



California Regional Water Quality Control Board

San Diego Region



Linda S. Adams
Secretary for
Environmental Protection

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>

February 7, 2011

Tom Rosales
General Manager
South Orange County Wastewater Association
34156 Del Obispo Street
Dana Point, CA 92629

In reply refer to:

ACOO:
CRU:01-0117:jcofrancesco
WDID: 9 000000117
SJCOO
CRU:01-0175:jcofrancesco
WDID: 9 000000175

Dear Mr. Rosales:

SUBJECT: COMPLIANCE EVALUATION INSPECTION REPORTS FOR THE ENCINA WASTEWATER AUTHORITY, ORDER NO. R9-2006-0054, NPDES PERMIT NO. CA0107417, AND ORDER NO. R9-2006-0055, NPDES PERMIT NO. CA0107611

On March 2-5, 2010, compliance evaluation inspections (CEIs) were performed at the Moulton Niguel Water District 3A Reclamation Plant (3A Plant), San Clemente Water Reclamation Plant (SCWRP), Santa Margarita Water District Chiquita Water Reclamation Plant (CWRP), and Jay B. Latham Treatment Plant (JBLTP). All of the facilities discharge to the Pacific Ocean via the San Juan Creek Ocean Outfall (SJCOO). The CEIs were conducted by Jared Richardson and Wes Ganter of PG Environmental, LLC, a contractor providing services for the San Diego Regional Water Quality Control Board (San Diego Water Board). The purpose of the inspections was to evaluate compliance with San Diego Water Board Order No. R9-2006-0054 (NPDES Permit No. CA0107417).

Also, on March 2-4, 2010, compliance evaluation inspections (CEIs) were performed at the Coastal Treatment Plant (CTP), San El Toro Water District - Water Recycling Plant (ETWRP), Los Alisos Water Reclamation Plant (LAWRP), and Regional Treatment Plant (RTP). All of the facilities discharge to the Pacific Ocean via the Aliso Creek Ocean Outfall (ACOO). The CEIs were conducted by Max Kuker of PG Environmental, LLC, a contractor providing services for the San Diego Regional Water Quality Control Board (San Diego Water Board). The purpose of the inspections was to evaluate compliance with San Diego Water Board Order No. R9-2006-0055 (NPDES Permit No. CA0107611).

Please review the enclosed inspection reports carefully. The reports include a summary of the inspector's findings and an evaluation of the effectiveness in complying with the permit requirements. The San Diego Water Board has completed review of the inspection reports and has the following comment:

1. Please ensure all internal pH bench sheets are filled in correctly to document the holding times.
 - a. 3A Plant: According to the report, the time pH was analyzed was not recorded on December 28, 2009 and the sample time was past the analyzed time on January 14, 2010.
 - b. CWRP: According to the report, the sample time was past the analyzed time on January 12, 2010.
 - c. ETWRP: The Discharger exceeded the fifteen minute holding time on at least four occasions in January 2010 (refer to Exhibits 2 through 6 of enclosure 6) and failed to record an analysis time on at least one occasion in January 2010.
2. CWRP: Please include all in-plant spills within the monthly and annual self-monitoring reports (SMRs) during which the spill occurred. According to the report, five in-plant spills were not included in the monthly SMR during which the spill occurred and were not included in the annual summary. **Submit any amendments to the SMRs as needed.**
3. CWRP: The November 2009 laboratory bench sheets for TSS analysis did not record the date for November 3, 2009 (refer to Exhibit 3 of enclosure 3) and November 24, 2009 (refer to Exhibit 4 of enclosure 3) analyses of TSS.
4. Special Provision VI.C.2.a requires that "Each POTW . . . shall submit a written report to the Executive Officer within 90 days after monthly average influent flow rate equals or exceeds 75 percent of the design secondary treatment capacity of their wastewater treatment and/or disposal facilities." Also, Standard Provision (Attachment D, Section V.B) requires reports to be signed by the duly authorized representative with the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations" [40 CFR §122.22(d)].

- JBLTP: There were no reports found for the following months which exceeded 75% of the design secondary treatment capacity (9.75 million gallon per day (MGD)): January 2009 (10.97 MGD); February 2009 (11.32 MGD); March 2009 (9.96 MGD); and December 2009 (10.04 MGD) (refer to Exhibit 1 of enclosure 4).
 - JBLTP: April 2010 also exceeded 75% of the design secondary treatment capacity and notification was sent to the Executive Officer regarding the time period. The notification, however, did not include the certification statement. **Please resubmit with the proper certification statement.**
 - RTP: Ten out of 12 months in 2009 exceeded the 75% of the design secondary treatment capacity. A Treatment Plant Capacity report could not be found for this facility. **Please provide the date this report was submitted or please submit this report as soon as possible.**
5. LAWRP: Effluent grab samples for pH, oil and grease, and settleable solids are not collected at a location that provides a representative sample as required in Order No. R9-2006-0055. **Please provide the date this was corrected and details on where the effluent grab sample is now taken.**
 6. LAWRP: WET samples for Monitoring Locations M-001C (final effluent from the LAWRP) and M-001E (effluent from the Irvine Desalter Project potable water treatment system) are collected after plant effluents are combined and therefore do not meet the requirements within Order No. R9-2006-0055, Attachment E. **Please provide the date this was corrected and details on where the effluent samples from M-001C and M-001E are now taken.**
 7. RTP: The 2009 Annual Report was signed by the Laboratory Manager, Ann M. Harley, who does not meet the definition of a responsible person or a duly authorized representative of that person (refer to Exhibit 1). Also, many of the reports do not contain the correct certification statement. Please ensure all future reports are submitted according the Attachment D, Standard Provisions, Section V.B.
 8. RTP: There were numerous data entry errors in the November 2009, December 2009, and January 2010 SMRs. Submit any amendments to the SMRs as needed.
 9. All information submitted shall have signature of the duly authorized representative and contain the correct certification statement, as required in Attachment D, Standard Provisions, Section V.B.

Mr. Rosales,
SOCWA
CEI Reports

- 4 -

February 7, 2011

We appreciated you and your staff's assistance during the CEIs. 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 Joann Cofrancesco at 858-637-5589 or jcofrancesco@waterboards.ca.gov.

Respectfully,



Robert W. Morris
Senior WRC Engineer

RWM:bdk:jlc

Enclosures:

- | | |
|----------------------------|-------------------------|
| 1. CEI Report for 3A Plant | 5. CEI Report for CTP |
| 2. CEI Report for SCWRP | 6. CEI Report for ETWRP |
| 3. CEI Report for CWRP | 7. CEI Report for LAWRP |
| 4. CEI Report for JBLTP | 8. CEI Report for RTP |

cc (by email):

Mr. Ken Greenberg, USEPA Region 9, greenberg.ken@epa.gov
Craig Blett, PG Environmental, LLC, craig.blett@pgenv.com
Danny O'Connell, PG Environmental, LLC, danny.oconnell@pgenv.com
Richard Sidlin, Chief Operator, rsidlin@socwa.com
Jay Estlon, Utilities Operations Supervisor, Elstonj@san-clemente.org
Tracy Wallace, WWTP Operations Supervisor, tracyw@smwd.com
Mike Wilson, Director of Operations, mwilson@socwa.com
Hillary Kelly, Operator-in-Charge, hkelly@socwa.com
Mark Pade, Chief Plant Operator, mpade@etwd.com
Noah Sanchez, Operations Manager, Sanchez@irwd.com
Bob Waters, Chief Operator, rwaters@socwa.com

Order No.	R9-2006-0054 and R9-2006-0055
NPDES No.	CA0107417 and CA0107611
CIWQS Plant IDs	257592 (SJCOO), 257590 (ACOO), 241054 (3A Plant), 255218 (SCWRP), 257518 (CWRP), 236649 (JBLTP), 257850 (CTP), 222509 (ETWRP), 237396 (LAWRP), and 241053 (RTP)
WRIID	9 000000175 (SJCOO) and 9 000000117 (ACOO)
WRIID Reg. Measure No.	R9-2006-0054 (309059) and R9-2006-0055 (309084)
CIWQS Inspection ID	2752633 (3A Plant), 2763910 (SCWRP), 2763911 (CWRP), 2763912 (JBLTP), 2292448 (CTP), 2291385 (ETWRP), 2291386 (LAWRP), and 2292449 (RTP)

California Environmental Protection Agency



HPEN\00\N