

## California Regional Water Quality Control Board, San Diego Region

Via Email

August 28, 2012

Mr. Gary Canfield  
Plant Manager  
Padre Dam Municipal Water District  
9300 Fanita Pkwy.  
Santee, CA 92071  
gcanfiel@padre.org

In reply refer to / attn:

Place ID 247351:JLLim

Dear Mr. Canfield:

**SUBJECT: Violations of Order No. R9-2009-0037, NPDES No. CA0107492; Review of Self-Monitoring Reports (SMRs), Ray Stoyer Water Recycling Facility**

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has re-reviewed the January through September 2011 monthly SMRs, January through September 2011 quarterly SMRs, and January through June 2011 semiannual SMR and has reviewed the October and November 2011 monthly SMRs for the facility referenced above. We have identified the following violations for the above SMRs and have included the following comments:

- **Effluent Violation of Discharge Specifications, Section IV.A.1.d / Total Coliform**
  1. The seven-day median limitation (2.2 MPN/100 mL) was exceeded on October 6, 2011 with the concentration of 4 MPN/100 mL.
  
- **Effluent Violations of Discharge Specifications, Section IV.A.2.a / Flow Rate**

The daily average limitation (2.0 MGD) was exceeded on:

  2. January 6 and 8, 2011 with flow rates of 2.03 and 2.05 MGD, respectively;
  3. February 17 and 28, 2011 with flow rates of 2.01 and 2.03 MGD, respectively;
  4. March 4, 5, 8, 22, 2011 with flow rates of 2.11, 2.04, 2.02, and 2.11 MGD, respectively; and
  5. April 2011—1 violation with a flow rate of 2.02 MGD.

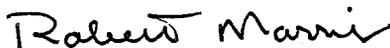
- **Comments**

6. The current effluent constituent bis(2-ethylhexyl) phthalate's limitations on the monthly reports reflect the interim effluent limitations (58 ug/L & 0.97 lb/day) which were effective from June 1, 2009 to May 18, 2010. The monthly average limitations are 1.8 ug/L & 0.03 lb/day and the daily maximum limitations are 3.6 ug/L & 0.06 lb/day. Your sample results for bis(2-ethylhexyl) phthalate were less than 2.5 ug/L, which is less than the minimal level listed in the Policy for Implementation of Toxics Standards for Inland Surface Water, Enclosed Bays, and Estuaries of California (SIP).
7. The maximum daily effluent limitation in Order No. R9-2009-0037 for total recoverable aluminum is 0.2 mg/L. According to U.S. Environmental Protection Agency Standard Method 200.7, the method detection limit for aluminum is 0.02 mg/L. Your sample results for total recoverable aluminum, however, were less than 1 mg/L, which was the current method detection limit you are using for analysis. Please revise your analytical method to obtain a lower method detection limit, and reporting limit, or explain why you are unable to use to a lower method detection limit.

Please take steps to ensure that the violations noted above do not occur in the future. Pursuant to the California Water Code (CWC), the violations noted are subject to additional enforcement action(s) by the San Diego Water Board including a time schedule order, cease and desist order, cleanup and abatement order, imposition of administrative civil liability, referral to the district attorney for criminal prosecution, or referral to the attorney general. Administrative civil liability amounts that may be imposed by the San Diego Water Board under authority of CWC Section 13385 include up to \$10,000 per day, or up to \$10 per gallon for each gallon of waste discharged.

In the subject line of any response, please include the reference "Place ID 247351:JLLim". For questions or comments, please contact Joann Lim at 858-637-5589 or [JLLim@waterboards.ca.gov](mailto:JLLim@waterboards.ca.gov).

Respectfully,



Robert W. Morris  
Senior WRC Engineer

RWM;jll

Tech Staff Info & Use

Order No.	R9-2009-0037
Party ID	33680
File No.	01-053
WDID	9 000000053
NPDES No.	CA0107492
Reg. Measure Nos.	364714 (R9-2009-0037), 385253 (Staff Enforcement Letter, SEL)
Place ID	247351
Person ID	104036 (Canfield)
Violation IDs	(1) 925863; (2) 925877 and 934760; (3) 925878 and 934768 (4) 925879, 934775, 934776, and 934778; and (5) 925880