201 N. Calle Cesar Chavez, Suite 300
Santa Barbara, CA 93103
Ph 805.692.6921

Memorandum

TO	Ashley Collick, General Manager, City SJB	**From**	Jordyn Arreola, P.E., MNS Engineers
DATE	April 6, 2026		
Subject	Collection System Salt Study for San Juan Bautista WWTP Permit Compliance		

MNS Engineers has completed an analysis of salt loading of the wastewater treatment plant (WWTP) influent for the City of San Juan Bautista (City). This analysis was completed using the best available information as well as water quality data from the WWTP and six pumping stations in the sewer collection system.

EXECUTIVE SUMMARY

The City has experienced longstanding challenges with salinity exceedances in wastewater discharged from its WWTP, resulting in regulatory enforcement actions including a Cease-and-Desist Order issued by the Central Coast Regional Water Quality Control Board (RWQCB) and subsequent Mandatory Minimum Penalties (MMPs). In 2022, these issues were addressed through a Stipulated Administrative Civil Liability Order (Order) that established a framework for evaluating and reducing salinity loading.

A primary long-term solution is the conveyance of San Juan Bautista wastewater to the City of Hollister's wastewater treatment facility. As a result, the City's wastewater will be subject to the effluent limits contained in Hollister's Waste Discharge Requirements (WDRs), which are more restrictive than the City's historical limits. These include 150 mg/L for chloride, 200 mg/L for sodium, and 1,200 mg/L for total dissolved solids (TDS). These lower limits reduce compliance margins and increase the need for effective salinity control.

This memorandum updates the City's prior salt loading analysis utilizing recent monitoring data collected at the WWTP and at multiple lift stations throughout the collection system. The results confirm that chloride, sodium, and TDS remain the primary compliance concerns. These constituents are not removed through conventional biological treatment, and effluent concentrations therefore largely reflect influent wastewater quality rather than treatment performance. Sodium and chloride are major contributors to salinity, while TDS represents the total concentration of dissolved constituents in the wastewater, including both sodium and chloride.

Monitoring data show that salinity concentrations declined from elevated levels observed in 2022 but have since increased and remain elevated, with continued variability under current conditions. This suggests that earlier improvements have not been sustained. The subsequent rebound in concentrations does not necessarily indicate a reemergence of softener use; although, it may be a contributing factor.

Sodium and chloride originate from a combination of baseline source water quality, domestic use, self-regenerating water softeners, and industrial domestic discharges. Lift station data show that salinity varies across the collection system, with certain locations exhibiting higher concentrations and greater variability than others. In particular, one location shows consistently elevated and highly variable concentrations that are not explained by known sources, suggesting additional or previously unidentified contributors. This spatial variability complicates source identification and increases compliance risk at the downstream monitoring point. Because not all lift stations were included, system-wide conclusions are limited by the available data.

Industrial users can contribute significant salinity loading during periods of high discharge; however, observed patterns show that industrial sources alone do not fully explain system-wide conditions. Source water quality also contributes to salinity, as elevated hardness promotes water softener use and baseline sodium and chloride concentrations remain present in both local and imported supplies.

Overall, the City has achieved limited and inconsistent reductions in salinity and remains vulnerable to exceedances under both historical and current regulatory limits. Continued source control will be required to achieve reliable compliance as the City transitions to discharge through the City of Hollister.

Recommended actions include continued implementation and enforcement of the water softener ordinance, development of incentive programs to facilitate removal or replacement of existing softeners, engagement with industrial users to evaluate pretreatment opportunities, and continued monitoring of salinity throughout the collection system. Integration of industrial user flow data with corresponding water quality data is also recommended to support mass balance evaluation and improve identification of key contributors to salinity loading. These actions will support the City's ability to manage salinity and meet increasingly restrictive discharge requirements.

BACKGROUND

The City operates its WWTP under Water Board permit number R3-2009-0019 and NPDES permit number CA0047902. Due to chronically elevated salinity levels in the wastewater effluent, the City was issued a Cease-and-Desist Order (01-106) by the RWQCB in July 2001, which required the City to achieve compliance with effluent limits by July 2006. The applicable permit limits for salinity-related parameters under the City's WDRs include 1400 mg/L for TDS, 200 mg/L for chloride, and 250 mg/L for sodium, with compliance determined based on the average of monthly samples. Serious violations of these effluent limits are subject to MMPs of $3,000 per occurrence.

Following many years of ongoing exceedances of salinity-related permit limits, the matter was resolved in 2022 when the RWQCB issued Order No. R3-2022-0031. The RWQCB alleged that the City incurred approximately $981,000 in MMPs between March 2007 and March 2022 as a result of repeated exceedances of salinity-related effluent limits. Under the terms of the Order, the City agreed to implement several corrective measures intended to reduce salinity loading to the wastewater system and achieve long-term regulatory compliance.

One of the primary elements of the settlement agreement is construction of a force main that conveys raw wastewater from the City to the City of Hollister WWTP. The City's wastewater is now treated at the Hollister facility and is subject to the effluent limits established under Hollister's WDRs, which operate under the State Water Board's General WDR permit for dischargers greater than 100,000 gallons per day. These limits are more restrictive than the City's historical permit limits, particularly for salinity parameters. Under the Hollister permit, effluent limits are 150 mg/L for chloride, 200 mg/L for sodium, and 1,200 mg/L for TDS. In addition to construction of the force main, the Order required the City to implement several source-control measures intended to reduce sodium, chloride and TDS within the wastewater collection system. These measures include development of an industrial pretreatment program for agricultural processing facilities, blending imported water with the City's groundwater supply to reduce potable water hardness, and implementation of programs to remove or replace residential self-regenerating water softeners.

This memorandum updates the City's previous salt loading analysis using the most recent monitoring data available prior to the transition to the Hollister system. The purpose of this memorandum is to evaluate the variability of wastewater quality generated within the City's collection system and to assess the City's progress toward reducing salinity concentrations to meet the lower permit limits of the Hollister WWTP.

To support this evaluation, recent monitoring data collected at compliance monitoring location M-001 were reviewed to identify trends in influent flow, TDS, sodium, and chloride concentrations as shown in Figure 1.

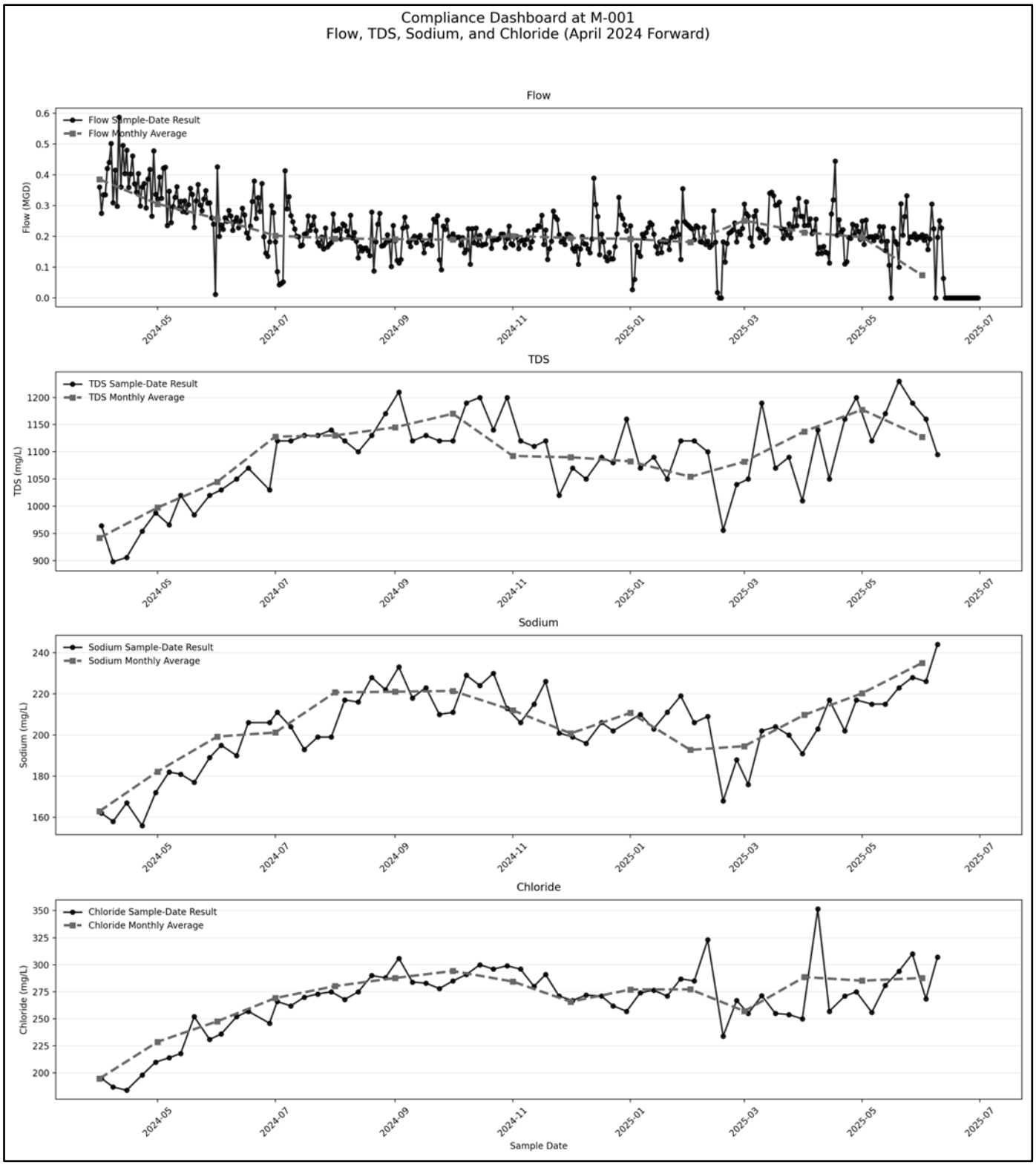


Figure 1 Compliance Data for 2024-2025 at the SJB WWTP

During preparation of this memorandum, the City completed construction of the force main conveying wastewater to the City of Hollister WWTP and discontinued operation of its local treatment facility. Although the City WWTP is

no longer operating, the analytical data reviewed in this memorandum represents the most recent monitoring records collected prior to the transition to the Hollister system. These data therefore provide the best available characterization of the wastewater quality generated within the City's collection system and conveyed to the Hollister facility.

San Juan Bautista Customer Base

The City's water and wastewater system primarily serves residential customers. Approximately 80 percent of potable water connections are residential and about 20 percent are commercial. The City currently reports 780 residential and 54 commercial water customers, with a residential population of 2,335.

In addition to these customers, several agricultural processing facilities within the service area discharge domestic wastewater to the City's sewer system and are considered industrial users. Wastewater contributions from these facilities will not correspond directly to potable water use reported by the City because industrial facilities obtain water from sources outside of the City's municipal supply.

As a result, wastewater flows entering the WWTP historically exceeded the volume that would be expected based solely on municipal water deliveries. A comparison between potable water production and wastewater flows provides a useful indicator when evaluating potential industrial contributions to the wastewater stream and was considered as part of the analysis presented in this memorandum. It should be noted that when evaluating production of groundwater versus WWTP flows, there is a large disparity in the months when outdoor water is taking place because this water doesn't flow through the WWTP. Disparities between measured influent flow and expected customer and industrial contributions are more difficult to assess during large rain events due to inflow and infiltration (I/I), as illustrated in Figure 2.

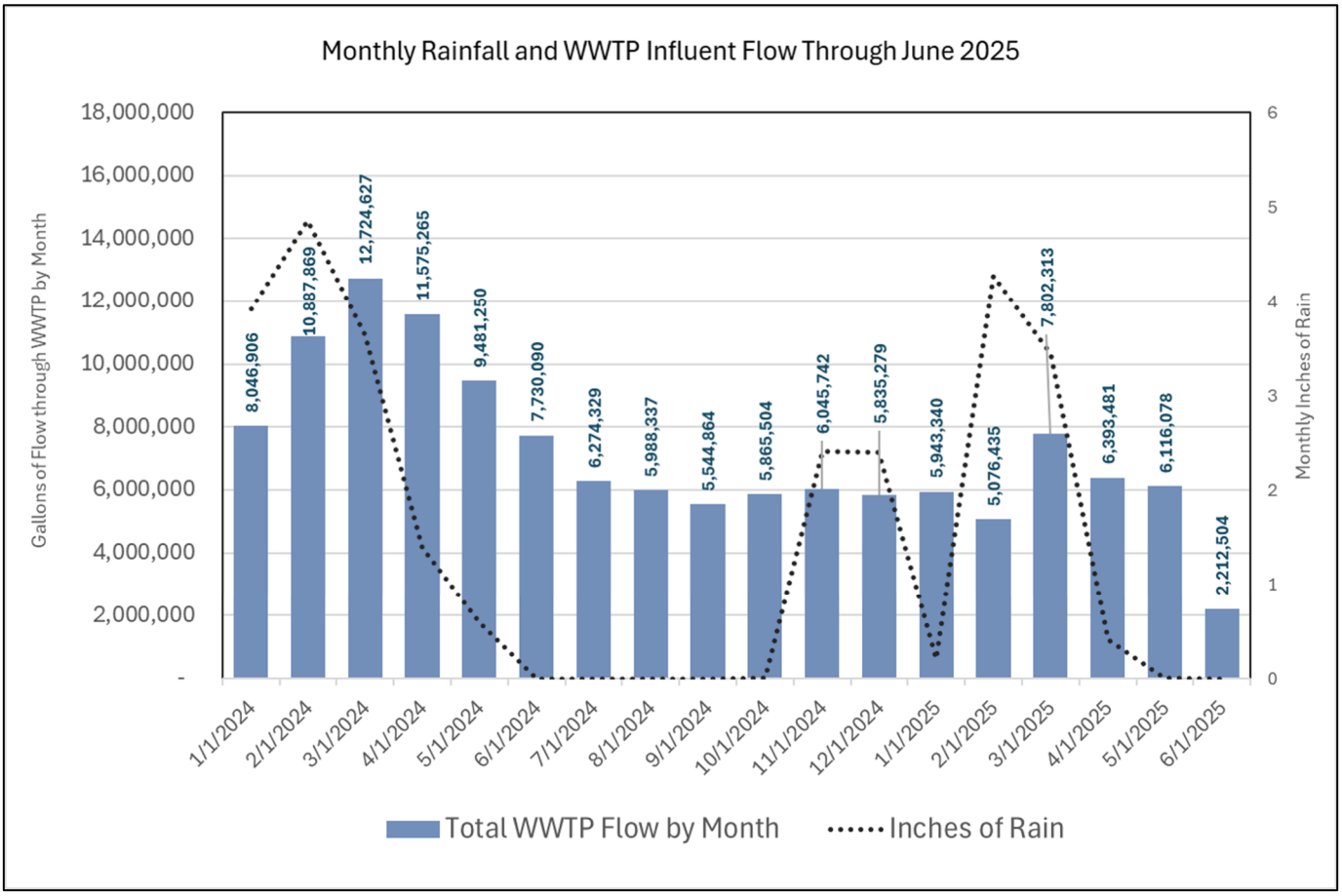


Figure 2 Rainfall Versus WWTP Flow in MGD

San Juan Bautista Water and Wastewater Flows

As reported in the City's 2020 Water Master Plan (WMP), average daily residential water use was approximately 127,000 gallons per day (gpd), with other users accounting for approximately 74,000 gpd (total 201,000 gpd, or 0.20 MGD). Under typical conditions, this expected wastewater volume is below the WWTP design and dry-weather permitted capacity of 0.27 MGD. The City's NPDES permit allowed a higher discharge rate of 0.50 MGD during wet weather. Figure 3 presents the production data from the City which generally aligns with consumer demand with the caveat that higher demand months are mostly attributed to outdoor use.

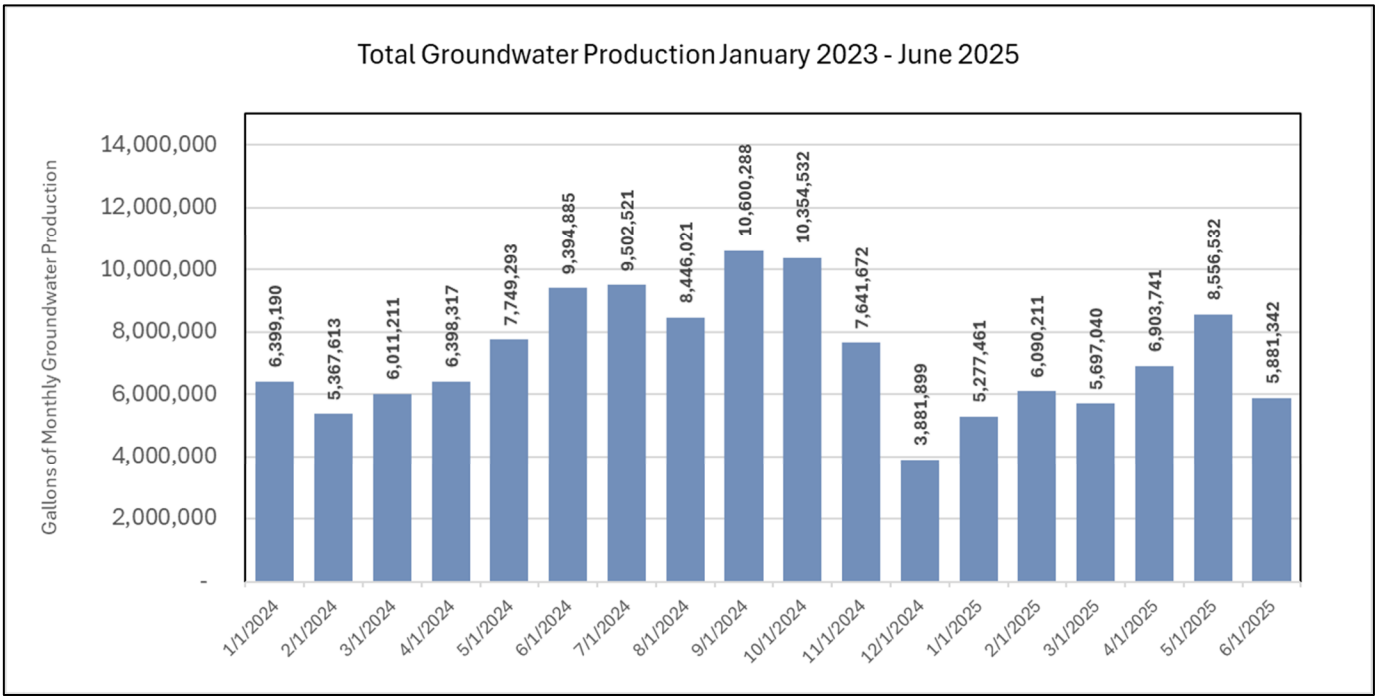


Figure 3 Potable Demand City of San Juan Bautista 2025

To evaluate how rainfall affects hydraulic loading at WWTP, available influent flow records were compared to rainfall data for the same period. Because flow readings are collected at varying times of day, individual "daily" values can be artificially high or low depending on when the meter was read (for example, a late reading one day followed by an early reading the next). To reduce this timing artifact, influent flow values were normalized using weekly average flow and then summarized by month. Figure 2 above presents monthly rainfall totals alongside average WWTP influent flow. The data show that influent flow generally remained in a relatively narrow band (approximately 0.15–0.20 MGD) for much of the period, with higher flows occurring during wetter months (notably March in 2024 and 2025), which is consistent with rainfall-driven influence.

Industrial User Salinity Contributions

Salinity-related parameters (chloride, sodium, and TDS) vary across the City's collection system, and this variability is reflected in the combined wastewater stream historically measured at the WWTP effluent compliance point. To evaluate spatial patterns in salinity concentrations, available monitoring data from lift stations were compared with results measured at the WWTP compliance monitoring location (M-001). Lift stations are named in relation to their general upstream service areas to support interpretation of spatial patterns. This approach is intended to identify trends and does not assign responsibility to any specific discharger.

Review of lift station monitoring indicates that salinity concentrations and variability are not uniform across the collection system. Chloride and sodium remain the dominant parameters of concern and are the primary drivers of exceedances relative to both the City's historical limits and the more restrictive Hollister limits. Because chloride, sodium, and TDS are conservative dissolved constituents not removed through either the SJB or Hollister

WWTPs, elevated concentrations within the collection system translate directly into concentrations that will persists through treatment and ultimately influence compliance risk at the receiving facility.

Under the Order, the City is required to implement an industrial pretreatment program for applicable industrial users connected to the sewer system. As of the period evaluated in this memorandum, it is unclear whether pretreatment agreements and enforceable discharge controls have been fully implemented for the industrial sources evaluated. Continued monitoring and development of facility-specific pretreatment requirements remain important to reduce overall salinity and support long-term compliance under the Hollister discharge framework.

To provide additional context for potential industrial contributions, Figure 4 presents an aggregate view of approximate daily flows from major industrial users over the period of record provided by the City. The figure is intended to illustrate general magnitude and variability rather than precise or directly comparable contributions. Reported flows indicate that some users account for a substantial portion of the variability in industrial flows, while others provide a more consistent baseline contribution. Flows reported for other users are more intermittent and may reflect periods of non-operation, data gaps, or uncertainty within the available records. As a result, the flow data presented in Figure 4 are used to support general interpretation of system behavior but are not relied upon for detailed quantitative source attribution.

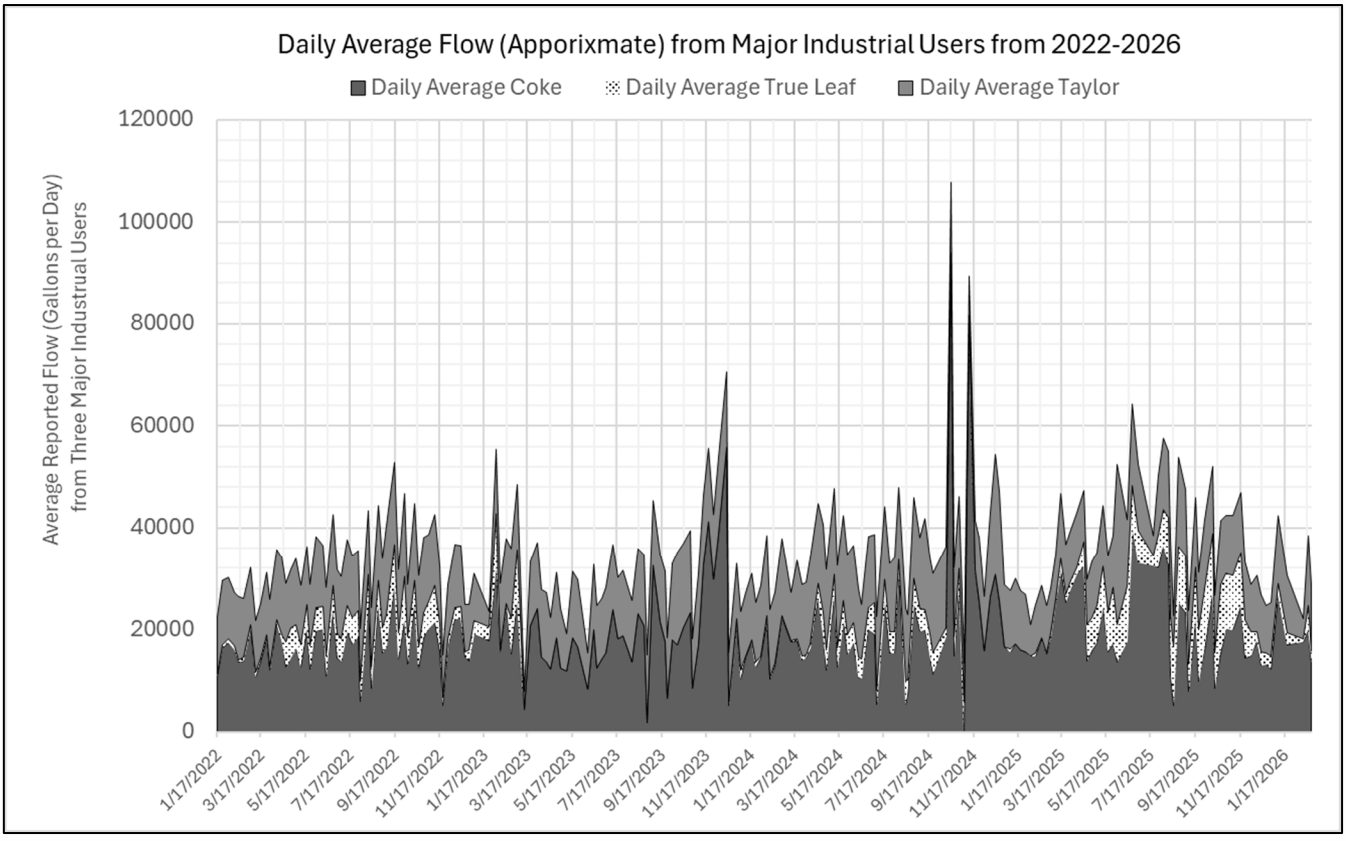


Figure 4 Relative Contribution to WWTP Flows from Jan 2022 to Jan 2026

Despite these limitations, the variability observed in industrial flow data is consistent with patterns observed in the lift station monitoring results, where certain locations exhibit elevated and more variable salinity concentrations. However, this behavior is not consistent across all industrial-influenced areas, indicating that industrial contributions alone do not fully explain system-wide conditions.

Appendix Figures A-1 through A-3 present monitoring results for chloride, sodium, and TDS measured at individual lift stations compared with concentrations observed at monitoring location M-001 beginning in April 2024. Each panel displays one lift station relative to the M-001 baseline to illustrate spatial variability within the

collection system and identify locations where elevated or highly variable salinity concentrations may contribute to loading observed at the compliance monitoring location.

Across all three parameters, variability differs substantially among lift stations. While some locations influenced by industrial service areas exhibit concentrations that are generally comparable to the M-001 baseline with moderate variability, others display distinctly different behavior. In particular, the Ahwanee lift station exhibits substantially higher variability and some of the most extreme concentrations observed during the study period, exceeding both the M-001 baseline and other industrial-influenced locations.

This memorandum updates the City's prior salt loading analysis using recent monitoring data collected at the WWTP and at multiple lift stations throughout the collection system. The results confirm that chloride, sodium, and TDS remain the primary compliance concerns. These constituents are not removed through conventional treatment, and effluent concentrations therefore largely reflect influent wastewater quality. Sodium and chloride are primary contributors to salinity, while TDS represents the total concentration of dissolved constituents, including both.

Domestic Wastewater Salinity Baseline

In addition to industrial service areas, the City's wastewater salinity reflects contributions from residential and commercial customers throughout the collection system. To characterize the non-industrial baseline, this analysis reviewed lift station locations representative of mixed residential and commercial areas and compared those results to lift stations serving industrial service areas. This comparison is intended to describe spatial variability within the system and does not assign source responsibility to any individual customer or facility.

Many household products are also sources of the salinity components evaluated in this study and are therefore a significant part of the wastewater profile. Typical residential wastewater contributions for salinity-related parameters are presented in Table 1 as a reference benchmark for domestic use. These values represent expected contributions from household activities only and exclude additional inputs such as water softener discharge.

Table 1 Typical Domestic Wastewater Contributions from Residential Use (Metcalf and Eddy, 2014)

Parameter	Loading (g/capita/day)	Concentration (mg/L)	Notes
Sodium	18 – 32	47 – 84	From domestic use only (excludes softeners)
Chloride	9 – 23	24 – 60	Primarily diet and household products (excludes softeners)
TDS	69 – 175	182 – 460	Total dissolved solids contribution from household use

Monitoring results show that salinity-related parameters are elevated throughout the collection system, including locations not associated with industrial service areas. This pattern suggests that a baseline level of salinity is present across the system due to various sources such as domestic water use, source water characteristics, and other possibly unidentified contributions. While locations serving industrial service areas often show consistently higher concentrations, the monitoring record indicates that the salt constituents cannot be attributed to industrial sources alone.

Table 2 Source Water Quality

Water System Name	Water Source Name	Hardness (mg/L) as $CaCO_3$	Hardness (grains per gallon)	Chloride in Source (mg/L)	Sodium in Source (mg/L)	TDS in Source (mg/L)
San Benito County	West Hills Plant	100	5.8	109	99	416
	Lessalt Memcor	98	5.7	120	85	370
San Juan Bautista	Well 1	417	24.4	51	53	588
	Well 5	377	22.0	101	85	618

Source water quality characteristics also influence baseline salinity conditions in the wastewater system. As shown in Table 2, groundwater sources serving the City exhibit relatively high hardness where levels exceed 20 grains per gallon. Hard water conditions commonly lead to the use of residential ion-exchange water softeners, which remove hardness by exchanging calcium and magnesium for sodium and discharge concentrated sodium chloride brine to the sewer system during regeneration cycles. Consequently, a portion of the baseline sodium and chloride observed in the collection system reflects source water characteristics and associated residential water softening practices rather than industrial discharge alone.

Water Softener Ordinance and Program Status

On October 17, 2023, the City adopted an ordinance prohibiting new and existing self-regenerating water softeners. This action was implemented as a source-control measure intended to reduce salt concentrations going to the City's wastewater system, particularly for chloride and sodium. Figure 5 illustrates the potential magnitude of salinity loading associated with residential softener use by estimating the increase in sodium and chloride concentrations in the combined wastewater stream under varying levels of residential softener adoption. The analysis demonstrates that even moderate levels of softener use can produce measurable increases in salinity concentrations at the WWTP.

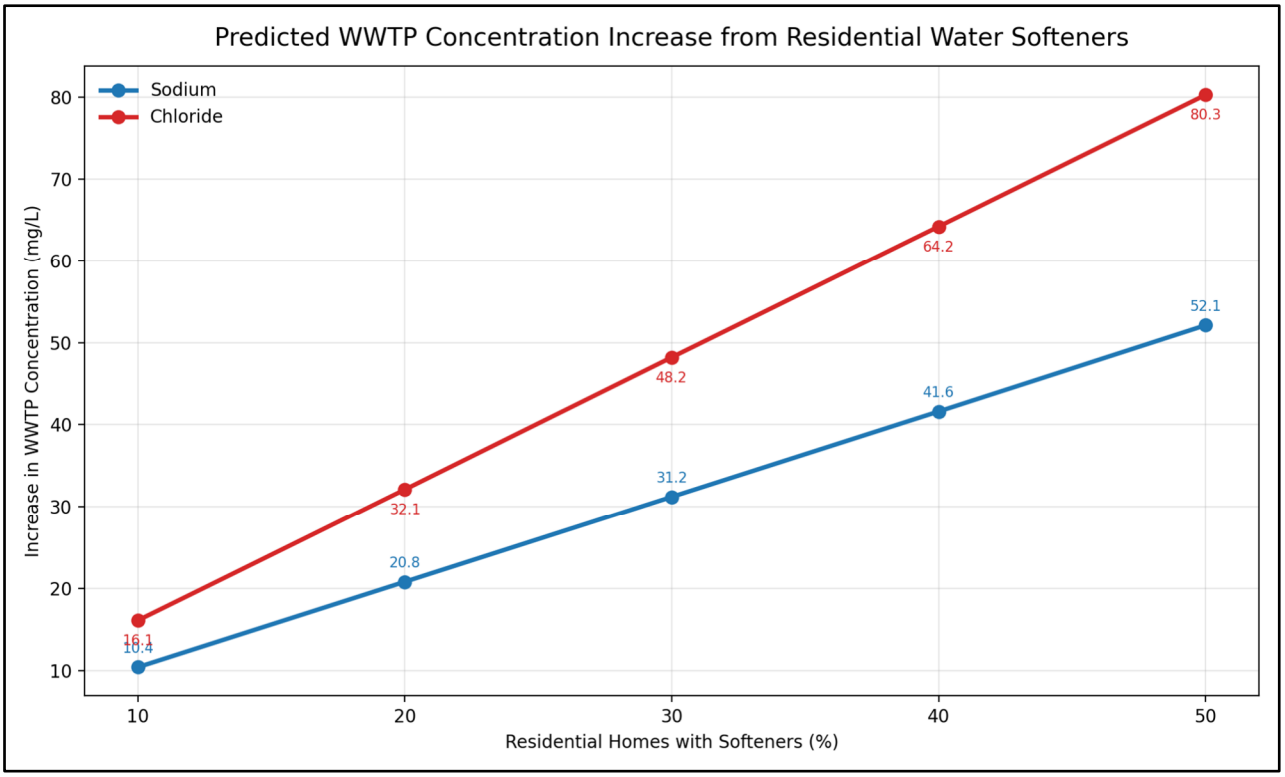


Figure 5 Predicted WWTP Sodium and Chloride Impacts to Wastewater

The predicted increase in sodium and chloride from residential water softeners was estimated based on source water hardness and the percentage of homes using softeners. The analysis assumes a proportional relationship between softener use and salt loading to the wastewater system and is intended as a baseline estimate. Actual contributions will vary based on softener operation and usage patterns. Variability in softener performance is expected to result in lower overall contributions than those shown in Figure 5, which represents a conservative, worst-case scenario assuming fully effective softener operation.

Review of available monitoring data indicates that wastewater salinity concentrations declined after 2022, presumedly in response to the ordinance. However, current chloride concentrations remain elevated and continue to represent the primary potential compliance issue under both the City's historical limits and the more restrictive Hollister limits. While the softener ordinance appears beneficial, the monitoring record indicates that the ordinance alone has not consistently reduced wastewater salinity to levels below permit limits.

Because the City does not currently have complete information on the number of self-regenerating softeners remaining in service, this memorandum does not estimate softener prevalence or quantify the percent reduction achieved through the ordinance. Given the continued elevation of chloride in the monitoring record, additional program measures, such as verification of remaining units, community outreach, and incentives to remove or replace self-regenerating softeners, may be the most direct next step for achieving further reductions in sodium and chloride.

Collection System Salinity Variability

To evaluate how salinity varies across the City's collection system, this memorandum compares available monitoring results from lift stations and the WWTP sampling locations. Lift stations are not compliance points. However, they provide useful, location-specific insight into the extent of salinity-related parameters prior to downstream mixing.

Across the dataset, chloride remains the dominant salinity-related parameter and is elevated throughout the collection system. While concentrations vary by location and sampling date, several lift stations exhibit greater variability than others. In particular, the Ahwanee lift station shows consistently elevated and highly variable chloride and TDS values that differ from patterns observed elsewhere. Although this location may receive flows from areas with industrial influence, the degree and variability are not explained by available data and may indicate additional or unidentified sources of salinity within this portion of the system. The persistence of these results, and their absence at other lift stations, suggests they are unlikely to represent anomalies or analytical artifacts.

The lift station data also show that salinity variability is not confined to a single location. Even areas representing mixed residential and commercial service exhibit periodic increases, indicating a baseline level of salinity across the system. Locations associated with industrial service areas, where concentrations are often higher and more variable, may further increase the magnitude and frequency of elevated salinity conditions in the combined flow. In addition, residential water softener regeneration events can produce short-duration "slug" discharges of elevated sodium and chloride. These events typically release on the order of 50 to 100 gallons of high-salinity brine and may contribute to transient spikes observed in the data.

Transition to Hollister and Salinity Permit Compliance

Wastewater generated within the City's collection system is now conveyed to the City of Hollister WWTP for treatment. As a result, the City's wastewater is evaluated under Hollister's WDRs, which include more restrictive salinity-related limits than those historically applied at the City WWTP. For key parameters, the applicable Hollister limits include 150 mg/L for chloride, 200 mg/L for sodium, and 1,200 mg/L for TDS, as shown in Table 3.

Table 3 Hollister Waste Discharge Limits

Pajaro Valley, Hollister Groundwater Basin		
Constituents	**Units**	**25-Month Rolling Median**
Total Dissolved Solids	mg/L	1200
Chloride	mg/L	150
Sodium	mg/L	200
Sulfate	mg/L	250
Boron	mg/L	1.0
Total Nitrogen	mg/L	10

The monitoring data summarized in this memorandum indicate that salinity-related parameters are elevated and variable across the City's collection system. These constituents are not removed via biological treatment and will thus be passed through to the compliance monitoring point and may represent a vulnerability for the City if future results remain elevated.

Under the City's wastewater conveyance agreements, understanding the level of salinity and overall variation within the City's wastewater stream is important for managing compliance risk. The reduction in allowable concentrations under the Hollister permit reduces the difference between typical observed conditions and the applicable limits. This fact alone increases the likelihood that routine variability in wastewater quality may contribute to exceedances at the receiving facility.

Accordingly, the City should continue to implement the provisions of the Order and pursue the recommended actions described below to further reduce salt concentrations within the wastewater collection system.

RECOMMENDATIONS

Based on this analysis, the City should ensure continued progress is made on source-control measures to reduce overall salt loading in its collective wastewater stream to minimize compliance risk under the City of Hollister discharge framework. The following is a list of specific ways the City might choose to accomplish this goal.

Refine source characterization:
Further investigation is warranted to better characterize salt inputs from industrial and other sources within the collection system. Integration of industrial user flow data with corresponding water quality data would support a more robust mass balance evaluation and improve identification of key contributors.

Implement industrial pretreatment:
Industrial users represent a potential source of elevated salinity, particularly during periods of high discharge. In alignment with the Order, the City should prioritize development and implementation of an industrial pretreatment program and engage with applicable facilities to evaluate opportunities for reducing salinity.

Continue residential source control:
The City's ordinance prohibiting self-regenerating water softeners represents an important step toward reducing residential salt contributions. Continued efforts to verify compliance, conduct targeted outreach, and encourage removal or replacement of remaining units will help further reduce salinity loading.

Evaluate source water management strategies:
Source water hardness contributes to demand for residential softening. Blending groundwater with purchased water from San Benito County may reduce hardness. However, the baseline salinity of the purchased supply should be considered when evaluating overall effectiveness.

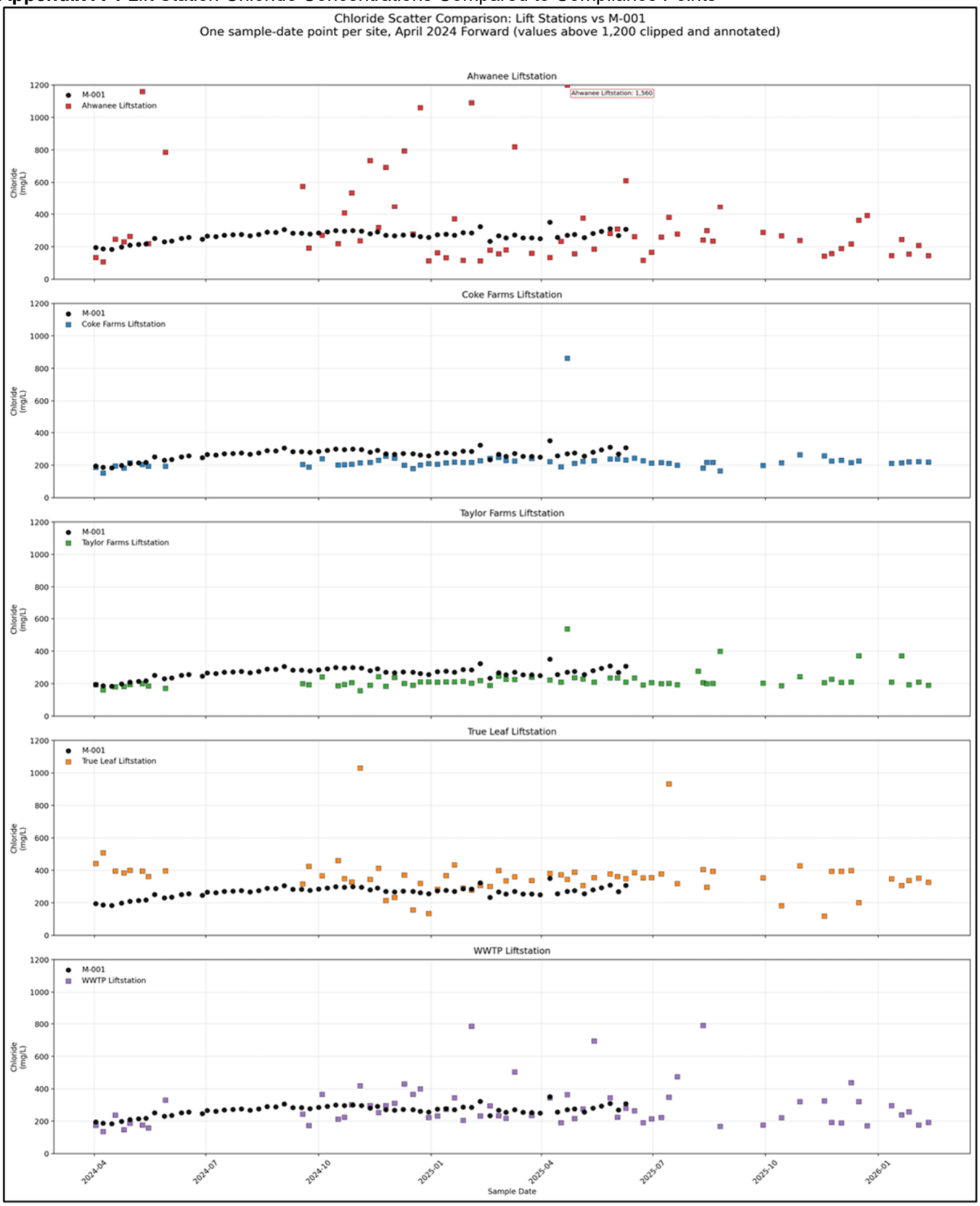
Maintain and coordinate monitoring:
Continued monitoring of salinity-related parameters should be maintained to track trends, identify areas of elevated loading, and support compliance evaluation. Monitoring efforts should be coordinated with available flow data, where feasible, to support improved system understanding and future refinement of management strategies. This monitoring should be incorporated into any permitted discharge agreements between large industrial users where possible, and costs should be assigned accordingly.

Future areas for study:
This analysis provides a foundation for additional evaluation of salinity within the collection system. To better understand the sources of transient spikes and persistently elevated salinity, the City could implement a collection system mass balance study that pairs wastewater quality data with corresponding flow data at a more granular level. This approach would allow the City to more precisely identify loading from specific areas within the system and improve its ability to evaluate contributions from large and industrial users. The results could also support development and enforcement of discharge requirements consistent with applicable permits.

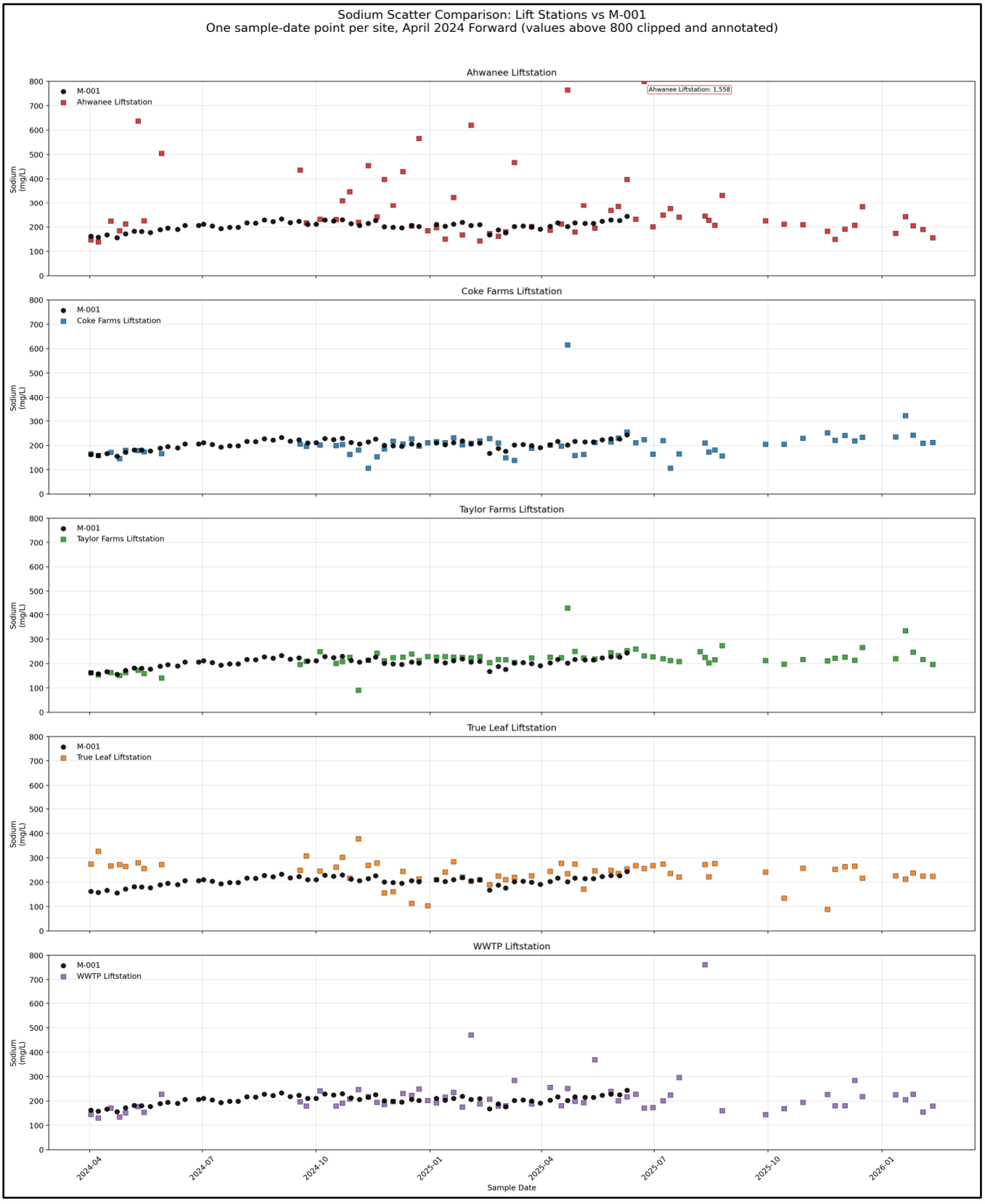
Appendices

Supporting figures and additional data are provided in the appendices.

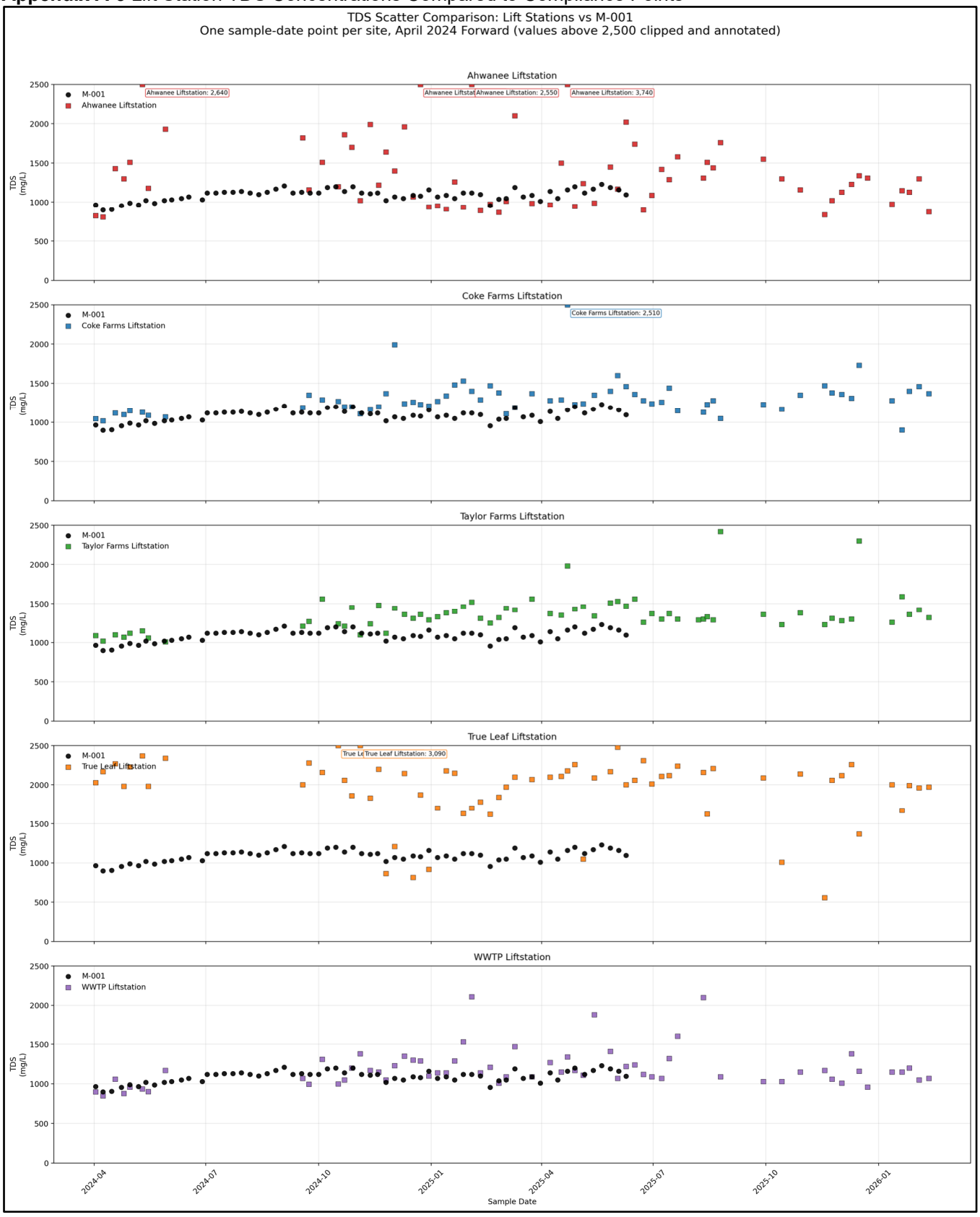
Appendix A-1 Lift Station Chloride Concentrations Compared to Compliance Points



Appendix A-2 Lift Station Sodium Concentrations Compared to Compliance Points



Appendix A-3 Lift Station TDS Concentrations Compared to Compliance Points



SJB Industrial Users Monthly Usage							
Date	Coke Farms Usage (gallons)	Coke Farms Discharge (GPD)	True Leaf Usage (gallons)	True Leaf Discharge (GPD)	Taylor Farms Usage (gallons)	Taylor Farms discharge (GPD)	Notes
Discharge Limit	3,000 GPD		1,500 GPD		10,000 GPD		True Leaf was previously Pride of San Juan | Taylor Farms was previoulsy Natural Selection
Feb 2026	406,260	14,509	86,620	3,094	679,580	24,271	Why are so many Coke Farms' readings negative in the calculated results provided? What is happening to the wastewater leaving Taylor Farms? Does Taylor Farms discharge pass through Coke Farms' Meter? Are IUs being charged based on the agreements or actual discharge?
Jan 2026	266,890	8,609	63,446	2,047	268,990	8,677	
Dec 2025	355,600	11,471	96,988	3,129	357,400	11,529	
Nov 2025	294,390	9,496	257,403	8,303	305,270	9,847	
Oct 2025	355,620	11,472	338,518	10,920	369,600	11,923	
Sept 2025	394,340	13,145	358,416	11,947	451,220	15,041	
Aug 2025	551,630	17,795	274,693	8,861	383,180	12,361	
Jul 2025	640,130	20,649	173,772	5,606	100,316,550	3,236,018	Does the City keep paper notes on readings? This value seems like a mssive outlier.
Jun 2025	592,900	19,763	295,041	9,835	432,020	14,401	
May 2025	372,470	12,015	245,374	7,915	320,170	10,328	
April 2025	464,540	15,485	128,763	4,292	287,310	9,577	
March 2025	644,660	20,795	46,581	1,503	341,580	11,019	
Feb 2025	313,530	11,198	8,690	310	256,700	9,168	
Jan 2025	321,500	10,371	3,643	118	331,120	10,681	
Dec 2024	575,200	18,555	1,735	56	585,440	18,885	
Nov 2024	668,620	21,568	76,005	2,452	262,760	8,476	
Oct 2024	757,090	24,422	150,032	4,840	525,820	16,962	
Sept 2024	328,590	10,953	109,163	3,639	406,360	13,545	
Aug 2024	420,110	13,552	138,424	4,465	479,940	15,482	True Leaf meter calibrated (per City)
Jul 2024	324,670	10,473	143,108	4,616	415,220	13,394	
Jun 2024	292,660	9,755	110,493	3,683	381,500	12,717	
May 2024	379,420	12,239	117,297	3,784	477,180	15,393	
April 2024	379,840	12,661	65,716	2,191	463,810	15,460	
March 2024	309,090	9,971	10,929	353	409,270	13,202	
Feb 2024	334,870	11,547	19,115	659	426,630	14,711	
Jan 2024	274,670	8,860	21,531	695	315,750	10,185	

SJB Industrial Users Monthly Usage							
Date	Coke Farms Usage (gallons)	Coke Farms Discharge (GPD)	True Leaf Usage (gallons)	True Leaf Discharge (GPD)	Taylor Farms Usage (gallons)	Taylor Farms discharge (GPD)	Notes
Discharge Limit	3,000 GPD		1,500 GPD		10,000 GPD		True Leaf was previously Pride of San Juan | Taylor Farms was previoulsy Natural Selection
Dec 2023	606,300	19,558	8,618	278	417,180	13,457	
Nov 2023	604,360	19,495	0	0	384,100	12,390	
Oct 2023	391,220	12,620	0	0	512,140	16,521	
Sept 2023	390,050	13,002	0	0	354,270	11,809	
Aug 2023	376,400	12,142	0	0	437,130	14,101	
Jul 2023	379,630	12,246	0	0	366,700	11,829	
Jun 2023	273,720	9,124	0	0	335,400	11,180	New meter installed at Coke Farms (per City)
May 2023	439,290	14,171	0	0	484,750	15,637	
April 2023	293,720	9,791	0	0	322,880	10,763	Coke Farms meter calibrated (per City); why is True Leaf zero April 2023 to November 2023?
March 2023	351,830	11,349	82,140	2,650	312,650	10,085	
Feb 2023	436,650	15,595	156,703	5,597	388,480	13,874	
Jan 2023	371,770	11,993	(693,998)	(22,387)	232,850	7,511	Weird True Leaf meter reading - why is this negative
Dec 2022	362,690	11,700	57,906	1,868	317,660	10,247	
Nov 2022	311,900	10,061	142,287	4,590	321,800	10,381	
Oct 2022	345,110	11,133	121,729	3,927	362,130	11,682	
Sept 2022	402,940	13,431	221,776	7,393	474,080	15,803	
Aug 2022	323,610	10,439	129,164	4,167	349,710	11,281	
Jul 2022	323,610	10,439	129,164	4,167	349,710	11,281	
Jun 2022	370,730	12,358	140,560	4,685	413,750	13,792	
May 2022	306,530	9,888	119,612	3,858	312,220	10,072	
April 2022	330,970	11,032	82,858	2,762	380,060	12,669	
March 2022	373,720	12,055	26,900	868	413,130	13,327	
Feb 2022	304,630	10,880	17,915	640	333,900	11,925	
Jan 2022	315,220	10,168	11,717	378	331,670	10,699	
Monthly Average		**13,120**		**2,695**		**77,111**	
Average Violation		**10,120**		**1,195**		**67,111**	

LEGEND

	Violation of discharge limits over daily average per month
	Value to be confirmed