

San Diego Regional Water Quality Control Board

June 12, 2017

Mr. Brandon Howard
Utilities Wastewater Operation Supervisor
City of San Clemente
380 Avendia Pico
San Clemente, CA 92672

In reply refer to / attn:
255218:BBushnell

Subject: Review of Monitoring Reports for Order No. R9-2003-0123, City of San Clemente Water Reclamation Plant

Mr. Howard:

The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) has reviewed the monitoring reports listed in the Table 1 below. The City of San Clemente (City) submitted the monitoring reports as required by the Monitoring and Reporting Program of Order No. R9-2003-0123.

Table 1. List of Monitoring Reports Reviewed

Report Type	Report Date
Monthly Monitoring Reports	January 2016 through April 2017
Quarterly Recycled Water User Reports	January-March 2015, April-June 2015, July-September 2015, October-December 2015 January-March 2016, April-June 2016, July-September 2016, October-December 2016 and January-March 2017
Semiannual Groundwater Monitoring Reports	January-June 2015, July-December 2015, January-June 2016 and July-December 2016
Annual Monitoring Reports	2015 Annual Report and 2016 Annual report

The following violations of section B.1 (Discharge Specifications) of Order No. R9-2003-0123 were identified in the monitoring reports:

1. The discharge specification for the daily maximum concentration of fluoride established at 1.2 milligrams per liter (mg/L) was exceeded on June 3, 2015 with a reported concentration of 1.27 mg/L.
2. The discharge specification for the 12-month average concentration for manganese established at 0.075 mg/L was exceeded for the following months:

Table 2. Manganese Violations

Date	Calculated Value (mg/L)
January 2016	0.079
February 2017	0.077
March 2017	0.087
April 2017	0.084

3. The discharge specification for the 12-month average concentration of total dissolved solids (TDS) established at 1200 mg/L was exceeded for the following months:

Table 3. TDS Violations

Date	Calculated Value (mg/L)
January 2016	1303
February 2016	1301
March 2016	1298
April 2016	1287
May 2016	1309
June 2016	1341
July 2016	1341
August 2016	1327
September 2016	1327
October 2016	1335
November 2016	1332
December 2016	1336
February 2017	1359
March 2017	1345
April 2017	1323

Discharge Specifications in Section B.3 of Order No. R9-2003-0123 specify that the 24-hour average effluent turbidity shall not exceed 2 Nephelometric Turbidity Units (NTU). The 24-hour effluent turbidity exceeded 2 NTU on the following dates:

Table 4. Turbidity Violations

Date	Value (NTU)
September 14, 2016	2.32
September 15, 2016	2.61
September 16, 2016	4.61
September 19, 2016	4.18
September 20, 2016	2.46
September 21, 2016	3.16
September 22, 2016	4.08
September 23, 2016	3.09
September 26, 2016	2.88

Date	Value (NTU)
September 27, 2016	2.31
March 16, 2017	2.26

Discharge Specifications in Section D.4.a of Order No. R9-2003-0123 specify that the CT value (chlorine concentration times modal contact time) achieved by the chlorine disinfection process shall not be less than 450 milligrams-minute per liter (mg-min/L). The City reported that the effluent CT value was below 450 mg-min/L on the dates listed in Table 5 below. The City, however, reported that recycled water was not reported from the plant on those days.

Table 5. Chlorine Disinfection Violations

Date	Value (mg-min/L)
February 16, 2016	180
February 18, 2016	262
December 6, 2016	290
December 11, 2016	389
December 20, 2016	81

Section D.9 of Order No. R9-2003-0123 requires the City to comply with the Monitoring and Reporting Program (MRP) of Order No. R9-2003-0123. The following violations of Section D.9 and Section B of the MRP were identified in the monitoring reports:

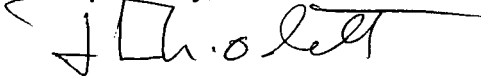
1. The effluent concentration for manganese was not reported for the month of December 2015. Section B.2 of the MRP specifies that effluent samples shall be analyzed monthly for manganese.
2. Effluent concentrations for manganese, TDS, and sulfate were not reported for January 2017. Section B.2 of the MRP specifies that effluent samples shall be analyzed monthly for manganese, TDS, and sulfate.

Please continue to implement follow-up actions necessary to ensure that the violation(s) noted above do 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.

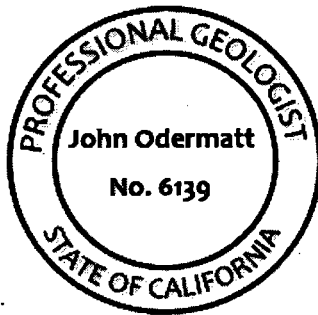
The next monitoring report required to be submitted is the May 2017 monthly monitoring report, which is due by July 1, 2017.

In the subject line of any response, please include reference **255218:BBushnell**. Please contact Mr. Brandon Bushnell at 619-521-8044, or at brandon.bushnell@waterboards.ca.gov if you have any questions or comments.

Respectfully,



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



JRO: oo: bb

Tech Staff Info & Use	
Place ID	255218
Reg. Measure ID	308954
SEL	413704
Violation ID	1024922, 1025124, 1025790, 1025792, 1025149, 1025150, 1025151, 1025152, 1025153, 1025154, 1025155, 1025156, 1025170, 1025171, 1025172, 1025185, 1025789, 1025791, 1025157, 1025158, 1025159, 1025161, 1025162, 1025164, 1025167, 1025168, 1025169, 1025793, 1025174, 1025175, 1025183, 1025184, 1025069, 1025195, 125166, 1025944, 1025943