

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION**

320 West 4th Street, Suite 200, Los Angeles, California 90013

**ORDER NO. R4-2026-XXXX
FILE NO. 25-051
CI-10888**

**WASTE DISCHARGE REQUIREMENTS AND
WATER RECLAMATION REQUIREMENTS
FOR
GREENHOUSE OPERATION PROTOTYPE**

The following Discharger is subject to Waste Discharge Requirements (WDRs) and Water Reclamation Requirements (WRRs) set forth in this Order.

Table 1. Discharger Information

Discharger/Permittee	Sensei Ag Holdings, Inc.
Facility Name	Greenhouse Operation Prototype
Facility Address	3900 Groves Place Somis, CA 93066 Ventura County

Table 2. Effluent Discharge Information

Discharge Locations	Approved landscaped areas within the property
Discharge Description	Undisinfected secondary recycled water
Receiving Groundwater	North Las Posas Area of the Las Posas Valley Groundwater Basin (DWR Basin No. 4-8)

Table 3. Administrative Information

This Order was adopted on:	November 19, 2026
This Order shall become effective on:	November 19, 2026

I, Susana Arredondo, Executive Officer, do hereby certify that this Order, including all attachments, is a full, true, and correct copy of the Order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on the date indicated above.

Susana Arredondo, Executive Officer

Draft: October 5, 2026

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BACKGROUND

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) finds:

1. Sensei Ag Holdings, Inc. (Discharger or Permittee) owns and operates a greenhouse operation prototype located at 3900 Groves Place in the Somis area, California (Facility). The Facility is surrounded by East Los Angeles Avenue to the north, Groves Place to the west, and residential properties to the east and south, as shown in Figure 1.
2. The Facility occupies approximately 22 acres of agricultural land and includes the following existing and proposed infrastructure, as shown in Figure 2:
 - A 20,000-square-foot greenhouse;
 - A 14,000-square-foot barn;
 - A 3,000-square-foot fertigation shed and supporting infrastructure;
 - An advanced onsite wastewater treatment system for the treatment and disposal of domestic wastewater (Domestic AOWTS);
 - An AOWTS for the treatment and disposal of agricultural wastewater (Process AOWTS);
 - A 16,600-square-foot stormwater retention pond;
 - Landscape irrigation areas; and
 - Residential dwellings.
3. The Facility primarily generates domestic wastewater, process wastewater, and brine. Domestic wastewater generated from the agricultural operation's structures, excluding the residences located in the northwest portion of the property, is discharged to the Domestic AOWTS. The Domestic AOWTS consists of a 1,000-gallon septic tank, an 800-gallon wet well, an advanced treatment unit (Oreco Advantex AX25RT), an ultraviolet (UV) disinfection unit, and a seepage pit. The seepage pit has a 6-foot diameter and a total depth of 20 feet, including 14 feet effective depth and 6 feet of capping. The advanced treatment unit was required because the percolation rate of 18 gallons per square foot per day (gal/ft²/day) exceeds 5.12 gal/ft²/day. In addition, Ventura County requires a disinfection component for all advanced treatment units. The Domestic AOWTS was approved by Ventura County in 2025 and is regulated under the Ventura County Local Agency Management Program (LAMP).
4. Process wastewater generated at the Facility consists of agricultural wastewater and greywater. Agricultural wastewater contains nutrients associated with agricultural operations, while greywater consists of wastewater generated from floor drains within the Facility. This process wastewater is treated by the Process AOWTS equipped with a fluidized bed reactor (FBR) treatment unit. The treated wastewater is subsequently reused onsite for landscape irrigation within the Facility.

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5. Water supplied to the Facility is provided by Ventura County Waterworks District No. 19. This municipal water is further treated through a reverse osmosis (RO) system located within the fertigation shed. The RO permeate is used for agricultural operations, while the resulting brine is collected and transported offsite for proper disposal.
6. The Facility includes a stormwater retention pond designed to capture and retain runoff generated from either the 10-year, 60-minute precipitation event or the 100-year, 30-minute precipitation event. The stormwater retention pond is used solely for stormwater management purposes and is not utilized for wastewater discharge or recycled water distribution.
7. On April 11, 2025, the Discharger submitted a Report of Waste Discharge (ROWD) to the Los Angeles Water Board proposing the discharge of treated wastewater from the Process AOWTS for landscape irrigation within the Facility. The Discharger subsequently submitted revised ROWD's on December 12, 2025, February 9, 2026, and March 27, 2026, to provide additional information and updates regarding the proposed discharge.

REGULATORY AGENCIES

8. The Los Angeles Water Board is the permitting authority responsible for regulating the discharge and reuse of treated wastewater generated at the Facility. The Los Angeles Water Board issues Waste Discharge Requirements (WDRs) and Water Reclamation Requirements (WRRs) to ensure that the treatment, discharge, and reuse of wastewater and recycled water are conducted in a manner that protects water quality and designated beneficial uses of groundwater and surface water.
9. Pursuant to Water Code section 13523, the Los Angeles Water Board is required to consult with and obtain recommendations from the State Water Resources Control Board (State Water Board), Division of Drinking Water (DDW), regarding proposed uses of recycled water to ensure protection of public health, safety, and welfare. Based on consultation with DDW staff, the proposed use of treated process wastewater for landscape irrigation at the Facility does not require preparation, review, or approval of a Title 22 Engineering Report by DDW.

PURPOSE OF ORDER

10. Water Code section 13260 requires any person "proposing to discharge waste, within any region that could affect the quality of the waters of the state, other than to a community sewer system," to file a report of waste discharge. The term "waste" is defined in Water Code section 13050(d) to include "sewage and any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation, or of human or animal origin...." The Facility discharges secondary-treated agricultural wastewater, i.e., "waste," to land where it could affect the quality of the waters of the state. Agricultural wastewater contains various waste

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constituents, including total dissolved solids (TDS), salts (e.g., sulfate, chloride, boron), bacteria, nitrogen, priority pollutants, and constituents of emerging concern.

11. Water Code section 13263 authorizes the Los Angeles Water Board, after any necessary hearing, to prescribe requirements as to the nature of any proposed or existing discharge with relation to the conditions existing in the disposal area or receiving waters upon, or into which, the discharge is made or proposed. The requirements must implement any relevant water quality control plans that have been adopted, and shall take into consideration the beneficial uses to be protected, the water quality objectives reasonably required for that purpose, other waste discharges, the need to prevent nuisance, and the provisions of Water Code section 13241.
12. Water Code section 13267 authorizes the Los Angeles Water Board to require that any person who proposes to discharge waste within its region submit, under penalty of perjury, technical or monitoring program reports to the Los Angeles Water Board. The estimated annual costs of these reports are approximately between \$3,500 and \$8,000. The burden, including costs of these reports, bears a reasonable relationship to the need for the reports and the benefits to be obtained from the reports, which include protection of public health and the environment. This Order incorporates a Monitoring and Reporting Program (MRP). The MRP is necessary to ensure that the discharge of waste and use of recycled water comply with this Order and are protective of human health and the environment.
13. This Order is adopted pursuant to Water Code sections 13263, 13267, and 13523. It establishes requirements, prohibitions, and other conditions to implement the Basin Plan (*Water Quality Control Plan for the Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*); prescribes limitations governing the production, distribution, monitoring, and application of recycled water; and includes an MRP. The Discharger is responsible for ensuring compliance with the WDRs and WRRs contained in this Order.

APPLICABLE PLANS, POLICIES, AND REGULATIONS

14. ***Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties*** (Basin Plan) – The Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (i) designates beneficial uses for surface and ground waters, (ii) establishes narrative and numeric water quality objectives that must be attained or maintained to protect the designated beneficial uses, and (iii) sets forth implementation programs to protect the beneficial uses of the waters of the state. The Basin Plan also incorporates State Water Board Resolution 68-16, *Statement of Policy with Respect to Maintaining High Quality of Waters in California* (Antidegradation Policy). In addition, the Basin Plan incorporates by reference applicable State and Los Angeles Water Board plans and policies and other pertinent water quality policies and regulations. Since 1994, numerous Basin Plan amendments have been adopted and more current background, program, and

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geographical information have become available. This Order implements the plans, policies, and provisions of the Los Angeles Water Board's Basin Plan.

15. The Basin Plan (Chapter 3) establishes water quality objectives for groundwater. The chemical constituents and radioactivity water quality objectives for groundwater designated as domestic or municipal supply incorporate the primary and secondary maximum contaminant levels (MCLs) for inorganic, organic, and radioactive contaminants in drinking water that are codified in Title 22 of the California Code of Regulations. This incorporation by reference is prospective, including future changes to the incorporated provisions as the changes take effect. Also, the Basin Plan establishes the following taste and odor water quality objective for groundwater: "Ground waters shall not contain taste or odor-producing substances in concentrations that cause nuisance or adversely affect beneficial uses." These water quality objectives are implemented in this Order to protect groundwater quality.
16. The Basin Plan incorporates State Water Board Resolution 88-63, which established a state policy that all waters of the state, with certain exceptions, should be considered suitable or potentially suitable for municipal or domestic water supply.
17. **California Code of Regulations, Title 22** – Title 22 of the California Code of Regulations contains primary and secondary MCLs for inorganic, organic, and radioactive contaminants in drinking water. Title 22 primary MCLs have been incorporated into the Basin Plan as water quality objectives. MCLs are used as one of the primary bases for effluent limits for discharges of recycled water in WDRs and WRRs to protect the designated beneficial uses of municipal and domestic supply.
18. **Water Code section 106.3** – It is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. This Order promotes that policy by requiring discharges to meet MCLs developed to protect human health and ensure that water is safe for domestic use.
19. **State Water Board Resolution 77-1, *Policy with Respect to Water Reclamation in California*** – Resolution 77-1 encourages and recommends funding for water recycling and its use in water-short areas of the state.
20. **State Water Board Resolution 68-16, *Statement of Policy with Respect to Maintaining High Quality of Waters in California*** (Antidegradation Policy) – Resolution 68-16 requires the Los Angeles Water Board, in regulating the discharge of waste, to maintain high-quality waters of the state until it is demonstrated that any change in quality will be consistent with maximum benefit to the people of the state, will not unreasonably affect beneficial uses, and will not result in water quality less than that described in the State Water Board's policies (i.e., quality that exceeds water quality objectives).
21. **State Water Board Resolution 2009-0011, *Adoption of a Policy for Water Quality Control for Recycled Water*** (Recycled Water Policy) – Resolution 2009-0011, as

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amended in 2013 and 2018, is intended to support the State Water Board's Strategic Plan to promote sustainable local water supplies. Increasing the acceptance and promoting the use of recycled water is a means toward achieving sustainable local water supplies and can result in reduction in greenhouse gas emissions, a significant driver of climate change. The Recycled Water Policy is intended to encourage beneficial use of, rather than solely disposal of, recycled water generated from wastewater sources that meets the definition in Water Code section 13050(n), in a manner that implements state and federal water quality laws and protects public health and the environment.

The most recent amendment to the Recycled Water Policy was adopted on December 11, 2018, and became effective on April 8, 2019. The amended Recycled Water Policy requires wastewater treatment plants and recycled water producers to annually report monthly volumes of influent, wastewater produced, and effluent, specifying treatment level and discharge type. As applicable, dischargers are additionally required to annually report recycled water use by volume and category of reuse. This Order implements the reporting requirements of the Recycled Water Policy.

HYDROGEOLOGY AND GROUNDWATER

22. The Facility is located within the Las Posas Valley Groundwater Basin, which underlies the Las Posas Valley in southern Ventura County. The basin is bounded by the Camarillo and Las Posas Hills to the south, South Mountain and Oak Ridge to the north, the Santa Susana Mountains to the east, and the Oxnard subbasin of the Santa Clara River Valley Groundwater Basin to the west.
23. The principal water-bearing formations within the basin consist of alluvial deposits, the San Pedro Formation, and the Santa Barbara Formation. These geologic units contain productive aquifers, including an upper unconfined aquifer that is locally utilized for groundwater production and two regionally extensive confined aquifer systems that underlie much of the basin.
24. Groundwater monitoring and production-well data in the vicinity of the Facility indicate that depths to groundwater ranged from approximately 480 to 660 feet below ground surface (bgs) between 1975 and 2025.
25. The Facility, including the recycled water use areas, is located within the Las Posas Valley Groundwater Basin-North Las Posas Area (North Las Posas Subbasin), as shown in Figures 3 and 4. Beneficial uses designated for groundwater within the North Las Posas Subbasin include municipal and domestic supply (MUN), industrial service supply (IND), industrial process supply (PROC), and agricultural supply (AGR). The applicable groundwater quality objectives for the North Las Posas Subbasin are summarized in Table 4.

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Table 4. Water Quality Objectives for the North Las Posas Subbasin

TDS (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Boron (mg/L)	Nitrogen (mg/L)	Coliform (MPN/100mL)
500	250	150	1.0	10	1.1

Table notes:

- Nitrogen refers to nitrate plus nitrite as nitrogen.
- Coliform refers to either total coliform or fecal coliform.
- The unit mg/L denotes milligrams per liter.
- The unit MPN/100mL denotes the use of the Most Probable Number (MPN) method to estimate the viable coliform bacteria per 100 milliliters.

26. Potable water serving the Facility and the surrounding Somis community is provided by Ventura County Waterworks District No. 19. The District's water supply is derived primarily from local groundwater sources, which account for approximately 97 percent of the total supply, with the remaining 3 percent supplied through imported water from the State Water Project.

WASTEWATER TREATMENT PROCESS DESCRIPTION

27. Process wastewater generated at the Facility consists of agricultural wastewater and greywater from the following sources:

- fertigation shed – Excess fertigated wastewater and floor-drain wastewater;
- barn – Floor-drain wastewater; and
- greenhouse – Excess fertigated wastewater and floor-drain wastewater.

The process wastewater is temporarily stored in four 6,000-gallon storage tanks and subsequently conveyed to an influent holding (or equalization) tank for treatment. Following treatment, the treated wastewater is stored in an effluent holding tank prior to distribution for onsite landscape irrigation, as shown in Figure 5.

28. The Process AOWTS is designed to treat up to 2,880 gallons per day (gpd) at a maximum flow rate of two gallons per minute. The Process AOWTS consists of the following components, as shown in Figure 6:

- 8,500-gallon influent holding (equalization) tank;
- Anoxic fluidized bed reactor (FBR) treatment unit; and
- 8,500-gallon effluent holding tank.

29. The Process AOWTS is designed to provide secondary treatment of process wastewater. The anoxic FBR promotes biological oxidation/reduction reactions that facilitate removal of oxyanions, including nitrate, selenate, and perchlorate. The treatment system is not designed to remove dissolved salts, including TDS, sulfate, chloride, and boron. Therefore, significant reductions in the concentrations of these

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constituents are not expected, and their concentrations in the treated effluent are anticipated to be approximately equivalent to their concentrations in the influent.

Table 5 summarizes the projected influent and effluent water quality associated with the Process AOWTS and provides a comparison with the applicable groundwater quality objectives for the North Las Posas Subbasin.

Table 5. Projected Influent and Effluent Quality

Constituents	Units	Influent	Effluent
Boron	mg/L	0.13	0.13
Nitrate as nitrogen	mg/L	19.9	10
Nitrite as nitrogen	mg/L	0	0
Sulfate	mg/L	135.63	135.63
Chloride	mg/L	61.01	61.01
TDS	mg/L	476.09	476.09
Total coliform	MPN/100 mL	0	0
Fecal coliform	MPN/100 mL	0	0

LANDSCAPE IRRIGATION DESCRIPTION

30. The landscaping areas within the Facility cover approximately 26,790 square feet, including areas around the building structures and the northwest portion of the property, as shown in Figure 2. Treated recycled water generated by the Process AOWTS is used for landscape irrigation within these areas. The landscape consists primarily of low-water-use vegetation, and irrigation is managed to maximize water use efficiency and minimize the potential for runoff. Recycled water is applied through a subsurface drip irrigation system that delivers water directly to the root zone of the vegetation.
31. Based on the irrigated area, plant water demand factors, and irrigation system efficiency, the estimated annual irrigation demand is approximately 189,569 gallons, equivalent to an average of 15,797 gallons per month or approximately 520 gallons per day (gpd).
32. Irrigation demand is expected to vary seasonally in response to changes in evapotranspiration rates. Estimated irrigation demand ranges from approximately 300 gpd during the winter months to 800 gpd during the summer months.
33. Due to seasonal variations in water demand, any excess treated recycled water that cannot be beneficially reused for landscape irrigation shall be collected and transported offsite by a licensed waste hauler for appropriate disposal. This

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management practice is intended to prevent ponding, runoff, nuisance conditions, and unauthorized discharges to surface waters.

ANTIDEGRADATION ANALYSIS

34. Pursuant to section 7.2.2 of the Recycled Water Policy, non-potable recycled water projects that are ineligible or inappropriate for enrollment under the statewide water reclamation requirements must include an antidegradation analysis demonstrating compliance with State Water Board Resolution 68-16, *Statement of Policy with Respect to Maintaining High Quality Waters in California* (Antidegradation Policy). Accordingly, the Discharger conducted an antidegradation analysis to evaluate the potential effects on groundwater quality resulting from the application of recycled water to the authorized landscape irrigation areas within the North Las Posas Subbasin and to demonstrate consistency with the requirements of the Antidegradation Policy.
35. The antidegradation analysis used a mass-balance approach to evaluate potential changes in groundwater constituent concentrations resulting from recycled water application. The analysis calculated constituent loading from recycled water recharge without considering agronomic rates and evaluated the resulting groundwater concentrations over time. The time required for each constituent to reach the groundwater quality threshold was estimated based on the projected rate of groundwater concentration increase.
36. The groundwater quality threshold is intended as a conservative screening metric to evaluate the magnitude and timing of potential groundwater degradation under a scenario in which the discharged effluent concentration is equal to the applicable groundwater quality objectives. This approach provides a margin of protection that accounts for uncertainties inherent in groundwater modeling, including variability in ambient groundwater concentrations, hydraulic conditions, constituent transport and attenuation, and delineation of the site-specific groundwater basin. To evaluate the potential for groundwater degradation, the groundwater quality threshold used in this analysis was calculated as the ambient groundwater concentration plus 10 percent of the available assimilative capacity for each constituent.
37. The estimated recycled water recharge volume was 190,000 gallons per year, and the groundwater yield for the West Las Posas Management Area was 12,500 acre-feet per year. The West Las Posas Management Area overlaps the western portion of the North Las Posas Subbasin and does not represent the entire North Las Posas Subbasin. The Las Posas Groundwater Basin is currently managed as three separate areas: the West, East, and South Las Posas Subbasins.
38. Ambient groundwater quality was characterized using the median (50th percentile) concentrations derived from six groundwater wells located within the North Las Posas Subbasin. The available assimilative capacity for the evaluated constituents is summarized in Table 6.

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Table 6. Ambient Groundwater Quality and Available Assimilative Capacity

	TDS (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Boron (mg/L)	Nitrate as nitrogen (mg/L)
Ambient Groundwater Quality	720	238	66	0.25	0.4
Available Assimilative Capacity	0	12	84	0.75	9.6
Groundwater Quality Threshold	500	239.2	74.4	0.325	1.36

Table notes:

- For TDS, the Groundwater Quality Threshold is equal to the applicable groundwater quality objective, as no assimilative capacity is available.
39. The analysis determined that ambient groundwater concentrations of TDS already exceed the applicable groundwater quality objective; therefore, no assimilative capacity is available for TDS. However, the recycled water application is not expected to further degrade groundwater quality with respect to TDS because the projected effluent TDS concentration (Table 5) is below both the ambient groundwater concentration and the applicable groundwater quality objective.
40. The proposed effluent quality for sulfate, chloride, and boron presented in Table 5 is lower than the ambient groundwater quality. Accordingly, concentrations of these constituents are not expected to reach groundwater quality thresholds, and groundwater degradation is not anticipated. Nevertheless, the Discharger's analysis under the conservative conditions indicates that it would require more than approximately 100 years for sulfate, 1,200 years for chloride, and 1,600 years for boron to reach their groundwater quality thresholds.
41. In contrast, the proposed effluent discharge concentration for nitrogen of 10 mg/L is higher than the ambient groundwater quality of 0.4 mg/L. Accordingly, discharge to the groundwater basin has the potential to increase nitrogen concentrations and adversely affect the existing groundwater quality. Based on the Discharger's mass-balance analysis, nitrogen concentrations would require more than 2,000 years to reach the groundwater quality threshold of 1.36 mg/L.
42. Additional analysis of the likely impact of the proposed effluent discharge on ambient groundwater quality further supports a finding that the high-quality of the underlying groundwater basin with respect to nitrogen concentrations will not be degraded by the proposed discharge. Estimates applying multiple conservative assumptions, including assuming an absence of nitrogen attenuation below the irrigated root zone and a perpetual, continuous discharge, project a potential resulting increase in

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ambient nitrogen concentrations from 0.4 mg/L to 0.40026 mg/L occurring over a temporal range of centuries to millennia.¹

43. Based on the above findings, although the proposed discharge has the hypothetical potential to result in degradation of existing groundwater quality due to its high nitrogen content relative to the underlying groundwater, such degradation is only projected to occur under conditions in which nitrogen is unrealistically conserved and the discharge persists over a long-term period that substantially exceeds the expected and potential duration of the proposed discharge.
44. Based on site-specific conditions, including depth to groundwater, agronomic application rates, subsurface dispersal methods, proposed effluent quality, natural attenuation, nutrient uptake, and other relevant site characteristics, the proposed recycled water application within the authorized landscape irrigation areas is not expected to degrade groundwater quality. Any potential of degradation resulting from the proposed discharge is estimated to be de minimis.
45. While degradation of existing high-quality is not expected to occur, even assuming that the exceptional, conservative conditions applied to estimate the risk of degradation occur, the projected worst case scenario degradation would be limited and reasonable. Accordingly, the Los Angeles Water Board finds that the discharge authorized by these WDRs and WRRs is consistent with the maximum benefit to the people of the state, will not unreasonably affect present or potential beneficial uses, and will not result in exceedances of water quality objectives. This Order requires the Discharger to implement the following: (1) best practicable treatment and control technology (BPTC); (2) compliance with all applicable discharge prohibitions, specifications, and limitations contained herein; (3) implementation of the MRP; and (4) regular monitoring of the discharge to verify that the discharge does not adversely affect groundwater quality or impair beneficial uses of groundwater.

GLOBAL WARMING AND CLIMATE CHANGE

46. In Southern California, the predicted impacts of climate change are numerous, including the following:

Annual average temperatures are expected to increase, coupled with a higher frequency of extreme heat days. A likely consequence of this warmer climate will be more severe drought periods, leading to an increase in the amount and intensity of fires and a longer fire season. In addition, precipitation patterns are likely to be modified.

A decrease in snowfall, combined with warmer temperatures, will include a decrease in the amount and duration of snowpack, an essential source of freshwater to the

¹ Letter from Kai Kim, Ph.D., Water Resource Control Engineer, to Jenny Newman, Assistant Executive Officer, *Potential Nitrogen Impact Calculations for Greenhouse Operation Prototype, Somis, Ventura County (File No. 25-051)* (Sept. 28, 2026).

region. Although changes to mean precipitation are expected to be small, the increasing occurrence of extreme precipitation events will amplify the risk of flooding. These impacts may affect water quality in multiple ways, including decreases in stream flow, reductions in, and changes to, aquatic habitats, increases in surface water temperature, increases in pollutant levels, sedimentation, algal growth, and changes in salinity levels and acidification in coastal areas.

47. On March 7, 2017, the State Water Board adopted Resolution 2017-0012, *Comprehensive Response to Climate Change*. The resolution recognizes that challenges posed by climate change and directs State Water Board programs and regional water boards to incorporate climate-change considerations into planning and regulatory decisions. Priority should be given to actions that both build climate preparedness and reduce greenhouse gas emissions; flexible and adaptive approaches should be used, where possible, to address uncertain climate impacts; actions should protect the state's most vulnerable populations; and natural infrastructure solutions should be prioritized.
48. On May 10, 2018, the Los Angeles Water Board adopted Resolution R18-004, *A Resolution to Prioritize Actions to Adapt to and Mitigate the Impacts of Climate Change on the Los Angeles Region's Water Resources and Associated Beneficial Uses*, which encourages mitigating direct and indirect impacts of climate change on water quality and beneficial uses.
49. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the Facility is located within an area of minimal flood hazard and is situated outside both the 100-year floodplain (1-percent annual chance flood zone) and the 500-year floodplain (0.2-percent annual chance flood zone). Therefore, flooding is not expected to adversely affect the operation of the Facility or the management of wastewater and recycled water authorized under this Order.

CONSIDERATIONS

50. **Water Code section 13241** – Pursuant to Water Code section 13263, the requirements of this Order take into consideration the provisions of Water Code section 13241, including the following factors:

- a) Past, present, and probable future beneficial uses of water;

The receiving water limitations in this Order are intended to maintain and protect the existing and potential beneficial uses of the North Las Posas Area of the Las Posas Valley Groundwater Basin. This Order also establishes effluent limitations and monitoring and reporting requirements to verify that authorized discharges do not adversely affect groundwater quality or beneficial uses.

- b) Environmental characteristics of the hydrographic unit under consideration, including the quality of the water available thereto;

This Order incorporates the site-specific groundwater quality objectives in the Basin Plan in considering geology, hydrogeology, and hydrology. The treatment system is expected to produce effluent that complies with the applicable effluent limitations and is protective of the groundwater quality objectives established in the Basin Plan.

- c) Water quality conditions that could reasonably be achieved through the coordinated control of all factors that affect water quality in the area;

The water quality conditions that can be reasonably achieved are those consistent with the site-specific water quality objectives necessary to protect the beneficial uses of the groundwater basin, through the coordinated control of all factors that affect water quality in the area. The process wastewater treatment system incorporates best practicable treatment or control measures to reduce selected constituents, including nitrogen compounds, that could affect groundwater quality, public health, or plant health.

- d) Economic considerations;

The anticipated annual operation and maintenance cost of the FBR treatment system is approximately \$15,000. The Los Angeles Water Board has considered these costs and finds that they are reasonable in relation to the need to properly treat process wastewater, prevent nuisance conditions, protect groundwater quality and beneficial uses, and enable the beneficial reuse of treated wastewater.

- e) The need for developing housing within the region;

The Facility is located in an area characterized primarily by agricultural land uses. This Order does not restrict or otherwise materially affect the development of housing within the region.

- f) The need to develop and use recycled water;

This Order authorizes the Discharger to treat up to 2,880 gpd of agricultural wastewater and to beneficially reuse treated effluent for landscape irrigation, subject to the annual discharge limitation specified in this Order.

51. In accordance with Water Code section 13263(g), no discharge of waste into waters of the state, whether or not the discharge is made pursuant to waste discharge requirements, shall create a vested right to continue the discharge. All discharges of waste into waters of the state are privileges, not rights.

RATIONALE FOR EFFLUENT LIMITATIONS

52. The numeric effluent limitations prescribed by this Order are based on the following considerations:

- A. The effluent discharge limitation is based on the estimated landscape irrigation demand and the hydraulic capacity of the designated use areas.
- B. Effluent limitations for TDS, sulfate, chloride, boron, and nitrogen compounds are based on the applicable groundwater quality objectives and beneficial uses designated for the Subbasin in the Basin Plan.
- C. The effluent limitation for pH is based on the National Secondary Drinking Water Standards established by the United States Environmental Protection Agency (USEPA).
- D. Effluent limitations for biochemical oxygen demand (BOD) and total suspended solids (TSS) are based on the USEPA secondary treatment standards.
- E. The effluent limitation for oil and grease is based on the Basin Plan narrative water quality objective for waters of the state and the Los Angeles Water Board's best professional judgment in implementing and interpreting that objective.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

- 53. In accordance with the provisions of the California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.) and the CEQA Guidelines (Cal. Code Regs., tit. 14, § 15000 et seq.), the Los Angeles Water Board has considered whether adoption of these WDRs and WRRs constitutes a project subject to CEQA.
- 54. The proposed project is the subsurface irrigation of 0.61 acres of water efficient landscaping with recycled water. The Los Angeles Water Board finds that the proposed project is categorically exempt from the requirements of CEQA under Title 14 of the California Code of Regulations, sections 15304 and 15061. Section 15304 exempts minor alterations to the condition of land, water, and/or vegetation, including new landscaping and the replacement of conventional landscaping with water efficient landscaping. Section 15061 exempts projects where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.

PUBLIC NOTIFICATION

- 55. On October 5, 2026, the Los Angeles Water Board notified the Discharger, interested agencies, and interested parties of its intent to issue WDRs and WRRs for the Facility. The notice provided an opportunity for interested persons to submit written comments regarding the tentative Order.
- 56. The Los Angeles Water Board, in a public meeting, heard and considered all comments pertaining to the discharge and to the tentative requirements.
- 57. Any person affected by this action of the Los Angeles Water Board may petition the State Water Board to review the action in accordance with Water Code section

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13320 and California Code of Regulations, title 23, section 2050. The State Water Board (P.O. Box 100, Sacramento, California 95812) must receive the petition within 30 days of the date this Order is adopted. Additional information regarding the petition process is available on the State Water Board's website at:

[Water Quality Petitions | California State Water Resources Control Board](#).

IT IS HEREBY ORDERED that the Discharger, Sensei Ag Holdings, Inc., shall be responsible for and shall comply with the following requirements in connection with all operations and activities at the Facility.

A. INFLUENT LIMITATIONS

Influent to the Process AOWTS shall be limited to process wastewater generated at the Facility, including agricultural wastewater and greywater identified in this Order.

B. EFFLUENT LIMITATIONS

1. Daily effluent average flowrate from the Process AOWTS shall not exceed 2,880 gpd.
2. Effluent samples shall be collected at the outlet of the treatment system, following all treatment processes and before discharge to the effluent holding tank or recycled water distribution system, at a location approved by the Executive Officer.
3. The pH of the effluent shall be maintained between 6.5 and 8.5 standard units at all times.
4. Effluent quality shall not exceed the limitations specified in Table 7 below.

Table 7. Effluent Limitations

Constituents	Units	Maximum
BOD ₅ at 20°C	mg/L	30
Total suspended solids (TSS)	mg/L	30
Oil and grease	mg/L	10
Total dissolved solids (TDS)	mg/L	500
Sulfate	mg/L	250
Chloride	mg/L	150
Boron	mg/L	1.0
Total nitrogen	mg/L	10
Nitrate as nitrogen	mg/L	10

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Constituents	Units	Maximum
Nitrite as nitrogen	mg/L	1

Table notes:

- Total nitrogen consists of ammonia as nitrogen, nitrite as nitrogen, nitrate as nitrogen, and organic nitrogen.
5. Effluent shall not contain trace, toxic, and other constituents in concentrations exceeding the applicable MCLs for drinking water established by the DDW in Title 22 of the California Code of Regulations, or subsequent revisions, or at levels that adversely affect the beneficial uses of receiving groundwater. The effluent shall not exceed the following MCLs at any time, as specified in Attachment A.
- a. Primary MCLs:
 - i. Inorganic chemicals in Title 22 of the California Code of Regulations, section 64431, Table 64431-A (Attachment A-1);
 - ii. Radionuclides in Title 22 of the California Code of Regulations, section 64442, Table 64442 (Attachment A-2), and section 64443, Table 64443 (Attachment A-2); and
 - iii. Organic chemicals in Title 22 of the California Code of Regulations, section 64444, Table 64444-A (Attachment A-3).
 - b. Secondary MCLs specified in Title 22 of the California Code of Regulations, section 64449, Table 64449-A (Attachment A-4).

C. GROUNDWATER LIMITATIONS

1. The discharge shall not cause pollution or nuisance, as defined in Water Code section 13050.
2. The discharge shall not adversely affect beneficial uses of groundwater or cause an exceedance of groundwater quality objectives for the applicable groundwater basin.

D. SPECIFICATIONS FOR USE OF RECYCLED WATER

1. The Discharger shall be responsible for the production, distribution, management, and use of recycled water generated at the Facility.
2. Recycled water shall be used solely for non-human-contact subsurface landscape irrigation within approved use areas.

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3. Recycled water shall not be used for direct human consumption, food processing, or any use not authorized by this Order.
4. Recycled water use shall not result in earth movement in geologically unstable areas.
5. Recycled water shall be applied at agronomic rates and in a manner that prevents ponding, runoff, soil saturation, nuisance conditions, and hydraulic overloading of the irrigation areas.
6. Recycled water pipelines, storage facilities, and appurtenances shall be maintained in good working condition and operated to prevent leaks and unauthorized discharges.
7. Recycled water shall not be applied during precipitation events or when rainfall is sufficient to cause runoff or prevent proper infiltration.

E. USE AREA REQUIREMENTS

For purposes of this Order, “use area” means an area with defined boundaries where recycled water is applied in accordance with this Order.

1. Recycled water shall be applied only within the approved recycled water use areas and shall not be distributed, conveyed, or otherwise supplied for use outside the Facility without prior written approval from the Executive Officer.
2. No irrigation with undisinfected secondary recycled water shall take place within 150 feet of any domestic water supply well.
3. Any irrigation runoff shall be confined to the recycled water use area and shall not be allowed to leave the use area as surface flow or discharge to surface waters without obtaining an appropriate National Pollutant Discharge Elimination System (NPDES) permit from the Los Angeles Water Board.
4. Recycled water irrigation or runoff shall not enter dwellings, designated outdoor eating areas, or food handling facilities.
5. Drinking water fountains shall be protected against contact with recycled water.
6. Spray irrigation, surface irrigation, and impoundment of recycled water are not authorized under this Order.
7. All use areas where recycled water is used that are accessible to the public shall be posted with warning signs that are visible to the public, in a size no less than 4 inches high by 8 inches wide, that include the following wording: “RECYCLED WATER – DO NOT DRINK.” Each sign shall display an international symbol similar to that shown in Figure 7. Alternative signage and

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- wording may be used upon approval by the Executive Officer of the Los Angeles Water Board.
8. No physical connection shall be made or allowed to exist between any recycled water system and any separate system conveying potable water, except as allowed under section 7604 of title 17 of the California Code of Regulations.
 9. The portions of the recycled water piping system that are in areas subject to access by the general public shall not include any hose bibs (a faucet or similar device to which a common garden hose can be readily attached). Only quick couplers that differ from those used on the potable water system shall be used on the portions of the recycled water piping system in areas subject to public access.
 10. The Executive Officer of the Los Angeles Water Board is authorized to approve additional recycled water use areas, provided that such uses are consistent with this Order and applicable laws and regulations.

F. GENERAL REQUIREMENTS

1. The siting, design, construction, operation, maintenance, and monitoring of the Process AOWTS covered by this Order shall comply with all applicable provisions of the Basin Plan and applicable statewide plans and policies.
2. Adequate facilities shall be provided to protect the Process AOWTS from damage by storm flows and runoff or run-on generated by a 100-year, 24-hour storm event. Adequate facilities shall also be provided to divert surface and stormwater away from the Process AOWTS.
3. The cleaning or maintenance of the Process AOWTS shall be performed by a qualified and appropriately licensed service provider.
4. Wastewater shall be properly treated before being used as recycled water. Wastewater shall be treated to the level necessary to comply with the effluent limitations, recycled water use specifications, and all other applicable requirements of this Order.
5. Records of all Process AOWTS cleaning and maintenance activities shall be retained for a minimum of five years. At a minimum, the records shall document the date of service, a description of the work performed (including the volume of waste pumped out), and the service provider's information, including name, address, telephone number, email address, and license number.
6. The Discharger shall ensure that the contents of the Process AOWTS are disposed of in accordance with all applicable laws and ordinances.
7. The Process AOWTS shall be operated and maintained to prevent wastewater from surfacing at any location.

8. The Executive Officer may require installation of groundwater monitoring wells if monitoring data or other information indicate that the discharge may adversely affect groundwater quality.
9. Any wastewater or sludge handling shall be conducted in a manner that prevents it from reaching the ground surface or any watercourse.
10. The Discharger shall provide written notice to the Executive Officer of the Los Angeles Water Board at least 30 days prior to any proposed transfer of responsibility and coverage under this Order to a new Discharger. The notice shall include a written agreement and acknowledgement between the existing and new Dischargers, specifying the effective date of the transfer. The existing Discharger remains liable for violations occurring before the effective transfer date, and the new Discharger is responsible for compliance beginning on the effective transfer date.

G. PROHIBITIONS

1. Any additional hookups to the Process AOWTS without prior written approval from the Los Angeles Water Board are prohibited.
2. The surfacing or overflow of wastewater from the Process AOWTS at any time and at any location is prohibited. The direct discharge of wastewater to surface waters, storm drains, drainage courses, or groundwater is prohibited, except for the authorized application of treated recycled water to land in accordance with this Order.
3. The onsite disposal of sludge is prohibited.
4. Any offsite disposal of wastewater or sludge other than to a legal point of disposal is prohibited.
5. The discharge of treated wastewater that causes or contributes to any of the following is prohibited:
 - a. Adverse effects on human, animal, or plant life;
 - b. A nuisance or adverse effect on groundwater quality or beneficial uses;
 - c. Adverse effects on any waterbody or watercourse hydraulically connected to groundwater;
 - d. Earth movement or geologic instability; or
 - e. Surfacing of wastewater.
6. Odors originating at the Process AOWTS that are perceivable at any time outside the property boundary are prohibited.

7. Any unauthorized bypass or overflow of untreated, partially treated, or treated wastewater is prohibited.
8. The discharge of waste to land not owned or controlled by the Discharger is prohibited.
9. The discharge of waste to the Process AOWTS in excess of its maximum design and disposal capacity is prohibited.
10. Any discharge from the Process AOWTS not expressly authorized by this Order is prohibited.
11. Public contact with untreated wastewater or recycled water is prohibited. This prohibition does not apply to trained personnel performing authorized operation, maintenance, sampling, or emergency-response activities using appropriate protective measures.

H. PROVISIONS

1. This Order includes “Attachment B – Standard Provisions Applicable to Waste Discharge Requirements” (Standard Provisions). If there is any conflict between provisions stated herein and the Standard Provisions, the provisions stated herein prevail.
2. The Discharger shall operate and maintain the Facility, treatment systems, collection systems, and associated appurtenances in a manner that minimizes reasonably foreseeable adverse effects on surface water and groundwater resulting from climate-change-related conditions.
3. The Discharger shall comply with all provisions and requirements of the MRP, which is part of this Order, and any revisions thereto as ordered by the Executive Officer of the Los Angeles Water Board. The Discharger shall submit self-monitoring reports by the deadlines specified in the MRP. If there is any conflict between the provisions stated herein and the MRP, the provisions stated herein prevail.
4. The Discharger shall file with the Los Angeles Water Board, under penalty of perjury, annual and quarterly reports on self-monitoring work performed according to the detailed specifications contained in the MRP attached hereto and incorporated herein by reference, as directed by the Executive Officer of the Los Angeles Water Board. The results of any monitoring conducted in addition to, or more frequently than, the monitoring required by the MRP at the specified locations or times shall also be reported to the Los Angeles Water Board.
5. This Order does not exempt the Discharger from compliance with any other laws, regulations, or ordinances that may be applicable; it does not legalize any treatment, recycling, distribution, or use facility; and it does not affect any

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- further constraint on the use of recycled water at certain sites that may be contained in other statutes or required by other agencies.
6. This Order does not alleviate the responsibility of the Discharger to obtain other necessary local, state, and federal permits to construct facilities necessary for compliance with this Order; nor does this Order prevent imposition of additional standards, requirements, or conditions by any other regulatory agency. Expansion of the recycled water distribution facility shall be contingent upon issuance of all necessary requirements and permits, including a conditional use permit.
 7. This Order may be modified, revoked and reissued, or terminated for cause. Grounds for such action include, but are not limited to, failure to comply with any condition of this Order; endangerment of human health; adverse effects on water quality or beneficial uses resulting from activities authorized by this Order; obtaining this Order through misrepresentation or failure to disclose relevant facts; or availability of new information that would have justified different requirements at the time of Order adoption.
 8. The filing of a request by the Discharger for modification, revocation and reissuance, or termination of this Order, or notification of planned changes or anticipated noncompliance, does not stay any condition of this Order.

I. COMPLIANCE DETERMINATION

Compliance with the effluent limitations in this Order will be determined based on the available analytical results for the applicable compliance period associated with each limitation. When only one sample analysis is available during a quarterly reporting period, that sample shall be considered representative of the discharge for each month within that quarter. Therefore, if the quarterly sample result exceeds a monthly average limitation, the exceedance shall constitute three separate violations of the monthly average limitation, one for each month of the quarter.

J. REOPENER

The Los Angeles Water Board may reopen and revise this Order at any time pursuant to applicable provisions of the Water Code. The WDRs, WRRs, and MRP requirements contained herein are based on the information currently available and on applicable water quality control plans, policies, laws, and regulations in effect at the time of adoption.

This Order may be reopened and modified, as appropriate, to incorporate new or revised requirements resulting from changes in applicable laws, regulations, policies, water quality control plans, or water quality objectives; the adoption of Total Maximum Daily Loads (TMDLs); the approval of a Salt and Nutrient Management Plan (SNMP); the availability of new technical or monitoring information; changes in Facility operations, treatment processes, recycled water use, or discharge

characteristics; or evidence indicating that the discharge has the potential to adversely affect water quality or beneficial uses of waters of the state.

The Los Angeles Water Board reserves the right to modify this Order based on any information obtained subsequent to its adoption that demonstrates such modification is necessary to protect water quality and beneficial uses.

K. EFFECTIVE DATE

This Order becomes effective immediately upon its adoption.

I, Susana Arredondo, Executive Officer, do hereby certify that this Order with all attachments is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region on November 19, 2026.

Susana Arredondo
Executive Officer

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Figure 1. Vicinity of the Greenhouse Operation Prototype in Somis

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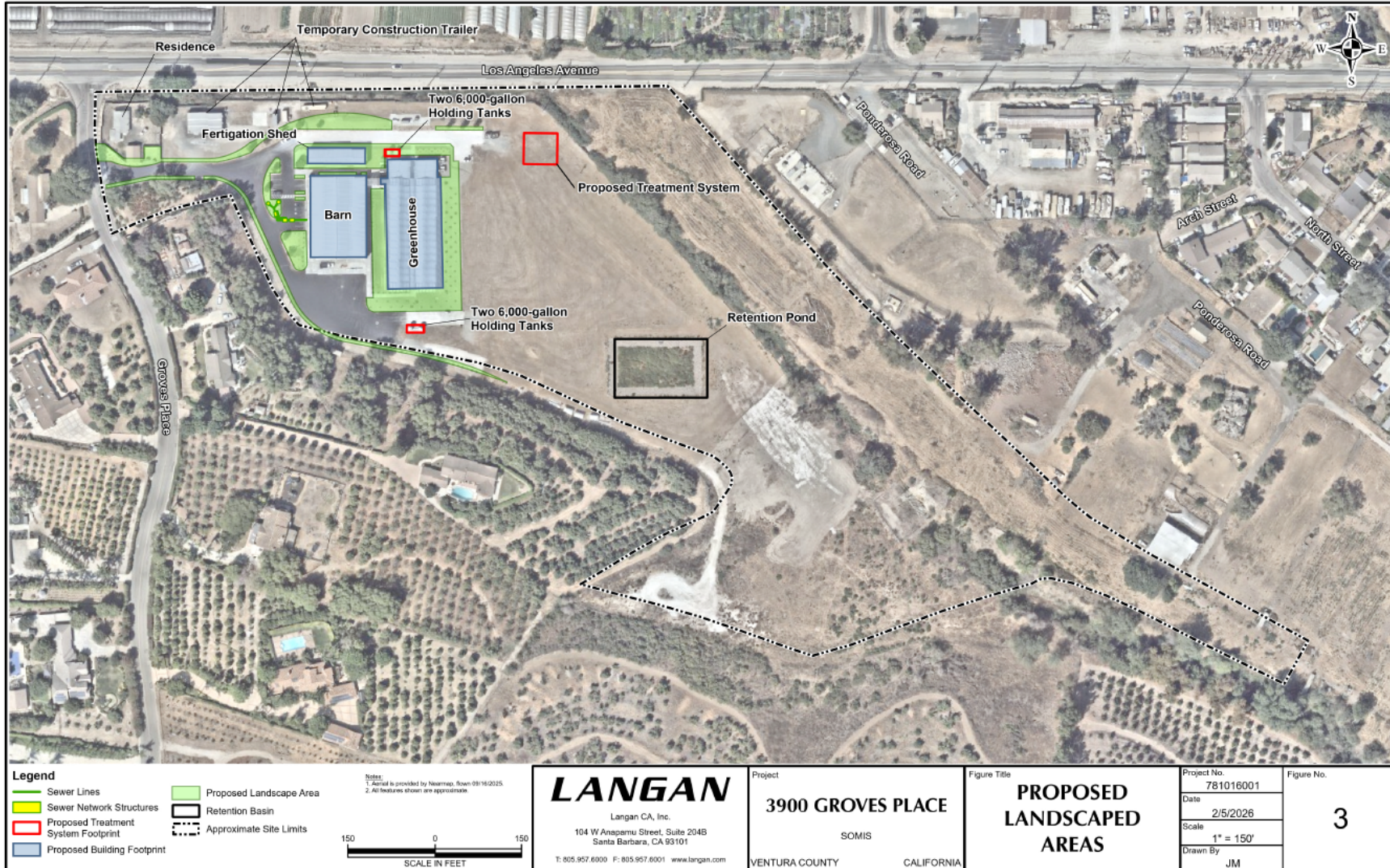


Figure 2. Greenhouse Operation Prototype Facility and Landscape Irrigation Areas (Green-shaded)

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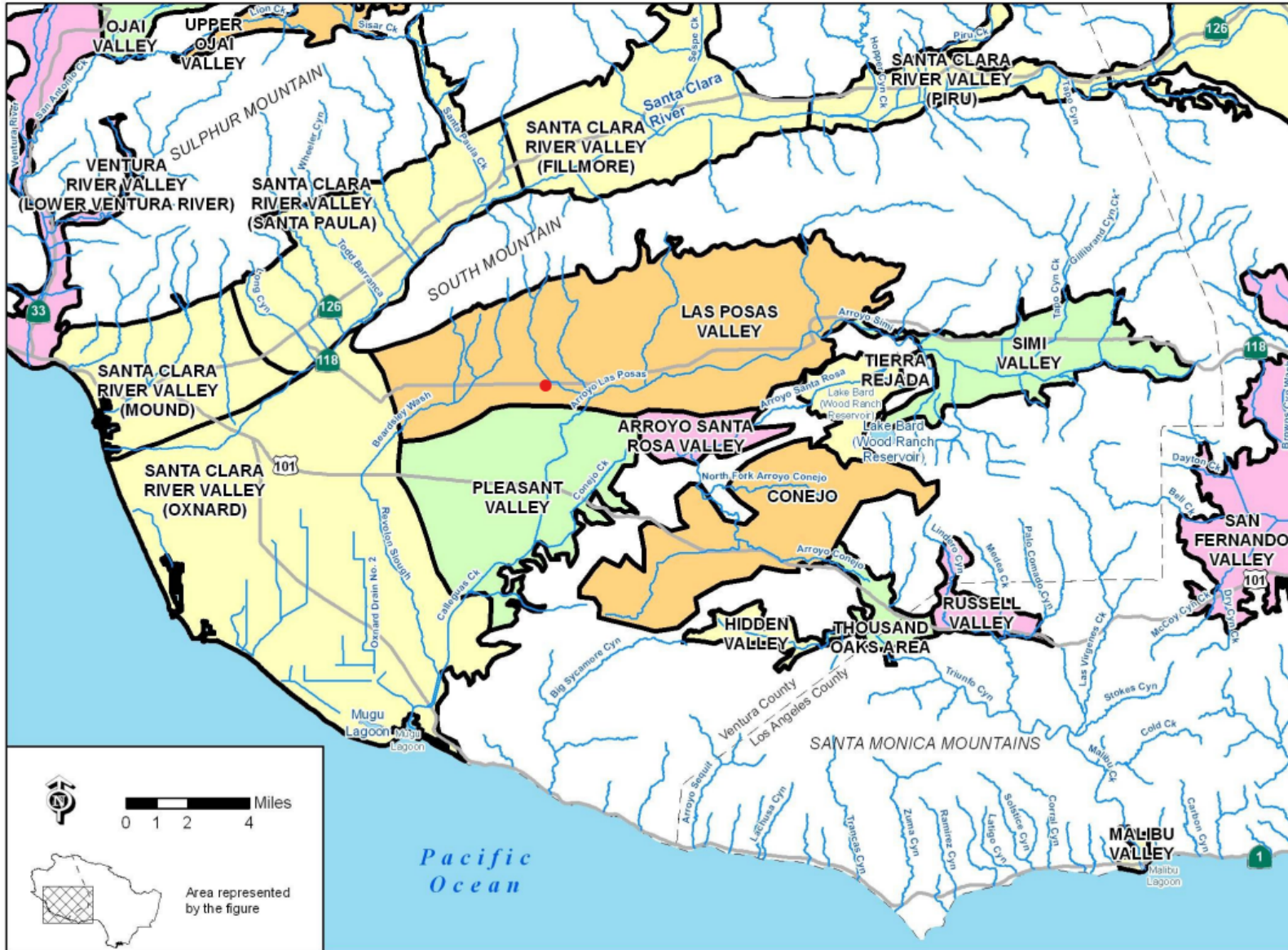


Figure 3. Las Posas Valley Groundwater Basin and the Facility (Red-dot)

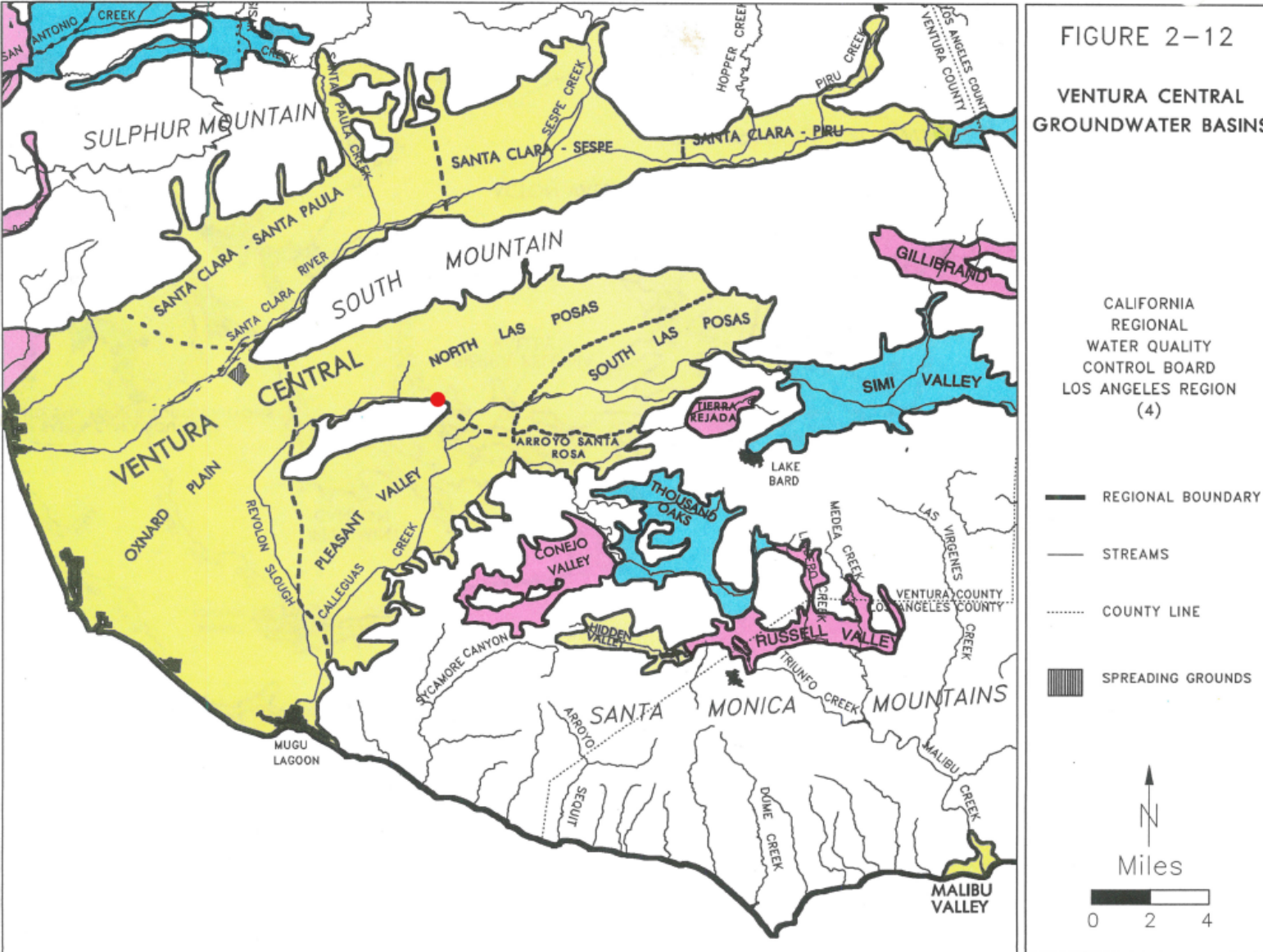


Figure 4. Determination of the Applicable Groundwater Subbasin and the Facility (Red-dot)

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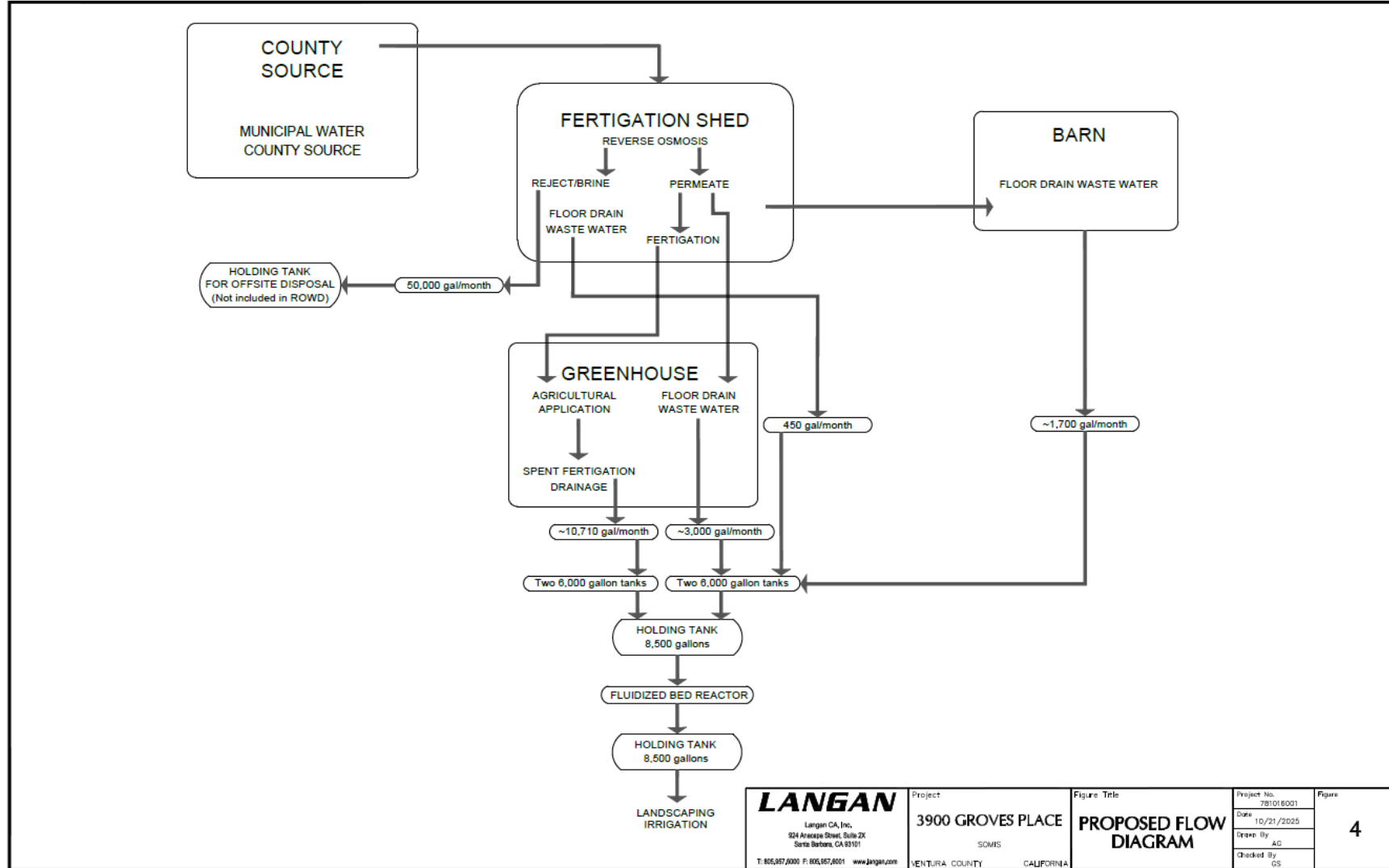


Figure 5. Wastewater Flow Diagram

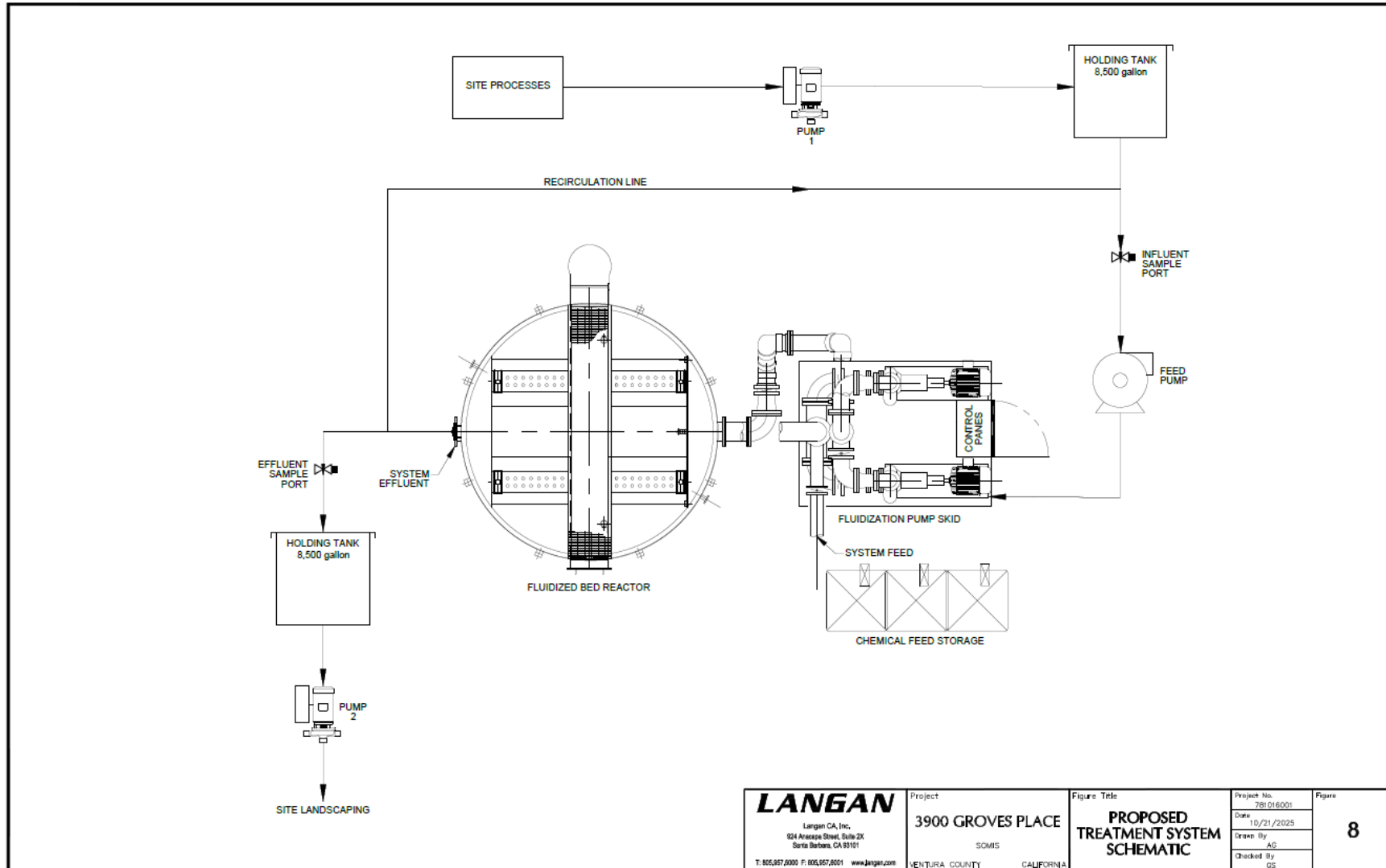


Figure 6. Anoxic Fluidized Bed Reactor

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Figure 7. Exhibit of “Recycled Water – Do Not Drink” Signage