

San Diego Regional Water Quality Control Board

September 14, 2015

Mr. Peter S. Vroom
Public Utilities Deputy Director
City of San Diego
2392 Kincaid Road
San Diego, Ca 92101

In reply refer to / attn:
402718: abuck

Subject: Review of Monitoring Reports for South Bay Water Reclamation Plant Order No. 2000-203

Mr. Vroom:

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 the October-December 2014, quarterly recycled water users report, and the January-December 2014 annual reports.

The City of San Diego (City) reported that it has taken temporary remedial steps to address the coliform violations, and that it is investigating the cause of the sulfate violations. Please include a description of Best Management Practices (BMPs) or steps in the July-September 2015 quarterly report to address the sulfate and coliform violations, particularly BMPs to prevent homogenized grease from entering the treatment plant.

Violations of Section A.1 of Order No. 2000-203

1. The 30-day average discharge specification for sulfate, established at 250 milligrams per liter (mg/L), was exceeded on the following days:

Date	Exceedances in mg/L
February 10, 2015	263 mg/L
February 17, 2015	265 mg/L
March 12, 2015	259 mg/L
March 17, 2015	260 mg/L
March 24, 2015	258 mg/L
April 1, 2015	257 mg/L
April 7, 2015	259 mg/L
April 14, 2015	261 mg/L
April 21, 2015	262 mg/L
April 28, 2015	261 mg/L
May 5, 2015	258 mg/L

2. The 7-day median effluent coliform concentration exceeded 2.2 Most Probable Number per 100 milliliter (MPN/100 mL) on the following days:

Date	Exceedances in MPN/100L
February 10, 2015	4.5 MPN
March 26, 2015	4.5 MPN
March 27, 2015	4.5 MPN
March 28, 2015	7.8 MPN
March 30, 2015	13 MPN
March 31, 2015	13 MPN
April 1, 2015	13 MPN
April 2, 2015	7.8 MPN
April 3, 2015	7.8 MPN
April 4, 2015	7.8 MPN
April 5, 2015	7.8 MPN
April 6, 2015	6.8 MPN

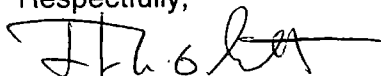
The City reportedly suspects that the coliform exceedances were caused by homogenized grease entering the treatment plant from the Otay River Pump Station (ORPS) and fouling the ultraviolet disinfection system. The City reported that it took the chopper pump offline at the ORPS to reduce the impact of the homogenized grease, and that it is in the process of implementing grease management practices at the ORPS.

3. The effluent total coliform bacteria concentration exceeded 23 MPN/100 mL more than once in a 30-day period, with reported values of 33 and 49 MPN per 100 mL on April 4 and March 30, 2015 respectively.

Finally, please take the steps to implement follow-up actions necessary to ensure that the violation(s) noted above does not occur in the future. These violations may subject the City to possible further enforcement action by the San Diego Water Board including but not limited to: administrative enforcement orders requiring the City 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	257831
Reg. Measure ID	402718
Violation ID	1. 995499, 995501, 995502, 995503, 995504, 995505, 995506, 995507, 995508, 995509, 995510
	2. 995512, 995513, 995514, 995515, 995516, 995517, 995518, 995519, 995520, 995521, 995522, 995523
	3. 995541