

## Los Angeles Regional Water Quality Control Board

September 18, 2013

Ms. Lucia M. McGovern  
Deputy Director/ Environmental Engineer  
Camarillo Sanitary District  
Department of Public Works  
P.O. Box 248  
Camarillo, CA 93011-0248

Dear Ms. McGovern:

### **ADOPTED WASTE DISCHARGE REQUIREMENTS (WDRs) AND WATER RECLAMATION REQUIREMENTS (WRRs) – CAMARILLO SANITARY DISTRICT, CAMARILLO WATER RECLAMATION PLANT (FILE NO. 54-181, CI-6187)**

Our letter dated July 12, 2013, transmitted the tentative Waste Discharge Requirements (WDRs)/ Water Reclamation Requirements (WRRs) and Time Schedule Order (TSO), associated with the WDRs/WRRs permit for the Camarillo Water Reclamation Plant (Camarillo WRP).

In accordance with administrative procedures, this Regional Water Board at a public hearing held on September 12, 2013, reviewed the tentative requirements, considered all the factors in the case, and adopted WDRs/WRRs Order No. **R4-2013-0140** and TSO No. **R4-2013-0141**.

The complete adopted Orders will be sent only to the Discharger. However, these documents are available on the Regional Water Board's website for your review. The Regional Water Board's web address is [www.waterboards.ca.gov/losangeles/](http://www.waterboards.ca.gov/losangeles/).

If you have any questions, please contact Veronica Cuevas at (213) 576-6662 or the undersigned at (213) 576-6664.

Sincerely,



Brandi Outwin-Beals, P.E., Chief  
Municipal Permitting Unit (NPDES)

Enclosures

cc: See Mailing List

**Mailing List**

Environmental Protection Agency, Region 9, Permits Branch (WTR-5)  
NOAA, National Marine Fisheries Service  
Department of Interior, U.S. Fish and Wildlife Service  
Jennifer Fordyce, State Water Resources Control Board, Office of Chief Counsel  
Department of Fish and Game, Region 5  
State Coastal Conservancy  
California State Parks and Recreation  
California Coastal Commission, South Coast Region  
Ventura County Watershed Protection  
Ventura Coast Keeper  
Heal the Bay  
Los Angeles Waterkeeper (formerly Santa Monica Baykeeper)  
Natural Resources Defense Council  
Environment Now

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

**TIME SCHEDULE ORDER NO. R4-2013-0141**

**REQUIRING CAMARILLO SANITARY DISTRICT AND THE CITY OF CAMARILLO  
(CAMARILLO WATER RECLAMATION PLANT)  
TO COMPLY WITH REQUIREMENTS PRESCRIBED IN  
ORDER NO. R4-2013-0140  
(FILE NO. 54-181)**

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

1. Camarillo Sanitary District (Camarillo SD or Permittee) owns and operates the Camarillo Water Reclamation Plant (Camarillo WRP), a tertiary wastewater treatment plant located at 150 East Howard Road, Camarillo, California.
2. The Camarillo WRP primarily discharges tertiary-treated wastewater into Conejo Creek under waste discharge requirements (WDRs) contained in Order No. R4-2003-0079, which serves as a permit under the National Pollutant Discharge Elimination System (NPDES No. CA0053597), adopted by this Regional Water Board on June 5, 2003.
3. Camarillo SD also recycles tertiary-treated water from its Camarillo WRP under WDRs/ Water Reclamation Requirements (WRRs) contained in Order No. 87-132 (1987 Order), adopted by this Regional Water Board on September 28, 1987. The 1987 Order permits the use of reclaimed water, also referred to as recycled water, for food crop irrigation at nearby farms and for landscape irrigation at a local cemetery.
4. WDRs/WRRs Order No. 87-132 prescribed the following limitations for protection of the designated beneficial uses of the underlying Pleasant Valley Hydrologic Subarea Groundwater Basin:

<b>Constituent</b>	<b>Units</b>	<b>Daily Maximum</b>
Total dissolved solids (TDS)	mg/L	1200
Sulfate	mg/L	600
Chloride	mg/L	175
Boron	mg/L	1.0

5. On September 12, 2013, the Regional Water Board reissued WDRs/WRRs for the Camarillo WRP by adopting Order No. R4-2013-0140, pursuant to the California Water Code (CWC) Section 13523. The 2013 Order updated the findings regarding the Facility upgrades that have taken place since 1987; included additional uses for recycled water; prescribed limitations for recycled water; and described Camarillo SD's responsibilities for the production, distribution, monitoring, and application of recycled water.

6. WDRs/WRRs Order No. R4-2013-0140 prescribes the following limitations for protection of the designated beneficial uses of the underlying Pleasant Valley Hydrologic Subarea Groundwater Basin:

Constituent	Units	30-Day Average
Total dissolved solids (TDS)	mg/L	1200
Sulfate	mg/L	600
Chloride	mg/L	175
Boron	mg/L	1

7. Effluent from the Camarillo WRP is discharged directly to Conejo Creek, a water of the United States. NPDES Order No. R4-2003-0079 prescribes the following limitations for protection of the designated beneficial uses of Conejo Creek:

Constituent	Units	Monthly Average
TDS	mg/L	850
Sulfate	mg/L	250
Chloride (routine conditions)	lbs/day	2,300
Chloride (drought conditions)	lbs/day	2,200

The final effluent limitations for TDS and sulfate were based on Water Quality Objectives in the *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan). The chloride final effluent limitations were based on the waste load allocations (WLAs) promulgated by United States Environmental Protection Agency (USEPA) in 2002 in the *Calleguas Creek Chloride Total Maximum Daily Load* (Chloride TMDL).

8. Because Camarillo SD could not attain immediate compliance with the effluent limitations contained in NPDES Order No. R4-2003-0079, the Regional Water Board adopted Time Schedule Order (TSO) No. R4-2003-0080 concurrently with the NPDES permit on June 5, 2003, establishing interim effluent limitations for ammonia nitrogen, nitrate plus nitrite as nitrogen, nitrite nitrogen, chloride, and bis(2-ethylhexyl)phthalate.
9. On July 7, 2003, Camarillo SD filed a petition with the State Water Resources Control Board (State Water Board) seeking, in part, review of the chloride effluent limitations in Order No. R4-2003-0079 and TSO No. R4-2003-0080. Camarillo SD later requested that the State Water Board issue a stay of those limitations. On October 20, 2003, Camarillo SD, the City of Thousand Oaks, the City of Simi Valley and this Regional Water Board entered into a stipulation entitled *Stipulation for Further Order Issuing Stay*, which stayed the final chloride effluent limitations in the NPDES permits, as well as provisions pertaining to chloride limits in TSOs, for those three wastewater treatment plants. Specifically to the Camarillo WRP, the stipulation stayed the final chloride effluent limitations in Order No. R4-2003-0079 and the interim chloride effluent limitations in TSO No. R4-2003-0080. On November 19, 2003, the State Water Board adopted Order WQO 2003-0019 approving the stipulation.

10. Because Camarillo SD could not attain compliance with the final effluent limitations for TDS and sulfate contained in Order No. R4-2003-0079, the Regional Water Board administratively issued TSO No. R4-2007-0010 on April 2, 2007, establishing performance-based interim effluent limitations for sulfate and TDS. The TSO applies only to the NPDES permit, and not to the 1987 Order.
11. On October 4, 2007, the Regional Water Board adopted the *Calleguas Creek Watershed Salts Total Maximum Daily Load (Salts TMDL)*, which superceded the USEPA-promulgated Chloride TMDL. However, the new Salts TMDL WLA-based final effluent limitations for chloride, TDS, and sulfate have not been incorporated into Camarillo WRP's NPDES permit pending the development and adoption of the Toxicity Policy/Plan by the State Water Board, and its subsequent approval by USEPA.
12. On December 7, 2010, Camarillo SD submitted a letter to the Regional Water Board requesting an extension of the TDS and sulfate interim effluent limits in TSO No. R4-2007-0010. Camarillo SD listed the following as their reasons to justify their request:
  - a. Camarillo WRP's current treatment processes are unable to remove dissolved salts, such as TDS, sulfate, and chloride, that are attributable to the potable water supply; and,
  - b. Because high salts concentrations is a problem watershed-wide, Camarillo SD has been working with other stakeholders within Calleguas Creek Watershed to developed regional solution strategies to address the salt accumulation problem that is impairing surface waters, such as:
    - i. Finding locations for brackish groundwater treatment facilities,
    - ii. Constructing a regional salinity management pipeline also known as a "brine line," and
    - iii. Increasing recycled water usage.

As an attachment to their letter, Camarillo SD submitted tabulated effluent water quality data for TDS and sulfate from January 2007 to October 2010. However, the Regional Water Board needed additional information.

13. On May 6, 2011, Camarillo SD submitted a letter requesting another TSO under California Water Code (CWC) section 13385(j)(3)(B)(iii) and including the following supporting documentation:
  - a. A chronology of events that explained the city of Camarillo's unanticipated increase on the reliance of local groundwater as a source of potable water, that resulted from mandatory reductions in water use instituted by Metropolitan Water District (MWD) in July 2009;
  - b. Water quality data for its blended potable water supply (consisting of local groundwater from wells and imported water from MWD, the only available sources of potable water available to Camarillo) that showed that the average concentrations for TDS, sulfate and chloride increased by 32%, 31%, and 20%,

- respectively, when comparing data between the periods of January 2004 to December 2006 and January 2007 to March 2011;
- c. Quantity data for its blended water supply that showed that the amount of imported water from MWD has been steadily decreasing (by 728 acre-feet a year from 2008 to 2009, and by 1037 acre-feet a year from 2009 to 2010);
  - d. Additional final effluent data for chloride, TDS, and sulfate from November 2010 to March 2011; and,
  - e. Milestones and completion dates for capital improvement projects, all of which will take longer than 30 days to install and put into operation, including:
    - i. Constructing a connection from Camarillo WRP to Calleguas Municipal Water District's brine line by December 2013,
    - ii. Discharging effluent to the brine line in order to achieve compliance with the final salts effluent limitations by June-December 2014; and
    - iii. Constructing a connection from the Camarillo well desalting facilities to the Calleguas Municipal Water District's brine line by December 2015.
14. Camarillo SD's conditions are unique because:
- a. Their discharge is located a few miles upstream of a tidally-influenced reach of Calleguas Creek;
  - b. Camarillo SD has worked effectively for many years to help develop a regional solution to remedy salt impairments; and,
  - c. The regional solution involves desalting groundwater and building a regional brine line which will resolve surface water impairments as well as improve groundwater quality in the watershed.
15. On July 14, 2011, the Regional Water Board adopted Time Schedule Order No. R4-2011-0126, for the reasons discussed above, prescribing interim effluent limitations for TDS and sulfate for Camarillo WRP's discharge into Conejo Creek. The TSO provides a schedule of compliance that allows Camarillo SD to come into compliance with the final effluent limits for TDS and sulfate for its surface water discharge, by December 31, 2014. However, it only applied to the NPDES permit and not to the WDRs/WRRs.
16. On September 1, 2011, Camarillo SD submitted an updated engineering report to the Regional Water Board and to the California Department of Public Health (CDPH) to reflect the changes made to the Camarillo WRP treatment process and request allowance to for additional uses of recycled water. Camarillo SD also proposes to connect to Camrosa Water District's transmission and distribution piping network to further expand the recycled water network in the Calleguas Creek Watershed. Of the 1,310 million gallons per year of treated effluent produced at the Camarillo WRP, Camarillo SD anticipates that approximately 782 million gallons will be used by farming operations, 782 million gallons will be used by a park, and 95 million gallons will be used by a cemetery.

17. On November 21, 2012, Camarillo SD requested renewal of its WDRs/WRRs and the concurrent issuance of a TSO with interim limits for TDS, chloride, and sulfate, analogous to the TSO issued for the NPDES Order. Camarillo SD also proposes to recycle and reuse wastewater to the greatest extent possible.
18. On July 10, 2013, CSD submitted a letter requesting an additional year to complete the milestone deadlines included on page 7 of this TSO. CSD staff informed Regional Water Board staff that additional time was needed to: design and construct a metering station for the brine line connection; amend the CEQA document for their project to address comments received during the public review period; conduct additional technical studies; perform biological/habitat fieldwork; gather additional stream flow information; and re-circulate the CEQA document for public comment. Regional Water Board staff evaluated the request and modified completion dates as requested.
19. In addition to discharging to the salinity management pipeline, Camarillo SD, in coordination with Camrosa Water District and the City of Thousand Oaks, proposes to pursue the potable water desalter activities identified in the Program Environmental Impact Report / Environmental Assessment (Program EIR/EA) for the proposed *Renewable Water Resource Management Program for the Southern Reaches of Calleguas Creek Watershed (October 2006)*, to improve the water quality of the groundwater basins.
20. Section 13300 of the CWC states:

“Whenever a regional (water) board finds that a discharge of waste is taking place or threatening to take place that violates or will violate requirements prescribed by the regional (water) board, or the state (water) board, or that the waste collection, treatment, or disposal facilities of a discharger are approaching capacity, the board may require the discharger to submit for approval of the board, with such modifications as it may deem necessary, a detailed time schedule of specific actions the discharger shall take in order to correct or prevent a violation of requirements.”
21. Based on the Permittee cannot consistently achieve compliance with the final effluent limitations for TDS, chloride, and sulfate in Order No. R4-2013-XXXX. Accordingly, pursuant to CWC section 13300, a discharge of waste is taking place and/or threatens to take place that violates requirements prescribed by the Regional Water Board.
22. Since the time schedule for completion of the actions necessary to bring the waste discharge into compliance exceeds one year from the effective date of this TSO, this TSO includes interim requirements and the dates for their achievement. The interim requirements include both interim effluent limitations for TDS, chloride, and sulfate and actions and milestones leading to compliance with the final effluent limitation for these pollutants. This TSO does not exceed five years.
23. This TSO establishes interim effluent limits for TDS, chloride, and sulfate and requires the Permittee to undertake specific actions to put the Permittee on the path towards compliance with the final effluent limitations for TDS, chloride, and sulfate in Order No. R4-2013-0140. The established time schedule is as short as possible, taking into account the technological, operation, and economic factors that affect the design,

development, and implementation of the control measures that are necessary to comply with the final effluent limitations for TDS, chloride, and sulfate. The Permittee is on a path to compliance via the regional salinity management pipeline and associated facilities.

24. This TSO establishes interim effluent limitations for chloride because the stipulation which stayed the final effluent limitation for chloride, adopted by the State Water Board's WQO No. 2003-0019, only pertains to the NPDES permit.
25. The monthly average interim effluent limits for TDS, chloride, and sulfate prescribed in this TSO are performance-based values set at the ninety-ninth percentile, derived from final effluent data, using MINITAB, the same statistical software used in the *Salts TMDL* development.
26. A TSO is appropriate in these circumstances to allow time for the Permittee to complete capital improvement projects that will bring the Camarillo WRP into compliance with the final effluent limits for TDS, chloride, and sulfate. These capital improvement projects cannot be designed, installed, and put into operation within 30 calendar days. The temporary TDS, chloride, and sulfate exceedances allowed by this TSO are in the public interest given the significant environmental benefits associated with promptly achieving compliance with the final effluent limitations for these pollutants.
27. This TSO concerns an existing facility and does not significantly alter the status with respect to the facility. This TSO is also being issued for the protection of the environment. Therefore, issuance of this TSO is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21100, et.seq.) in accordance with sections 15301 and 15321(a)(2) of Title 14 of the California Code of Regulations (CCR).
28. The Regional Water Board has notified the Permittee and interested agencies and persons of its intent to issue this TSO concerning compliance with waste discharge requirements. The Regional Water Board, in a public hearing, heard and considered all testimony pertinent to this matter.
29. Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with CWC section 13320 and CCR, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the Regional Water Board action, except that if the thirtieth day following the action falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at [http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

**IT IS HEREBY ORDERED** that, pursuant to CWC section 13300, Camarillo SD, as owner and operator of the Camarillo WRP, shall comply with the requirements listed below to ensure compliance with the final effluent limitations for TDS, chloride, and sulfate contained in Order No. R4-2013-0140:



1. Comply immediately with the following interim effluent limits, which shall be deemed effective from September 12, 2013 to September 12, 2018:

Constituent	Units	Monthly Average <sup>1</sup>	Daily Maximum
TDS	mg/L	1242	---
Sulfate	mg/L	359	---
Chloride	mg/L	259	---

2. Complete the capital improvement projects according to the schedule proposed by Camarillo SD in their correspondence dated May 6, 2011, February 21, 2013, and July 10, 2013, as follows:

Milestone	Completion Date
Build a connection from Camarillo SD's WRP to the Calleguas Municipal Water District brine line under Phase 2A	December 2014
Discharge from Camarillo SD to the brine line	December 2015
Design Desalter for Groundwater Treatment	May 2017
Finish Building Desalter	September 2018


3. Achieve full compliance with the final effluent limitations as soon as possible, but no later than September 12, 2018, for TDS, chloride, and sulfate contained in Order No. R4-2013-0140.
4. Submit a PPP work plan, with the time schedule for implementation, for approval of the Executive Officer no later than November 4, 2013, pursuant to CWC section 13263.3.
5. Submit quarterly progress reports of efforts taken by the Permittee towards achieving compliance with the final effluent limits for TDS, chloride, and sulfate. The reports shall summarize the progress to date, activities conducted during that quarter, and the activities planned for the upcoming quarters. The reports shall also state whether or not Camarillo SD was in compliance with the interim effluent limitations for TDS, chloride, and sulfate during the reporting period. Each quarterly report shall be received by the Regional Water Board by the 15<sup>th</sup> day of the first month following the reporting period (January 15, April 15, July 15, and October 15). The first progress report shall be received by the Regional Water Board by February 15, 2014, and will cover the partial month of September 2013 through December 2013.
6. All technical and monitoring reports required under this TSO are required pursuant to CWC sections 13267 and 13383. The Regional Water Board needs the required information in order to determine compliance with this TSO and Order No. R4-2013-

<sup>1</sup> This interim effluent limitation is based on effluent performance data from February 2007 through October 2012 for the Camarillo WRP. Consistent with the procedure contained in *Appendix E of USEPA's Technical Support Document For Water Quality-based Toxics Control* (USEPA's TSD), the monthly average was set at the 95<sup>th</sup> percentile. The interim limit was derived statistically from a probability plot, using the MINITAB statistical software, Release 14.

0140. The Regional Water Board believes that the burdens, including costs, of these reports bear a reasonable relationship to the needs for the reports and the benefits to be obtained from the reports.

7. Any person signing a document submitted under this TSO shall make the following certification:  
  
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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 fine and imprisonment for knowing violations."
8. If the Permittee fails to comply with any provision of this TSO, the Regional Water Board may take any further action authorized by law. The Executive Officer, or his/her delegee, is authorized to take appropriate enforcement action pursuant, but not limited to, CWC sections 13350 and 13385. The Regional Water Board may also refer any violations to the Attorney General for judicial enforcement, including injunction and civil monetary remedies.
9. All other provisions of Order No. R4-2013-0140. not in conflict with this TSO are in full force and effect.
10. The Regional Water Board may reopen this TSO at its discretion or at the request of the Permittee, if warranted. Lack of progress towards compliance with this TSO may be cause for the Regional Water Board to modify the conditions of this TSO.
11. This TSO becomes effective immediately upon adoption by the Regional Water Board. This TSO expires on September 12, 2018.

I, Samuel Unger, 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 September 12, 2013.

  
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Samuel Unger, P.E.  
Executive Officer

*Chief Deputy E.O.*  
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