



California Regional Water Quality Control Board

Central Coast Region



Alan C. Lloyd, Ph.D.
Agency Secretary

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Arnold Schwarzenegger
Governor

July 26, 2005

Mr. Charles Richardson, Director
Monarch Grove Homeowners Association
735 Tank Farm Road, Suite 130
San Luis Obispo, CA 93401

Dear Mr. Richardson:

INADEQUATE RESPONSE TO CLEANUP AND ABATEMENT ORDER NO. R3-2005-0083 FOR MONARCH GROVE WASTEWATER RECLAMATION FACILITY

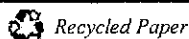
As discussed during your July 21, 2005, meeting with Water Board staff, Sorrel Marks and Gerhardt Hubner, we have reviewed the June 27, 2005 letter from your consultant MicroMedia, submitted in response to Cleanup and Abatement Order No. R3-2005-0083, on behalf of Monarch Grove Homeowners Association. The June 27, 2005, submittal is inadequate to address requirements specified in the Cleanup and Abatement Order. Cleanup and Abatement Order No. R3-2005-0083 specifies the following requirements:

- "2. As soon as possible but not later than June 15, 2005, submit a report summarizing economic benefit obtained by failure to comply with Water Reclamation Requirements Order No. R3-200[2]-0061. The submittal shall include the estimated dollar amount of benefit and the basis for such estimates.*
- "3. As soon as possible but not later than June 30, 2005, submit a report of actions needed to correct wastewater treatment facility deficiencies and discharge violations. The report shall include, but not be limited to, a summary of actions needed, design of facility improvements, and schedule for completing necessary corrective actions consistent with compliance dates specified below. "*

MicroMedia's June 27, 2005, letter does not estimate a dollar amount of economic benefit obtained by failure to comply with Water Reclamation Requirements, nor does it provide any basis to estimate such a value. Economic benefit is one of the many factors to be considered by the Regional Board in assessing civil liability, in accordance with Water Code Section 13327.

Additionally, the June 27, 2005, letter is non-responsive to Cleanup and Abatement Order requirement No. 3 (above). In short, the correspondence reiterates earlier requests to approve MicroMedia's experimental treatment system. Attached, please find copy of our September 28, 2004 letter, summarizing deficiencies in earlier submittals making the same request, many of which have not been resolved. In addition to the deficiencies listed in our September 28, 2004 letter, sampling performed on influent to, and effluent from the MicroMedia system indicates that the process will not dependably improve compliance with your Water Reclamation Requirements.


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Item No. 3 Attachment No. 4
October 6, 2005 Panel Hearing
Monarch Grove Homeowners
Association Wastewater Facility

We encourage you to implement compliance measures immediately. If you have questions, please call Sorrel Marks at 805/549-3695 or Gerhardt Hubner at 805/542-4647.

Sincerely,


Roger W. Briggs
Executive Officer

cs: Sam Luxenberg, MicroMedia Filtration, 30336 Esperanza, Rancho Santa Margarita, CA 92688
Jim Wilson, Monarch Grove Homeowners Association, P. O. Box 6818, Los Osos, CA 93412
Warren Morgan, 2311 Glen Street, Los Osos, CA 93402
Wade Baker, P. O. Box 6818, Los Osos, CA 93412
Gary Setting, Golf Course Manager, 1945 Solano Ave., Los Osos, CA 93402
Kurt Souza, DHS, 1180 Eugenia Place, Suite 200, Carpinteria, CA 93013

S:/wdr/wdr facilities/san luis obispo co/Los Osos/Monarch Grove/CAOinsufficientresponse.ltr
File: Monarch Grove Reclamation Facility Task: 126-01



Terry Tamminen
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

Central Coast Region



Arnold Schwarzenegger
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September 28, 2004

Charlie Richardson, Director
Monarch Grove Homeowners' Association
P. O. Box 6818
Los Osos, CA 93412

Dear Mr. Richardson:

REPORT OF WASTE DISCHARGE FOR REVISED TREATMENT PROCESSES AT MONARCH GROVE WASTEWATER FACILITY IN LOS OSOS (ORDER NO. R3-2002-0061) AND NOTICE OF VIOLATIONS

This letter responds to a Report of Waste Discharge submitted May 18, 2004, with additional information submitted August 25, 2004, on behalf of Monarch Grove Homeowners' Association (HOA). The submittals describe proposed changes to the treatment processes at Monarch Grove Wastewater Reclamation Facility and seek either a) approval of such changes in accordance with existing requirements specified in Order No. R3-2002-0061, or b) revision of Order No. R3-2002-0061 to accommodate the modified treatment facilities. We have the following comments regarding the submittals.

1. Throughout your August 25, 2004 submittal, reference is made to existing Water Reclamation Requirements as Order No. 93-81. Order No. 93-81 was rescinded by the Regional Board in 2002 and replaced by Order No. R3-2002-0061, a copy of which was provided to your agent, Sam Luxenberg, on April 14, 2004.
2. We may not approve Micromedia's Cleanstream process for the production of recycled water unless the process has been approved by California Department of Health Services (DHS). Please provide documentation that demonstrates the Cleanstream process has been approved, or is in the process of being approved by DHS.
3. Effluent Total Nitrogen is limited to a Monthly Mean of 22 mg/L. Performance data from Micromedia's pilot test indicates that the process does not remove any nitrogen. We doubt that the Cleanstream process can meet this limitation. The submittal points to the Las Gallinas Study as evidence that the Cleanstream filter is capable of removing nitrogen. However, upon review of the Las Gallinas Study, we remain skeptical. The Study suggests that nitrogen removal occurs due to some biological treatment within the filter. However, considering your proposal to chlorinate the filter influent, we doubt that any biological activity or denitrification could occur within the filter. Furthermore, the Study fails to include performance data for the complete nitrogen series, therefore we are unclear as to whether ammonia is actually removed or just converted to a different nitrogen form. Please submit additional information to demonstrate how the Cleanstream process will meet the Total Nitrogen limitation of 22 mg/L.
4. Your submittal describes sewage solids removed by screening, dewatered and disposed to landfill or composting facility. However, the report does not describe treatment to oxidize or reduce pathogens in these solids. We are unaware of composting facilities accepting such solids. Therefore, the solids

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must be disposed as septage, or if properly dried, at a landfill. Due to the shortage of septage disposal facilities in our region, we encourage treatment including oxidation and pathogen reduction to provide for long-term disposal and/or beneficial reuse of adequately treated biosolids.

5. Your submittal indicates potential for gravity overflows from the equalization basin to a short-term detention pond, lined with 40 ml vinyl and soil overlay. If untreated or partially treated wastewater is diverted to the detention pond, solids removal and cleaning will undoubtedly be needed. However, it is not clear how such cleanup will occur without damaging the pond liner. Also, it is not clear how the operator will know that waste has flowed into the emergency detention pond.
6. Emergency storage is provided in the pre- and post-screened equalization tanks and sludge tank. The report indicates that the combined capacity of these tanks exceeds 30,000 gallons, however at any given time the tanks are likely to be at least partially filled, leaving potentially little emergency storage capacity.
7. Chlorine residual of 5.5 mg/l is specified as the target performance criteria. What is the basis for such residual? Considering that the recycled water distribution system is very small, we believe it is not necessary to maintain such a high chlorine residual. A much lower chlorine residual should be sufficient to prevent regrowth of bacteria in the distribution system. Also, excess chlorine may contribute to unnecessary salts loading, trihalomethane generation and difficulty in accurately testing for coliform bacteria in the effluent.
8. The treatment facility is currently limited to 30,000 gpd of effluent flow. Your Facility Description indicates the capacity of the Cleanstream filters is 60,000 gpd. We are unclear as to whether this extra capacity is intended to accommodate short-term peaks in wastewater flow or if you are planning to increase the rated design capacity of the entire treatment process. Please clarify.
9. Statements in your submittal indicating Micromedia, Inc. as the responsible entity for treatment are incorrect. Monarch Grove HOA is and will remain the entity authorized and responsible for compliance with Waste Discharge Requirements Order No. R3-2002-0061. However, service agreements and/or operational contracts are at the discretion of the HOA.
10. The cover letter accompanying your August 25, 2004, submittal indicates the report documents improvements made to the existing water reuse facility in order to bring the facility into compliance. However, performance does not appear improved. In fact, recent monitoring reports reveal numerous turbidity violations in May, June and July 2004, in addition to violations summarized in our June 29, 2004 letter. Some of these violations are directly attributable to the Micromedia processes. **You must immediately take action to resolve noncompliance and cease discharging inadequately treated water to the golf course irrigation area.**

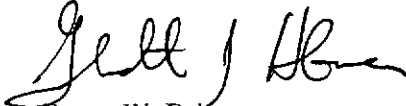
In summary, the information provided in your August 25, 2004, submittal is inadequate to address ongoing noncompliance and does not address a schedule for restoring compliance (required in our June 29, 2004 Notice of Violations). Please note that discharge of inadequately treated wastewater to the golf course irrigation pond is prohibited. Effluent not meeting requirements specified in Order No. R3-2004-0061 must be either recirculated for further treatment or hauled to an appropriate disposal facility.

The information described above is required in accordance with Section 13267 of the California Water Code. Failure to submit complete reports may subject you to further enforcement action, including the imposition of civil liability penalties up to \$1,000 per day for each day of non-compliance (in accordance with California Water Code Section 13268).



If you have questions regarding this matter, please call Sorrel Marks at 805/549-3695 or Gerhardt Hubner at 805/542-4647.

Sincerely,


Roger W. Briggs
Executive Officer

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