•	•
10/02/08	0.22					
10/03/08	0.22					
10/04/08	0.22					
10/05/08	0.22					
10/06/08	0.22					
10/07/08	0.22					
10/08/08	0.22					
10/09/08	0.22					
10/10/08	0.22					
10/11/08	0.22					•
10/12/08	0.22					
10/13/08 10/14/08	0.22					
10/15/08	0.22 0.22		422	3.2	7.3	9.7
10/16/08	0.22	211	744	0.2	7.0	J.,
10/17/08	0.22					
10/18/08	0.22					
10/19/08	0.22					
10/19/08	No Flow					
10/21/08	No Flow				N.	
10/21/08	No Flow					
10/23/08	No Flow					
10/24/08	No Flow				•	
10/25/08	No Flow					
10/26/08	No Flow					
10/27/08	No Flow	•				
10/28/08	No Flow					
10/29/08	No Flow					
10/30/08	No Flow					
10/31/08	No Flow					
Monthly Average	0.22	211	422	3.2	7.3	9.7
Comments:						



December 23, 2008

John H. Robertus California Regional Water Quality Control Board San Diego Region 9174 Sky Park Court, Suite 100 San Diego, CA. 92123

SUBJECT: NOVEMBER 2008 SUMMARY OF MONITORING OF ORDER NO.R9 - 2002-0054, NPDES NO. CA0107417

Dear Mr. Robertus:

There were no exceedances of Order R9-2006-0054 discharge permit limits or performance goals in November 2008.

The South Coast Water District's Groundwater Recovery Facility (SCWD-GRF) began discharging its brine wastewater to the South Orange County Wastewater Authority - J. B. Latham wastewater treatment plant in November 2008.

Surfzone sites S4 and S6 met all bacterial objectives. Enterococcus objectives only were exceeded at surfzone sites S0, S1, S5, S7, S9, S11, S13, S15, S19, S21 and S23. Sites S2, S3, and S17 exceeded objectives for both fecal coliform and enterococcus. Sites C1 and C2 in San Juan Creek exceeded all bacterial objectives. There were several days of heavy rainfall during November which increased urban runoff to the monitoring sites. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

TY WASTEWATER AUTHORITY

Thomas R. Rosales

General Manager

Page 12 of 28

South Orange County Wastewater Authority

NPDES No. CA0107417

DISCHARGE: San Juan Creek Ocean Outfall

SAMPLED BY: ECO Resources

REPORT DUE: January 2009

ANALYZED BY: Sierra Analytical

REPORT DUE: January, 2009

SAMPLE POINT: M-001F

SAMPLE SOURCE: SCWD GRF Brine/Backwash

	Flow	Suspended Solids	Turbidity	Oil & Grease	рΗ	Settleable Solids
Sample Type		24-HC	24-HC	Grab	Grab	Grab
Method Units	Meter MGD	EPA 160.2 mg/L	EPA 180.1 NTU	EPA 413.1 mg/L	EPA 150.1 Standard Units	EPA 160.5 ml/L
Mo. Avg. Limit	•	60	75	25	6.0 to 9.0	1.0
11/01/08	No Flow					
11/02/08	No Flow					
11/03/08	No Flow					
11/04/08	0.31					
11/05/08	0.38					
11/06/08	0.49					•
11/07/08	0.66				4	•
11/08/08	No Flow					
11/09/08	No Flow					
11/10/08	No Flow			1		
11/11/08	0.12			*		
11/12/08	0.21		No.			
11/13/08	0.24	- 124 - 124				
11/14/08	0.28	6	8	<2.0	6.9	<0.1
11/15/08	No Flow				And the second second	· a
11/16/08	No Flow					
11/17/08	0.26					
11/18/08	0.26					
11/19/08	0.26					
11/20/08	0.26				4.	ν.
11/21/08	0.26				w.i	
11/22/08	0.04					
11/23/08	0.04					
11/24/08	0.54					
11/25/08	0.34					
11/26/08	0.08					
11/27/08	0.08					
11/28/08	0.08					
11/29/08	0.08					
11/30/08	0.08					

Comments: Plant not operating in November due to rehabilitation of the well. All flow was raw well water.