



THE CITY OF SAN DIEGO

June 13, 2016

Metro Technical Advisory Committee Chair, Gregory P. Humora
Director of Public Works/City Engineer
8130 Allison Avenue
La Mesa, California 91942

Reference: Establishment of a Wastewater Sample Rejection Protocol Working Group

Dear Chair Humora:

In Fiscal Year (FY) 2013 Brown and Caldwell (B&C) issued a Metro Billing Technical Memorandum which was presented to Metro Technical Advisory Committee (Metro TAC). The report made 19 recommendations for improvements to the City of San Diego's (City) strength-based billing revenue program which the City and participating agencies agreed to implement beginning in FY 2014. Presently, 18 recommendations have been implemented which include the following:

- Account for the recycled water produced at the North City Water Reclamation Plant
- Changed/added sampling site locations eliminated use of cumulative data Total Suspended Solids (TSS), and Chemical Oxygen Demand (COD)
- Establish new data sample set
- Use five year rolling average sample data TSS & COD
- Perform sampling testing concurrently
- Ensure Homogenization prior to analysis for COD

Since implementation, per B&C's recommendation, we have collected two additional fiscal years' worth of sewage strength sampling data by performing monthly sampling in FY 2014 and bi-monthly sampling in FY 2015. This enabled us to form a baseline quickly and reinstate the quarterly (four times a year) sampling program in FY 2016 and going forward. One of the recommendations that has not been implemented yet suggested the use of "Loading-based statistical analysis" in lieu of "Concentration-based statistical analysis" to determine the mean concentration value. The new samples (concentrations) are added to the base data set in order to conduct a concentration statistical analysis to reject outliers and establish a mean or typical concentration.

When staff attempted to implement the B&C's recommended change to the sample rejection protocol, it turned out to be more involved than originally anticipated. Implementation of the change and its effects on billing were never studied by B&C or staff. Staff feels that the impacts of implementing this change could be significant and efforts should be spent studying this further in form of a working group of Metro TAC members and City staff.



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In the interest of moving forward with ongoing financial audits, we would like to recommend that consideration of any protocol changes not take place until FY 2017. This will allow existing audits, in process, to be completed and time to further study the impacts of change implementation.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Amen", with a stylized, flowing script.

Rania Amen, Assistant Director
Public Utilities Department

A handwritten signature in blue ink, appearing to read "L. Santos", with a stylized, flowing script.

Lee Ann Jones-Santos, Assistant Director
Public Utilities Department

RA/slc