## CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN DIEGO REGION



## SOUTH ORANGE COUNTY WASTEWATER AUTHORITY IS HEREBY GIVEN NOTICE THAT:

1. South Orange County Wastewater Authority (SOCWA) is alleged to have violated provisions of law for which the California Regional Water Quality Control Board, San Diego Region (Regional Board) may impose civil liability pursuant to Section 13385 of the California Water Code (CWC). The violations alleged herein include violations of effluent limitations in waste discharge requirements for discharges of pollutants from point sources to navigable waters for which the Regional Board must impose mandatory minimum penalties (MMP).
2. SOCWA owns and holds the NPDES permit for the San Juan Creek Ocean Outfall on behalf of all its member agencies (Order No. R9-2006-0054, NPDES No. CA0107417, Waste Discharge Requirement for the South Orange County Wastewater Authority, Discharge to the Pacific Ocean Via the San Juan Creek Ocean Outfall, Orange County). The South Coast Water District (SCWD) operates the Groundwater Recovery Facility and discharges brine to the San Juan Creek Ocean Outfall as a mémber agency under Order No. R9-2006-0054.
3. Treated effluent discharged from the SCWD Groundwater Recovery Facility into the Pacific Ocean through the San Juan Creek Ocean Outfall is subject to numeric effluent limitations contained in Order No. R9-2006-0054.
4. Every violation of an NPDES permit is subject to discretionary liability under CWC section $13385(\mathrm{a})(2)$, and certain violations are subject to MMPs under CWC sections 13385(h) or (i).
5. CWC section $13385(\mathrm{~h})$ requires that an MMP of $\$ 3,000$ be imposed for each serious violation. CWC section 13385 subdivision (h)(2) defines a 'serious' violation as any waste discharge that violates an effluent limitation contained in waste discharge requirements (applying to surface water discharges) for a Group I pollutant by 40 percent or more or for a Group II pollutant by 20 percent or more.
6. CWC section 13385 (i) requires that an MMP of $\$ 3,000$ be imposed for each violation (i.e. any waste discharge that violates an effluent limitation contained in waste discharge requirements) beginning with the fourth violation in any sixmonth period.
7. On February 26, 2008, the Regional Board issued a Notice of Violation to SOCWA for violations of Order No. R9-2006-0054 occurring between October 2007 and December 2007, including eight violations of effluent limitations from the SCWD Groundwater Recovery Facility.
8. On August 14, 2008, the Regional Board issued ACL Complaint No. R9-2008-0093 with MMPs to SOCWA for nineteen violations of effluent limitations from the SCWD Groundwater Recovery Facility that occurred from August 2007 through March 2008. The Complaint was withdrawn on October 6, 2008 by the Regional Board with the stated intent to reissue a Complaint with additional MMPs after review of subsequent monitoring reports and an expected operational resolution to ongoing violations.
9. On December 30, 2008, SOCWA notified the Regional Board that the SCWD's Groundwater Recovery Facility began discharging its brine wastewater to the sanitary sewer in November 2008, rather than directly to the San Juan Creek Ocean Outfall.

## ALLEGATIONS

10. Effluent Limitation Violations. SOCWA has reported, pursuant to the Monitoring and Reporting schedule for Order No. R9-2006-0054, effluent sampling results that document violations of effluent limitations prescribed by Order No. R9-2006-0054. Pursuant to CWC section 13385 subdivisions (h) and (i), sixty eight (68) reported effluent violations are subject to MMPs as described in Attachment 1, Calculation of Mandatory Minimum Penalties Based on Reported Monitoring Results from August 2007 through December 2008.
11. Fifty eight of the alleged violations subject to MMPs are considered serious violations pursuant to CWC Section 13385(h). Ten other alleged violations subject to the chronic MMPs provisions of CWC Section 13385 (i) because they represent more than the third effluent limitation violation within a six month period, but do not exceed the respective effluent limitation enough to be considered an MMP pursuant to CWC Section 13385(h).

## PROPOSED CIVIL LIABILITY

12. Pursuant to CWC section 13385(h), the Regional Board must impose mandatory minimum penalties in the amount of two hundred one thousand $(\$ 204,000)$ on the South Orange County Wastewater Authority. Discretionary civil liability above the mandatory minimum for effluent violations alleged in this Complaint is not recommended.

Dated this 27th day of February 2009

## BY THE EXECUTIVE OFFICER



## Attachments:

1. Calculation of Mandatory Minimum Penalties Based on Reported Monitoring Results from August 2007 through December 2008.
2. Excerpted Monitoring Report Pages from August 2007 through December 2008.

CIWQS Entries:
Reg Msr: 360847
Related Reg Msr (NPDES): 309059
Place ID: 704670
Party ID: 41388
Violations: 660728, 689220, 689715, 689237, 689307, 689310, 689267, 689282, 698165, 715317, $715322,715281,754137,724233,724234,724195,724241,755310,755198,755317,805397,805277$, 805281, $805283,805285,805286,805288,805290,805330,805332,805795,805819,805797,805799$, $805803,805804,805806,805842,805843,805824,805825,805844,805827,805823,805833,805838$, $805836,805826,805835,805832,805820,805821,805822,805828,805824,805829,805831,805813$, $805814,805815,805817,805818,805812,805810,805808,805805,805802,805796,805793$.

## Attachment 1: Calculation of Mandatory Minimum Penalties Based on Reported Monitoring Results from August 2007 through December 2008.

Calculation of Mandatory Minimum Penalties Based on Reported Monitoring Results
from August 2007 through December 2008


| Violation Date | Violation ID | Constituent | Effluent Limitation | Unit | Permitted Limit | Reported Value | Serious <br> Violation | Mandatory Minimum Penaltyil |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 6/6/2008 | 805824 | TSS | average monthly | mg/L | 60 | 135.0 | yes | \$3,000 |
|  | 805825 | turbidity | instantaneous max | NTU | 225 | 381.0 | yes | \$3,000 |
|  | 805844 | turbidity | average weekly | NTU | 100 | 381.0 | yes | \$3,000 |
|  | 805827 | turbidity | average monthly | NTU | 75 | 381.0 | yes | \$3,000 |
|  |  |  |  |  |  |  |  |  |
| 7/31/2008 | 805823 | TSS | average monthly | $\mathrm{mg} / \mathrm{L}$ | 60 | 131.0 | yes | \$3,000 |
|  | 805833 | turbidity | instantaneous max | NTU | 225 | 314.0 | no | \$3,000 |
|  | 805838 | turbidity | average weekly | NTU | 100 | 314.0 | yes | \$3,000 |
|  | 805836 | turbidity | average monthly | NTU | 75 | 314.0 | yes | \$3,000 |
|  | 805826 | SS | instantaneous max | $\mathrm{ml} / \mathrm{L}$ | 3.0 | 4.9 | yes | \$3,000 |
|  | 805835 | SS | average weekly | $\mathrm{ml} / \mathrm{L}$ | 1.5 | 4.9 | yes | \$3,000 |
|  | 805832 | SS | average monthly | $\mathrm{ml} / \mathrm{L}$ | 1.0 | 4.9 | yes | \$3,000 |
|  |  |  |  |  |  |  |  |  |
| 8/27/2008 | 805820 | TSS | average monthly | $\mathrm{mg} / \mathrm{L}$ | 60 | 130.0 | yes | \$3,000 |
|  | 805821 | turbidity | instantaneous max | NTU | 225 | 348.0 | yes | \$3,000 |
|  | 805822 | turbidity | average weekly | NTU | 100 | 348.0 | yes | \$3,000 |
|  | 805828 | turbidity | average monthly | NTU | 75 | 348.0 | yes | \$3,000 |
|  | 805824 | SS | instantaneous max | $\mathrm{ml} / \mathrm{L}$ | 3.0 | 7.5 | yes | \$3,000 |
|  | 805829 | SS | average weekly | $\mathrm{ml} / \mathrm{L}$ | 1.5 | 7.5 | yes | \$3,000 |
|  | 805831 | SS | average monthly | $\mathrm{ml} / \mathrm{L}$ | 1.0 | 7.5 | yes | \$3,000 |
|  |  |  |  |  |  |  |  |  |
| 9/30/2008 | 805813 | TSS | average monthly | $\mathrm{mg} / \mathrm{L}$ | 60 | 232.0 | yes | \$3,000 |
|  | 805814 | turbidity | instantaneous max | NTU | 225 | 480.0 | yes | \$3,000 |
|  | 805815 | turbidity | average weekly | NTU | 100 | 480.0 | yes | \$3,000 |
|  | 805817 | turbidity | average monthly | NTU | 75 | 480.0 | yes | \$3,000 |
|  | 805818 | SS | average monthly | $\mathrm{ml} / \mathrm{L}$ | 1.0 | 1.3 | no | \$3,000 |
|  |  |  |  |  |  |  |  |  |
| 10/15/2008 | 805812 | TSS | average monthly | mg/L | 60 | 211.0 | yes | \$3,000 |
|  | 805810 | turbidity | . instantaneous max | NTU | 225 | 422.0 | yes | \$3,000 |
|  | 805808 | turbidity | average weekly | NTU | 100 | 422.0 | yes | \$3,000 |
|  | 805805 | turbidity | average monthly | NTU | 75 | 422.0 | yes | \$3,000 |
|  | 805802 | SS | instantaneous max | $\mathrm{ml/L}$ | 3.0 | 9.7 | yes | \$3,000 |
|  | 805796 | SS | average weekly | $\mathrm{ml/L}$ | 1.5 | 9.7 | yes | \$3,000 |
|  | 805793 | SS | average monthly | $\mathrm{ml} / \mathrm{L}$ | 1.0 | 9.7 | yes | \$3,000 |
|  |  |  |  |  |  | Total MMP Liability |  | \$204,000 |

i. TSS $=$ Total Suspended Solids; SS $=$ Settleable Solids
ii. CWC Section $13385(\mathrm{~h})(1)$ requires that an MMP of $\$ 3,000$ be imposed for each serious violation. A serious violation occurs when the discharge exceeds Group I effluent limitations by 40 percent or more or Group II effluent limitations by 20 percent or more. TSS, settleable solids, and turbidity are Group I pollutants.
iii. MMPs are required for Serious violations (CWC Sec. 13385(h) and for the fourth and subsequent effluent limitation violation in any six month period (CWC Section 13385(h)).

## Attachment 2: Excerpted Monitoring Report Pages from August 2007 through December 2008.

South Orange County Wastewater Authority
September 27, 2007
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123
SUBJECT: AUGUST 2007 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:
Five permit limits were exceeded at the South Coast Water District Groundwater Recovery Facility, monitoring location M-001F. The facility started preliminary test operations August 1 , 2007. During this testing period, all RO brine, filter backwash, and product water was discharged to the San Juan Creek Ocean Outfall. The required monthly monitoring was performed on the discharge. The monthly average limits for suspended and settleable soiids were both exceeded. All three turbidity limits were also excceded. The South Coast Water District (SCWD) believes the sampling methodology used to collect the August monthiy composite sample was in error. A review of the Groundwater Recovery System indicates that a more representative sample may be obtained from a standpipe which receives all of the component flows prior to discharge to the Chiquita Land Outfall. The August test results are substantially higher than the feed water from the source well. A sample station will be established at the standpipe where the flows are more homogeneous. SCWD has also indicated that they will conduct more frequent sampling during the month.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process has been extended to December 2007.

All bacterial objectives, except one total coliform single sample maximum, were exceeded at surfzone monitoring station C . Single sample fecal coliform objectives were exceeded twice at S15 and once at S19. Single sample enterococcus objectives were exceeded once at S3 and six times at S 15 ; the 30 -day geometric mean objective was also exceeded at S 15 . These sites are located in or adjacent to large urban runoff channels. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances. At no time during August was there any surface water at Upper San Juan Creek monitoring station C2.

Section V.A. calls for calculation of a 30-day geometric mean using the five most recent samples from each surfzone monitoring site. Because Order R9-2006-0054 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30 day mean.

Sincerely,

## SOUTH ORANGE COUNTY WASTEWATER AUTHORITY



Thomas R. Rosales
General Manager

MRP R9-2006-0054 MONTHLY MONITORING REPORT
South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: August 2007
REPORT DUE: October 012007
AMPLE SOURCE: SCWD GRF Brine/Backwash/Product

Page 12 of 32
NPDES No. CA0107417

SAMPLED BY: ECO Resources
ANALYZED BY: Sierra Analytical

SAMPLE POINT:M-001F

|  | Flow | Suspended <br> Solids | Turbidity | Oil \& Grease | pH | Settleable <br> Solids |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Sample Type |  | $24-\mathrm{HC}$ | $24-\mathrm{HC}$ | Grab | Grab | Grab |
|  |  |  |  |  |  |  |
| Method | Meter | EPA 160.2 | EPA 180.1 | EPA 413.1 | EPA 150.1 | EPA 160.5 |
| Units | MGD | $\mathrm{mg} / \mathrm{L}$ | NTU | $\mathrm{mg} / \mathrm{L}$ | Standard Units | $\mathrm{mI/L}$ |
| Mo. Avg. Limit |  | 60 | 75 | 25 | 6.0 to.9.0 | 1.0 |



South Orange County Wastewater Authority
October 29, 2007
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123
SUBJECT: SEPTEMBER 2007 SUMMARY OF MONITORING OF ORDER NO. R9-20060054, NPDES NO. CA0107417

Dear Mr. Robertus:
There were six exceedences of Order R9-2006-0054 effluent limits during October.
One settleable solids analysis at the Santa Margarita Water District Chiquita Water Reclamation Plant, monitoring location $\mathrm{M}-001 \mathrm{~B}$, had a value of $4.0 \mathrm{ml} / \mathrm{L}$; the instantaneous maximum limit is $3.0 \mathrm{mi} / \mathrm{L}$. Bob Jordan, Water Quality Manger for SMWD, notified Joann Cofrancesco of the violation on September $19^{\text {th }}$; the cause of the high result is unknown.

Five permit limits were exceeded at the South Coast Water District Groundwater Recovery Facility, monitoring location M-001F. The facility discharged RO brine, filter backwash, and product water to the San Juan Creek Ocean Outfall. The monitoring results from the facility exceed the settleable solids instantaneous limit, and the weekly and monthly average settleable solids and turbidity limits. Since the samples were collected, SCWD has redesigned the sampling location in order to obtain what they believe will be samples more representative of the discharge. The plant has been off-line since the change to the sampling location.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is December 2007.

All bacterial objectives, except one total coliform single sample maximum, were exceeded at surfzone monitoring station C1. The C2 site was dry for the first three weeks of monitoring ; two samples collected the last week of the month exceeded all bacterial objectives. Single sample fecal coliform objectives were exceeded S0, S1, S2, S3 and S5. Single sample enterococcus objectives were exceeded at $\mathrm{S} 0, \mathrm{~S} 1, \mathrm{~S} 2, \mathrm{~S} 3 \mathrm{~S} 5, \mathrm{~S} 7, \mathrm{~S} 9, \mathrm{~S} 11$, and S 15 ; the 30 -day geometric mean objective was also exceeded at S 15 . These sites are located in or adjacent to urban runoff channels. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Section V.A. calls for calculation of a 30 -day geometric mean using the five most recent samples from each surfzone monitoring site. Because Order R9-2006-0054 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30 day mean.

Sincerely,
SOUTH ORANGE COUNTY WASTEWATER AUTHORITY


Thomas R. Rosales
General Manager
34156 Del Obispo Street • Dana Point, CA 92629 • Phone: (949) 234-5400 • Fax: (949) 489-0130 • Website: ww.w.socwa.com

MRP R9-2006-0054 MONTHLY MONITORING REPORT

South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: September 2007
REPORT DUE: November 012007
AMPLE SOURCE: SCWD GRF Brine/Backwash/Product

Page 12 of 32
NPDES No. CA0107417
SAMPLED BY: ECO Resources
ANALYZED BY: Sierra Analytical

SAMPLE POINT:M-001F

|  | Flow | Suspended <br> Solids | Turbidity | Oil \& Grease |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  | SH | Settieable |
| Solids |  |  |  |  |  |  |


| Sep-01 | 1.14 |
| :--- | :--- |
| Sep-02 | 1.14 |
| Sep-03 | 1.14 |


| Sep-03 | 1.14 |
| :--- | :--- |
| Sep-04 | 1.14 |

Sep-05 1.14
Sep-06 1.14
Sep-07 1.14
Sep-08 1.14

| Sep-09 | 1.14 |
| :--- | :--- |
| Sep-10 | 1.14 |

Sep-11 0.90
Sep-12 1.14
Sep-13 0.33
Sep-14 0.00
Sep-15 0.00

Sep-16 0.00
Sep-17 0.57

Sep-18 1.14
Sep-19 1.14
Sep-20 1.14
Sep-21 1.14
Sep-22 1.14
Sep-23 1.14
Sep-24 1.14
Sep-25 0.46

| Sep-26 | 0.79 | 73.0 | 204 |  |  |  |
| :--- | :--- | :--- | :---: | :---: | :---: | :---: |
| Sep-27 | 1.14 | 35.0 | 141 | 2.6 | 7.11 | 3.2 |
| Sep-28 | 0.94 |  |  |  |  |  |
| Sep-29 | 0.94 |  |  | 1.4 |  | 0.2 |
| Sep-30 | 0.94 |  | $<2.0$ | 7.42 | $<0.1$ |  |


| Monthly Average | 0.92 | 54.00 | 173 | 1.33 | 7.27 | 1.1 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |

Comments: The facility is discharging RO Brine, filter backwash, and product water to the SJCOO.

South Orange County Wastewater Authority


November 27, 2007

John H. Robertus

California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

## SUBJECT: OCTOBER 2007 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:
There was one exceedence of Order R9-2006-0054 effluent limits during October.
All three total suspended solids analyses performed on the South Coast Water District Groundwater Recovery Facility 24 -hour composite effluent exceeded the monthly average limit of $60 \mathrm{mg} / \mathrm{L}$. The facility discharged RO brine, filter backwash, and product water to the San Juan Creek Ocean Outfall.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is December 2007.

The total coliform single sample maximum objective was exceeded once at surfzone monitoring site S 1 and six times at Cl . The 30 -day mean total coliform objective was exceeded at Cl and C 2 . The fecal coliform single sample maximum objective was exceeded once at surfzone monitoring sites $\mathrm{S} 2, \mathrm{~S} 17$ and C 2 , twice at S 0 and S 15 , and ten times at C 1 . The 30 -day mean fecal coliform objective was exceeded at Cl and C 2 . The enterococcus single sample maximum objective was exceeded once at surfzone monitoring sites S 3 and S 9 , twice at $\mathrm{S} 1, \mathrm{~S} 9$, and S 17 , three times at $\mathrm{S} 2, \mathrm{~S} 13$, and C 2 , four times at S 0 , seven times at S 15 , and ten times at C 1 . The 30 -day mean enterococcus objective was exceeded at $\mathrm{S} 0, \mathrm{~S} 2, \mathrm{~S} 13, \mathrm{~S} 15, \mathrm{C} 1$, and C 2 . Upper San Juan Creek was dry for the seven of the ten sampling days in October, so only three samples were collected at C 2 . These sites are located in or adjacent to urban runoff channels. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Section V.A. calls for calculation of a 30 -day geometric mean using the five most recent samples from each surfzone monitoring site. Because Order R9-2006-0054 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30 day mean.

Sincerely,
SOUTH ORANGE COUNTY WASTEWATER AUTHORITY


Thomas R. Rosales
General Manager

MRP R9-2006-0054 MONTHLY MONITORING REPORT
South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: October 2007
REPORT DUE: 1-Dec-07
AMPLE SOURCE: SCWD GRF Brine/Backwash/Product

Page 12 of 34
NPDES No. CA0107417
SAMPLED BY: ECO Resources
ANALYZED BY: Sierra Analytical
SAMPLE POINT: M-001F

|  | Flow | Suspended <br> Solids | Turbidity | Oil \& Grease | pH | Settleable |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Solids |  |  |  |  |  |  |

Comments: The facility began start-up operations with all RO Brine, filter backwash, and product water being discharged to the SJCOO.

South Orange County Wastewater Authority

December 27, 2007
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky. Park Court, Suite 100.
San Diego, CA. 92123
SUBJECT: NOVEMBER 2007 SUMMARY OF MONITORING OF ORDER NO. R9-20060054, NPDES NO. CA0107417

Dear Mr. Robertus:
There were ten exceedences of Order R9-2006-0054 effluent limits during November 2007.
The discharge at site M-001F, the South Coast Water District Groundwater Recovery Facility, exceeded the monthly average total suspended solids limit of $60 \mathrm{mg} / \mathrm{L}$. One of two turbidity results exceeded the instantaneous maximum limit, causing the weekly and monthly average turbidity limits to also be exceeded.

Three settleable solids results exceeded the instantaneous maximum limit at discharge site M001 D , the City of San Clemente RP; these high values caused 2 weekly average and one monthly average limit exceedences.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process has been pushed back to March 2008.

The total coliform single sample maximum objective was exceeded twice at surfzone monitoring site C 1 ; the 30 -day mean total coliform objective was exceeded at Cl and C 2 . The fecal coliform single sample maximum objective was exceeded once at surfzone monitoring sites S 2 and $\mathrm{S}!9$, twice at C 2 , and four times at Cl . The 30 -day mean fecal coliform objective was exceeded at $\mathrm{S} 15, \mathrm{C} 1$ and C 2 . One or both of the enterococcus bacterial objectives were exceeded at least once at all sites except $\$ 4, \mathrm{~S}$, and $\$ 23$. Upper San Juan Creek was dry for two of the four sampling days in November. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

## SOUTH ORANGE COUNTY WASTEWATER AUTHORITY



Assistant General Manager


South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: November 2007
REPORT DUE: January 10, 2008
SAMPLE SOURCE: SCWD GRF Brine/Backwash/Product

NPDES No. CA0107417
SAMPLED BY: ECO Resources
ANALYZED BY: Sierra Analytical
SAMPLE POINT: M-001F

|  | $\begin{array}{c}\text { Suspended } \\ \text { Solids }\end{array}$ |  |  | Turbidity | Oil \& Grease | pH |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | \(\left.\begin{array}{c}Settleable <br>

Solids\end{array}\right]\).

Nov-01 0.71
Nov-02 0.28
Nov-03
Nov-04
Nov-05 0.61
Nov-06 0.56
Nov-07 0.56
Nov-08 1.13
Nov-09 0.71
Nov-10
Nov-11
Nov-12
Nov-13 0.65
Nov-14 1.13
Nov-15 1.13
Nov-16 0.71
Nov-17
Nov-18
Nov-19 0.56
Nov-20
$\begin{array}{lllllll}\text { Nov-21 } & 0.61 & 124 & 273 & 1.3 & 7.18 & 0\end{array}$
Nov-22
Nov-23
Nov-24
Nov-25
Nov-26 0.61
Nov-27
$\begin{array}{llll}\text { Nov-28 } & 0.33 & 15.7 & 29.6\end{array}$
Nov-29
Nov-30
Monthly Average
Comments: The facility is in start-up operations
discharged to the SJCOO .

South Orange County Wastewater Authority

January 24, 2008
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123
SUBJECT: DECEMBER 2007 SUMMARY OF MONITORING OF ORDER NO. R9-20060054, NPDES NO. CA0107417

Dear Mr. Robertus:
There were five exceedances of Order R9-2006-0054 effluent limits during December 2007.
The maximum daily Chronic Toxicity limit was exceeded at discharge site M-001 on December 10,2007 . SOCWA was not notified of the exceedance by the contract laboratory performing the analysis until January $15^{\text {th }}$. The regular monthly toxicity sample for January was sent on $1 / 14 / 08$; a second sample, as required in the NPDES permit, was sent on 1/22/08.

There were four limits exceeded at discharge site M-001F, the South Coast Water District Groundwater Recovery Facility. The monthly average total suspended solids limit and instantaneous maximum, weekly average and monthly average turbidity limits were exceeded.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is March 2008.

The total coliform single sample maximum objective was exceeded at Cl ; the 30 -day geometric mean objective was exceeded at both Cl and C 2 . The fecal coliform single sample maximum was exceeded at surfzone sites $\mathrm{S} 2, \mathrm{C} 1$, and $\mathrm{C} 2 ; \mathrm{C} 1$ and C 2 also exceeded the 30 -day geometric mean objective. The enterococcus daily maximum and 30 -day geometric mean objectives were exceeded at $\mathrm{S} 0, \mathrm{~S} 1, \mathrm{~S} 2, \mathrm{~S} 3, \mathrm{~S}, \mathrm{~S} 7, \mathrm{~S} 15, \mathrm{~S} 17, \mathrm{C} 1$ and C . There were several days of heavy rainfall during December which increased urban runoff to the monitoring sites. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

## SOUTH ORANGE GOUNTY WASTEWATER AUTHORITY



Thomas R. Rosales
General Manager

South Orange County Wastewater Authority

DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: December 2007
REPORT DUE: January 10, 2008
SAMPLE SOURCE: SCWD GRF Brine/Backwash

Page 12 of 28

NPDES No. CA0107417
SAMPLED BY: - Operator
ANALYZED BY: Sierra Analytical
SAMPLE POINT: M-001F

|  | Flow | Suspended <br> Solids | Turbidity | Oil \& Grease | pH | Settleable |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Solids |  |  |  |  |  |  |

Dec-01
Dec-02
Dec-03 0.23
Dec-04 0.23
Dec-05 0.23
Dec-06 0.23
Dec-07 0.23
Dec-08
Dec-09
Dec-10 0.23
Dec-11 0.23
Dec-12
Dec-13
Dec-14 0.05
Dec-15
Dec-16
Dec-17 0.08
Dec-18 0.23
Dec-19 0.23
Dec-20 0.23
$\begin{array}{lllllll}\text { Dec-21 } & 0.23 & 114.0 & 393 & 0 & 6.47 & 0.8\end{array}$
Dec-22
Dec-23
Dec-24
Dec-25
Dec-26 0.23
Dec-27 0.23
Dec-28 0.23
Dec-29
Dec-30
Dec-31

| Monthly Average | 0.21 | 114.0 | 393 | 0 | 6.47 | 0.8 |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |

Comments:

South Orange County Wastewater Authority

February 27, 2008
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

## SUBJECT: JANUARY 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:
There were two monitoring violations of Order R9-2006-0054 during January 2008.
In response to the Chronic Toxicity limit exceedance at site M-001 on December 10, 2007, two samples were collected and analyzed in January. The results of both samples were within acceptable limits and included in this report. Regular monthly testing was resumed in February.
There were two monitoring violations at discharge site M-001F, the South Coast Water District Groundwater Recovery Facility during January 2008. The total suspended solids and turbidity concentrations could not be determined due to inadequate sampling and analyses. All of the component flow streams which contribute to the total brine effluent were not analyzed concurrently making it impossible to provide flow weighted averages for these constituents.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is March 2008.

The total coliform single sample maximum objective was exceeded at Cl ; the 30 -day geometric mean objective was exceeded at both Cl and C 2 . The fecal coliform single sample maximum was exceeded at surfzone sites $\mathrm{S} 0, \mathrm{~S} 2, \mathrm{~S} 17, \mathrm{Cl}$, and $\mathrm{C} 2 ; \mathrm{S} 0, \mathrm{~S} 2, \mathrm{C} 1$ and C 2 also exceeded the 30 -day geometric mean objective. The enterococcus daily maximum and 30 -day geometric mean objectives were exceeded at all sites except $\mathrm{S} 6, \mathrm{~S} 21$, and S 23 . There were several days of heavy rainfall during January which increased urban runoff to the monitoring sites. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,
SOUTH ORANGE COUNTY WASTEWATER AUTHORITY


Thomas R. Rosales
General Manager

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South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: January 2008
REPORT DUE: February 10, 2008
SAMPLE SOURCE: SCWD GRF Brine/Backwash

|  | Flow | Suspended <br> Solids <br> $24-H C$ | Turbidity <br> $24-H C$ | Oil \& Grease <br> Grab | pH <br> Grab | Settleable <br> Solids <br> Grab |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Sample Type |  |  |  |  |  |  |
| Method | Meter | EPA 160.2 | EPA 180.1 | EPA 413.1 | EPA 150.1 | EPA 160.5 |
| Units | MGD | $\mathrm{mg} / \mathrm{L}$ | NTU | $\mathrm{mg} / \mathrm{L}$ | Standard Units | $\mathrm{ml} / \mathrm{L}$ |
| Mo. Avg. Limit |  | 60 | 75 | 25 | 6.0 to 9.0 | 1.0 |

Jan-01
Jan-02 0.08
Jan-03 0.08
Jan-04 0.08
Jan-05
Jan-06

| Jan-07 | 0.08 | 1.4 | 6.92 | 0.2 |
| :--- | :--- | :--- | :--- | :--- |

Jan-08
Jan-09 0.08
Jan-10 0.08
Jan-11 0.08
Jan-12
Jan-13
Jan-14 0.08
Jan-15
Jan-16 : 0.08
Jan-17 0.08
Jan-18 0.08
Jan-19
Jan-20
Jan-21 - 0.08
Jan-22 0.08
Jan-23 0.08
Jan-24 0.08
Jan-25 0.08
Jan-26
Jan-27
Jan-28 0.08
Jan-29 0.08
$\begin{array}{lllll}\text { Jan-30 } & 0.007 & 1.3 & 6.87 & 0.1\end{array}$
Jan-31 0.08

NPDES No. CA0107417
SAMPLED BY: Operator
ANALYZED BY: Lab

SAMPLE POINT: M-001F

South Orange County Wastewater Authority

March 24, 2008
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123
SUBJECT: FEBRUARY 2008 SUMMARY OF MONITORING OF ORDER NO. R9-20060054, NPDES NO. CA0107417

Dear Mr. Robertus:
There were five monitoring violations of Order R9-2006-0054 during February 2008.
No samples representative of the entire waste stream to the outfall were collected at discharge site M-001F, the South Coast Water District Groundwater Recovery Facility, during February 2008. Results of analyses shown on page twelve are from composite and grab samples of the RO Brine Reject, one component of the facilities discharge.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is March 2008.

The total coliform single sample maximum objective was exceeded at C 1 and C 2 ; the 30 -day geometric mean objective was exceeded at $\mathrm{S} 0, \mathrm{C} 1$ and C 2 . The fecal coliform single sample maximum was exceeded at surfzone sites $\mathrm{S} 0, \mathrm{~S} 2, \mathrm{Cl}$ and $\mathrm{C} 2 ; \mathrm{Cl}$ and C 2 also exceeded the 30 day geometric mean objective. The enterococcus daily maximum and 30 -day geometric mean objectives were exceeded at $\mathrm{S} 0, \mathrm{~S} 1, \mathrm{~S} 2, \mathrm{~S} 3, \mathrm{~S} 5, \mathrm{~S} 7, \mathrm{~S} 9, \mathrm{~S} 11, \mathrm{~S} 13, \mathrm{~S} 15, \mathrm{~S} 17, \mathrm{~S} 19, \mathrm{~S} 21, \mathrm{Cl}$ and CZ; S 4 exceeded the enterococcus single sample limit once. There were several days of heavy rainfall during February which increased urban runoff to the monitoring sites. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,
SOUTH ORANGE COUNTY WASTEWATER AUTHORITY


Thomas R. Rosales
General Manager

MRP R9-2006-0054 MONTHLY MONITORING REPORT
South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: February 2008
REPORT DUE: April 01, 2008
SAMPLE SOURCE: SCWD GRF Brine/Backwash/Product

Page 12 of 28
NPDES No. CA0107417
SAMPLED BY: ECO Resources ANALYZED BY: Sierra Analytical

SAMPLE POINT: M-001F

|  | Flow | Suspended Solids | Turbidity | Oil \& Grease | pH | Settleable Solids |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Sample Type |  | 24-HC | 24-HC | Grab | Grab | Grab |
| Method Units | Meter MGD | $\begin{gathered} \text { EPA } 160.2 \\ \mathrm{mg} / \mathrm{L} \end{gathered}$ | $\begin{gathered} \text { EPA } 180.1 \\ \text { NTU } \end{gathered}$ | $\begin{gathered} \text { EPA } 413.1 \\ \mathrm{mg} / \mathrm{L} \end{gathered}$ | EPA 150.1 Standard Units | $\begin{gathered} \text { EPA } 160.5 \\ \mathrm{~m} / \mathrm{L} \end{gathered}$ |
| Mo. Avg. Limit |  | 60 | 75 | 25 | 6.0 to 9.0 | 1.0 |

Feb-01 0.174
Feb-02
Feb-03
Feb-04 0.174
Feb-05 0.174
Feb-06 0.174
Feb-07 0.174
Feb-08 0.174
Feb-09
Feb-10
Feb-11
Feb-12 0.174
Feb-13 0.174
Feb-14 0.174
Feb-15 0.174
Feb-16
Feb-17
Feb-18
Feb-19 0.174
Feb-20 0.174
Feb-21 0.174
Feb-22 0.174
Feb-23
Feb-24
Feb-25 - 0.174
Feb-26 0.174
Feb-27 0.174
Feb-28 0.174
Feb-29 0.174
$\begin{array}{lllllll}\text { Wonthly Average } & 0.174 & 5.00 & 11.90 & 0.00 & 6.82 & 0.00\end{array}$
Comments: The facility never ran 24-7 the whole month. We are still in start-up operation with all RO Brine, fron \& Manganese filter backwash and some product water being discharged to the SJCOO. The sample shown above is for the RO Brine Reject only composited over 24 -hours.

South Orange County Wastewater Authority

April 23, 2008
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123
SUBJECT: MARCH 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:
There were five monitoring violations and three limit exceedences of Order R9-2006-0054 during March 2008.

Site M-001E, the City of San Juan Capistrano RO Treatment Plant, was offline in March, except for March 10 when the RO train was flushed for twelve minutes to preserve the membranes. Approximately 7,000 gallons was discharged to the outfall, but no samples were collected.

The monthly and weekly average turbidity limits at site M-001F, the South Coast Water District Groundwater Recovery Facility, exceeded permit limits during March 2008. The single total suspended solids result exceeded the monthly average limit.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is late May 2008.

The total coliform single sample maximum objective was exceeded at $C$; the 30 -day geometric mean objective was exceeded at $\mathrm{SO}, \mathrm{Cl}$ and C 2 . The fecal coliform single sample maximum was exceeded at surfzone sites Cl and $\mathrm{C} 2 ; \mathrm{S} 0, \mathrm{Cl}$ and C 2 exceeded the 30 -day geometric mean objective. The enterococcus daily maximum and 30 -day geometric mean objectives were exceeded at $\mathrm{S} 0, \mathrm{~S} 1, \mathrm{~S} 2, \mathrm{~S} 3, \mathrm{~S} 5, \mathrm{~S} 9, \mathrm{C} 1$ and $\mathrm{C} 2 ; \mathrm{S} 17$ exceeded the enterococcus single sample limit once and S 7 exceeded only the 30 -day geometric mean. SOCWAs discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,



MRP R9-2006-0054 MONTHLY MONITORING REPORT
South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: March 2008
REPORT DUE: May 01, 2008
SAMPLE SOURCE: SCWD GRF Brine/Backwash/Product

Page 12 of 28
NPDES No. CA0107417
SAMPLED BY: ECO Resources ANALYZED BY: Sierra Analytical

SAMPLE POINT: M-001F

|  | Flow | Suspended <br> Solids | Turbidity | Oil \& Grease | pH | Settleable <br> Solids |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Sample Type |  | $24-\mathrm{HC}$ | $24-\mathrm{HC}$ | Grab | Grab | Grab |
| Method | Meter | EPA 160.2 | EPA 180.1 | EPA 413.1 | EPA 150.1 | EPA 160.5 |
| Units | MGD | $\mathrm{mg} / \mathrm{L}$ | NTU | $\mathrm{mg} / \mathrm{L}$ | Standard Units | $\mathrm{ml} / \mathrm{L}$ |
| Mo. Avg. Limit |  | 60 | 75 | 25 | 6.0 to 9.0 | 1.0 |

Mar-01 Off Line
Mar-02 Off Line
Mar-03 0.221
Mar-04 0.221
Mar-05 0.221
Mar-06 0.221
Mar-07 0.221
Mar-08 Off Line
Mar-09 Off Line
Mar-10 Off Line
Mar-11 Off Line
Mar-12 Off Line
Mar-13 Off Line
Mar-14 Off Line
Mar-15 Off Line
Mar-16 Off Line
Mar-17 Off Line
Mar-18 Off Line
Mar-19 Off Line
Mar-20 Off Line
Mar-21 0.221
Mar-22 0.221
Mar-23 0.221
Mar-24 0.221
Mar-25 0.221
Mar-26 0.221
Mar-27 0.221
Mar-28 0.221
Mar-29 0.221
Mar-30 0.221
Mar-31 0.221
177.1

ND
6.92
0.35

Monthly Avg. 0.22
85.9
177.1
0.00
. 92
0.35

South Orange County Wastewater Authority

May 28, 2008

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John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123
$\begin{aligned} \text { SUBJECT: } & \text { APRIL } 2008 \text { SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, } \\ & \text { NPDES NO. CA0107417 }\end{aligned}$
Dear Mr. Robertus:
There was one monitoring violation and six limit exceedences of Order R9-2006-0054 during April 2008.

All settleable solids and turbidity limits were exceeded at site $\mathrm{M}-001 \mathrm{~F}$, the South Coast Water District Groundwater Recovery Facility. Total Suspended Solids was not analyzed due to a miscommunication with the laboratory.

Site M-001E, the City of San Juan Capistrano RO Treatment Plant, was offline all month.
There were no toxic effects observed in the three-species Chronic Toxicity screening performed in April. The Acute Toxicity test species was changed from Fathead minnow to Mysid for April and will continue to be used in future tests.

The anticipated start date for the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process is late May 2008.

All bacterial objectives were exceeded at least once at Cl ; the fecal coliform single sample maximum was exceeded at surfzone site C 2 ; S 0 and S 2 exceeded both the single sample maximum and the 30 -day geometric mean Enterococcus objective. SOCWAs discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,


Thomas R. Rosales
General Manager

MRP R9-2006-0054 MONTHLY MONITORING REPORT
South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: April 2008
REPORT DUE: June 01, 2008
SAMPLE SOURCE: SCWD GRF Brine/Backwash/Product

Page 12 of 29
NPDES No. CA0107417
SAMPLED BY: ECO Resources
ANALYZED BY: Sierra Analytical
SAMPLE POINT: M-001F


NA - Not analyzed due to miscommunication with the laboratory

John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123
SUBJECT: MAY 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:
There was one monitoring violation and twelve limit exceedences of Order R9-2006-0054 during May 2008.

At site M-001B, only four cBOD analyses were performed for the week of May 4.
All total suspended solids, settleable solids and turbidity limits were exceeded at site M-001F, the South Coast Water District Groundwater Recovery Facility.

Site M-001E, the City of San Juan Capistrano RO Treatment Plant was offline all month.
The anticipated start date for M-001G, the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process, is the beginning of July 2008.

The three-species Chronic Toxicity screening performed March through May 2008 concluded with no toxic effects observed in any of the nine tests. Kelp was determined to be the most sensitive species in previous screenings and will continue to be monitored monthly, along with the Acute Mysid test.

All bacterial objectives were exceeded at least once at C 1 and $\mathrm{C} 2, \mathrm{~S} 1, \mathrm{~S} 2$ and S 4 all exceeded the Enterococcus single sample maximum once; S 0 exceeded both the single sample maximum and 30-day geometric mean Enterococcus objective. S15 excceded all single sample maximum bacterial objectives at least once, as well as the 30 -day geometric mean for Enterococcus. SOCWAs discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

## SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Thomas R. Rosales<br>General Manager

MRP R9-2006-0054 MONTHLY MONITORING REPORT
South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: May 2008
REPORT DUE: July 01, 2008
SAMPLE SOURCE: SCWD GRF Brine/Backwash/Product

Page 12 of 32
NPDES No. CA0107417
SAMPLED BY: ECO Resources
ANALYZED BY: Sierra Analytical
SAMPLE POINT: M-001F

|  | Flow | Suspended Solids | Turbidity | Oil \& Grease | pH | Settleable Solids |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Sample Type |  | 24-HC | 24-HC | Grab | Grab | Grab |
| Method Units | Meter MGD | $\begin{gathered} \text { EPA } 160.2 \\ \mathrm{mg} / \mathrm{L} \end{gathered}$ | EPA 180.1 NTU | EPA 413.1 $\mathrm{mg} / \mathrm{L}$ | EPA 150.1 Standard Units | $\begin{gathered} \text { EPA } 160.5 \\ \mathrm{~m} / \mathrm{L} \end{gathered}$ |
| Mo. Avg. Limit |  | 60 | 75 | 25 | 6.0 to 9.0 | 1.0 |
| May-01 | 0.244 |  |  |  |  |  |
| May-02 | 0.244 |  |  |  |  |  |
| May-03 | 0.244 | 96 | 249 | 1.8 | 7.0 | 0.2 |
| May-04 | 0.244 |  |  |  |  |  |
| May-05 | 0.244 |  |  |  |  |  |
| May-06 | 0.244 |  |  |  |  |  |
| May-07 | 0.244 |  |  |  |  |  |
| May-08 | 0.244 |  |  |  |  |  |
| May-09 | 0.244 |  |  |  |  |  |
| May-10 | 0.244 |  |  |  |  |  |
| May-11 | 0.244 |  |  |  |  |  |
| May-12 | 0.244 |  |  |  |  |  |
| May-13 | 0.244 |  |  |  |  |  |
| May-14 | 0.244 |  |  |  |  |  |
| May-15 | 0.244 |  |  |  |  |  |
| May-16 | 0.244 | 161 | 372 | 2.4 | 6.8 | 1.6 |
| May-17 | 0.244 |  |  |  |  |  |
| May-18 | 0.244 |  |  |  |  |  |
| May-19 | 0.244 |  |  |  |  |  |
| May-20 | 0.244 |  |  |  |  | \% |
| May-21 | 0.244 |  |  |  |  |  |
| May-22 | 0.244 |  |  |  |  |  |
| May-23 | 0.244 |  |  |  |  |  |
| May-24 | 0.244 |  |  |  |  |  |
| May-25 | 0.244 |  |  |  |  |  |
| May-26 | 0.244 |  |  |  |  |  |
| May-27 | 0.244 |  |  |  |  |  |
| May-28 | 0.244 |  |  |  |  |  |
| May-29 | 0.244 | 138 | 330 | 1.9 | 7.1 | 11.7 |
| May-30 | 0.244 |  |  |  |  |  |
| May-31 | 0.244 |  |  |  |  |  |
| Monthly Avg. | 0.221 | 132 | 317 | 2.0 | 7.0 | 4.5 |

South Orange County Wastewater Authority

July 24, 2008
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123
SUBJECT: JUNE 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:
There were three monitoring violations and four limit exceedences of Order R9-2006-0054 during June 2008.

For the week of June 15 , cBOD was not analyzed at M-INFB and only four $\dot{c} B O D$ analyses were performed at M-001B. The analyses for the June $17^{\text {th }}$ samples were run without the addition of nitrification inhibitor.

Chlorine was accidentally discharged to the outfall from the Chiquita Water Reclamation Plant on June 20, but no sample was collected at M-001B. A letter explaining the discharge is included with this report.

One sample collected at M-001F, the South Coast Water District Groundwater Recovery Facility, exceeded the suspended solids and all three turbidity limits for that discharge.

Site M-001E, the City of San Juan Capistrano RO Treatment Plant was offline all month.
The anticipated start date for M-001G, the City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process, is the end of July or early August 2008.

All bacterial objectives were exceeded at least once at Cl and C 2 . The single sample maximum fecal coliform objective was exceeded once at S 15 . The single sample Enterococcus objective was exceeded at least once at $\mathrm{S} 0, \mathrm{~S} 1, \mathrm{~S} 2, \mathrm{~S} 3$, and S 15 ; S 0 exceeded both the single sample maximum and 30-day geometric mean Enterococcus objective. SOCWAs discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,
SOUTH ORANGE COUNTY WASTEWATER AUTHORITY

Thomas R. Rosales
General Manager



| MRP R9-2006-0054 MONTHLY MONITORING REPORT |  |  |  | Page 12 of 33 |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| South Orange County Wastewater Authority |  |  |  |  | NPDES No. CA0107417 |  |  |
| DISCHARGE: San Juan Creek Ocean Outfall |  |  |  |  | SAMPLED BY: ECO Resources |  |  |
| REPORT FOR: June, 2008 |  |  |  |  | ANALYZED BY: Sierra Analytical |  |  |
| SAMPLE SOURCE: SCWD GRF Brine/Backwash |  |  |  | - | SAMPLE POINT: M-001F |  |  |
|  | Flow | Suspended Solids | Turbidity | Oil \& Grease | pH | Settleable Solids |  |
| Sample Type |  | 24-HC | 24-HC | Grab | Grab | Grab |  |
| Method Units | Meter MGD | $\begin{gathered} \text { EPA } 160.2 \\ \mathrm{mg} / \mathrm{L} . \end{gathered}$ | EPA 180.1 NTU | $\begin{gathered} \text { EPA } 413.1 \\ \mathrm{mg} / \mathrm{L} \end{gathered}$ | EPA 150.1 <br> Standard Units | $\begin{gathered} \text { EPA } 160.5 \\ \mathrm{ml} / \mathrm{L} \end{gathered}$ |  |
| Mo. Avg. Limit |  | 60 | 75 | 25 | 6.0 to 9.0 | 1.0 |  |
| 06/01/08 | 0.24 |  |  |  |  |  |  |
| 06/02/08 | 0.24 |  |  |  | . |  |  |
| 06/03/08 | 0.24 |  |  |  |  |  |  |
| 06/04/08 | 0.24 |  |  |  |  |  |  |
| 06/05/08 | 0.24 |  |  | $\therefore$ |  |  |  |
| 06/06/08 | 0.24 | 135 | 381 | 2.3 | 6.5 | $<0.1$ |  |
| 06/07/08 | 0.24 |  |  |  |  |  |  |
| 06/08/08 | 0.24 |  |  |  |  |  |  |
| 06/09/08 | 0.24 |  |  |  |  |  |  |
| 06/10/08 |  |  |  |  |  |  |  |
| 06/11/08 | \% |  |  |  |  |  |  |
| 06/12/08 |  |  |  |  |  |  |  |
| 06/13/08 | 0.05 |  |  |  |  | . |  |
| 06/14/08 | 0.24 |  | . |  |  |  |  |
| 06/15/08 | 0.24 | . |  |  |  |  |  |
| 06/16/08 | 0.24 |  |  |  |  |  |  |
| 06/17/08 | 0.24 |  |  |  |  |  |  |
| 06/18/08 | 0.24 |  |  |  |  |  |  |
| 06/19/08 | 0.24 |  |  |  |  | * |  |
| 06/20/08 | 0.24 |  |  |  |  |  |  |
| 06/21/08 | 0.24 |  |  |  |  |  |  |
| 06/22/08 | 0.24 |  |  |  |  |  |  |
| 06/23/08 | 0.24 |  |  |  |  |  |  |
| 06/24/08 | 0.24 |  |  |  |  |  |  |
| 06/25/08 | 0.24 |  |  |  |  |  |  |
| 06/26/08 | 0.24 |  |  |  |  |  |  |
| 06/27/08 | 0.24 |  |  |  |  |  |  |
| 06/28/08 | 0.24 |  |  |  |  |  |  |
| 06/29/08 | 0.24 |  |  |  |  |  |  |
| 06/30/08 | 0.24 |  |  |  |  |  |  |
| Monthly Average | 0.23 | 135 | 381 | 2.3 | 6.5 | 0.1 |  |
| Comments: |  |  |  |  | cogonsuancmut |  |  |

South Orange County Wastewater Authority

GAH DEGOREGIOHAB
WAEE OIJALITY COMTRSL BOARD

August 26, 2008
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

## SUBJECT: JULY 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:
There were seven limit exceedences of Order R9-2006-0054 during July 2008. One composite sample collected at M-001F, the South Coast Water District Groundwater Recovery Facility, exceeded the suspended solids and all three turbidity limits for that discharge. A grab sample exceeded all three Settleable Solids limits.

The City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process was tested briefly on August 4 . Modifications to the process will be made before further testing.

All bacterial objectives were exceeded at least once at C 1 . Site C 2 exceeded the 30 -day geometric mean total coliform and both enterococcus objectives. The daily maximum fecal coliform objective was exceeded at S0, S5, S15, and S21. At least one enterococcus objective was exceeded at S0, S11, S15, and S21. SOCWAs discharge from the outfall is not believed to be the cause of these exceedances.

Section V.A. calls for calculation of a 30-day geometric mean using the five most recent samples from each surfzone monitoring site. Because Order R9-2006-0055 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30 day mean.

Sincerely,
SOUTH ORANGE COUNTY WASTEWATER AUTHORITY


Thomas R. Rosales
General Manager

MRP R9-2006-0054 MONTHLY MONITORING REPORT
South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: July, 2008
REPORT DUE: Aug 01, 2008
SAMPLE SOURCE: SCWD GRF Brine/Backwash

Page 12 of 33
NPDES No. CA0107417

SAMPLED BY: ECO Resources ANALYZED BY: Sierra Analytical

SAMPLE POINT: M-001F

|  | Suspended |  |  | Oil \& Grease | pH | Settleable Solids |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Sample Type |  | 24-HC | 24-HC | Grab | Grab | Grab |
| Method Units | Meter MGD | $\begin{gathered} \text { EPA } 160.2 \\ \mathrm{mg} / \mathrm{L} \end{gathered}$ | $\begin{gathered} \text { EPA } 180.1 \\ \text { NTU } \end{gathered}$ | $\begin{gathered} \text { EPA } 413.1 \\ \mathrm{mg} / \mathrm{L} \end{gathered}$ | EPA 150.1 Standard Units | $\begin{gathered} \text { EPA } 160.5 \\ \mathrm{ml} / \mathrm{L} \end{gathered}$ |
| Mo. Avg. Limit |  | 60 | 75 | 25 | 6.0 to 9.0 | 1.0 |
| 07/01/08 | 0.24 |  |  |  |  |  |
| 07/02/08 | 0.24 |  |  |  |  |  |
| 07/03/08 | 0.24 |  |  |  |  |  |
| 07/04/08 | 0.24 |  |  |  |  |  |
| 07/05/08 | 0.24 |  |  |  |  |  |
| 07/06/08 | 0.24 |  |  |  |  |  |
| 07/07/08 | 0.24 |  |  |  |  |  |
| 07/08/08 | 0.24 |  |  |  |  |  |
| 07/09/08 | 0.24 |  |  |  |  |  |
| 07/10/08 | 0.21 |  |  |  |  |  |
| 07/11/08 | 0.24 |  |  |  |  |  |
| 07/12/08 | 0.24 |  |  |  |  |  |
| 07/13/08 | 0.06 |  |  |  |  |  |
| 07/14/08 |  |  |  |  |  |  |
| 07/15/08 | 0.19 |  |  |  |  |  |
| 07/16/08 | 0.24 |  |  |  |  |  |
| 07/17/08 | 0.24 | $\cdot$ |  |  |  |  |
| 07/18/08 | 0.24 |  |  |  |  |  |
| 07/19/08 | 0.24 |  |  |  |  |  |
| 07/20/08 | 0.24 |  |  |  |  | * |
| 07/21/08 | 0.24 |  |  |  |  |  |
| 07/22/08 | 0.13 |  |  |  |  |  |
| 07/23/08 | 0.12 |  |  |  |  |  |
| 07/24/08 | 0.24 |  |  |  |  |  |
| 07/25/08 | 0.24 |  |  |  |  |  |
| 07/26/08 | 0.24 |  |  |  |  |  |
| 07/27/08 | 0.24 |  |  |  |  |  |
| 07/28/08 | 0.24 |  |  |  |  |  |
| 07/29/08 | 0.24 |  |  |  |  |  |
| 07/30/08 | 0.24 |  |  |  |  |  |
| 07/31/08 | 0.24 | 131 | 314 | 2.7 | 6.9 | 4.9 |
| Monthly Average | 0.22 | 131 | 314 | 2.7 | 6.9 | 4.9 |

Comments:

September 26, 2008
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123
SUBJECT: AUGUST 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:
There was one reporting omission and seven limit exceedences of Order R9-2006-0054 during August 2008.

At site M-001B, only four TSS analyses were reported for the week of August 17.
One composite sample collected at M-001F exceeded the suspended solids and all three turbidity limits for that discharge. A grab sample exceeded all three Settleable Solids limits.

The City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process was tested briefly on August 4, but no flow was sent to the outfall. Modifications to the process will be made before further testing.

All bacterial objectives were exceeded at least once at C1. Site Si exceeded the daily Fecal Coliform and Enterococcus objectives. The daily Enterococcus limit was exceeded once at S3, S5, and S13; S15 exceeded both daily and 30-day objectives. C2 exceeded all enterococcus objectives. SOCWAs discharge from the outfall is not believed to be the cause of these exceedences.

Section V.A. calls for calculation of a 30 -day geometric mean using the five most recent samples from each surfzone monitoring site. Because Order R9-2006-0055 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30 day geometric mean.

Sincerely,

## SOUTH ORANGE COUNTY WASTEWATER AUTHORITY



Thomas R. Rosales
General Manager

MRP R9-2006-0054 MONTHLY MONITORING REPORT
South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: August, 2008
REPORT DUE: Sep 01, 2008
SAMPLE SOURCE: SCWD GRF Brine/Backwash

Page 12 of 32
NPDES No. CA0107417.
SAMPLED BY: ECO Resources
ANALYZED BY: Sierra Analytical
SAMPLE POINT: M-001F

|  | Flow | Suspended <br> Solids | Turbidity | Oil \& Grease | pH | Settleable |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Solids |  |  |  |  |  |  |

Comments:

October 22, 2008
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

## SUBJECT: SEPTEMBER 2008 SUMMARY OF MONITORING OF ORDER NO. R9-20060054, NPDES NO. CA0107417

Dear Mr. Robertus:
There were five limit exceedences of Order R9-2006-0054 during September 2008.
One composite sample collected at M-001F exceeded the suspended solids and all three turbidity limits for that discharge. A grab sample exceeded the monthly average Settleable Solids limit.

The City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process did not operate during September; no discharge is anticipated for October 2008.

The single sample maximum total coliform limit was exceeded at $S 9$. The single sample maximum fecal coliform limit was exceeded at sites $\mathrm{S} 1, \mathrm{~S} 9, \mathrm{~S} 15$, and S 19 . The single sample maximum Enterococcus limit was exceeded at S0, S2, S3, S5, S7, S9, S11, S13, S15, S19, and S 21 ; the 30 -day geometric mean Enterococcus objective was also exceeded at $\mathrm{S} 0, \mathrm{~S} 2, \mathrm{~S} 3, \mathrm{~S} 5, \mathrm{~S} 7$, $\mathrm{S} 9, \mathrm{~S} 11, \mathrm{~S} 13, \mathrm{~S} 15, \mathrm{~S} 19$ and S21. C1 and C2 exceeded all bacterial objectives. SOCWAs discharge from the outfall is not believed to be the cause of these exceedences.

Section V.A. calls for calculation of a 30-day geometric mean using the five most recent samples from each surfzone mónitoring site. Because Order R9-2006-0054 requires more frequent monitoring of the surfzone, all values for the month, for each site, were used to calculate the 30 day geometric mean.

Sincerely,

## SOUTH ORANGE COUNTY WASTEWATER AUTHORITY



Thomas R. Rosales
General Manager

MRP R9-2006-0054 MONTHLY MONITORING REPORT
South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: September, 2008
REPORT DUE: November 01, 2008
SAMPLE SOURCE: SCWD GRF Brine/Backwash

Page 12 of 34
NPDES No. CA0107417
SAMPLED BY: ECO Resources ANALYZED BY: Sierra Analytical

SAMPLE POINT: M-001F

|  | Flow | Suspended <br> Solids | Turbidity | Oil \& Grease | pH | Settleable |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Solids |  |  |  |  |  |  |

South Orange County Wastewater Authority

November 19, 2008
John H. Robertus
California Regional Water Quality Control Board
San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123
SUBJECT: OCTOBER 2008 SUMMARY OF MONITORING OF ORDER NO. R9-2006-0054, NPDES NO. CA0107417

Dear Mr. Robertus:
There was one monitoring omission and seven limit exceedences of Order R9-2006-0054 during October 2008.

One composite sample collected at M-001F exceeded the suspended solids and all three turbidity limits for that discharge. A grab sample exceeded all three Settleable Solids limits.

For the week of October 19, only four cBOD analyses were reported for M-001B. The analyses for the October 24 sample was run without the addition of nitrification inhibitor.

The City of San Clemente Segunda Deshecha Flood Control Channel runoff treatment process did not operate during October; no discharge is anticipated for November 2008.

Surfzone sites S15 and S17 exceeded the single sample maximum objectives for both fecal coliform and Enterococcus. The single sample maximum Enterococcus objective was exceeded at sites S3, S5, and S9; S13 exceeded the 30-day geometric mean objective All bacterial objectives were exceeded at C1. Site C2 was dry the entire month of October. SOCWAs discharge from the outfall is not believed to be the cause of these exceedences.

Sincerely,
SOUTH ORANGE COUNTY WASTEWATER AUTHORITY


Thomas R. Rosales
General Manager

MRP R9-2006-0054 MONTHLY MONITORING REPORT
South Orange County Wastewater Authority
DISCHARGE: San Juan Creek Ocean Outfall
REPORT FOR: October, 2008 REPORT DUE: December, 2008
SAMPLE SOURCE: SCWD GRF Brine/Backwash

Page 12 of 32
NPDES No. CA0107417
SAMPLED BY: ECO Resources ANALYZED BY: Sierra Analytical

SAMPLE POINT: M-001F

|  | Flow | Suspended Solids | Turbidity | Oil \& Grease | pH | Settleable Solids |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Sample Type |  | 24-HC | 24-HC | Grab | Grab | Grab |
| Method Units | Meter MGD | $\begin{gathered} \text { EPA } 160.2 \\ \mathrm{mg} / \mathrm{L} . \end{gathered}$ | $\text { EPA } 180.1$ NTU | $\begin{gathered} \text { EPA } 413.1 \\ \mathrm{mg} / \mathrm{L} \end{gathered}$ | EPA 150.1 Standard Units | $\begin{gathered} \text { EPA } 160.5 \\ \mathrm{mi} / \mathrm{L} \end{gathered}$ |
| Mo. Avg. Limit |  | 60 | 75 | 25 | 6.0 to 9.0 | 1.0 |
| 10/01/08 | 0.22 |  |  |  |  |  |
| 10/02/08 | 0.22 |  |  |  |  |  |
| 10/03/08 | 0.22 |  |  |  |  |  |
| 10/04/08 | 0.22 |  |  |  |  |  |
| 10/05/08 | 0.22 |  |  |  |  |  |
| 10/06/08 | 0.22 |  |  |  |  |  |
| 10/07/08 | 0.22 |  |  |  |  |  |
| 10/08/08 | 0.22 |  |  |  |  |  |
| 10/09/08 | 0.22 |  |  |  |  |  |
| 10/10/08 | 0.22 |  |  |  |  |  |
| 10/11/08 | 0.22 |  |  |  |  | . |
| 10/12/08 | 0.22 |  |  |  |  |  |
| 10/13/08 | 0.22 |  |  |  |  |  |
| 10/14/08 | 0.22 |  |  |  |  |  |
| 10/15/08 | 0.22 | 211 | 422 | 3.2 | 7.3 | 9.7 |
| 10/16/08 | 0.22 |  |  |  |  |  |
| 10/17/08 | 0.22 |  |  |  |  |  |
| 10/18/08 | 0.22 |  |  |  |  |  |
| 10/19/08 | 0.22 |  |  |  |  |  |
| 10/20/08 | No Flow |  |  |  |  |  |
| 10/21/08 | No Flow |  |  |  |  |  |
| 10/22/08 | No Flow |  |  |  |  |  |
| 10/23/08 | No Flow |  |  |  |  |  |
| 10/24/08 | No Flow |  |  |  |  |  |
| 10/25/08 | No Flow. |  |  |  |  |  |
| 10/26/08 | No Flow |  |  |  |  |  |
| 10/27/08 | No Flow | . |  |  |  |  |
| 10/28/08 | No Flow |  |  |  |  |  |
| 10/29/08 | No Flow |  |  |  |  |  |
| 10/30/08 | No Flow |  |  |  |  |  |
| 10/31/08 | No Flow |  |  |  |  |  |
| Monthly Average | 0.22 | 211 | 422 | 3.2 | 7.3 | 9.7 |

South Orange County Wastewater Authority

December 23, 2008

## John H. Robertus

## California Regional Water Quality Control Board

San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA. 92123

SUBJECT: NOVEMBER 2008 SUMMARY OF MONITORING OF ORDER NO.R9 - 20020054, NPDES NO. CA0107417

## Dear Mr. Robertus.

There were no exceedances of Order R9-2006-0054 discharge permit limits or performance goals in November 2008.

The South Coast Water District's Groundwater Recovery Facility (SCWD-GRF) began discharging its brine wastewater to the South Orange County Wastewater Authority - J. B. Latham wastewater treatment plant in November 2008.

Surfzone sites S 4 and S 6 met all bacterial objectives. Enterococcus objectives only were exceeded at surfzone sites $\mathrm{S} 0, \mathrm{~S} 1, \mathrm{~S} 5, \mathrm{~S} 7, \mathrm{~S} 9, \mathrm{~S} 11, \mathrm{~S} 13, \mathrm{~S} 15, \mathrm{~S} 19, \mathrm{~S} 21$ and S 23 . Sites $\mathrm{S} 2, \mathrm{~S} 3$, and S17 exceeded objectives for both fecal coliform and enterococcus. Sites C1 and C2 in San Juan Creek exceeded all bacterial objectives. There were several days of heavy rainfall during November which increased urban runoff to the monitoring sites. SOCWA's discharge from the outfall is not believed to be the cause of these exceedances.

Sincerely,

## SOUTH ORANGE CQLANTY WASTEWATER AUTHORITY



Thomas R. Rosales
General Manager


34156 Del Obispo Street • Dana Point, CA 92629 - Phone: (949) 234-5400 • Fax: (949) 489-0130 • Website: www.socwa.com

[^0] IRYIN RANCH WATER DISTRICT • MOULTON NGGUEL WATER DISTRICT • SANTA MARGARITA WATER DISTRICT • SOUTH COAST WATER DISTRICT • TRABUCO CANYON WATER DISTRICT

| MRP R9-2006-0054 MONTHLY MONITORING REPORT |  |  |  |  | Page 12 of 28 |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| South Orange County Wastewater Authority |  |  |  |  | NPDES No. CA0107417. |  |
| DISCHARGE: San Juan Creek Ocean Outfall |  |  |  |  | SAMPLED BY: ECO Resources |  |
| REPORT FOR: November, 2008 |  |  |  |  | ANALYZED BY: Sierra Analytical |  |
| REPORT DUE: January, 2009 |  |  |  |  |  |  |
| SAMPLE SOURCE: SCWD GRF Brine/Backwash |  |  |  |  | SAMPLE POINT: M-001F |  |
|  | Flow | Suspended Solids | Turbidity | Oil \& Grease | pH | Settleable Solids |
| Sample Type |  | 24-HC | 24-HC | Grab | Grab | Grab |
| Method Units | Meter MGD | $\begin{gathered} \text { EPA } 160.2 \\ \mathrm{mg} / \mathrm{L} \end{gathered}$ | $\begin{gathered} \text { EPA } 180.1 \\ \text { NTU } \end{gathered}$ | $\begin{gathered} \text { EPA } 413.1 \\ \mathrm{mg} / \mathrm{L} \end{gathered}$ | EPA 150.1 Standard Units | $\begin{gathered} \text { EPA } 160.5 \\ \mathrm{~m} / \mathrm{L} . \end{gathered}$ |
| Mo. Avg. Limit |  | 60 | 75 | 25 | 6.0 to 9.0 | 1.0 |
| 11/01/08 | No Flow |  |  |  |  |  |
| 11/02/08 | No Flow |  |  |  |  |  |
| 11/03/08 | No Flow |  |  |  |  |  |
| 11/04/08 | 0.3 |  |  |  |  |  |
| 11/05/08 | 0.3 |  |  |  |  |  |
| 11/06/08 | 0.4 |  |  |  |  |  |
| 11/07/08 | 0.6 |  |  |  |  |  |
| 11/08/08 | No Flow |  |  |  |  |  |
| 11/09/08 | No Flow |  |  |  |  |  |
| 11/10/08 | No Flow |  |  |  |  |  |
| 11/11/08 | 0.1 |  |  |  |  |  |
| 11/12/08 | 0.2 |  |  |  |  |  |
| 11/13/08 | 0.2 |  |  |  |  |  |
| 11/14/08 | 0.2 | 6 | 8 | <2.0 | 6.9 | <0.1 |
| 11/15/08 | No Flow |  |  |  |  |  |
| 11/16/08 | No Flow |  |  |  |  |  |
| 11/17/08 | 0.2 |  |  |  |  |  |
| 11/18/08 | 0.2 |  |  |  |  |  |
| 11/19/08 | 0.2 |  |  |  |  |  |
| 11/20/08 | 0.2 |  |  |  | $\cdots$ |  |
| 11/21/08 | 0.2 |  |  |  |  |  |
| 11/22/08 | 0.0 |  |  |  |  |  |
| 11/23/08 | 0.0 |  |  |  |  |  |
| 11/24/08 | 0.5 |  |  |  |  |  |
| 11/25/08 | 0.3 |  |  |  |  |  |
| 11/26/08 | 0.0 |  |  |  |  |  |
| 11/27/08 | 0.0 |  |  |  |  |  |
| 11/28/08 | 0.0 |  |  |  |  |  |
| 11/29/08 | 0.0 |  |  |  |  |  |
| 11/30/08 | 0.0 |  |  |  |  |  |
| Monthly Average | 0.18 | 6 | 8 | 2.0 | 6.9 | 0.1 |


[^0]:    A public agency created by: CITY OF LAGUNA BEACH - CITY OF SAN CLEMENTE • CITY OF SAN JUAN CAPISTRANO - EL TORO WATER DISTRICT • EMERALD BAY SERVICE DISTRICT

