



POSEIDON CHANNELSIDE

a Poseidon Water company

March 29, 2018

Ben Neill
Water Resources Control Engineer
Core Regulatory Unit
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92123

SUBJECT: Order R9-2006-0065 Discharge Monitoring Report – February, 2018

PROJECT: Carlsbad Desalination Plant (CDP), 4590 Carlsbad Blvd., Carlsbad, CA 92008

Dear Mr. Neill,

Poseidon Resources (Channelside), LP (Discharger) is submitting its monthly discharge monitoring report in compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) Permit Number CA0109223, Order Number R9-2006-0065 (collectively, the “Order”). For reference, a summary of the Order for the site is presented below:

<u>NPDES Permit</u>	<u>Order No.</u>	<u>Adopted</u>	<u>Order Effective Date</u>
CA0109223	R9-2006-0065	June 14, 2006	October 1, 2006

During the month of February 2018, continuous discharges occurred in accordance with the Order. As required under Attachment E of the Order, samples were taken throughout the month.

On February 5, 2018 at 8:15 PM CDP Operator inadvertently shutdown a high pressure feed pump and SWRO Train due to an erroneous command entered into the SCADA system. This caused the off-spec valve located at the product water tank (PWT) to open due to a fluctuation in PWT inlet chemistry and discharge to M-001. CDP Operator took immediate corrective action and restored inlet chemistry on February 5, 2018 at 8:50 PM. The following flows contributed to the daily operational flow totals discharged through M-001: February 5th – 1.04 MG.

On February 6, 2018 at 10:04 AM CDP experienced a partial plant shutdown due to a power loss on incoming breaker #3 during SDG&E maintenance activities. Power was restored and CDP resumed delivery to the SDCWA on February 6, 2018 at 3:19 PM. The following off-spec flows contributed to the daily operational flow totals discharged through M-001: February 6th – 16.25 MG.

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On February 14, 2018 at 06:56 AM CDP experienced a partial plant shutdown due to a power loss on incoming breaker #4 during SDG&E maintenance activities. Power was restored and CDP resumed delivery to the SDCWA on February 14, 2018 at 8:40 PM. The following off-spec flows contributed to the daily operational flow totals discharged through M-001: February 14th – 28.80 MG. Monthly average discharge flows through M-001 for the February 2018 reporting period are 49.56 MG.

Seven compliance chronic toxicity samples were collected during the February 2018 reporting period; results of analysis are as follows: February 5th - >40 TUc, February 5th – 20 TUc, February 6th – 16.5 TUc, February 9th – 20 TUc, February 13th – 10 TUc, February 14th – <6.67 TUc, and February 20th – 16.5 TUc. Chronic toxicity analysis reports were uploaded as attachments in CIWQS for the February 2018 reporting period. Results from chronic toxicity samples collected at M-001 have been uploaded to CIWQS as attachments for the February 2018 reporting period.

According to the Compliance Determination Section of the Order (VII. J. 2. Page 32), if toxicity is observed, the Discharger shall: “Increase the frequency of the toxicity test(s) that showed a violation to at least weekly for a minimum of 6-weeks and until the results of at least two consecutive toxicity tests do not show violations.” Page 6 of the Toxicity Reduction Evaluation (TRE) Workplan (Poseidon 2014) also indicates that after two consecutive passing weekly tests, routine monitoring will resume. Since the results from two consecutive weekly (February 12 and February 20) were in compliance with the chronic toxic unit (TUc) limit, the Discharger has resumed routine monitoring for chronic toxicity.

I Certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

A handwritten signature in black ink that reads "Peter MacLaggan". The signature is written in a cursive style with a large initial "P".

Peter MacLaggan