Exhibit 1: Inspection Report and Cover Letter, sent to Respondent on Oct. 17, 2019



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX – PACIFIC SOUTHWEST REGION 75 Hawthorne Street San Francisco, CA 94105-3901

# OCT 1 7 2019

Mr. Don Reynolds City of San Juan Bautista 311 Second Street San Juan Bautista, CA 95045

Dear Mr. Reynolds:

Enclosed is the inspection report for EPA's Clean Water Act compliance inspection of the City of San Juan Bautista Wastewater Treatment Plant (NPDES Permit No. CA0047902/WDR Order No. R3-2009-0019) conducted on June 24, 2019.

EPA identified the following areas of concern during the inspection:

- 1. Pond 2 may not be providing full treatment because of gaps in the baffles; some flows may be bypassing the treatment cells and this could reduce treatment effectiveness.
- 2. The floating media in Cell 2C is likely no longer doing what it was designed to do, presumably nitrogen reduction.
- 3. Cypress Water Services has made changes to the flows at the plant that should be communicated to the permit writer and documented in a permit modification.
- 4. Calibration records should be kept for all meters.
- 5. The City has been out of compliance with effluent chloride limits since they became part of the permit on May 10, 2009. Current drinking water treatment infrastructure is inadequate to reduce the hardness of the City's current drinking water sources and current wastewater treatment infrastructure is not designed to remove chlorides.
- Ongoing development and new wastewater connections are increasing the load on the City's aging wastewater treatment infrastructure. The City is not consistently complying with effluent limits for sodium, total Coliform, BOD, sulfate, total dissolved solids, and ammonia.
- 7. Unlabeled and unused chemicals in drums need to be disposed of in accordance with all applicable regulations.
- 8. Chemicals which remain stored onsite should have secondary containment and/or be stored in a location where a spill would not reach the discharge drainage. The Facility should develop and implement a Spill Prevention and Response Plan.

- 9. There have been six exceedances of the Median Total Coliform limit and five exceedances of the Instantaneous Maximum Total Coliform limit since November 2018. This may be caused by an inadequate or malfunctioning disinfection system.
- 10. The San Juan Bautista WWTP NPDES permit became effective in 2009 and expired in May 2014. No new permit has been issued since its expiration. The 2009 permit has been administratively continued and does not match existing Facility conditions.
- 11. The San Juan Bautista WWTP is in Significant Noncompliance for unionized ammonia, sodium, and chloride effluent exceedances and has numerous other effluent violations. These violations will likely continue until the Facility makes improvements to the wastewater treatment plant and its operations. Several of these areas of concern were noted in the January 25, 2018 Inspection Report and remain unaddressed.

Please review this report. Contact EPA within 14 calendar days of receipt of this letter if any factual disputes are identified. Provide a written response to each of the areas of concern noted above within 45 calendar days of receipt of this letter. Send your response to Adam Howell of my staff at howell.adam@epa.gov (415) 947-4248.

Thank you for your cooperation and the cooperation of your staff during the inspection.

Sincerely,

Eric Magnan Manager, Wastewater Section Enforcement Division

Cc:

Miles Farmer, Cypress Water Services Aaron Slusher, Cypress Water Services Nicholas Bryan, City of San Juan Bautista Paul Champion, City of San Juan Bautista Elliot Gil, City of San Juan Bautista Erin Mustain, California State Waterboard



# Region 9 Enforcement Division 75 Hawthorne Street San Francisco, CA 94105

Inspection Date(s):	June 24, 20	19								
Time:	Entry: 9:30		Exit: 2:00 PM							
Media:	Water									
Regulatory Program(s)	Clean Wate	r Act NPDES								
Company Name:	City of San J	luan Bautista								
Facility or Site Name:	City of San Juan Bautista Wastewater Treatment Plant									
Facility/Site Physical	1300 Third Street									
Location:	San Juan Bautista, CA 95054									
	San Benito	County								
Geographic Coordinates:	Latitude: 36	6°50'52.86"N Longitu	ıde: 121°32'40.00"W							
Mailing address:	PO Box 142	0								
	San Juan Bautista, CA 95045									
Facility/Site Contact:	Miles Farme	er	Title: Operator of Record							
	Phone: 831	1-601-9367	Email:							
			miles@cypresswaterservices.com							
Facility/Site Identifier:	NPDES Pern	nit No. CA0047902								
	WDR Order No. R3-2009-0019									
Facility/Site Personnel Par	ticipating in I	nspection:								
Name	Affiliation	Title	Email							
Aaron Slusher	Cypress	Wastewater Operato	r slusher.aaron@gmail.com							
	Water									
	Services									
Nicholas Bryan	City	Public Works	publicworks@San-Juan-							
		Supervisor	Bautista.ca.us							
Ed Tewes	City	Interim City Manager	citymanager@San-Juan-							
			Bautista.ca.us							
Paul Champion	City	Fleet Manager	fleetmanager@San-Juan-							
			Bautista.ca.us							
Elliott Gil	City	Collection System	sewer@ City-San-Juan-Bautista.ca.us							
		Operator								
EPA Inspector(s):										
Adam Howell	EPA R9	Inspector	howell.adam@epa.gov							
Mike Weiss	EPA R9	Inspector	weiss.michael@epa.gov							
Federal/State/Tribal/Local	Representat	lives:								
Erin Mustain	State	Inspector	erin.mustain@waterboards.ca.gov							

City of San Juan Bautista WWTP Inspection Date: June 24, 2019

Inspection Report	Adam Howell	415-947-4248
Author:		
		Date:
	1	
	Eric Magnan	415-947-4179
Supervisor Review:		Date:
Supervisor neview.		

# SECTION I – INTRODUCTION I.1 Purpose of the Inspection

The purpose of the inspection was to evaluate compliance with NPDES Permit No. CA0047902/WDR Order No. R3-2009-0019 and applicable Federal regulations covering the discharge of wastewaters into waters of the United States. The Permit was adopted by California Central Coast Regional Water Quality Control Board (Regional Board 3) and became effective on May 9, 2009. The permit expired on May 9, 2014 but has been administratively continued. This inspection is also part of the national compliance initiative for reduction of facilities in Significant Noncompliance (SNC).

# SECTION II – FACILITY / SITE DESCRIPTION

# II.1 Facility Description

The City of San Juan Bautista Wastewater Treatment Plant (the Facility) achieves preliminary treatment of raw wastewater with a manually cleaned bar screen and a comminutor. From there, influent is moved with three alternating pumps up the hill to Pond 1, which is operated as a Sequencing Batch Reactor (SBR). Here, wastewater is aerated and mixed using eight aerators and two mixers, then allowed to settle before being decanted. Mr. Slusher stated that each batch cycle lasts four hours and freeboard in Pond 1 fluctuates approximately two to three feet. The pond does not appear to be fully lined. We observed bare soil on the western and southern side slopes of the pond. The surficial geology of the inspection area is mapped as Los Gatos clay loam or LvE, which is well-drained, has rapid to very rapid runoff, and moderate permeability.

Effluent decanted from Pond 1 is gravity fed to seven hydraulically connected 10,000 gallon storage tanks used to equalize flows to Pond 2. Pond 2 consists of three cells, separated by baffles. The first two, cells 2a and 2b, are ostensibly used to store sludge and the third, cell 2c, for denitrification. Sometime after October 2018, two hydraulically connected 5,000 gallon tanks were installed on the East bank of Pond 2 adjacent to cell 2c. In the past, all flows from the seven upper tanks entered the second pond at cell 2a. Now, some effluent from the upper tanks is directed to the 5,000 gallon lower tanks and discharged directly into cell 2c.

Effluent from Pond 2 has polymer added in the line before being sent through a pressurized media sand filtration system. Sand filters are backwashed on a differential pressure system with manual override. After filtering, effluent is disinfected with an Ultraviolet (UV) light system. There is a back-up disinfection system consisting of chlorine injection and a contact chamber. Effluent samples are pulled downstream of the UV disinfection system and upstream of the receiving water (drainage channel adjacent to the Facility, which flows to San Juan Creek, a tributary of the San Benito River).

The Facility was designed for the City of San Juan Bautista by Bracewell Engineering, who operated it for over thirty years. On August 1, 2018 Bracewell submitted a 90-day notice to the city to terminate their contract. On October 16, 2018 the City Council awarded a two year contract to Cypress Water Services to operate the Facility.

# II.2 Wastewater Sources

The Facility receives domestic wastewater from the City's service area and some domestic wastewater from three vegetable processors located outside of the City and approximately 10,000 gallons a month from septage haulers.

The City's drinking water is sourced from groundwater wells which have very hard water. Many residents have private water softeners installed in their homes, which causes domestic sewage to be high in chloride and sodium.

# II.3 Compliance History

On July 31, 2001, the Central Coast Regional Board issued Cease and Desist Order 01-106 to the City for exceedances of the final chloride effluent limit. The Order included an interim limit for chloride and required compliance with the final limit by July 12, 2006.

On July 1, 2008, the State Water Board's Office of Enforcement issued the City an Offer to Participate in Expedited Payment Program (EPP) No. SWB-2008-3-0015, which included a Notice of Violation notifying the Permittee of four serious effluent violations and one non-serious effluent violation subject to a mandatory minimum penalty (MMP) of \$3,000 each. The City signed the waiver agreeing to pay upon receipt of a written statement that the violations were violations under State Law, which the original offer stated. The City did not submit payment.

On October 21, 2009, the Central Coast Regional Board issued administrative complaint Order R3-2009-0076, in the amount of \$12,000 for 4 chloride violations subject to mandatory minimum penalties.

On November 28, 2012, the Central Coast Regional Board issued administrative complaint Order R3-2012-0040, in the amount of \$114,000 for 37 chloride violations and one sodium violation subject to mandatory minimum penalties. On July 1, 2015, the Office of Enforcement issued the City an amended EPP, notifying the Permittee of 29 serious effluent violations and eight non-serious effluent violations subject to an MMP of \$3,000 each. The amended EPP acknowledged the dismissal of one violation due to a sampling deficiency and removed it from further consideration for a MMP. As of the date of this inspection report, the City has not submitted payment to the State, past violations remain unresolved and additional violations that have been reported to the California Integrated Water Quality System (CWIQS) by the Facility include the following:

- Monthly Average Chloride limit of 200mg/l has been violated every month since July 2017;
- Average Weekly BOD limit 45mg/l: August 2018 and May 2019 values were 49mg/l;
- Monthly Average Sodium limit 250mg/I: Violated May 2018 January 2019 and March 2019 June 2019;
- Total Coliform Median limit 23 MPN/100mL: Violated November 2018, February 2019 June 2019. Missing values for July 2017 May 2018 and August 2018 October 2018;
- Total Coliform Inst Max limit 2300 MPN/100mL: Violated February 2019 June 2019;
- Monthly Average TDS limit 1400mg/l: Violated July 2018 November 2018 and March 2019 June 2019;
- All three Total Suspended Solids limits violated August 2018;
- August 2018 value of 83.2% BOD removal was less than 85% lower limit;
- Max Daily un-ionized Ammonia limit of 0.025mg/l violated September 2018, March 2018, June 2019 (Quarterly reporting requirement). Missing Value for December 2018.

#### **SECTION III – OBSERVATIONS**

The inspection team made the following observations during the site visit on June 24, 2019:

- The baffles in Pond 2 no longer extend to the surface in several areas (Photos 9, 10, and 12).
- Floating media in Cell 2C no longer floats at the surface. Aaron Slusher (Wastewater Operator) stated that they sank when disturbed by Synagro's sludge removal operations in late 2018. He said that Cypress Water Services had attempted to right them, but they were too heavy with sludge.
- City staff provided the inspection team with a document showing records of sludge removal from Pond 2 by Synagro (Appendix 2). The document shows that between October 2018 and December 2018 Synagro removed 439.96 dry tons of sludge from Pond 2.
- The Facility is no longer operated in accordance with the process flow diagram in the permit, included as Attachment 3. For example, the diagram does not show the two new 5,000 gallon equalization tanks adjacent to Pond 2.
- The UV information panel's (Photo 16) intensity and run time displays were unreadable.
- No calibration records were available for the turbidimeter, dissolved oxygen or pH meters in the onsite lab or for the flowmeter.
- The daily bench sheets (Photos 20 through 24) and logbook were clear and well kept.

• There were three full 55-gallon drums behind the structure housing the polymer injection system (Photo 25). One drum was labelled Sodium Bisulfate, one labelled polymer, and one had an unreadable label. There was an additional full unlabeled 55-gallon drum behind the shed housing the composite sampler. None of the drums were covered or had secondary containment.

#### SECTION IV – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

- 1) Pond 2 may not be providing full treatment because of gaps in the baffles; some flows may be bypassing the treatment cells and this could reduce treatment effectiveness.
- 2) The floating media in Cell 2C is likely no longer doing what it was designed to do, presumably nitrogen reduction.
- 3) Cypress Water Services has made changes to the flows at the plant that should be communicated to the permit writer and documented in a permit modification.
- 4) Calibration records should be kept for all meters.
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- 9) There have been six exceedances of the Median Total Coliform limit and five exceedances of the Instantaneous Maximum Total Coliform limit since November 2018. This may be caused by an inadequate or malfunctioning disinfection system.
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- 11) The San Juan Bautista WWTP is in Significant Noncompliance for unionized ammonia, sodium, and chloride effluent exceedances and has numerous other effluent violations detailed in Section II.3. These violations will likely continue until the Facility makes improvements to the wastewater treatment plant and its operations. Several of these areas of concern were noted in the January 25, 2018 Inspection Report and remain unaddressed.

#### APPENDICES

#### Appendix 1 – Photograph Log

The photographs were taken during the inspection by Michael Weiss using an Olympus Tough TG-5 digital camera. Original copies of the photos are maintained by EPA Region 9.



Photo 1 : Facility entrance.



Photo 2 : Operator of record's certification. Note that Aaron Slusher was filling in for Miles Farmer during the inspection.



Photo 3 : Headworks with comminutor and bar screen.



Photo 4 : Headworks side view.

# City of San Juan Bautista WWTP Inspection Date: June 24, 2019



Photo 5 : Pond 1, which acts as the sequencing batch reactor (SBR), from the East.



Photo 6 : Pond 1 with level indicator. Note watermark approximately 1.5ft above current level.



Photo 7: The 10,000 gallon flow equalization tank located between Ponds on the far West side.



Photo 8 : View of 10,000 gallon equalization tanks from the fill side.



Photo 9 : Looking North from above Pond 2.



Photo 10 : Pond 2 seen from the North. Cell 2C on the left and 2B on the right.



Photo 11 : Two 5,000 gallon equalization tanks discharging into Cell 2C from the East bank of Pond 2.



Photo 12 : Baffle in Cell 2C with gap at surface.



Photo 13 : Polymer tank.



Photo 14 : Pressurized filter system.



Photo 15 : UV channel.



Photo 16 Unreadable UV system information panel.



Photo 17 : Refrigerator containing composite sample container.



Photo 18 : Effluent wet well.



Photo 19 : Outfall to drainage channel flowing to San Juan Creek.



Photo 20 : Daily pond monitoring bench sheet.

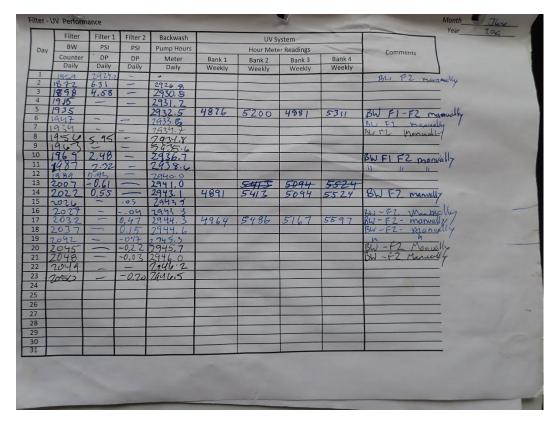


Photo 21 : Daily UV system performance bench sheet.

Day	Time	Initials	Influent Mtr • Gal	Effluent Mtr Gal	Eff Flow Setting GPM	Influent Mtr (Chart) Gal	Effluent Mtr (Chart) Gal	Backwash Mtr (Chart) Gal	Liftstation pump I - Hours	Liftstation pump II - Hours	Liftstation pump III- Hours
	Daily	Daily	Daily	Daily	Daily	Daily	Daily	Daily	Daily	Daily	Daily
1	730	ME	43793974	124307010	130/330	,			24534.4	1749.6	18739.6
2	830	mw	4405 0263	105091405	88				24541.8	29075. 6	18742.4
3	1430	36	44336195	05252920	140				24550.8	27082.3	18795.6
4	0900	56	44460439	105345 138					24555.3	27085,5	18747.1
5	0800	56	44658194	105582700	290				24561,9	27090.3	18749.5
6	1000	MP	44857720	10589673	280				74568.4	27095.1	18751.7
7	1115	me	45068065	104278434	290	and the second		and the second s	a375.1	27010.4	18753.9
8	870	AS	452 08389	108403651	150			1	245810.0	2701.0	18755.5
9	115	INS	454 18629	166499013	275				21586.5	27109.1	18757.6
10	1230	56		106980276					24593.7	27114.7	18760.0
11	900	AS	45825515	107272011	271/250				24599.4	27118.6	18762.3
2	1000	hose	46049163	107607351	24/250	1		-	316060	271225	18764.6
3	0800	IL	46230441		205/340				24612.0	27127.5	18766.7
	0900		46467766		106/			and the second second	24619.1	27133.2	18768.9
5	0915	ME	46644320	12942/1200	100				24625-2	271375	18770.7
.6	TAS	ma	46873595	108539777	40				24632-3	27142.3	10773-1
.7	1100	IC	91017239	108743468	100/140				24637.7	L1196.C	187747
.8	0800	16	47163070	108884907	150/170				24642.6	27150.0	18776.2
9	0900	MT	47343811	109108976	139/51				246487	27154.6	197729
0	1500	36	47557868	109394029	190/155	and the second		-	24656.3	27160.0	187802
1	0800	76		109544065	160	for the second	-		24660.2	27167.9	18781.2
2	100	AS	47865159	109797114	155	deres and	the second second				14/852
3	\$30	AL	4800046	109955810	159		-		24107 7.0	27171.3	187861
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Photo 22 : Daily flow readings bench sheet.

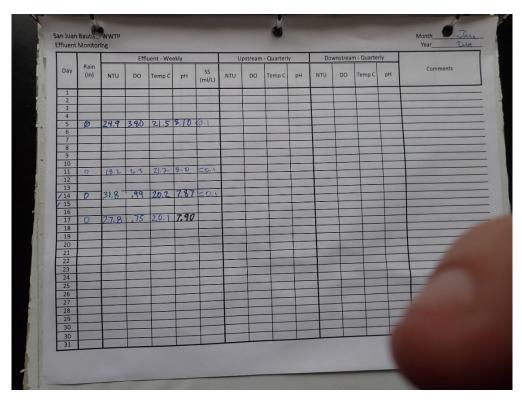


Photo 23 : Effluent monitoring bench sheet.

Day	Time	Intials	834		Aera	tor Meter F	Readings - \	Veekly			Mixers -	Weekly	P	Year	2019	- k
1		intidis	Aerator 1 Hours	Aerator 2 Hours	Aerator 3 Hours	Aerator 4 Hours	Aerator 5 Hours	Aerator 6 Hours	Aerator 7 Hours	Aerator 8 Hours	Mixer 2 Hours	Mixer 3 Hours	Decant Hours	Waste	P2 Recycle	
2	11120	-													Hours	-
4	0900	56	31212.4	5913,1	21490.2	3415.4	3266.4	24975.3	4171-5	548115	11/371	11097 0	107246	anu		12
5	0820	56	31212.4 31212.4 31212.4	5919 2	21501.5	3415.4	3266.4	24975.3	6182.9	566842.6	11649.0	110956	13124,0	1841.6	53186.5	-
6 7	15		31212, 4	N 151.3	41216.2	2419.8	5266.4	24975,3	6197.7	566877.5	11683.8	1110.8	18734.3	9841.6	532037	
8																-
10	1248	56	31212.4	6017.3	21590.8	3430.3	3341.0	249752	62761	547/11	11711 7	11161	147101			
11 12		A COLOR							0210.1	01010.0	111461	10141.0	10160.0	0 9891-6	5522.80	
	6800	56	31212.4	6060.5	216238	34369	3383 5	749753	1210 2	STRACIA	117040	112351	19770	0000		- 12
14 15	0830	JG	31212.4	6076.1	21623.8	3436.9	3399.0	24975.3	6335.2	568196.5	11800-8	11251.6	18779	198416	53243.1	1
16	and the second	-				-										
	1015	56	31212.4	6122,9	21634.2	3436.9	3445.2	24975.3	6382.1	568657	11846.9	11299 1	197937	9841 6	527975	-
18	1815	56	31212.4	6136,5	21634.2	3436,9	3458,7	24975.3	6395,8	5687922	11860,6	11313.3	18798.7	9841.6	53308.8	13
	530														53335.3	
1 (	1800	56	31225,7	6179 9	Sinc	Same	3501.5	Same	6439.2	569219.6	11903.8	1357.7	18813,1	OFF	53343.5	
3	-							S. Marrielland			10	-				-
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Photo 24 : Aerator and mixer hour tracking bench sheet.



Photo 25 : Full 55 gallon drums stored outside without secondary containment.

# Appendix 2 – Record of Sludge Removal from Pond 2

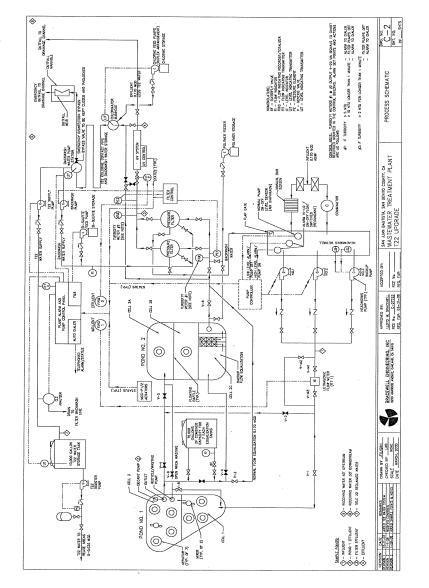
Date Synagro Tckt #		Trailer #	Load Dest	% Solids	Weight	Dry	
	#					Tons	
				Certified lab			
				Certified lab			
10/26/18	341601	570885	johnson canyon	23.8	23.62	5.62	
10/29/18	341602	570887	johnson canyon	26.2	22.22	5.82	
10/29/18	341603	570888	johnson canyon	26.2	23.29	6.10	
10/30/18	341604	57804	Billy Wright	25.8	22.72	5.86	
11/2/18	341605	57-803	Billy Wright	25.2	19.82	4.99	
11/2/18	341606	57-0887	johnson canyon	25.2	18.37	4.63	
11/2/18	341607	57-514	johnson canyon	25.2	22.36	5.63	
11/2/18	341608	57-804	Billy Wright	25.2	22.56	5.69	
11/5/18	341609	57-0889	Billy Wright	23.5	23.47	5.52	
11/5/18	341610	57-803	johnson canyon	23.5	23.54	5.53	
11/5/18	341611	57-514	johnson canyon	23.5	22.09	5.19	
11/6/18	341612	57-804	johnson canyon	23	21.78	5.01	
11/6/18	341613	57-0889	Billy Wright	23	23.26	5.35	
11/6/18	341614	57-803	johnson canyon	23	23.98	5.52	
11/6/18	341615	57-804	john smith	23	21.71	4.99	
11/7/18	341616	57-514	john smith	23.4	23.18	5.42	
11/7/18	341617	57-0805	john smith	23.4	22.05	5.16	
11/7/18	341618	57-0889	john smith	23.4	23.22	5.43	
11/7/18	341619	57-803	john smith	23.4	23.59	5.52	
11/7/18	341620	57-0805	john smith	23.4	23.06	5.40	
11/8/18	341621	57-514	john smith	24.2	20.12	4.87	
11/8/18	341622	57-322	john smith	24.2	21.8	5.28	
11/8/18	341623	57-0889	john smith	24.2	22.98	5.56	
11/8/18	341624	57-0805	john smith	24.2	22.05	5.34	
11/8/18	341625	57-514	john smith	24.2	24.45	5.92	
11/9/18	341626	57-803	john smith	24.7	22.08	5.45	
11/9/18 11/9/18	341627 341628	57-322 57-0805	john smith	24.7	21.53	5.32	
11/9/18	341628	57-514	john smith john smith	24.7 24.7	22.27	5.50	
11/9/18	341630	57-0889	john smith	24.7	21.79 22.85	5.38 5.64	
11/12/18	341631	57-322	john smith	23.2	20.26	4.70	
11/12/18	341632	57-0885	john smith	23.2	23.05	5.35	
11/12/18	341633	57-0805	john smith	23.2	22.92	5.32	
11/12/18	341634	57-0889	john smith	23.2	23.26	5.40	
11/13/18	341635	57-0805	john smith	21.5	22.47	4.83	
11/13/18	341636	57-0885	john smith	21.5	22.4	4.83	
11/14/18	341637	57-0889	john smith	23.4	23.15	5.42	
11/14/18	341638	57-0885	john smith	23.4	23.79	5.57	
11/14/18	341639	57-0889	john smith	23.4	23.92	5.60	
11/14/18	341640	57-0885	john smith	23.4	24.22	5.67	

### Appendix 3 – Attachment C – Flow Schematic from permit

1/

CITY OF SAN JUAN BAUTISTA WASTEWATER TREATMENT AND RECLAMATION PLANT ORDER NO. R3-2009-0019 NPDES NO. CA0047902

#### ATTACHMENT C - FLOW SCHEMATIC



Attachment C – Wastewater Flow Schematic

C-1