



Cambria Enforcement Items

Administrative Civil Liability Complaint

Item # 9 R3-2017-0015

and

Item # 10 Cease and Desist Order R3-2017-0016

Central Coast Regional Water Quality Control Board Meeting

July 13, 2017



Cambria



Project Location

Relative Locations

Advanced Water Treatment

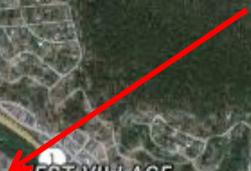


Hearst San Simeon State Park

Cambria State Marine Conservation Area

Hearst San Simeon State Park

WWTP



Moonstone Beach Park

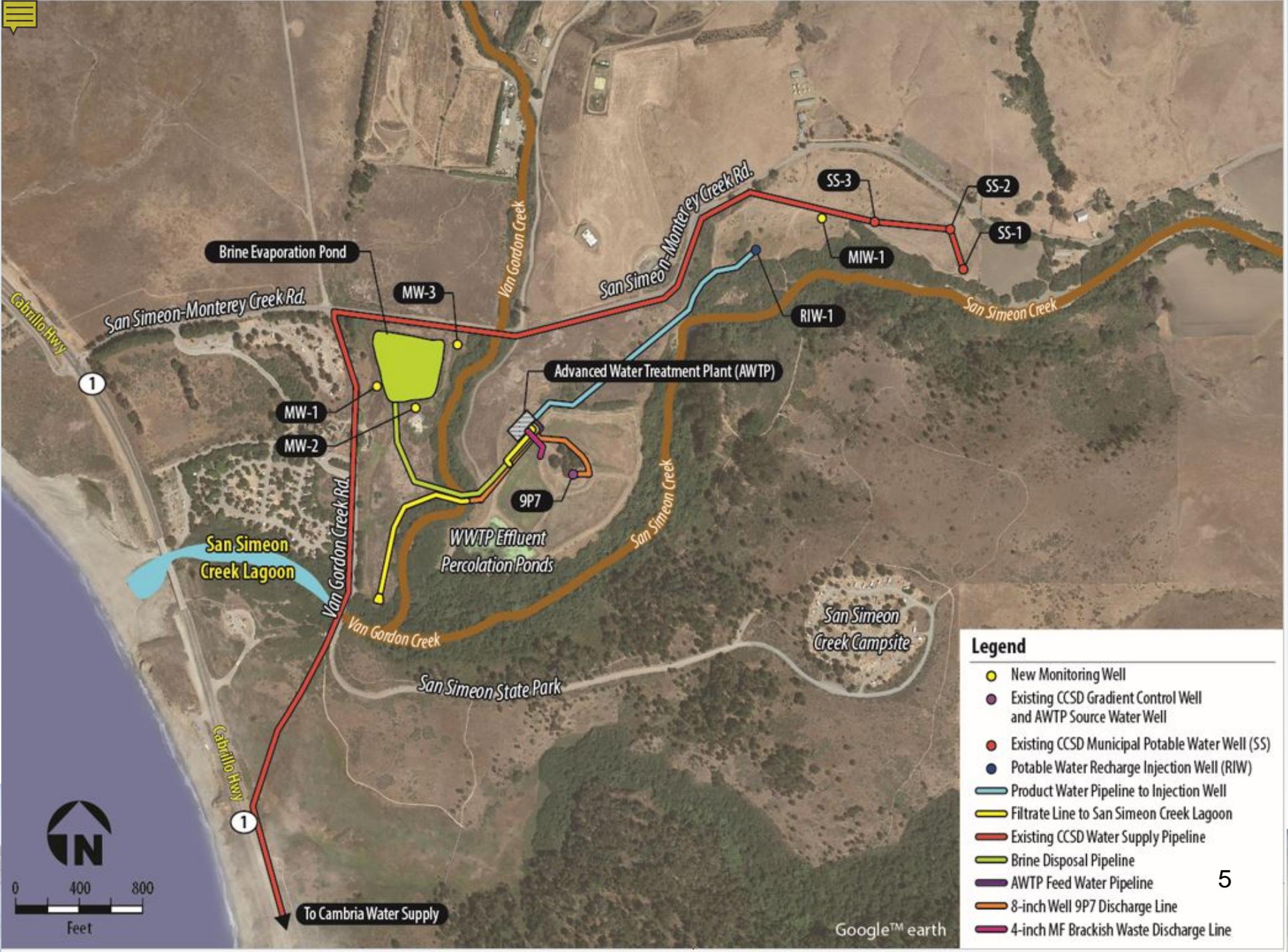
WEST VILLAGE



Advanced Treatment System

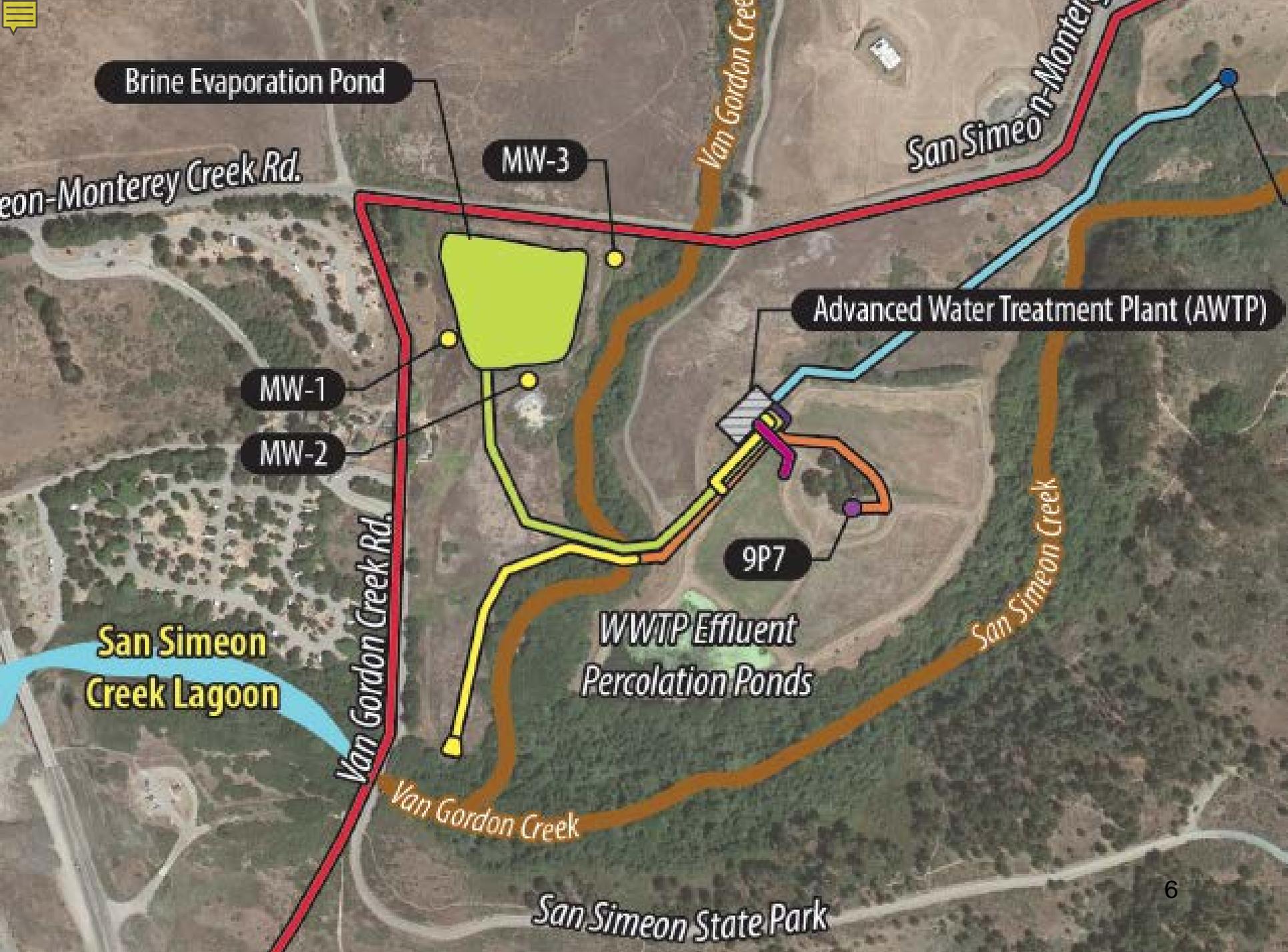


Designed to treat impaired groundwater to Title 22 standards and re-inject treated water into San Simeon well field aquifer



Legend

- New Monitoring Well
- Existing CCSD Gradient Control Well and AWTP Source Water Well
- Existing CCSD Municipal Potable Water Well (SS)
- Potable Water Recharge Injection Well (RIW)
- Product Water Pipeline to Injection Well
- Filtrate Line to San Simeon Creek Lagoon
- Existing CCSD Water Supply Pipeline
- Brine Disposal Pipeline
- AWTP Feed Water Pipeline
- 8-inch Well 9P7 Discharge Line
- 4-inch MF Brackish Waste Discharge Line



Brine Evaporation Pond

MW-3

Advanced Water Treatment Plant (AWTP)

MW-1

MW-2

9P7

WWTP Effluent Percolation Ponds

San Simeon Creek Lagoon

Van Gordon Creek Rd.

San Simeon-Monterey Creek Rd.

Van Gordon Creek

San Simeon Creek

Van Gordon Creek

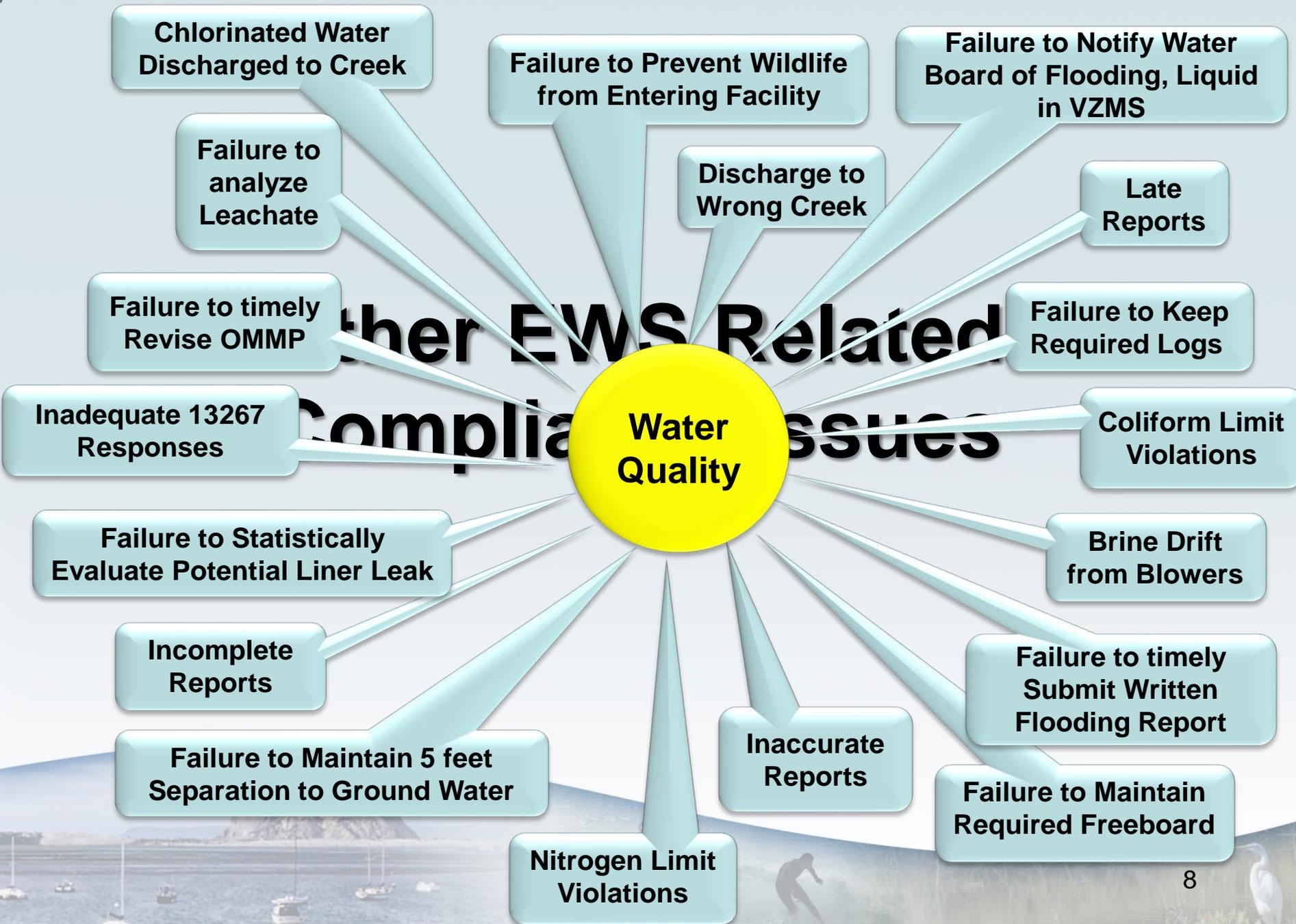
San Simeon State Park



Permits

- **Emergency Water Supply System Order (R3-2014-0050)**
- **Surface Impoundment Order (R3-2014-0047)**
- **Low Threat NPDES Order for Discharges to San Simeon Lagoon (R3-2011-0223)**





Progressive Enforcement Actions to Date



**NOV - Van Gordon
Creek Chlorinated
Water Discharge**

**13267
Letter #1**

**ACLC for
Discharges to Van
Gordon Creek**

**NOV - Failed to
Submit Effluent Limit
Data in Monthly SMR**

**Cease and Desist Order
for Surface Impoundment
ITEM #10**

**13267
Letter #2**

**NOV - Missing
Groundwater Data**

**NOV - Failed to submit 1st
semi-annual SMR On Time**

**ACLC for
Chronically Late
Reports
ITEM #9**

**NOV - Failed to Submit Complete
Response to 13267 #2**

**Failure to Adequately
Respond to 13267 Letter**

**NOV - for Chronic
Late Reporting**

**NOV - Failure to Notify Water Board
within 24-hours of Identifying Flooding**

**NOV - Failure to submit
Wet Weather Report on Time**



Item #9

Informational Item

**Cambria Community Services District
Administrative Civil Liability
Complaint No. R3-2017-0015**



Thea Tryon, Enforcement Coordinator

July 13-14, 2017



Complaint Overview

- **Limited enforcement**
- **Address violations of WDR Order No. R3-2014-0050 for chronic failure to submit reports on time**
- **Monitoring and reporting very important for protection of drinking water users**





Regular Reporting Requirements

- **WDR requires:**
 - Monthly Reports
 - Quarterly Reports
 - Annual Reports





Late Reports

(January 2015 – June 2017)

Report	Number of Reports Due	Number of Reports Late	Total Number of Days Late
Monthly	29	21	309
Quarterly	9	6	81
Annual	2	1	5





Water Board Staff Assistance

- **December 2014** - WDR review in field
- **January 2015** - System startup
- **October 2015** - Revised monitoring program
- **October 2016** - Spreadsheet
- **February 2017** - Notice of violation
- **April 2017** - Complaint





Complaint Overview

- **Criteria used to identify six late reports for enforcement:**
 - Monthly late reports
 - After October 2015 revision of monitoring program
 - System in operation





Penalty Amount

- **\$53,596**
- **Enforcement Policy penalty methodology**
- **Cambria CSD agreed not to contest Complaint and paid full amount and waived right to hearing on May 3, 2017**

Administrative Civil Liability Complaint No. R3-2017-0015

Comments?





Cease and Desist Order

Item # 10

Order No. R3-2014-0047

- **Applies to Surface Impoundment Only**
- **Two Major Design Flaws Identified During January Storms**
- **Flooding Began on January 8, 2017**
 - **Flooding reported to Water Board on January 9, 2017**
 - **Flooding not reported by CCSD until January 11, 2017**



01/11/2017



01/11/2017



02/17/2017



03/20/2017

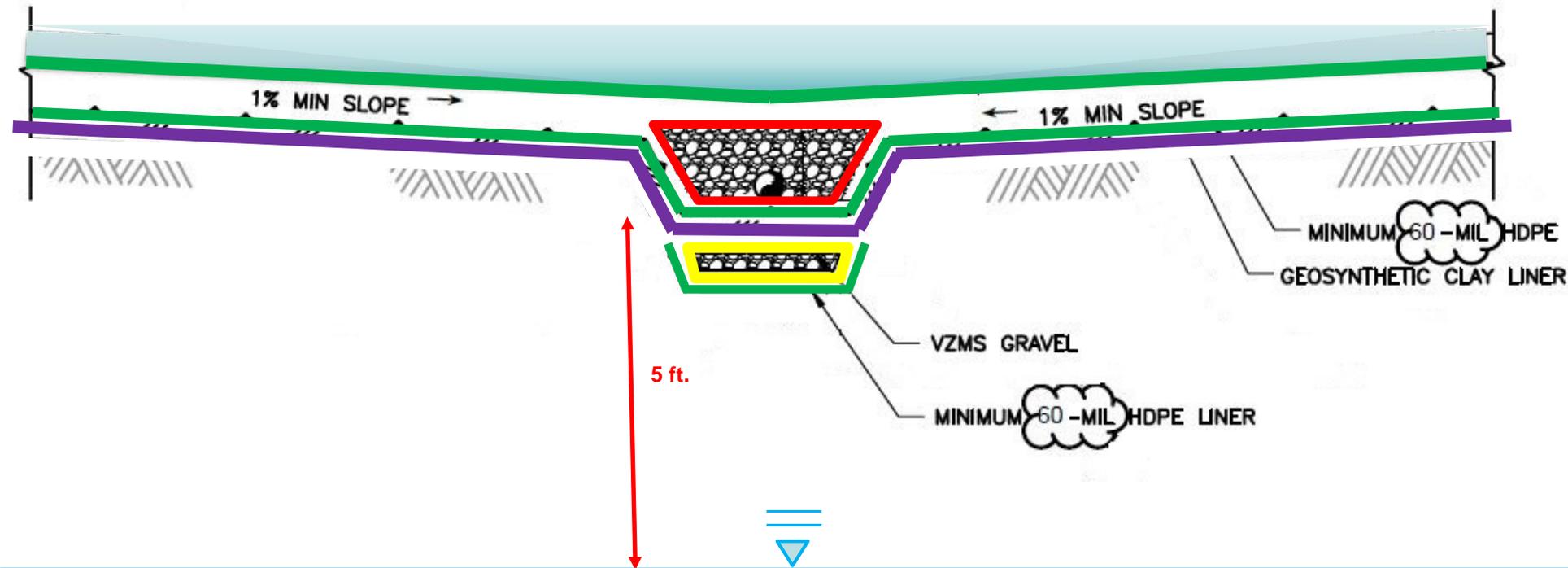


Impoundment Design Flaw #1

- **Liquid in the Vadose Zone Monitoring System (VZMS)**
 - **Water detected in VZMS on January 24 through March 7, 2017**



Surface Impoundment Liner System







Impoundment Design Flaw #1

The presence of liquid in the VZMS means either:

- 1) The liner is leaking; or**
- 2) Groundwater has infiltrated into VZMS**





Impoundment Design Flaw #2

- **Surface Impoundment designed to contain a 1,000-year 24-hour storm event**
 - Exceeded minimum freeboard on February 5, 2017 (34.2 inches required)
 - Design Report states:
“...there is no anticipated stormwater flow into the evaporation pond.”



Van Gordon Creek Road

Culvert

State Parks Owned Property

Approximate low spot in
San Simeon Creek Road

San Simeon Creek Road

Van Gordon Creek

North

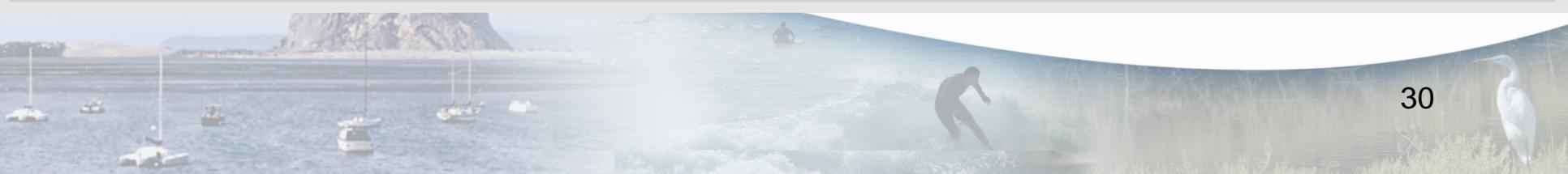
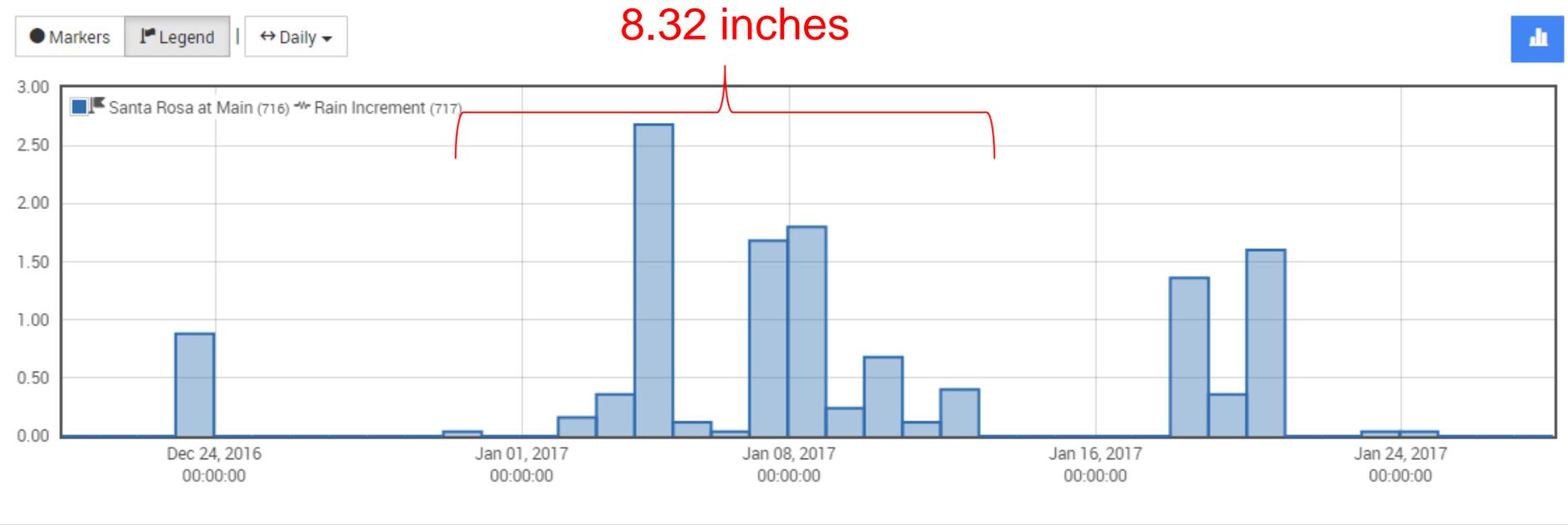
Daily Rainfall Data

(SLOCountyWater.org)

Santa Rosa at Main (716)

☁️ 0.00 in 🕒 about 7 hours ago

📅 December 20, 2016 - January 27, 2017 ▾





Culvert



02/17/2017



PLASTIC SHEET
PLASTIC SHEET
PLASTIC SHEET

NO TRESPASSING

02/17/2017



02/17/2017





02/17/2017



Overview of CDO

- **Two options for Surface Impoundment:**
 1. **Rehabilitate**
 2. **Discontinue use**
- **CCSD is not contesting the CDO as proposed**
- **CCSD plans to discontinue use**
- **CDO requires workplan within 30 days of adoption**



Removing Waste

- **Allowing liquids to evaporate is problematic**
 - Design evaporation rates predict approximately 11 years for liquid removal
 - Pollutant concentrations will increase over time
 - Wildlife attracted to increasingly polluted water
 - Facility would be continuously out of compliance with Title 27

On the Bottom





Comments

- **Many claim it will be prohibitively expensive to remove liquids other than evaporation**
 - **CCSD has not submitted their proposed work plan yet**
 - **Staff expects to work with CCSD to come up with the most effective methodology**
 - **Timing range of removal options**
 - **50 days to 10+ years**





Comments

- **Comments stating impoundment presents no threat to the environment or public health**
 - **Current impoundment contents exceed basin plan concentration limit for Boron**
 - **Selenium and other constituents have exceeded MCLs in the past**
 - **Attractive nuisance for wildlife**

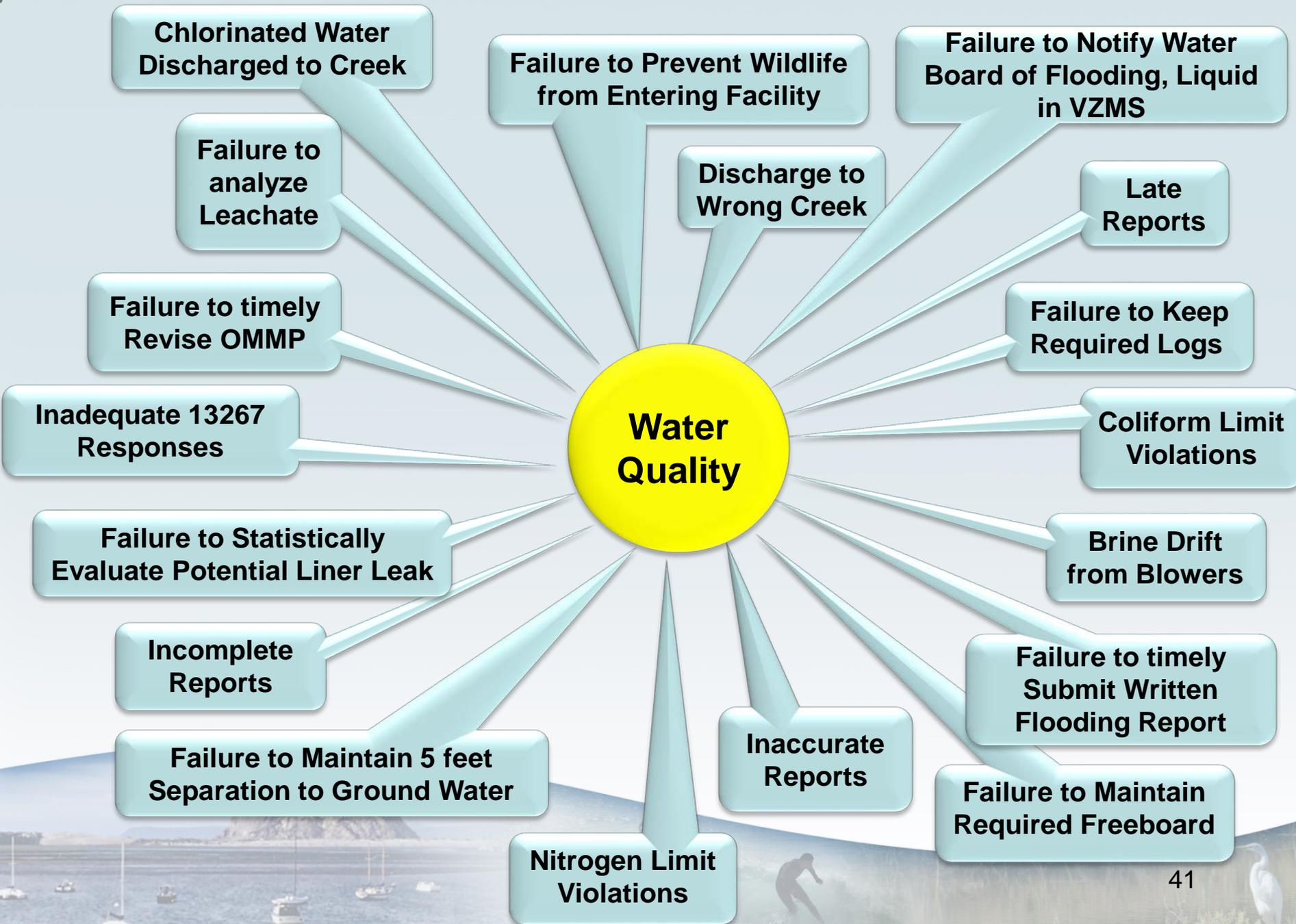




Comments

- **Comments stating that the proposed CDO is designed to punish CCSD and that previous violations were only for late reports**





Chlorinated Water Discharged to Creek

Failure to Prevent Wildlife from Entering Facility

Failure to Notify Water Board of Flooding, Liquid in VZMS

Failure to analyze Leachate

Discharge to Wrong Creek

Late Reports

Failure to timely Revise OMMP

Failure to Keep Required Logs

Inadequate 13267 Responses

Water Quality

Coliform Limit Violations

Failure to Statistically Evaluate Potential Liner Leak

Brine Drift from Blowers

Incomplete Reports

Failure to timely Submit Written Flooding Report

Failure to Maintain 5 feet Separation to Ground Water

Inaccurate Reports

Failure to Maintain Required Freeboard

Nitrogen Limit Violations



Staff Time Spent on CCSD Facilities Oversight

- **CCSD has consumed \cong 25 - 30% of my time since December 2015**
 - 255 hours/year
- **Typical Facility**
 - 8.25 hours/year/WDR



Conclusion

- **The Surface Impoundment is out of compliance with Title 27 requirements**
 - We now know that separation between the liner and groundwater will be less than 5 feet under certain conditions.
 - We should not allow CCSD to operate the impoundment in violation of the WDR.





Staff Recommends Adoption of Cease and Desist Order R3-2017-0016

QUESTIONS?

