

California Regional Water Quality Control Board, San Diego Region

July 7, 2017

In reply refer to:
237004: oosibodu

Mr. Mike Cirillo
PCP-Lilac, LP
PO Box 11427
Santa Ana, CA, 92711-1427

Subject: Review of Monitoring Report for Order WQ 2014-0153-DWQ, Lilac Oaks Campground

Mr. Cirillo:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has reviewed the quarterly monitoring report which was submitted as required by Order WQ 2014-0153-DWQ. Violations identified in the monitoring report and comments on the monitoring report are included below.

Need for Submittal of a Report of Waste Discharge

The San Diego Water Board has been informed that PCP-Lilac plans to install a new advanced Onsite Wastewater Treatment System (OWTS) and abandon some of the existing septic tanks. Please submit a Report of Waste Discharge (ROWD) that includes the information outlined in Attachment B1 of Order WQ 2014-0153-DWQ prior to beginning construction and installation of the advanced OWTS. Section E.2.n of Order WQ 2014-0153-DWQ (page 33) requires the Discharger to notify the San Diego Water Board Executive Officer before making a material change in the character, location, or volume of the discharge, and also specifies that the Executive Officer may require that a ROWD be submitted. The ROWD must be prepared by a civil engineer that is licensed in the State of California, must also include a schedule for construction and installation of the OWTS, and must include procedures that will be followed to ensure septic tanks that will no longer be used are properly abandoned or decommissioned. If any of the existing septic tanks or leach fields will continue to be used after installation of the advanced OWTS, the ROWD, must include a certification by the design engineer that the existing septic tanks and leach fields can be operated and maintained to meet the requirements of the General Order and Notice of Applicability (NOA).

Violations of Order WQ 2014-0153-DWQ

The monitoring report submitted did not include the information described in page 2 of this letter. Deficient monitoring or reporting is a violation of Order WQ 2014-0153-DWQ. Please provide the information required in a written response to the San Diego Water Board by

September 8, 2017, or provide a written explanation of why the information required below was not included in the monitoring report submitted:

1. Septic tank pumping reports were not attached to the monitoring report, although the monitoring report stated that the septic tanks were pumped on February 7, March 5, 16, 20, 21 and 31, 2017. Attachment C of Order WQ 2014-0153-DWQ (page C-3) requires that pumping reports shall include the date, nature of service, service company name, and service company license number. In addition, based upon the available report it is unclear which septic tanks were pumped on the dates listed above. Please ensure future monitoring reports clearly identify which septic tanks are pumped during each monitoring period.
2. Attachment C of the Order WQ 2014-0153-DWQ (pages C-8 and C-9) and Table 3 of the Notice of Applicability (NOA)¹ specify that subsurface disposal area shall be inspected quarterly to determine if wastewater is evenly applied, the disposal area is saturated, burrowing animals and/or deep rooted plants are present, and if odors are present. Recorded observations from inspection/monitoring of the subsurface disposal area were not included in the monitoring report submitted.

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 you 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.

Additional Comments

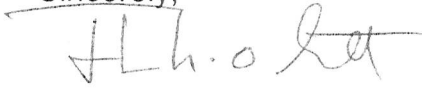
The San Diego Water Board has the following comments regarding submittal of future monitoring reports:

1. Please ensure future monitoring reports include copies of laboratory analytical reports and chain of custody forms.
2. Future quarterly monitoring reports must be submitted to the San Diego Water Board on the second day after the quarter ends. For example, the next quarterly monitoring report due is the April-June 2017 monitoring report, which is due by August 1, 2017 (see page C-3 of Attachment C of the Order WQ 2014-0153-DWQ).
3. The 2017 annual monitoring report is due by March 1, 2018 (see page C-3 of Attachment C of the Order WQ 2014-0153-DWQ).

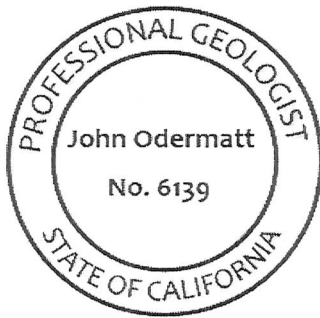
¹ The NOA, dated August 1, 2016 enrolled Lilac Oaks Campground in Order WQ 2014-0153-DWQ

In the subject line of any response, please include reference **237004:osibodu**. Please contact Mr. Fisayo Osibodu at 619-521-8036, or at Olufisayo.Osibodu@waterboards.ca.gov if you have any questions or comments.

Sincerely,



JOHN R. ODERMATT, M.Sc., P.G., Senior Engineering Geologist
Groundwater Protection Unit



JRO: oo

cc w/enclosure: Mr. Jeffrey Leek; Star Management Company; Jeff@StarManagement.com

Mr. Brett Marasco; Brettmascaro@gmail.com

Mr. Larry Newcomb; Jayhawk Consultants; larry@septiclayout.com

CIWQS INFO	Number
Place IDs	237004
Party IDs	25940
Regulatory Measure ID	413985
Violation IDs	1027494, 1027495