
State Water Resources Control Board

January 3, 2024

Robert E. Donlan
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DELIVERY BY EMAIL ONLY

RESPONSE LETTER TO COMPLIANCE REPORT SUBMITTED ON DECEMBER 15, 2023 PURSUANT TO ORDER WR 2023-0042 - BLUETRITON BRANDS, INC.

Dear Mr. Donlan:

We have received the Microsoft Excel Workbook and accompanying information submitted in your email dated December 15, 2023, as required by State Water Resources Control Board (State Water Board) Order WR 2023-0042. We found several aspects of Blue Triton Brands' (BTB) compliance report to be unclear. Please provide State Water Board staff with clarification on the following items:

1. Accurate metering/monitoring:
 - a. Do the meters/data loggers collect and store error codes for events such as the high-bias readings observed at the San Manuel Band of Mission Indians (SMBMI) flow meter?
 - b. What is the current estimated measurement accuracy of each meter?
 - i. When was this accuracy last verified using field or laboratory testing?
 - ii. Is there an estimated impact to the meter accuracy due to the high bias readings?
 - c. How does BTB plan to improve its measurement accuracy at sites that experienced accuracy problems during this reporting period?
 - i. What is the anticipated timeframe?
 - ii. What changes to accuracy can be expected from these improvements?
2. Confirm/explain the following reported data:
 - a. BTB used roughly 95,000 gallons to maintain hygienic conditions at the load station.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

- b. No water was delivered to tank trucks at BTB's facilities during the reporting period?
 - c. Nearly 5.9 million gallons was delivered to the SMBMI.
 - i. Why does this value significantly differ from the calculated SMBMI delivery (roughly 4.7 million gallons) in the worksheet?
 - ii. Does the reported SMBMI delivery amount match their riparian use?
 - d. Is it possible to measure and report the amount of water being bypassed into the creek from the spring sites?
 - i. SWRCB staff believes this information is needed to assess compliance with the Order.
 - ii. These can be reported as a discharge in the Other Discharges sheet of the workbook.
3. Is it feasible to use Spring Tunnel 7 and Boreholes 7, 7A, 7B, and 7C to supply SMBMI?

We would like to meet with BTB to discuss these items in more detail. Please let us know which of the following dates this month BTB is available to meet:

January 11th
January 12th
January 16th
January 17th
January 18th

If you have any questions regarding this letter, please contact Connor Bovee with the Enforcement Section by email at Connor.Bovee@waterboards.ca.gov.

Sincerely,



Robert P. Cervantes, PE
Program Manager – Enforcement
Division of Water Rights

cc: Jule Rizzardo
Kathy Bare
Yvonne West
Ken Petruzzelli
Michael Nobles
David Anderson