

# facsimile

## TRANSMITTAL

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**to:** Matt Fabry, CCRWQCB  
**fax #:** 805-543-0397  
**re:** Cease and Desist Order, San Juan Bautista, CA  
**date:** June 18, 2001  
**pages:** 2, including this cover sheet.

We are writing to provide some additional information for the Board for preparation of a Cease And Desist Order (CDO) for the San Juan Bautista Wastewater Treatment Plant.

- A. The reason that the City is not able to comply with the existing NPDES permit effluent limits is due to an unanticipated change in the water quality of the water supply that has caused an unavoidable change in the composition of the waste discharge that has led to the inability of the City to comply with the effluent limitations. During the permit renewal process an ROWD was prepared that used the historical water quality data for salts, including chloride, for wells 2 and 3, the water supply wells for the City, and plant influent. At that time the City was in the process of switching from well 3 to well 2 as the water supply well due to high nitrate levels in well 3. The water quality of well 2 was much better than that of well 3. With the limited water quality data for the plant influent that was generated during quarterly monitoring of the influent for salts as required in the previous monitoring plan, it appeared that the City would be able to comply with the chloride effluent limit when using well 2 due to its higher water quality. However, the new permit requires monthly monitoring of plant effluent for chloride using 24-hour composite sampling. This new data has found that the plant effluent consistently exceeds the discharge limitation. Composite samples of the influent show that the influent chloride concentration varies widely from 116 mg/L to 500 mg/L. Investigation of this wide variation in chloride levels has determined that the grab samples collected under the old permit were not representative of the plant influent. Also, a substantial number of the City residents use water softeners and the use of water softeners has not decreased with the use of Well 2. Thus, there has been an unanticipated increase in chloride levels in the plant influent over what was expected based on monitoring conducted for the ROWD. Had we known that the influent chloride levels varied so much and attained such high levels with well 2 online, the City would have argued against the effluent chloride limit of 200 mg/L.
- B. The discharge limit in the CDO should not be less than 350 mg/L.
- C. From the Corrective Action Plan, the milestones for installation of a new water supply that will lead to compliance with the effluent limit are as follows:
1. Presentation of the Preliminary Design to City Council

From the desk of...

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7/17/2001

2. Completion of the 90 percent design 11/15/2001
  3. Application for final construction funding 12/15/2001
  4. Receipt of final construction funding commitments 2/15/2002
  5. Advertising for bids 4/15/2002
  6. Completion of construction and start-up 4/15/2004
- D. The City has prepared and is implementing a pollution prevention plan. The pollution prevention plan was submitted to the Board on June 8, 2001 as a Corrective Action Plan. The Corrective Action Plan consists primarily of an “input change” by bringing a new water supply to the City that will reduce chloride and the total dissolved solids level in the City water and allow the water customers to remove their water softeners. Removal of the water softeners will eliminate the chloride increment that is contributed by regeneration of the water softeners. In addition, the City is requiring all new construction to use only non-regenerative water softeners and is developing a program to encourage homeowners to replace existing regenerative water softeners with non-regenerative water softeners.