

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

**320 West 4th Street, Suite 200, Los Angeles, California 90013
(213) 576-6600 • Fax (213) 576-6640**

**ORDER NO. R4-2024-XXXX
FILE NO. 91-076
CI-7418**

**WASTE DISCHARGE REQUIREMENTS
ISSUED TO
VENTURA COUNTY WATER AND SANITATION DEPARTMENT
TODD ROAD JAIL WASTEWATER TREATMENT PLANT**

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

BACKGROUND

1. The Ventura County Water and Sanitation Department (hereinafter Discharger) owns and operates the Todd Road Jail Wastewater Treatment Plant (Todd Road Jail WWTP) located at 600 South Todd Road, Santa Paula, California (Site), as shown in Figure 1. The Todd Road Jail WWTP, originally constructed in 1996, treats domestic wastewater from the Todd Road County Jail, including wastewaters from food preparation facilities, laundry facilities, air conditioning units, and bathrooms generated from the Site. The Todd Road County Jail has a maximum bed capacity of 974 inmates. It currently serves approximately 819 inmates and 115 employees.
2. Todd Road Jail WWTP has an average influent flow of approximately 32,000 gallons per day (gpd) over the past three years. It has a design capacity of 85,000 gpd. Treated effluent from Todd Road Jail WWTP is disposed of via three onsite percolation ponds.
3. On December 8, 2011, the Los Angeles Water Board adopted Waste Discharge Requirements (WDRs) Order No. R4-2011-0193. The WDRs required the Discharger to submit an updated Report of Waste Discharge (ROWD) prior to the 10-year anniversary of the adoption of Order No. R4-2011-0193 or be in violation of California Water Code (CWC) section 13264.
4. On October 28, 2021, the Los Angeles Water Board issued a directive to submit an updated ROWD in compliance with the requirement listed in Order No. R4-2011-0193.

5. On November 24, 2021, the Discharger submitted an updated ROWD to the Los Angeles Water Board via GeoTracker to comply with the requirement to submit an updated ROWD prior to December 8, 2021.
6. On January 20, 2022, the Los Angeles Water Board issued a Notice of Incomplete Application letter to the Discharger, requiring submittal of additional information regarding use of cleaning chemicals and any chemicals used as part of vocational programs within the jail.
7. On April 22, 2022, the Discharger submitted a revised ROWD which provided all the information requested in the January 20, 2022 letter.

PURPOSE OF THE ORDER

8. California Water Code (CWC) 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 CWC 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, . . . prior to, and for purposes of, disposal.” The Discharger proposes to discharge secondary-treated human sewage, i.e., “waste” to land where it could affect the quality of the waters of the state. Sewage contains various waste constituents, including total dissolved solids (TDS), sulfate, salts (e.g., chloride, boron), bacteria, nitrogen, priority pollutants, and constituents of emerging concern. In accordance with CWC 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.
9. CWC section 13263(e) provides that all WDRs shall be reviewed periodically and, upon such review, may be revised by the Regional Water Board. Following a review of the requirements prescribed in the current WDRs Order No. R4-2011-0193, these requirements have been revised to include additional findings, effluent discharge limitations, updated standard provisions, and a revised monitoring reporting program (MRP).
10. While the plant has been able to meet effluent requirements prescribed in the current WDRs Order No. R4-2011-0193 when operated optimally, there have been frequent plant upsets that resulted in exceedances of effluent limits. Quarterly monitoring of most effluent parameters is not adequate to fully understand the impact of the

discharge from Todd Road Jail WWTP to waters of the state when the performance of the treatment plant has been so inconsistent.

11. The quality of the groundwater near and around the Todd Road Jail WWTP is highly impacted by upgradient discharges as evidenced by the fact that the groundwater quality in the onsite upgradient monitoring wells is worse than that of the downgradient monitoring wells. Figure 2 shows the locations of the four onsite monitoring wells in relation to the percolation ponds. As shown in Table 2, upgradient wells (MW-8 and MW-17) exceed groundwater quality objectives (GQOs) established in the Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan) for total dissolved solids (TDS), chloride, sulfate, and boron, while the downgradient wells (MDMW-1) and cross-gradient (MW-11) also frequently exceed GQOs for these constituents, at generally lower concentrations for a majority of the pollutants than upgradient wells. The current WDRs Order No. R4-2011-0193 does not include effluent limits for TDS, chloride, sulfate, or boron; however, the lack of assimilative capacity in the local groundwater for these constituents indicates that effluent limits for these GQOs is necessary for this Order to comply with the Antidegradation Policy (State Water Board Resolution No. 68-16) and the Basin Plan.
12. Monitoring of local groundwater conditions indicates no bacterial contamination of groundwater. Since the Todd Road Jail WWTP treatment process does not include disinfection, continued groundwater monitoring is required to ensure that this discharge does not negatively impact groundwater quality and local groundwater continues to meet GQOs for bacteria.

FACILITY AND TREATMENT PROCESS DESCRIPTION

13. The Site is located approximately 2.5 miles southwest of Santa Paula in unincorporated Ventura County. It overlies the Santa Clara River Valley - Santa Paula groundwater basin, West of Peck Road subbasin (Subbasin).
14. The approximate coordinates of the Site are latitude 34°18' 25" and longitude 119°06' 40". The Site is in an unsewered area of unincorporated Ventura County. To date, no public sewers have been scheduled for construction in the vicinity of the Site.
15. The Todd Road Jail WWTP and its percolation pond dispersal systems are shown in Figure 2. Figure 3 shows the process flow diagram (PFD) of the Todd Road Jail WWTP. The treatment plant consists of the following key components:

- an influent pump station with three grinder-pumps
 - a rotating drum screen
 - a magnetic flow meter with a totalizer
 - an influent lift station
 - a 25,000-gallon influent surge tank
 - dual 52,000-gallon aeration tanks
 - dual 52,000-gallon clarifiers
 - a 50,000-gallon aerobic sludge digester tank with a NEMO NE30A positive displacement sludge pump
 - six 20-foot by 35-foot sludge drying beds
 - three percolation/evaporation ponds
 - instruments, controls, and backup generators
16. As shown in Figure 3, influent wastewater is conveyed from Todd Road Jail to the WWTP by a gravity sewer system where the influent enters the influent pump station. Influent flowrate is recorded by a magnetic flow meter and totalizer. Three submersible grinder pumps in the influent pump station convey wastewater through rotating drum screens (0.060-inch openings) and then to the influent lift station. At the influent lift station, the screened wastewater is pumped into the treatment system via two 120-gallon per minute (gpm) submersible pumps.
17. The aboveground treatment system consists of two aeration tanks, two secondary clarifiers, an aerobic sludge digester, and an influent surge tank. Return activated sludge is returned to the aeration tanks, and waste activated sludge can either be conveyed to the clarifiers or wasted to the aerobic digester.
18. Clarified effluent is pumped to one of three percolation/evaporation ponds. Two of the ponds are 90 feet wide by 160 feet long and the third is 180 feet wide by 160 feet long. All three ponds are 5 feet deep. Each of the three ponds are cycled between fill, rest, and standby phases. The percolation ponds are approximately 300 feet from the channelized Todd Barranca and approximately 1,450 feet from the Santa Clara River.
19. Wasted sludge is aerobically digested in the 50,000-gallon sludge digester tank. A NEMO model NE30A positive displacement sludge pump delivers sludge from the digester tank to six lined sludge drying beds. Each drying bed is 20 feet wide and 35 feet long. Dried sludge and screened solids are hauled to Toland Landfill by the Ventura County Water and Sanitation Department for disposal.

COMPLIANCE HISTORY

20. Todd Road Jail WWTP effluent water quality based on the self-monitoring reports (SMRs) from January 2018 to September 2023 is summarized as follows:

Table 1. Effluent Water Quality Summary

Constituents	Units^[1]	Effluent	Effluent Limit^[2]
pH	standard unit	7.0 – 8.3	6.5 – 8.5
Biochemical oxygen demand (5-day BOD @20°C)	mg/L	0.2 – 552^[4]	40 – 80
Total suspended Solids	mg/L	1.1 – 1700^[4]	30
Oil & grease	mg/L	<3 – 24.9	10 – 15
Total dissolved solids	mg/L	1083 – 1379	NA ^[3]
Chloride	mg/L	66 – 121 ^[5]	NA ^[3]
Sulfate	mg/L	388 – 514	NA ^[3]
Boron	mg/L	0.5 – 1.37 ^[5]	NA ^[3]
Nitrate as N	mg/L	0.016 – 24.5 ^[5]	NA ^[3]
Nitrite as N	mg/L	0.0074 – 0.82	1
Ammonia as N	mg/L	0.282 – 17.3	NA ^[3]
Total nitrogen	mg/L	4.3 – 78.14^[5]	10
Total organic carbon	mg/L	3.22 – 11.5	NA ^[3]
Radioactivity (alpha)	pCi/L	4.07 – 11.9	NA ^[3]
Radioactivity (beta)	pCi/L	2.77 – 14.9	NA ^[3]
Priority pollutants	µg/L	-	NA ^[3]

Table 1 Note:

^[1] mg/L = milligrams per liter; pCi/L = picocuries per liter; µg/L = micrograms per liter

^[2] Effluent limits prescribed in Order No. R4-2011-0193

^[3] NA= Not applicable. No effluent limit specified in the current WDRs Order No. R4-2011-0193.

^[4] See Compliance History, Finding 23

^[5] See Compliance History, Finding 22

Bolded number indicate exceedance of effluent limit

21. Between August 1990 and October 1992, the Discharger installed four groundwater monitoring wells: MDMW-1, MW-8, MW-11, and MW-17 at the Site (Figure 2). Depth to groundwater at the site varies between 8.5 feet and 19.6 feet below ground surface (bgs). The groundwater quality based on the SMRs from January 2018 to September 2023 is summarized as follows:

Table 2. Groundwater Quality Summary

Constituents	Units ^[1]	MDMW-1 ^[3]	MW-8 ^[2]	MW-11 ^[4]	MW-17 ^[2]
Total coliform	MPN/100 mL	< 1.1 – 6.9 ^[5]	< 1.1	< 1.1	< 1.1
Fecal coliform	MPN/100 mL	< 1.1	< 1.1	< 1.1	< 1.1
Enterococcus	MPN/100 mL	< 1 – 2 ^[6]	< 1	< 1	< 1
Total dissolved solids	mg/L	1,310 – 2430	2,800 – 3,950	2,960 – 4,020	2,520 – 3,900
Chloride	mg/L	94 – 124	109 – 220	124 – 179	110 – 187
Boron	mg/L	0.719 – 1.5	0.83 – 1.2	1.1 – 1.6	0.83 – 1.13
Sulfate	mg/L	518 – 1270	1260 – 2040	1660 – 2980	1270 – 2040
Nitrate as N	mg/L	< 0.2 – 19.2	< 0.2 – 0.5	< 0.2 – 9.5	< 0.2
Nitrite as N	mg/L	< 0.2	< 0.2	< 0.2	< 0.2
Ammonia as N	mg/L	< 0.1 – 0.1	< 0.1 – 0.9	< 0.1 – 0.9	< 0.1 – 0.3
Total nitrogen	mg/L	0.1 – 19.2	< 0.5 – 1	0.6 – 10.5	< 0.5 – 9.4

Table 2 Notes:

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

^[2]MW-8 and MW-17: Upgradient Wells

^[3]MDMW-1: Downgradient Well

^[4]MW-11: Cross-gradient Well

^[5] One exceedance between January 2018 and September 2023 measured on July 1, 2020.

^[6] One exceedance between January 2018 and September 2023 measured on July 12, 2023.

Bolded number indicate exceedance of Groundwater Quality Objective

22. The effluent quality data from January 2018 to September 2023 show that concentrations of TDS, chloride, sulfate, boron, nitrate as nitrogen, and nitrite as nitrogen are typically below Basin Plan Groundwater Quality Objectives (GQOs). GQOs for the Subbasin are: TDS = 2,000 mg/L, chloride = 110 mg/L, sulfate = 800 mg/L, boron = 1.0 mg/L, nitrate as nitrogen = 10 mg/L, nitrite = 1.0 mg/L, and total nitrogen = 10 mg/L. Since January 2018, the only measured exceedances of GQOs in effluent are: chloride at 121 mg/L in February 2021; boron at 1.37 mg/L in May 2020 and 1.1 mg/L in Aug 2020; total nitrogen at 78.14 mg/L in November 2021, 29.5 mg/L in May 2022, and 17.7 mg/L in November 2022; and nitrate as nitrogen at 24.5 mg/L in May 2022.

The current WDRs Order No. R4-2011-0193 does not require total and fecal coliform sampling for the effluent and thus bacterial concentrations in effluent are not known; however, given the lack of disinfection or filtration treatment processes at the

treatment plant, it is probable that effluent would not meet the GQOs of 1.1 MPN/100 mL for total and fecal coliform. Additionally, Table 2 indicates that total coliform and enterococcus have been exceeded in downgradient groundwater well MDMW-1. Hence, the MRP adds a monitoring requirement to monitor total coliform, fecal coliform and enterococcus in the effluent and increases groundwater sampling frequency from annually to quarterly.

23. In April 2020, February 2021, November 2021, and June 2022, there were significant exceedances of BOD₅ @20°C and Total Suspended Solids (TSS), the highest of which was in June 2022 at 552 mg/L and 1,700 mg/L for BOD₅ @20°C and TSS, respectively. Onsite operations staff identified the cause of these exceedances was due to the growth by filamentous thiothrix bacteria that caused a significant increase in the thickness of the sludge blanket in the clarifiers. In response to each of these events, operations staff adjusted blower settings, and in 2021 reseeded the treatment plant with sludge from the Piru WWTP. There were no issues related to thickening of the sludge blanket reported in 2023.
24. From 2020 through September 2023, the average daily discharge flowrate from the Todd Road Jail WWTP was 32,000 gpd with a maximum daily flowrate of 56,000 gpd. The Todd Road Jail WWTP has a design flow capacity of 85,000 gpd. Therefore, the current design capacity is adequate for expected wastewater flows.
25. Effluent sampling analytical results from January 2018 through September 2023 indicated the following exceedances of the effluent limits: total nitrogen at 21.1 mg/L in February 2021, 78.14 mg/L in November 2021, 29.5 mg/L in May 2022, and 17.7 mg/L in November 2022, above the total nitrogen limit of 10 mg/L; TSS at 109 mg/L in April 2020, 346 mg/L in February 2021, 143 mg/L in November 2021, and 1700 mg/L in June 2022, above the daily maximum limit of 80 mg/L; and BOD₅ @20°C at 76 mg/L in April 2020, 93.6 mg/L in November 2021, and 552 mg/L in June 2022, above the daily maximum limit of 80 mg/L. The discharger has had no effluent exceedances in 2023. Priority pollutants are typically below detection limit in annual effluent sampling.

As presented in Table 2 above, the groundwater sampling results from 2018 through 2023 indicated that salts (TDS, chloride, sulfate, and boron) have exceeded their respective GQOs at upgradient (MW-8 and MW-17), downgradient (MDMW-1), and cross-gradient monitoring well (MW-11). Upgradient wells show higher concentrations of salts than the downgradient well, MDMW-1, which consistently had the lowest concentrations for TDS, chloride, sulfate, and boron of the four monitoring wells during the review period. However, the cross-gradient well indicates higher exceedances of salts compared to the upgradient well. Except for two

samples for boron and one sample for chloride since January 2018, effluent quality from Todd Road Jail WWTP shown in Table 1, did not exceed GQOs for these salt constituents. It is also unclear why salt concentrations in the cross-gradient well are higher than the other three wells even though the concentration of salts in the effluent are consistently below GQOs, which could provide a dilution effect.

The following exceedances of groundwater limits for nitrogen species and pathogens were observed between January 2018 and September 2023: total coliform of 6.9 MPN/100 mL in MDMW-1 on July 1, 2020, exceeding the limit of 1.1 MPN/100 mL, nitrate of 19.2 mg/L in MDMW-1 on January 14, 2021, exceeding the limit of 10 mg/L, total nitrogen of 19.2 mg/L in MDMW-1 on January 14, 2021, and total nitrogen of 10.5 mg/L in MW-11 on March 2, 2023, exceeding the limit of 10 mg/L. The single exceedance for total coliform, nitrate, and total nitrogen between January 2018 and September 2023 in the downgradient monitoring well (MDMW-1) and the low frequency for groundwater sampling required in the existing permit make it unclear if the discharge has impacted groundwater quality for these constituents. Therefore, an increased monitoring frequency for groundwater monitoring is warranted.

Priority pollutants are typically below detection limits in effluent and groundwater samples for all wells between January 2018 and September 2023. Hence, the MRP has been revised to decrease effluent sampling frequency for priority pollutants from yearly to every five years, and the groundwater monitoring requirement for priority pollutants has been removed.

SITE SPECIFIC CONDITIONS

26. The Todd Road Jail WWTP overlies the Santa Paula Groundwater Basin within the West of Peck Road Area subbasin (Subbasin).
27. Groundwater beneath the Todd Road Jail WWTP is contained in Quarternary age alluvial and river deposits, which extend to depths of several hundred feet. The depth to groundwater beneath the Site ranges from approximately 8.5 feet to 19.6 feet below ground surface (bgs), and the groundwater flow direction is southwesterly towards the Santa Clara River and down-valley.
28. The only well within 1,500 feet of the WWTP is State Well Number 03N21W29N01S, which is an agricultural well approximately 800 feet upgradient from the WWTP.
29. The Site is bounded to the southwest by the channelized Todd Barranca. The WWTP is approximately 300 feet from the Todd Barranca and approximately 1,450

feet from the Santa Clara River to the southeast.

30. Shallow groundwater, significant upgradient agricultural activity, and the constrained nature of groundwater in the Santa Clara River Valley likely all contribute to high background concentrations of salts at the Site.

APPLICABLE PLANS, POLICIES AND REGULATIONS

Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan)

31. On June 13, 1994, the Los Angeles Water Board adopted a revised Basin Plan. The Basin Plan (i) designates beneficial uses for surface and groundwater, (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 the State Water Resources Control Board (State Water Board) Resolution 68-16. In addition, the Basin Plan incorporates by reference applicable State and Regional Water Board plans and policies and other pertinent water quality policies and regulations. The Los Angeles Water Board prepared the 1994 update of the Basin Plan to be consistent with previously adopted State and Regional Water Board plans and policies. This Order implements the plans, policies and provisions of the Los Angeles Water Board's Basin Plan. The Basin Plan has been amended occasionally since 1994.

In addition, the Basin Plan incorporates State Water Board Resolution No. 88-63, which established state policy that all waters, with certain exceptions, should be considered suitable or potentially suitable for municipal or domestic supply.

32. The designed beneficial uses of the receiving Subbasin groundwater are as follows:

Existing beneficial uses:

- Municipal and Domestic Supply (MUN)
- Industrial Process Supply (PROC)
- Industrial Service Supply (IND)
- Agricultural Supply (AGR)

33. The Basin Plan (Chapter 3) incorporates as water quality objectives primary and secondary maximum contaminants levels (MCLs) for inorganic, organic, and radioactive contaminants in drinking water that are codified in Title 22 California Code of Regulations, Division 1 (CCR Title 22). This incorporation by reference is

prospective, including future changes to the incorporated provisions as the changes take effect. The CCR Title 22 primary MCLs are applicable water quality objectives for a receiving water to protect beneficial uses when that receiving water is designated as municipal and domestic supply. Also, the Basin Plan specifies that “Groundwaters shall not contain taste or odor-producing substances in concentrations that cause nuisance or adversely affect beneficial uses.” Therefore, the CCR Title 22 secondary MCLs, which are limits based on aesthetic, organoleptic standards, are applicable water quality objectives for a receiving water to protect beneficial uses when that receiving water is designated as municipal and domestic supply. These water quality objectives are implemented in this Order to protect groundwater quality.

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 designed to protect human health and ensure that water is safe for domestic use.

34. Pursuant to CWC section 13263, the requirements of this Order take into consideration the provisions of CWC section 13241, including the following factors.
- a) Past, present, and probable future beneficial uses of water;

The receiving water for discharges from the Todd Road Jail WWTP is the Santa Paula Groundwater Basin, West of Peck Road Area subbasin. The receiving water limitations in this Order are specified to maintain the existing and probable future beneficial uses of this basin: municipal and domestic water supply (MUN), industrial process supply (PROC), industrial service supply (IND), and agricultural supply (AGR). This Order also specifies effluent limitations protective of the beneficial uses and includes effluent and groundwater monitoring and reporting requirements to verify that discharges will not adversely affect the beneficial uses of groundwater.

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

This Order incorporates the site-specific water quality objectives for groundwater in the Basin Plan considering geology, hydrogeology, and hydrology. Todd Road Jail WWTP will, for most constituents, produce effluent quality that meets or is better than the groundwater quality objectives. The site has an established groundwater monitoring record which shows only a single

detection of both total coliform and enterococcus in groundwater between January 2018 and September 2023. Due to the complex nature of groundwater monitoring and the low values detected, these single-sample events cannot conclusively indicate that the subject discharge has not impacted groundwater beneficial uses. However, since the detections only occurred in the downgradient monitoring well MDMW-1, additional monitoring of effluent and groundwater is required to continue to comply with the state's Antidegradation Policy (Resolution No. 68-16), and operational changes may be required if the increased monitoring indicates the discharge is impacting groundwater beneficial uses.

- c) Water quality conditions that could reasonably be achieved through the coordinated control of all factors that affect water quality in the area, such as joint efforts in developing the Salt and Nutrient Management Plan (SNMP) for the Santa Paula Groundwater Basin. The SNMP was developed by the Ventura County Watershed Protection District (VCWPD) and other agencies, including the Cities of Ventura, Santa Paula, and Fillmore; Ventura County Water Works District 16; United Water Conservation District; and the Ventura County Agricultural Irrigated Lands Group. The SNMP strategies developed are measures designed to maintain water quality that is protective of beneficial uses, supports increased recycled water use, facilitates long-term planning, balances use of assimilative capacity (where it exists), and supports collecting, treating and infiltrating stormwater runoff.

- d) Economic considerations;

The limits and requirements described in this permit can be met with proper operation of the existing treatment plant, so this Order and revised MRP will not have significant economic impact on the discharger.

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

The Todd Road Jail WWTP only collects wastewater from the Todd Road County Jail.

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

This Order authorizes Todd Road Jail WWTP to treat and discharge up to 85,000 gpd of secondary-treated wastewater for discharge into percolation ponds. It currently only discharges an average of 32,000 gpd. The Discharger has no plans to meet recycled water requirements for reuse of wastewater.

35. **AB 685 – CWC 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 maximum contaminant levels developed to protect human health and ensure that water is safe for domestic use.

Antidegradation Policy, State Water Board Resolution No. 68-16

36. State Water Board Resolution No. 68-16 (“Statement of Policy with Respect to Maintaining High Quality Waters in California”, also called the “Antidegradation Policy”) requires the Regional 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 (e.g., quality that exceeds water quality objectives). The Regional Water Board finds that the discharge, as allowed in these WDRs, is consistent with Resolution No. 68-16 since this Order requires (1) compliance with effluent and groundwater limitations including new effluent requirements for TDS, chloride, sulfate, boron, and nitrate; (2) implementation of the revised MRP, which increases the monitoring frequency for coliform, nitrogen species, TDS, chloride, sulfate, and boron; and (3) an increased frequency of groundwater monitoring to comply with water quality objectives.

Antidegradation Analysis

37. As described in Finding 25 and Table 2 above, the groundwater beneath the Site lacks assimilative capacity and is impacted with TDS up to 4,020 mg/L, chloride up to 220 mg/L, sulfate up to 2980 mg/L, boron up to 1.6 mg/L, and total nitrogen up to 19.2 mg/L; therefore, to provide certainty that discharges from the Site will not further degrade groundwater quality, this Order sets the effluent discharge limitations the same as the groundwater quality objectives. Although the groundwater monitoring data indicates that this site has only had a single exceedance of total coliform and enterococcus in the past 5 years, the exceedances occurred only in the downgradient well, so this Order and revised MRP add monthly monitoring requirements for total and fecal coliforms in effluent and increase groundwater sampling frequency from annually to quarterly to verify that beneficial uses are not impacted. The previous Order had no effluent limits for TDS, chloride, sulfate, and boron. In the past, TDS, chloride, sulfate, boron, and nitrogen species in effluent were monitored quarterly, and groundwater was monitored semi-annually. Now all constituents except chemicals of emerging concern and priority pollutants will be monitored in the effluent monthly, and groundwater is monitored quarterly.

38. Pursuant to California Water Code Section 13263(g), the discharge of waste is a privilege, not a right, and adoption of this Order does not create a vested right to continue the discharge.
39. Section 13267(b) of the California Water Code states, in part, that “In conducting an investigation specified in subdivision (a), the Regional Water Board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging or who proposes to discharge within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste outside of its region that could affect the quality of waters of the state within its region shall furnish under penalty of perjury, technical or monitoring program reports which the Regional Water Board requires to protect public health and provide water beneficial use benefits. The burden, including the costs of preparing these reports shall bear a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The reports including quarterly SMRs and annual reports required by the revised MRP No. CI-7418 are necessary to assure compliance with these waste discharge requirements to protect future beneficial uses. The costs to prepare a quarterly SMR including analytical and labor costs typically range from \$18,000 to \$25,000. The costs to prepare an annual summary report typically range from \$7,000 to \$14,000. The submission of the SMRs ensures effluent limitations are compiled. The benefits to water quality and public health outweigh the costs associated with the production of these reports.

Global Warming and Climate Change

40. 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 wildfires and a longer wildfire season. In addition, precipitation patterns are likely to be modified.

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

For permitted wastewater treatment facilities such as Todd Road Jail WWTP, specific impacts could include, but are not limited to, an increase in the concentration of pollutants entering the facility, an increase in the temperature of effluents and receiving waters, an increase in storm water inflow and infiltration, increase in flooding inundation of facilities, sewer overflows, power outages, pump maintenance issues, and onsite or nearby hillside destabilization.

41. On March 7, 2017, recognizing the challenges posed by climate change, the State Water Board adopted Resolution No. 2017-0012, Comprehensive Response to Climate Change, directed state agencies to take climate change into account in their planning decisions which are guided by the following principles: Priority should be given to actions that both build climate preparedness and reduce greenhouse gas emissions; where possible, flexible and adaptive approaches should be taken to prepare for uncertain climate impacts; actions should protect the state's most vulnerable populations; and natural infrastructure solutions should be prioritized.

On May 10, 2018, the Los Angeles Water Board adopted Resolution No. 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.

42. This Order contains provisions to require planning and taking actions to address climate-related impacts that can cause or contribute to violations of permit requirements and/or degradation of the waters of the state.

California Environmental Quality Act and Public Notification

43. This project involves the re-issuance of WDRs for an existing facility; as such, the action to adopt WDRs is exempt from the provisions of the California Environmental Quality Act (Public Resources Code section 21000 et seq.) in accordance with California Code of Regulations, Title 14, section 15301.
44. The Los Angeles Water Board, in a public meeting, heard and considered all comments pertaining to the discharge and to the tentative requirements.

RECONSIDERATION OF THE WDRs:

45. Pursuant to California Water Code section 13320, any person aggrieved by this

action of the Regional Water Board may petition the State Water Board to review the action in accordance with section 13320 of the California Water Code and Title 23, California Code of Regulations, Section 2050. The State Water Board (P.O. Box 100, Sacramento, California, 95812) must receive the petition by 5:00 p.m. within 30 days of the date this Order is adopted. The regulations regarding petitions, and the address to which petitions may be sent, may be found at:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality/index.shtml

IT IS HEREBY ORDERED that the Discharger, Ventura County Water and Sanitation Department, shall be responsible for complying with the following requirements in all operations and activities at the Todd Road Jail WWTP.

A. INFLUENT LIMITATIONS

1. The source of wastewater is limited to the Todd Road County Jail.
2. Waste discharge shall be limited to domestic wastewater only. No commercial or industrial wastewater shall be discharged to Todd Road Jail WWTP.
3. The maximum daily flowrate of the influent to the Todd Road Jail WWTP shall not exceed 85,000 gpd.

B. EFFLUENT LIMITATIONS

1. The maximum discharge flowrate shall not exceed 85,000 gpd.
2. The pH in the effluent shall be between 6.5 and 8.5 standard units at all times.
3. Effluent concentration shall not contain constituents in excess of the effluent limitations in Table 3 and Sections B.4 through B.8. The effluent sampling point immediately downstream of the clarifiers, prior to discharge to the evaporation/percolation ponds as indicated in Figure 3 shall continue to be the effluent compliance point.

Table 3. Effluent Limitations

Constituent	Units ^[1]	Daily Maximum	Monthly Average
BOD ₅ @20°C	mg/L	45	30
Total suspended solids	mg/L	45	30
Total nitrogen ^[2]	mg/L	10	NA ^[3]
Nitrate-N	mg/L	10	NA

Nitrite-N	mg/L	1	NA
Oil and grease	mg/L	15	10
Total dissolved solids	mg/L	2,000	NA
Sulfate	mg/L	800	NA
Chloride	mg/L	110	NA
Boron	mg/L	1.0	NA
MBAS	mg/L	1.0	NA

Table 3 Notes:

[¹]mg/L = milligrams per liter

[²]Total nitrogen = nitrate-N + nitrite-N + ammonia-N + Organic Nitrogen

[³]NA = Not Applicable

1. Effluent from the Todd Road Jail WWTP shall not contain heavy metals, arsenic, or cyanide, or other pollutants designated as Priority Pollutants (Appendix A to 40 CFR, Part 423--126 Priority Pollutants – Attachment D) by the U.S. Environmental Protection Agency in concentrations exceeding the limits contained in the California Drinking Water Standards, CCR Title 22, section 64431 (Attachment A-1).
2. Radionuclides shall not exceed the limits specified in the current California Drinking Water Standards, CCR Title 22, sections 64441 or subsequent revisions (Attachment A-2).
3. Effluent shall not contain organic chemicals in concentrations exceeding the limits contained in the current California Drinking Water Standards, CCR Title 22, section 64444 or subsequent revisions (Attachment A-3).
4. Effluent shall not exceed the Secondary MCLs, California Drinking Water Standards, CCR Title 22, Table 64449-A (Attachment A-4).
5. Effluent shall not contain disinfectant byproducts in concentrations exceeding the limits contained in the current California Drinking Water Standards, CCR Title 22, section 64533, or subsequent revisions (Attachment A-5).

C. RECEIVING WATER LIMITATIONS FOR GROUNDWATER QUALITY

1. "Receiving water" is defined as groundwater underlying the wastewater treatment plant and associated percolation ponds.
2. Receiving water shall not contain constituents with concentrations exceeding limits specified in Table 4 as a result of the discharge. Compliance with these

limits will be determined at monitoring wells MDMW-1, MW-8, MW-11, and MW-17. MW-8 and MW-17 are upgradient, MDMW-1 is downgradient, and MW-11 is cross-gradient. In the event that the groundwater quality exceeds the limitations specified in Table 4, the Discharger shall be in violation of this Order unless it can demonstrate that the discharge does not contribute to the exceedance of the receiving water quality limitations.

3. The Site’s receiving water quality limitations consistent with the Basin Plan are listed in Table 4 below.

Table 4. Receiving Water Limitations for Groundwater Quality

Constituent	Units ^[1]	Maximum Limitation
Total dissolved solids	mg/L	2,000
Sulfate	mg/L	800
Chloride	mg/L	110
Boron	mg/L	1.0
Total nitrogen ^[2]	mg/L	10
Nitrate-N	mg/L	10
Nitrite-N	mg/L	1.0
Total coliform	MPN/100 mL	1.1
Fecal coliform	MPN/100 mL	1.1
Enterococcus	MPN/100 mL	1.1

Table 6 Notes:

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

^[2]Total nitrogen = nitrate-N + nitrite-N + ammonia-N + organic nitrogen

D. GENERAL REQUIREMENTS

1. Dischargers shall operate and maintain facilities, treatment operations, associated collection systems and discharge locations in ways to preclude adverse impacts to surface or groundwater from impacts predicted to occur due to climate change.
2. The Discharger shall submit a Climate Change Effects Vulnerability Assessment and Management Plan (Climate Change Plan) no later than 12 months after adoption of this permit. Submittal of the Climate Change Plan is required pursuant to Water Code section 13267. As required by this provision, a regional water board may require a person to submit technical or monitoring

program reports which the regional water board requires. The Climate Change Plan is needed in order to assess and manage climate change related effects associated with Discharger operations that may affect water quality.

The Climate Change Plan shall include an assessment of short- and long-term vulnerabilities of the facility(ies) and operations as well as plans to vulnerabilities of collection systems, facilities, treatment systems, and discharge locations for predicted impacts in order to ensure that facility operations are not disrupted, compliance with permit conditions is achieved, and receiving waters are not adversely impacted by discharges. Control measures shall include, but are not limited to, emergency procedures, contingency plans, alarm/notification systems, training, backup power and equipment, and the need for planned mitigations to ameliorate climate-induced impacts including, but not limited to, changing influent and receiving water quality and conditions, as well as the impact of rising sea level (where applicable) storm surges and back-to-back severe storms that are expected to become more frequent.

3. Standby or emergency power facilities and/or sufficient capacity shall be provided for treated wastewater storage during rainfall or in the event of system upsets or outages.
4. Adequate measures shall be provided to protect the Todd Road Jail WWTP, treatment systems, wastewater collection system, as well as instrumentation and controls from damage by storm and runoff generated by a 100-year storm.
5. The Discharger's wastewater treatment system and percolation ponds shall be operated and maintained to prevent inundation or washout due to floods with a 100-year return frequency.
6. The Discharger shall optimize the wastewater treatment processes periodically to maximize treatment of wastewater and produce a high quality of effluent for discharge. Sludge and other solids shall be removed from wastewater treatment equipment, sumps, tanks, etc. as needed to ensure optimal system operation and adequate hydraulic capacity.
7. The wastewater collection system, treatment system, and the treated wastewater dispersal system (i.e., percolation ponds) shall be maintained in such a manner that prevents wastewater from surfacing or overflowing at any

location.

8. Sludge and other solids removed from wastewater treatment shall be disposed of in a manner that is consistent with Title 27, Division 2, Subdivision 1 of the CCR and approved by the Executive Officer.
9. Storage and disposal of domestic wastewater shall comply with existing federal, state, and local laws and regulations, including permitting requirements and technical standards.
10. Any proposed change in solids use or disposal practice from a previously approved practice shall be reported to the Executive Officer at least 60 days for approval in advance of the change.
11. Dischargers are directed to submit all reports required by the WDRs and MRP, including self-monitoring reports, groundwater monitoring analytical data, and discharge location data to the State Water Resources Control Board GeoTracker database website at: <https://geotracker.waterboards.ca.gov/> under Global ID WDR100001460.

E. PROHIBITIONS

1. The direct or indirect discharge of any waste and/or wastewater to surface waters or surface water drainage courses is prohibited.
2. Bypass, discharges, or overflow of untreated wastes, except as allowed by Section E. Item 12 of this Order, are prohibited.
3. Discharge of waste classified as "hazardous," as defined in Section 2521(a) of Title 23, CCR, Section 2510 et seq., is prohibited. Discharge of waste classified as 'designated,' as defined in California Water Code Section 13173, in a manner that causes violation of groundwater limitations, is prohibited.
4. Wastes shall not be disposed of in geologically unstable areas to cause earth movement.
5. Wastes discharged shall not impart tastes, odors, color, foaming or other objectionable characteristics to the receiving waters.
6. There shall be no onsite permanent disposal of sludge. Sludge-drying activities are allowed. Any offsite disposal of wastewater or sludge shall be made only to a legal point of disposal. For the purposes of this Order, a legal

disposal site is one for which requirements have been established by the Regional Water Board or comparable regulatory entity, and which is in full compliance therewith. Any wastewater or sludge handling shall be conducted in such a manner to prevent its reaching surface waters or watercourses.

7. Odors originating at this facility shall not be perceivable beyond the limits of the property operated by the Discharger.
8. Wastes discharged from the wastewater treatment plant shall at no time contain any substances in concentrations toxic to human, animal, plant, or aquatic life.
9. The discharge of waste shall not create a condition of pollution, contamination, or nuisance. No new connections may be made without prior notification to the Regional Water Board for approval.
10. The discharge of any wastewater to surface waters or surface water drainage courses is prohibited without a National Pollutant Discharge Elimination System (NPDES) permit.
11. Any holding tanks and percolation ponds shall not contain floating materials, including solids, foams, or scum in concentrations that cause nuisance, adversely affect beneficial uses, or serve as a substrate for undesirable bacterial or algae growth or insect vectors.
12. Bypass (the intentional diversion of waste stream from any portion of a treatment facility) is prohibited. The Regional Water Board may take enforcement actions against the Discharger for bypass unless:
 - a) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage. (Severe property damage means substantial physical damage to property, damage to the treatment facilities that cause them to become inoperable, or substantial and permanent loss in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production);
 - b) There were no feasible alternatives to bypass, such as the use of auxiliary treatment facilities, retention of untreated waste, or maintenance during normal periods of equipment down time. This condition is not satisfied if adequate backup equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass that could occur

during normal periods of equipment downtime or preventive maintenance;
and

- c) The Discharger submitted a notice at least 48 hours in advance of the need for a bypass to the Regional Water Board.
13. Any discharge of wastewater from the treatment system (including the wastewater collection system) at any point other than specifically described in this Order is prohibited and constitutes a violation of this Order.

F. PROVISIONS

1. A copy of this Order shall be maintained at the wastewater treatment plant to be available at all times to operating personnel.
2. The Discharger shall file with the Regional Water Board self-monitoring reports according to the detailed specifications contained in the revised MRP No. CI-7418 attached hereto and incorporated herein by reference, as directed by the Executive Officer. The results of any monitoring done more frequently than required at the location and/or times specified in the MRP shall be reported to the Regional Water Board. The Discharger shall comply with all of the provisions and requirements of the MRP.
3. The Discharger shall comply with all applicable requirements set forth in Chapter 4.5 (commencing with section 13290) of Division 7 of the California Water Code.
4. The Discharger shall achieve compliance with all the effluent limitations requirements listed in this Order.
5. Revised MRP No. CI-7418 contains requirements for the sampling and monitoring of influent and effluent wastewater samples and local groundwater to determine if discharges from the Todd Road Jail WWTP are meeting the discharge limits.
6. Should effluent or groundwater monitoring data indicate potential degradation of groundwater attributable to Discharger's effluent, the Discharger shall submit, within 90 days after discovery of the problem, mitigation measures that will be taken, or have been taken, to prevent degradation that may result from the discharge(s).
7. Wastewater treatment and discharge at the discharge/disposal area shall not

cause pollution or nuisance as defined in California Water Code section 13050.

8. In accordance with California Water Code section 13260(c), the Discharger shall file a report of any material change or proposed change in the character, location, or volume of the discharge.
9. The Discharger shall operate and maintain its wastewater collection, treatment, and dispersal facilities in a manner to ensure that all facilities are adequately staffed, supervised, financed, operated, maintained, repaired, and upgraded as necessary, to provide adequate and reliable transport, treatment, and disposal of all wastewaters from both existing and planned future wastewater sources under the Discharger's responsibilities. The plant operators and supervisors employed in the operations of the wastewater treatment plant must be certified pursuant to California Water Code sections 13625 through 13633, and in accordance with CCR Title 23, section 3680.
10. The Discharger shall submit an updated Operations and Maintenance Manual (O & M Manual) for the Todd Road Jail WWTP to the Los Angeles Water Board by **August 25, 2024**. The Discharger shall maintain the O & M Manual in a usable condition and available for reference and use by all applicable personnel. The Discharger shall regularly review, and revise or update as necessary, the O & M Manual in order for the document to remain useful and relevant to current equipment and operation practices. Reviews shall be conducted annually, and revisions or updates shall be completed as necessary and submitted to the Los Angeles Water Board.
11. The Discharger shall take all reasonable steps to minimize or prevent any discharge that has a reasonable likelihood of adversely affecting human health or the environment.
12. Spill Reporting Requirements for the WWTP
 - a) Initial Notification – Although State and Regional Water Board staff do not have duties as first responders, this requirement is an appropriate mechanism to ensure that the agencies that do have first responder duties are notified in a timely manner in order to protect public health and beneficial uses. For certain spills, overflows and bypasses, the Discharger shall make notifications as required below:
 - i. In accordance with the requirements of Health and Safety Code

section 5411.5, the Discharger shall provide notification to the local health officer or the director of environmental health with jurisdiction over the affected water body of any unauthorized release of sewage or other waste that causes, or probably will cause, a discharge to any waters of the state as soon as possible, but no later than two (2) hours after becoming aware of the release.

- ii. In accordance with the requirements of CWC section 13271, the Discharger shall provide notification to the California Office of Emergency Services (Cal OES) of the release of reportable quantities of hazardous substances or sewage that causes, or probably will cause, a discharge to any waters of the state as soon as possible, but not later than two (2) hours after becoming aware of the release. CCR, Title 23, section 2250, established 1,000 gallons or more as a reportable quantity of sewage. The phone number for reporting these releases to the Cal OES is (800) 852-7550. The Discharger shall also include public outreach in their emergency communications protocols, which may include media updates, social media postings, and community notices.
- iii. The Discharger shall notify the Los Angeles Water Board of any unauthorized release of sewage from the Todd Road Jail WWTP that causes, or probably will cause, a discharge to a water of the state as soon as possible, but not later than two (2) hours after becoming aware of the release. This initial notification does not need to be made if the Discharger has notified Cal OES and the local health officer or the director of environmental health with jurisdiction over the affected waterbody. The phone number for reporting these releases of sewage to the Los Angeles Water Board is (213) 576-6683. The phone numbers for after hours and weekend reporting of releases of sewage to the Los Angeles Water Board are (213) 305-2284 and (213) 305-2253.

At a minimum, the following information shall be provided to the Los Angeles Water Board:

- The location, date, and time of the release;
- The water body that may be impacted by the discharge;
- An estimate of the amount of sewage or other waste released

and the amount that reached the receiving water at the time of notification;

- If ongoing, the estimated flowrate of the release at the time of the notification;
- The name, organization, phone number, and email address of the reporting representative; and
- A certification that Cal OES and the local health officer or directors of environmental health with jurisdiction over the possibly affected water bodies have been notified of the discharge.

- b) Monitoring – For spills, overflows and bypasses reported under Section E of this Order, the Discharger shall monitor as required below:

To define the geographical extent of spill's impact, the Discharger shall obtain grab samples (if feasible, accessible, and safe) for all spills, overflows or bypasses of any volume that reach any waters of the State (including surface and ground waters). The Discharger shall analyze the samples for total and fecal coliform, Escherichia coli ([E. coli], if a fecal coliform test shows positive), enterococcus, and relevant pollutants of concern, upstream and downstream of the point of entry of the spill (if feasible, accessible and safe). This monitoring shall be done on a daily basis from time the spill is known until the results of two (2) consecutive sets of bacteriological monitoring indicate the return to the background level or the County Department of Public Health authorizes cessation of monitoring.

- c) Reporting – The initial notification required under Initial Notification shall be followed by the following.
- i. As soon as possible, but not later than twenty-four (24) hours after becoming aware of an unauthorized discharge of sewage or other waste from its wastewater treatment plant to a water of the state, the Discharger shall submit a statement to the Los Angeles Water Board by email at augustine.anijelo@waterboards.ca.gov. If the discharge is 1,000 gallons or more, this statement shall certify that Cal OES has been notified of the discharge in accordance with CWC section 13271. The statement shall also certify that the local

health officer or director of environmental health with jurisdiction over the affected water bodies has been notified of the discharge in accordance with Health and Safety Code section 5411.5. The statement shall also include at a minimum the following information:

- Agency, Order No., and MRP No.;
 - The location, date, and time of the discharge;
 - The water body that received the discharge;
 - A description of the level of treatment of the sewage or other waste discharged;
 - An initial estimate of the amount of sewage or other waste released and the amount that reached the impacted water body;
 - The Cal OES control number and the date and time that notification of the incident was provided to Cal OES; and
 - The name of the local health officer or director of environmental health representative notified (if contacted directly); the date and time of notification; and the method of notification (e.g., phone, fax, email).
- ii. A written preliminary report shall be submitted to the Los Angeles Water Board within five (5) working days after disclosure of the incident via the State Water Board GeoTracker database under Global ID WDR100001460. Within 30 days after submitting the preliminary report, the Discharger shall submit the final written report to the Los Angeles Water Board. The final written report shall be included in the next quarterly monitoring report submitted to the GeoTracker database above. The final written report shall document the information required in paragraph section 12.d) Records, below, monitoring results and any other information required in provisions of the Standard Provisions document including corrective measures implemented or proposed to be implemented to prevent/minimize future occurrences.

d) Records

The Discharger shall develop and maintain a record of all spills, overflows or bypasses of raw or partially treated sewage from its collection system or treatment plant. This record shall be made available to the Los Angeles Water Board upon request and a spill summary shall be included in the annual summary report. The records shall contain:

- i. The date and time of each spill, overflow, or bypass;
 - ii. The location of each spill, overflow, or bypass;
 - iii. The estimated volume of each spill, overflow, and bypass including gross volume, amount recovered and amount not recovered, monitoring results;
 - iv. The cause of each spill, overflow, or bypass;
 - v. Whether each spill, overflow, or bypass entered a receiving water and, if so, the name of the water body and whether it entered via storm drains or other man-made conveyances;
 - vi. Any mitigation measures implemented;
 - vii. Any corrective measures implemented or proposed to be implemented to prevent/minimize future occurrences; and
13. In the event the Discharger does not comply or will be unable to comply for any reason, with any prohibition, effluent limitation, or receiving water limitation of this Order, the Discharger shall notify the Supervisor of the Groundwater Permitting Unit at the Los Angeles Water Board by telephone at (213) 576-6683 within 24 hours of having knowledge of any violations, and shall confirm this notification in writing to the Regional Water Board within five working days from the date of notification, unless otherwise specified in this Order. The written notification shall also be submitted via email with reference to CI-7418 to losangeles@waterboards.ca.gov. The written notification shall include, but not limited to, the following information, as appropriate:
- a) Nature and extent of violation;
 - b) Date and time: when the violation started, when compliance was achieved; and, when discharge was suspended and restored, as applicable;

- c) Duration of violation;
 - d) Cause(s) of violation;
 - e) Impact of the violation;
 - f) Corrective and/or remedial actions taken and/or will be taken with time schedule for implementation to return to compliance and prevent recurrence including, where applicable, a schedule of implementation; and
 - g) Other noncompliance requires written notification as above at the time of the normal monitoring report.
14. This Order does not relieve the Discharger from the responsibility 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.
15. After notice and opportunity for a hearing, this Order may be terminated or modified for causes including, but not limited, to:
- a) Violation of any term or condition contained in this Order;
 - b) Obtaining this Order by misrepresentation, or failure to disclose all relevant facts; or
 - c) A change in any condition, or the discovery of any information, which requires either a temporary or permanent reduction or elimination of the authorized discharge.
16. The Discharger shall furnish, within a reasonable time, any information the Los Angeles Water Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The Discharger shall also furnish to the Los Angeles Water Board, upon request, copies of records required to be kept by this Order.
17. This Order includes the attached *Standard Provisions Applicable to Waste Discharge Requirements* (Attachment B) which are incorporated herein by reference. If there is any conflict between the provisions stated herein and the *Standard Provisions Applicable to Waste Discharge Requirements*, the

provisions stated herein will prevail.

18. The Discharger shall allow the Los Angeles Water Board, or an authorized representative upon the presentation of credentials and other documents as may be required by law, to:
 - a) Enter upon the Discharger premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Order;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order;
 - c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and
 - d) Sample or monitor at reasonable times, for the purposes of assuring compliance with this Order, or as otherwise authorized by the California Water Code, any substances or parameters at any locations.
19. Until terminated by the Los Angeles Water Board, the WDRs contained in this Order will remain in effect and will be reviewed periodically.
20. All discharges of waste into the waters of the State are privileges, not rights. In accordance with California Water Code section 13263(g), these requirements shall not create a vested right to continue to discharge and are subject to rescission or modification.
21. Failure to comply with this Order and Revised MRP No. CI-7418, could subject the Discharger to monetary civil liability pursuant to the California Water Code, including sections 13268 and 13350. A person's failing to furnish monitoring reports or falsifying any information provided therein is guilty of a misdemeanor.

G. COMPLIANCE DETERMINATION

1. Compliance with the effluent limitations contained in Section B of this Order will be determined as specified below:
 - a) General:

Compliance determinations shall be based on available analyses for the time interval associated with the effluent limitation. Where only one sample analysis is available in a specified time interval (e.g., monthly or weekly average), that sample shall serve to characterize the discharge for the entire interval. If quarterly sample results show noncompliance with the average monthly limit and that sample result is used for compliance determination for each month of the quarter, then three separate violations of the average monthly limit shall be deemed to have occurred.

b) Average Monthly Effluent Limitation:

If the average of daily discharges over a calendar month exceeds the average monthly effluent limitation for a given parameter in Table 3, this will represent a single violation, though the Discharger will be considered out of compliance for each day of that month for that parameter (e.g., resulting in 31 days of non-compliance in a 31-day month). If only a single sample is taken during the calendar month and the analytical result for that sample exceeds the average monthly effluent limitation, the Discharger will be considered out of compliance for that calendar month. The Discharger will only be considered out of compliance for days when the discharge occurs. For any one calendar month during which no sample (daily discharge) is taken, no effluent compliance determination can be made for that calendar month.

c) Maximum Daily Effluent Limitation:

If a daily discharge exceeds the maximum daily effluent limitation for a given parameter in Table 3, the Discharger will be considered out of compliance for that parameter for that 1 day only within the reporting period. For any 1 day during which no sample is taken, no effluent compliance determination can be made for that day.

H. REOPENER

The Los Angeles Water Board may modify, or revoke and reissue this Order at any time, and may if present or future investigations demonstrate that the discharge(s) governed by this Order will cause, have the potential to cause, or will contribute to adverse impacts on water quality and/or beneficial uses of the receiving waters or to address Discharger's expansion or mitigation plans, TMDL or Basin Plan provisions, or compliance with Resolution 68-16.

EFFECTIVE DATE OF THE ORDER

This Order takes effect upon its adoption.

I, Susana Arredondo, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Los Angeles Region, on July 25, 2024.

Susana Arredondo
Executive Officer

Tentative

Figure 1. Site Location Map

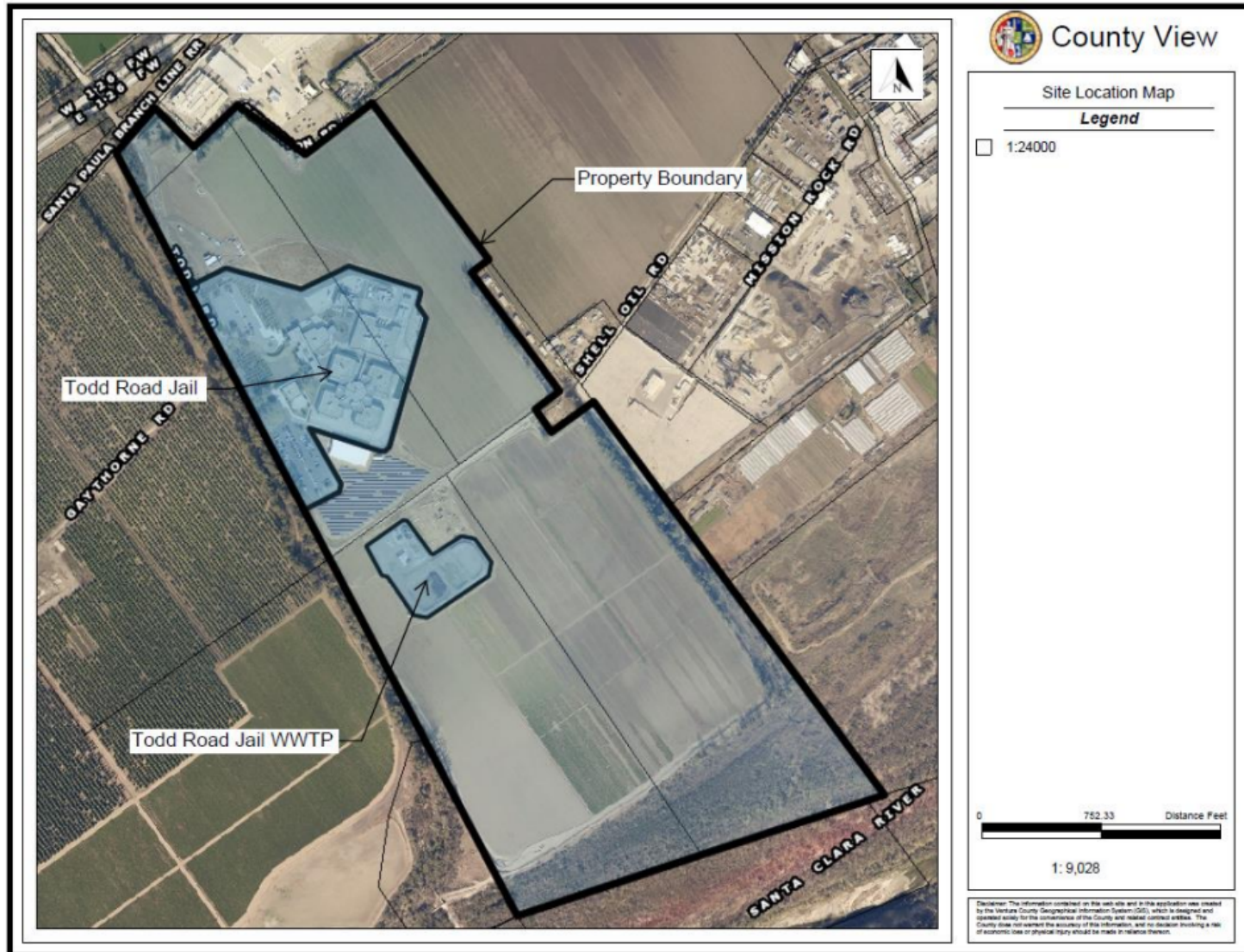


Figure 2. Groundwater Monitoring Well and Percolation Pond Locations

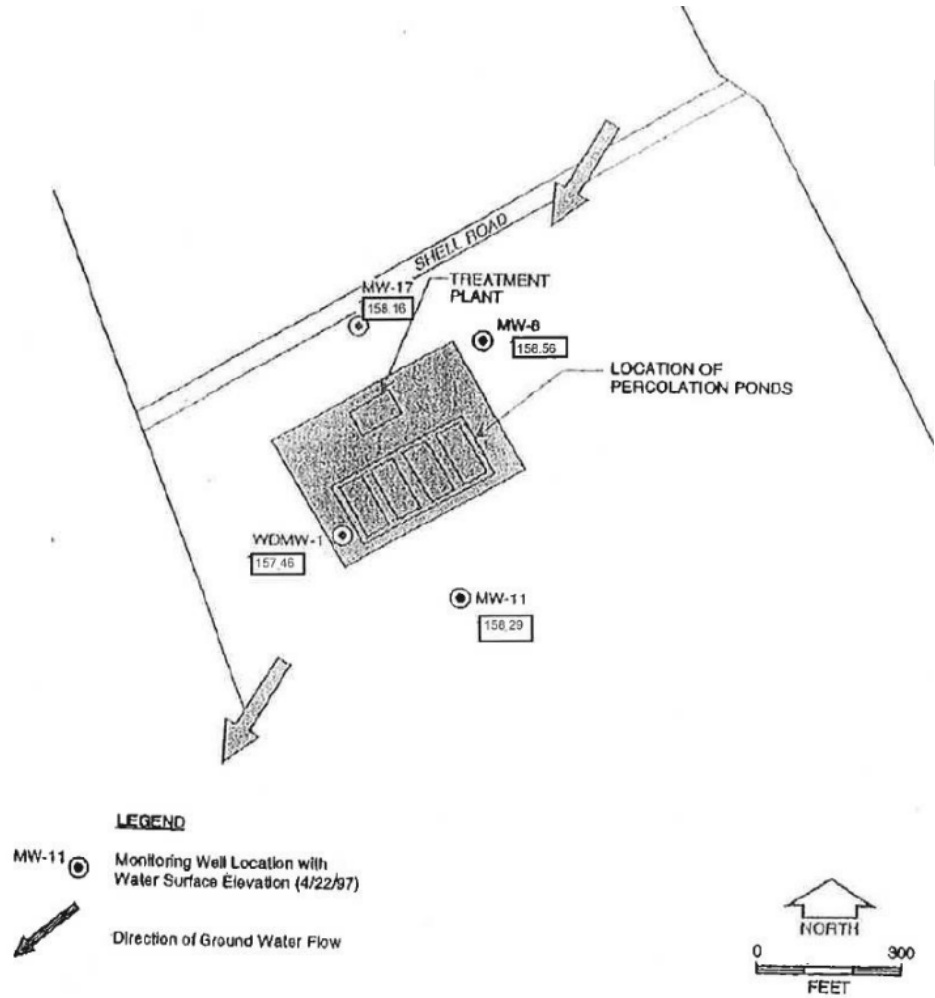


Figure 3. Process Flow Diagram

