



Linda S. Adams
Secretary for
Environmental Protection

California Regional Water Quality Control Board San Diego Region

Over 50 Years Serving San Diego, Orange, and Riverside Counties
Recipient of the 2004 Environmental Award for Outstanding Achievement from USEPA



Arnold Schwarzenegger
Governor

9174 Sky Park Court, Suite 100, San Diego, California 92123-4353
(858) 467-2952 • Fax (858) 571-6972
<http://www.waterboards.ca.gov/sandiego>

March 2, 2010

CERTIFIED MAIL
7009 1410 0002 2347 2523

Mr. Matt Estrin, Associate Director of Facilities
San Diego Wild Animal Park
15500 San Pasqual Valley Road
Escondido, CA 92027-8702

In reply refer to:
255446:chenning

Dear Mr. Estrin:

**SUBJECT: NOTICE OF VIOLATION NO. R9-2010-0058
SAN DIEGO WILD ANIMAL PARK**

Enclosed is Notice of Violation (NOV) No. R9-2010-0058 for the San Diego Wild Animal Park. The basis for this NOV was the monitoring data contained in the May 2009 through January 2010, 3rd and 4th quarter 2009, and 2009 annual monitoring reports submitted by the Zoological Society of San Diego (Society) in accordance with Order No. 99-04.

Please take steps to implement the follow-up actions necessary to ensure that the violations noted do not occur in the future. These violations subject the Society to possible further enforcement action by the California Regional Water Quality Control Board, San Diego Region (San Diego Water Board), including administrative enforcement orders requiring the Society to cease and desist from violations, or to clean up waste and abate existing or threatened conditions of pollution or nuisance; administrative assessment of civil liability in amounts of up to \$5,000 per day per violation;¹ referral to the State Attorney General for injunctive relief; and referral to the District Attorney for criminal prosecution.

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

1. The Wild Animal Park Sewage Treatment Plant has had violations of the total coliform effluent limitation since April 2005. Historically, violations were addressed through re-training of personnel on correct sampling techniques. More recently, violations have been attributed to clogging of the chlorine dosing pump, high influent flows, and failure of the chlorine dosing pump. During these

¹ Under authority of California Water Code section 13350.

March 2, 2010

events, inadequately disinfected secondary effluent was discharged to the recycled water storage pond. Recycled Water Use Requirement E.5 (as written in Addendum No. 1 to Order No. 99-04) states:

The plant shall be equipped with automatic shut down capability to prevent inadequately disinfected secondary effluent from discharging into the recycled water storage pond. The inadequately disinfected secondary effluent at the chlorine contact tank will be re-disinfected with higher dose and re-sampled prior to diversion into the recycled water pond.

Based on conversations with the treatment plant operators and an inspection of the facility, the Wild Animal Park STP is not equipped with automatic shut down capability to prevent the discharge of inadequately disinfected secondary effluent. Ms. Cathryn Henning of the San Diego Water Board discussed this deficiency during a meeting with you on August 20, 2009. Ms. Henning followed up with emails dated August 26, 2009 and October 27, 2009 requesting a list of tasks and expected completion dates for the installation of a chlorination system in compliance with Recycled Water Use Requirement E.5. No response has been provided to the San Diego Water Board to date. Please provide the requested information as soon as possible.

2. The median values for total coliform calculated on August 25, 26, and 27, 2009 were reported as ND when the actual values were 17 most probable number per 100 milliliters.

The next monitoring report is the February 2010 monthly monitoring report, which is due by March 30, 2010. In the subject line of any response, please include the requested "in reply refer to:" information located in the heading of this letter. For questions pertaining to the subject matter, please contact Ms. Cathryn Henning at (858)-636-3161 or at chenning@waterboards.ca.gov.

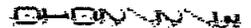
Sincerely,



Julie Chan P.G.
Supervising Engineering Geologist
Groundwater Basins Branch

JC:rwm:clh

Enclosure: Notice of Violation No. R9-2010-0058



4. The 4th quarter 2009 monitoring report did not include grab sample results from SW-3 and SW-4 as required in Section C.3 of Monitoring and Reporting Program No. 99-04.
5. The 4th quarter 2009 monitoring report did not include grab sample results from SW-5 and SW-6 as required in Section C.4 of Monitoring and Reporting Program No. 99-04.
6. The 2009 annual monitoring report did not include grab sample results from SW-8 (or SW-7) and SW-9 as required in Section C.5 of Monitoring and Reporting Program No. 99-04.
7. Groundwater monitoring data for 2009 has not been reported to the San Diego Water Board as required in section C of Monitoring and Reporting Program No. 99-04.
8. The 2009 annual monitoring report did not include the evaluation report required in section E.1.e of Monitoring and Reporting Program No. 99-04.
9. The 2009 annual monitoring report did not include the information required in section F.1 through F.7 of Monitoring and Reporting Program No. 99-04.

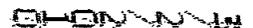
Questions pertaining to the issuance of this Notice of Violation are to be directed to Ms. Cathryn Henning at (858)-636-3161 via e-mail at chenning@waterboards.ca.gov. Written correspondence should be directed to the following address:

California Regional Water Quality Control Board, San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340
Attn: Groundwater Basins Branch Chief



Julie Chan, P.G.
Supervising Engineering Geologist
Groundwater Basins Branch

3/2/10
DATE



SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee X</p> <p>B. Received by (Printed Name) C. Date of Delivery</p>
<p>1. Article Addressed to:</p> <p>Mr. Matt Estrin San Diego Wild Animal Park # 5500 San Pasqual Valley Rd. Escondido, CA 92027-8702</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7009 1410 0002 2347 2523</p>

PS Form 3811, February 2004

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<table border="1"> <tr> <td colspan="2">Sent To</td> </tr> <tr> <td colspan="2">Matt Estrin, Wild Animal Park</td> </tr> <tr> <td colspan="2">Street, Apt. No., or PO Box No. 15500 San Pasqual Valley Rd.</td> </tr> <tr> <td colspan="2">City, State, ZIP+4 Escondido, CA 92027-8702</td> </tr> </table>		Sent To		Matt Estrin, Wild Animal Park		Street, Apt. No., or PO Box No. 15500 San Pasqual Valley Rd.		City, State, ZIP+4 Escondido, CA 92027-8702			
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PS Form 3800, August 2006	See Reverse for Instructions										

0-EN-11