



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>

November 4, 2010

In reply refer to:
272418:adai

Mr. Jeff Pape
Operations Manager
Whispering Palms Community Services District
605 Third Street
Encinitas, CA 92024

Dear Mr. Pape:

**SUBJECT: REVIEW OF MONITORING REPORT FOR WHISPERING PALMS
WATER POLLUTION CONTROL FACILITY (W.P.C.F.)**

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has reviewed the April-June 2010 quarterly monitoring report submitted by the Whispering Palms Community Services District (District) in accordance with Monitoring and Reporting Program of Order No. 94-80.

The following violations of the Order No. 94-80 was identified in the submitted report:

1. The 30-day average of Discharge Specification B.1 for total dissolved solids (TDS), established at 1100 milligrams per liter (mg/L), was exceeded in May 2010 with a reported value of 1168 mg/L.
2. The 30-day average of Discharge Specification B.1 for chloride, established at 350 mg/L, was exceeded in May 2010 with a reported value of 390 mg/L.
3. The analyses for TDS, chloride, sulfate in groundwater were submitted late. Monitoring and Reporting Program No. 94-80 Section C (Groundwater) requires the groundwater samples to be analyzed for those constituents and submitted semiannually, which is due by July 30, 2010. We received the groundwater data on October 29, 2010.

Please be aware these violations subject the District to possible further enforcement action by the San Diego Water Board, including administrative enforcement orders requiring the District to cease and desist from violations, or to clean up waste and abate existing or threatened conditions of pollution or nuisance; administrative assessment of

Mr. Pape

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November 3, 2010

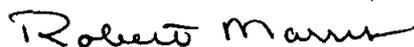
civil liability in amounts of up to \$5,000 per day per violation;¹ referral to the State Attorney General for injunctive relief; and referral to the District Attorney for criminal prosecution.

The California Regional Water Quality Board, San Diego Region (San Diego Water Board) implemented an electronic records management system, aka Paperless Office, to reduce paper consumption, anticipate future records management solutions, and improve the overall accessibility to water quality records and documents. We strongly encourage you to provide all regulatory documents, submissions, materials, data, and correspondence on compact disk (CD-ROM or CD) in a Portable Document Format (PDF) file *in lieu of paper-sourced documents*. However, submitting electronically for documents fewer than 25 pages (<10 MB) is not mandatory. In some instances paper submittals are still required; see attached letter for details.

For questions pertaining to the subject matter, please contact Amanda Dai at (858) 627-3977 or via email at adai@waterboards.ca.gov.

PLEASE INCLUDE "272418:ADAI" IN THE SUBJECT LINE OF FUTURE CORRESPONDANCE.

Sincerely,



Robert Morris, P.E.
Senior Water Resource Control Engineer
Cleanup and Land Discharge Branch

Regulatory Measure ID: 376443
Violation ID: 884072, 884073, 884074

Attachment: Guidelines for Electronic Submittal Documents

¹ Under authority of California Water Code section 13350.



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TO: All Persons/Parties Submitting Documents and Data

FROM: David W. Gibson, Executive Officer

DATE: July 1, 2010

SUBJECT: Guidelines for Electronic Submittal of Documents – CD-ROM

The California Regional Water Quality Board, San Diego Region (San Diego Water Board) implemented an electronic records management system, aka Paperless Office, to reduce paper consumption, anticipate future records management solutions, and improve the overall accessibility to water quality records and documents. We strongly encourage you to provide all regulatory documents, submissions, materials, data, and correspondence on compact disk (CD-ROM or CD) in a Portable Document Format (PDF) file *in lieu of paper-sourced documents*. In some instances paper submittals are still required; see below for details.

The following format guidelines will provide an accurate substitute of an original paper-sourced document suitable for inspection, review, and copying:

1. **Convert** documents greater than 10 megabytes (>10MB), or more than 25 pages, into a PDF file as it would normally appear in a paper-sourced document. Please limit the size of the PDF file to <150mbs (less than 150MB); if more than 150MB, divide the document into volumes. *Documents that are 25 pages or less need not be submitted on CD.*
2. **Transfer** onto a CD. Remember to *label* the CD and case or envelope with similar information which appears in the 'subject' line of the cover page (ie. title of the document, property name and location, submission date, and project identifier such as NPDES, CIWQS, Order Numbers, etc.).
3. **Verify** that the PDF file on CD:
 - a. Contains the *entire* document, maintaining organization and layout, including page orientations, size, margins, fonts, table formats, page numbers, and appendices.
 - i. Appendix cover pages must be in the same order as they would appear in a paper-sourced document, followed by the information assigned to that appendix; and
 - ii. Each subsection of an appendix must also have its own cover page (ie. Appendix D.1 or Appendix E.4) followed by the information assigned to that subsection.

- b. Allows the reviewer to *copy text and images* into common word processing documents (OCR – Optical Character Recognition). If you do not have this technology we will attempt to convert the PDF into OCR as necessary.
 - c. Enables review of the document *clearly and legibly*. If needed for larger documents, include a well-structured table of contents that allows the reviewer to identify key components of the document. Generally, bookmarks are useful, and hypertext linking improves navigation through the document. However, in order to minimize loss of functionality, if hypertext links are provided, use only relative paths which do not reference specific drives or root directories, and make the bookmark hierarchy identical to the table of contents (avoid using more than 2-3 levels which will increase the need for space to read the bookmarks).
4. *Submit / mail* to the address listed above with a *paper copy of a cover letter*, transmittal page, and/or report cover page. See additional information regarding original certifications and other original signature requirements below.

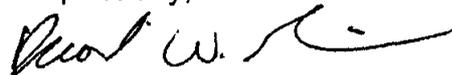
Be advised that failure to comply with formatting guidelines for CD-sourced documents may cause a delay in the review of the submission, and you may be requested to perform necessary re-conversion changes. Additionally, we may request that some documents and materials continue to be submitted on paper, particularly large drawings or maps.

Documents submitted via electronic mail (e-mail) to individual Staff will not be accepted as formal submissions at this time. In order to properly catalogue all submissions, they must be sent to our mailing address.

The San Diego Water Board is developing policy and procedure requirements for the submission of digital signatures (electronic signatures). In the meantime, if documents for which regulations, orders, permits, etc., require an *original hand-written signature*, such as professional certifications or penalty of perjury oaths, please *also* scan and insert into the PDF file where appropriate and easily identified. If you are unable to provide an electronic duplicate of the original hand-written signature please indicate on your cover letter when submitting the CD-sourced document.

If you have questions please call the appropriate Staff assigned to your program or project. Thank you for your cooperation and assistance in protecting California's natural resources.

Respectfully,



David Gibson,
Executive Officer

DWG/ca/ac