



California Regional Water Quality Control Board

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9174 Sky Park Court, Suite 100, San Diego, California 92123-4340
(858) 467-2952 • Fax (858) 571-6972
[http:// www.waterboards.ca.gov/sandiego](http://www.waterboards.ca.gov/sandiego)

November 24, 2008

Mr. Joe Jackson
Asst. General Manager
Fallbrook Public Utility District
990 E. Mission Rd.
P.O.Box 2290
Fallbrook, CA 92088-2290

VIA CERTIFIED MAIL
7007 1490 0003 8753 5605

In reply refer to:
NCGW:224137:rpierce

Dear Mr. Jackson:

SUBJECT: NOTICE OF VIOLATION NO. R9-2008-0116, COMMENTS ON MARCH-JUNE 2008 RECYCLED WATER MONITORING REPORTS, AND REQUIREMENT FOR ADDITIONAL INFORMATION FOR FALLBROOK PUBLIC UTILITY DISTRICT TREATMENT PLANT NO. 1, 1425 ALTURAS STREET, FALLBROOK, CA 92088

Enclosed is **Notice of Violation (NOV) No. R9-2008-0116** for Fallbrook Public Utility District (FPUD) Treatment Plant No. 1 (the Site) located in Fallbrook, California. The California Regional Water Quality Control Board, San Diego Region (Regional Board) identified the violations cited in the NOV during the review of the following Semiannual Monitoring Reports for Order No. 91-39:

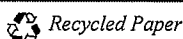
FREQUENCY	PERIOD	REPORT DATE	DATE RECEIVED
Monthly:	March 2008	April 14, 2008	April 18, 2008
	April 2008	May 16, 2008	May 21, 2008
	May 2008	June 10, 2008	June 17, 2008
Monthly, Quarterly, Semiannually	June 2008	July 10, 2008	July 10, 2008
	April - June 2008 January - June 2008		

In addition, the Regional Board has the following comments on the Reports referenced above:

1. The discharger must provide the Regional Board with clarification of the "units" specified on the tabulated results for the semiannual report referenced above. It is unclear if the units are milligrams per liter (mg/L).¹ If the reported results are in units of mg/L, then the concentration of aluminum at 0.25 mg/L is greater than

¹ Units are not displayed on the semiannual results table for January to June 2008.

California Environmental Protection Agency



the secondary maximum contaminant level (MCL) for drinking water of 0.20 mg/L. The secondary MCL concentration limit is an applicable water quality objective because the designated beneficial uses for both the Santa Margarita River and the San Luis Rey River Hydrographic Units include municipal and domestic supply.²

2. For the potable water supply, the tabulated monthly analytical results for total dissolved solids, chloride, and sulfate (reported as 510, 90, and 150 mg/L respectively) do not match the results tabulated in the laboratory analysis (see page 4: results reported as 540, 100, and 230 mg/L respectively). The monthly data tabulation appears to include data from the previous monthly report.
3. The FPUD provided the following comment on the fluoride concentration in the potable water supply: "We are requesting a relief in the fluoride limitations of Order No. 91-39, as we have no control of the potable water supply levels and no way of reducing the elevated levels, which are now bordering on a [violation] to the permit". The Discharge Specification for fluoride is based on the water quality objective established in the Basin Plan.

Requirement for Additional Information

To demonstrate compliance with State regulations for tertiary treatment of recycled water, the discharger shall provide supporting data, including any necessary calculations using analytical results from treated waste water, to verify compliance with CCR Title 22, section 60304(a) and by reference section 60301.230(a). CCR Title 22, section 60301.230(a) defines "disinfected tertiary recycled water" as either:

- "(1) A chlorine disinfection process following filtration that provides a CT (the product of total chlorine residual and modal contact time measured at the same point) value of not less than 450 milligram-minutes per liter at all times with a modal contact time of at least 90 minutes, based on peak dry weather design flow; or
- (2) A disinfection process that, when combined with the filtration process, has been demonstrated to inactivate and/or remove 99.999 percent of the plaque-forming units of F-specific bacteriophage MS2, or polio virus in the wastewater. A virus that is at least as resistant to disinfection as polio virus may be used for purposes of the demonstration."

² Prohibition A.4(i) of Order No. 91-39 states "The discharge of wastewater shall not: (i) Cause a pollution, contamination or nuisance or adversely affect beneficial uses of the ground or surface waters of the Santa Margarita Hydrographic Unit or the San Luis Rey Hydrographic Unit as established in the Basin Plan."


Mr. Joe Jackson
Fallbrook Public Utility District
Treatment Plant No. 1: NOV R9-2008-0116

November 24, 2008

The Regional Board Executive Officer³ can require information from the FPUD regarding Discharge Specification B.6. of the Order, which states that effluent use shall conform to the Reclamation Criteria in California Code of Regulations Title 22. The Regional Board requires samples be collected in compliance with Monitoring and Reporting Program No. 91-39 (Monitoring Provision A) for analysis of the total chlorine residual and monthly reporting of those results.

The required additional information requested in this letter shall be included in monthly reports as of the January 30, 2009 reporting date. If you have any questions regarding this matter, please contact Mr. Robert Pierce at (858) 627-3935 or at RPierce@waterboards.ca.gov.

Respectfully,



MICHAEL P. MCCANN
Assistant Executive Officer

MPM:jac:jro:rep

Attachments: Notice of Violation No. R9-2008-0116

CIWQS:

Regulatory Measure ID	142164
Place ID	224137
Enforcement ID	351187 (SEL) 351186 (NOV)
Violation ID	781444

³ Under authority of Reporting Requirement E.2. of Order No. 91-39.

Summary of Violations:

I. DISCHARGE SPECIFICATION B.2.

Discharge Specification B.2. requires:

"The median number of coliform organisms shall not exceed 2.2 per 100 milliliters (mL) as determined from the bacteriological results of the last 7 days for which analysis have been completed, and the number of coliform organisms shall not exceed 23 per 100 milliliters in any sample."

The reported coliform concentration of 67 colony forming units (cfu)/100 mL in the effluent exceeded the daily maximum limit of 23 cfu/100 ml on June 22, 2008.



Julie Chan, Supervising Engineering Geologist
Groundwater Basins Branch

11/24/08
DATE

JAC:jro:rep