

**STATE OF CALIFORNIA
LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD
REVISED MONITORING AND REPORTING PROGRAM NO. CI-7418
FOR
VENTURA COUNTY, WATER AND SANITATION DEPARTMENT
TODD ROAD JAIL WASTEWATER TREATMENT PLANT
FILE NO. 91-076**

This Monitoring and Reporting Program (MRP) No. CI-7418 is issued pursuant to California Water Code section 13267, which authorizes the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) to require Ventura County Water and Sanitation Department. (hereafter Permittee) who discharges the secondary treated effluent generated from the Todd Road Jail Wastewater Treatment Plant (Todd Road Jail WWTP) to furnish technical or monitoring reports. The reports required herein are necessary to assure compliance with the Waste Discharge Requirements (WDRs) Order No. R4-2024-XXXX issued on July 25, 2024, and to protect the waters of the state and their beneficial uses. The evidence that supports the need for the reports is set forth in the WDRs and the Los Angeles Water Board record.

I. SUBMITTAL OF REPORTS

A. The Permittee shall submit the following reports by the due dates.

1. **Quarterly Monitoring Reports** shall be received by the Los Angeles Water Board by the 30th day of the month following the end of each quarterly monitoring period according to Table 1. The first Quarterly Monitoring Report under this program must be received by the Los Angeles Water Board by October 30, 2024.

Table 1. Quarterly Monitoring Reporting Period and Due Date

Reporting Period	Reporting Due
January – March	April 30
April – June	July 30
July – September	October 30
October – December	January 30

2. **Annual Summary Reports** shall be received by the Los Angeles Water Board by January 30th of each year. The first Annual Summary Report under this program must be received by the Los Angeles Water Board no later than **January 30, 2025**.

- B. In reporting the monitoring data, the Permittee shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements and, where applicable, shall include results of receiving water observations.
- C. If there is no discharge during any reporting period, the report shall so state
- D. All monitoring reports must include, at minimum, the following:
 - 1. Well or sampling location identification, date and time of sampling;
 - 2. Sampler identification, laboratory identification; and chain of custody; and
 - 3. The additional information in the sections below, where applicable.
- E. At least 60 days after receiving these WDRs, the Permittee shall submit an updated operations plan for the WWTP. If any changes or modifications are made to the operations plan, then a revised plan must be submitted as a separate report due at least a week prior to implementing the changed operations plan.
- F. The Los Angeles Water Board may request supporting documentation, such as daily logs of operations.

II. REPORTING REQUIREMENTS

A. Quarterly monitoring reports

- a. These reports shall include, at a minimum, the following information:
 - i. The volume of the treated wastewater applied to the onsite percolation ponds.
 - ii. The date and time of sampling and analyses on the effluent.
 - iii. All analytical results of samples collected during the monitoring period of the effluent.
 - iv. Documentation of all QA/QC procedures that were followed during sampling and laboratory analyses.
 - v. Records of any operational problems, plant upset and equipment breakdowns or malfunctions, and any discharge(s) used for nonpotable Title 22 recycled water applications including landscape irrigation. In addition, any spills or discharge of untreated or partially treated wastewater must be immediately reported.

- vi. Discussion of compliance, non-compliance, or violation of requirements.
 - vii. All corrective or preventive action(s) taken or planned with schedule of implementation if any violation occurs.
- b. Each quarterly monitoring report shall contain a separate section titled "Summary of Non-Compliance" located at the front of the report. This section shall clearly list all non-compliance with the WDRs, including any excursion(s) of effluent or receiving groundwater limitations. For every item where the requirements were not met, the Permittee shall include a statement of the cause(s) of non-compliance and the corrective actions undertaken or proposed that will bring the discharge into full compliance with the WDRs at the earliest possible time, including a timetable for implementation of those actions.
- c. For the purpose of reporting compliance with numerical limitations, analytical data shall be reported using the following reporting protocols:
- i. Sample results greater than or equal to the RL must be reported "as measured" by the laboratory (i.e., the measured chemical concentration in the sample);
 - ii. Sample results less than the RL, but greater than or equal to the laboratory's method detection limit (MDL), must be reported as "Detected, but Not Quantified," or DNQ. The laboratory must write the estimated chemical concentration of the sample next to DNQ as well as the words "Estimated Concentration" (may be shortened to Est. Conc.); or,
 - iii. Sample results less than the laboratory's MDL must be reported as "Not detected," or ND. It is appropriate to leave the result blank and qualify the result as ND (i.e., Qualifier = [ND]) for database entry.
 - iv. If more than one analytical test method is available for a given parameter, the Permittee must select the test method with lowest Minimum Level.
- d. If the Permittee samples and performs analyses (other than for process/operational control, startup, research, or equipment testing) on any sample more frequently than required in this MRP using approved analytical methods, the results of those analyses shall be included in the report. These results shall be included in the calculation of the average used in demonstrating compliance with average effluent limitations.
- e. Results of at least monthly observations in the WWTP and percolation pond area for any overflow, runoff, or surfacing of wastes.

- f. An estimate of population served must be provided for each month of the reporting period.
- g. Influent monitoring reports shall measure the monthly average and daily maximum wastewater flow from the collection system to the WWTP.
- h. An effluent sampling station shall be established at a location where representative samples of treated effluent can be obtained prior to discharge to the percolation ponds. Monitoring shall be conducted as described in the table below. The following shall constitute the effluent monitoring program, as specified in Table 2.
- i. For the flow reporting requirements, the Permittee shall report the daily maximum values.
- j. Any alarm setpoints that are triggered must be included in quarterly and annual reports. Include the time and cause of failure and corrective actions taken.
- k. A grab sample is an individual sample collected in a short period of time not exceeding 15 minutes. Grab samples shall be collected during normal peak loading conditions for the parameter of interest, which may or may not be during hydraulic peaks.
- l. Frequency of Analysis – The effluent shall be sampled as specified in Table 2 below.

Table 2. Effluent Monitoring Requirements for the WWTP

Constituent	Unit¹	Type of Sample	Frequency of Analysis
Total flow	gallons	Recorder	Continuous
pH	standard scale	Grab	Monthly
Total suspended solids	mg/L	Grab	Monthly
Biochemical oxygen demand (5@20°C)	mg/L	Grab	Monthly
Oil and grease	mg/L	Grab	Monthly
Total dissolved solids	mg/L	Grab	Monthly
Sulfate	mg/L	Grab	Monthly
Chloride	mg/L	Grab	Monthly
Boron	mg/L	Grab	Monthly
Nitrate as nitrogen	mg/L	Grab	Monthly

Constituent	Unit ¹	Type of Sample	Frequency of Analysis
Nitrite as nitrogen	mg/L	Grab	Monthly
Ammonia as nitrogen	mg/L	Grab	Monthly
Total nitrogen	mg/L	Grab	Monthly
Total coliform	MPN/100mL	Grab	Monthly
Fecal coliform	MPN/100mL	Grab	Monthly
Inorganic chemicals ²	Various	Grab	Every 5 years ⁸
Radionuclides ³	Various	Grab	Every 5 years ⁸
Disinfection byproducts ⁴	Various	Grab	Every 5 years ⁸
Secondary constituents ⁵	mg/L	Grab	Every 5 years ⁸
Constituents of Emerging Concern (CECs) ⁶	µg/L	Grab	Every 5 years ⁸
Priority Pollutants ⁷	µg/L	Grab	Every 5 years ⁸

Table 2 Notes:

[1] mg/L = milligrams per liter; µg/L = micrograms per liter; MPN/100 mL = most probable number per 100 mL

[2] See Attachment A-1 for the list of inorganic chemicals.

[3] See Attachment A-2 for the list of radionuclides.

[4] See Attachment A-4 for the list of disinfection byproducts.

[5] See Attachment A-5 for the list of secondary constituents.

[6] See Attachment C for the list of California Constituents of Emerging Concern.

[7] See Attachment D for the list of Priority Pollutants.

[8] Monitoring constituents listed in the Attachments were last sampled on November 6, 2023. Therefore, the next sampling shall occur in 2028.

B. Annual Monitoring Reports

- a. Tabular and graphical summaries of the monitoring data collected during the previous calendar year. A comparison of laboratory results against effluent limits prescribed in the cover letter and notations of any exceedances of limits or other requirements shall be summarized and submitted at the beginning of the report.
- b. Discussion of the compliance record and corrective or preventive action(s) taken or planned that may be needed to bring the non-compliant items into full compliance with requirements of the treated effluent.

- c. An in-depth discussion of the results of the final effluent monitoring conducted during the previous year.
- d. The description of any changes and anticipated changes including any impacts on the operation of any unit processes or facilities shall be provided.
- e. A list of the analytical methods employed for each test and associated laboratory quality assurance/quality control procedures shall be included. The report shall restate the laboratories used by the Permittee to monitor compliance with the Order, their status of certification, and provide a summary of analyses.
- f. The report shall confirm operator certification and provide a list of current operating personnel, their responsibilities, and their corresponding grade of certification.
- g. The report shall also summarize any change in the Operation, Maintenance, and Monitoring Plan (OMM Plan) due to the optimization of the existing WWTP operation. The summary shall discuss conformance with the WWTP's OMM Plan for operations, maintenance, and monitoring of the WWTP, and whether the OMM Plan requires revision for the current facilities.

III. SAMPLING AND ANALYSIS REQUIREMENTS

- A. Laboratory analyses – all chemical, bacteriological, and/or toxicity analyses shall be conducted at a laboratory certified for such analyses by the State Water Resources Control Board (State Water Board), Division of Drinking Water (DDW) Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certifications shall be provided each time a new analysis is used and/or renewal is obtained from ELAP.
- B. Unless specified differently, all samples shall be analyzed using analytical methods described in 40 CFR Part 136; or where no methods are specified for a given pollutant, by commercially available methods approved by the United States Environmental Protection Agency (USEPA) or DDW, Los Angeles Water Board and/or State Water Board. The Permittee shall select the analytical methods that provide reporting limits (RLs) lower than the limits prescribed in these WRRs.
- C. The Permittee shall instruct its laboratories to establish calibration standards so that the RLs (or its equivalent if there is a different treatment of samples relative to calibration standards) are the lowest calibration standard. At no time shall the Permittee use analytical data derived from extrapolation beyond the lowest point of the calibration curve.

- D. Upon request by the Permittee, the Los Angeles Water Board, in consultation with the USEPA or DDW and the State Water Board Quality Assurance Program, may establish RLs, in any of the following situations:
1. When the pollutant has no established method under 40 CFR 136 (revised May 14, 1999, or subsequent revision);
 2. When the method under 40 CFR 136 for the pollutant has an RL higher than the limit specified in this Order; or,
 3. When the Permittee agrees to use a test method that is more sensitive than those specified in 40 CFR136 and is commercially available.
- E. Water/wastewater samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136.3. If holding time limits for a particular analysis are so short that laboratory analysis is not possible (e.g., analyzing pH), then samples may be analyzed at the WWTP by trained personnel. All QA/QC samples must be run on the same dates when samples were actually analyzed. The Permittee shall make available for inspection and/or submit the QA/QC documentation upon request by Los Angeles Water Board staff. Proper chain of custody procedures must be followed and a copy of the chain of custody documentation shall be submitted with the quarterly reports.
- F. For unregulated chemical analyses, the Permittee shall select methods according to the following approach:
1. Use drinking water methods, if available;
 2. Use DDW-recommended methods for unregulated chemicals, if available;
 3. If there is no DDW-recommended drinking water method for a chemical, and more than a single USEPA-approved method is available, use the most sensitive USEPA-approved method;
 4. If there is no USEPA-approved method for a chemical, and more than one method is available from the scientific literature and commercial laboratory, after consultation with DDW, use the most sensitive method;
 5. If no approved method is available for a specific chemical, the Permittee's laboratory may develop or use its own methods and should provide the analytical methods to DDW or the Los Angeles Water Board for review. Those methods may be used until DDW recommended or USEPA-approved methods are available.

6. If the only method available for a chemical is for wastewater analysis (e.g., a chemical listed as a priority pollutant only), sample and analyze for that chemical in the treated and disinfected effluent. Use this approach until the Permittee's laboratory develops a method for the chemical in drinking water, or until a DDW-recommended or USEPA-approved drinking water method is available.
7. The Permittee is required to inform the Los Angeles Water Board, if 4, 5, or 6 are occurring.

G. The Permittee shall maintain all sampling and analytical results, including strip charts, date, exact place, and time of sampling, dates analyses were performed, analyst's name, analytical techniques used, and results of all analyses. Such records shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge, or when requested by the Los Angeles Water Board.

IV. GROUNDWATER MONITORING PROGRAM

The groundwater monitoring program consists of four monitoring wells (MDMW-1, MW-8, MW-11, and MW-17) around the three percolation ponds of which MW-8 and MW-17 are upgradient, MDMW-1 is downgradient, and MW-11 is cross-gradient.

The following is the groundwater monitoring program for Todd Road Jail WWTP.

Table 3. Groundwater Monitoring Requirements for the WWTP

Constituent	Unit¹	Type of Sample	Frequency of Analysis
Total dissolved solids	mg/L	Grab	Quarterly
Sulfate	mg/L	Grab	Quarterly
Chloride	mg/L	Grab	Quarterly
Boron	mg/L	Grab	Quarterly
Nitrate as nitrogen	mg/L	Grab	Quarterly
Nitrite as nitrogen	mg/L	Grab	Quarterly
Ammonia as nitrogen	mg/L	Grab	Quarterly
Total nitrogen	mg/L	Grab	Quarterly
Total coliform	MPN/100mL	Grab	Quarterly
Fecal coliform	MPN/100mL	Grab	Quarterly

Table 3 Notes:

[1] mg/L = milligrams per liter; MPN/100 mL = most probable number per 100 mL

All groundwater monitoring reports must include the following, at a minimum:

1. Well identification, date and time of sampling;
2. Sampler identification, and laboratory identification; and
3. Quarterly observation of groundwater levels, recorded to 0.01 feet mean sea level, and groundwater flow direction.

V. WASTE HAULING REPORTING

In the event that waste sludge or other wastes are hauled offsite, the name and address of the hauler shall be reported, along with types and quantities hauled during the reporting period and the location of the final point of disposal. In the event that no wastes are hauled during the reporting period, a statement to that effect shall be submitted.

VI. MONITORING FREQUENCIES

Specifications in this monitoring program are subject to periodic revision. Monitoring requirements may be modified or revised by the Executive Officer based on review of monitoring data submitted pursuant to this MRP. Monitoring frequencies may be adjusted to a less frequent basis or parameters and locations may be dropped from the MRP by the Executive Officer if the Permittee make a request and the request is backed by statistical trends of monitoring data submitted.

VII. ELECTRONIC SUBMITTAL OF INFORMATION

The Permittee shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, discharge location coordinate data, and monitoring reports in Portable Document Format (pdf) to the State Water Resource Control Board GeoTracker database under Global ID WDR100001460.

VIII. CERTIFICATION STATEMENT

Each report shall contain the following completed declaration:

“I certify under penalty of law that this document, including all attachments and supplemental information, was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge

and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.

Executed on the _____ day of _____ at _____

_____ (Signature)

_____ (Title)"

These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the Los Angeles Water Board.

Ordered by

Date: July 25, 2024

Susana Arredondo
Executive Officer