

San Diego Regional Water Quality Control Board

October 13, 2015

Mr. Michael Thornton
General Manager
San Elijo Joint Powers Authority
2695 Manchester Ave P.O. Box 1077
Cardiff, Ca 92007

In reply refer to / attn:
403056: abuck

Subject: Review of Monitoring Reports for San Elijo Water Reclamation Plant Order No. 2000-010

Mr. Thornton:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has reviewed the November 2014 through July 2015 monthly monitoring reports, the January-March 2015 and April-June 2015, quarterly recycled water users report, and the January-December 2014 annual report. Violations noted in the reports reviewed are identified below. Please include an update in the October or November monthly monitoring report of steps being taken to address the coliform exceedances.

Violations of Section A.1 of Order No. 2000-010

1. The total coliform bacteria concentration exceeded 23 Most Probable Number per 100 milliliter (MPN per 100 mL) more than once in a 30 day period, during the following dates:

Date	Exceedances (MPN per 100 mL)
November 6, 2014	130
April 6, 2015	300
April 7, 2015	30
April 18, 2015	240

2. The 7-day median effluent coliform concentration exceeded 2.2 MPN per 100 milliliter (MPN/100 mL) during the following dates:

Date	Exceedances (MPN per 100 mL)
April 7, 2015	4
April 8, 2015	4
April 9, 2015	4

3. The effluent total coliform bacteria concentration exceeded 240 MPN per 100 mL on April 6, 2015 with a reported value of 300 MPN per 100 mL.

The San Elijo Joint Powers Authority (San Elijo JPA) reported that these violations were likely due to problems in the operation of the sand filters. The San Elijo JPA has hired Trussell Technologies to analyze the sand filter operations to determine the recurring cause of these incidents.

Violation of Section C.6.a of Order No 2000-010

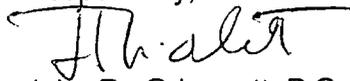
4. The CT value was reported as 448 milligrams-minute per (mg-min/L) on July 11, 2015. Pursuant to section C.6.a of Order No. 2000-010 the effluent CT value shall not be less than 450 mg-min/L at all times.

The San Elijo JPA reported that the average CT value for July 2015 was 796 mg-min/L. In addition, San Elijo JPA reported that it has increased the minimum target value in its electronic monitoring program from 450 to 500 mg-min/L to prevent fluctuations in flow causing future violations.

These violations may subject the San Elijo JPA to possible further enforcement action by the San Diego Water Board including but not limited to: administrative enforcement orders requiring the San Elijo JPA 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.

In the subject line of any response, please include reference 402718: **abuck**. Please contact Mr. Aaron Buck at 619-521-8045, or at buck.aaron@waterboards.ca.gov if you have any questions or comments.

Respectfully,



John R. Odermatt, P.G., Senior Engineering Geologist
Land Discharge Unit

JRO: oo: ab

Tech Staff Info & Use	
Place ID	255265
Reg. Measure ID	403056
Violation ID	997222, 997308, 997309, 997310, 997312, 997759, 997760, 997762