

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

ORDER NO. R4-2003-0075

**WASTE DISCHARGE REQUIREMENTS
FOR
THE THACHER SCHOOL
(The Thacher School Wastewater Treatment Plant)
(File No. 93-16)**

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

PURPOSE OF ORDER

1. The Thacher School (hereinafter Discharger) owns an onsite wastewater treatment plant (Plant) which is located at 5025 Thacher Road, Ojai, California (Figure 1). Since February 2002, the Ventura Regional Sanitation District (VRSD) has been operating the Plant according to a contract with the Discharger. At all times during which it continues to operate the Plant during the term of this Order, the VRSD is subject to the provisions of this Order. The Discharger discharges domestic wastewater through the Plant to a leachfield system under waste discharge requirements contained in Order No. 93-56 adopted by the Regional Board on September 27, 1993.
2. Section 13263(e) of the California Water Code provides that all waste discharge requirements shall be reviewed periodically and, upon such review, may be revised by the Regional Board. Following a review of requirements in Order No. 93-56, and inspections of the subject site on September 30, 2002, the Regional Board is updating waste discharge requirements for the Discharger in the accompanying Order No. R4-2003-0075.

FACILITY AND TREATMENT PROCESS DESCRIPTION

3. The Discharger is located in an unsewered area in the County of Ventura northeast of the City of Ojai. No public sewers have been scheduled near the Discharger.
4. The Discharger was established in 1889 as a boarding high school (School). The main campus occupies approximately 360 acres in the County of Ventura, California. The current population at the School is approximately 340.
5. There are a total of 97 bathrooms on campus. These bathrooms are located in classroom buildings, offices, locker rooms, dormitories, and faculty homes. Domestic wastewater from these bathrooms is discharged to the Plant (Figure 2).
6. Prior to the construction of the Plant, domestic wastewater was discharged to a septic disposal system consisting of one 9,600-gallon and three 5,500-gallon

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- septic tanks and a 24,000-square foot leachfield. In 1994, the septic tanks were emptied and have been inactive since that time.
7. The existing Plant (Figure 3) began operation in 1994. It consists of one 8,000-gallon flow equalization tank, five 8,000-gallon aeration tanks, two 6,000-gallon sedimentation tanks, one 6,000-gallon dosing tank, one 8,000-gallon digester tank, a distribution box, and the same 24,000-square foot leachfield.
 8. The design capacity of the Plant is 40,000 gallons per day (gpd). Based on the quarterly monitoring reports, average daily dry weather inflow to the Plant during 2002 was 16,926 gpd.
 9. Domestic water for the School is supplied by the Senior Canyon Mutual Water Company, a public water purveyor. The Senior Canyon Mutual Water Company resells water from Casitas Municipal Water Company on an as-needed basis to supplement its supply to the School.
 10. According to the water billings from the Senior Canyon Mutual Water Company, the average domestic water usage for the School was 20,000 gpd in 2002. This amount includes water used for irrigation purposes and fluctuates when the School is not in session (during holidays and summer vacation).
 11. Groundwater level data obtained in June 2002 indicates that the depth to groundwater at a well located on campus near the intersection of McAndrew Road and Thacher Road was 230 feet below ground surface.
 12. Historical effluent monitoring data indicate that sulfate and total nitrogen constituents exceeded the effluent limitations stated in Order No. 93-56 on numerous occasions from 1997 to 2002. On April 18, 2003, Regional Board staff issued a Notice of Violation (NOV) requiring the Discharger to implement corrective and preventative actions to bring the discharge into full compliance and to submit a report detailing the corrective actions taken and the results thereof.
 13. Historical groundwater monitoring data indicate that no water has been detected in monitoring well TS-MW-1 located at 300 feet southwest (downgradient) of the leachfield since 1995 when the well was installed. The Discharger is required, in Monitoring and Reporting Program No. CI-7327, to re-evaluate the existing groundwater monitoring network in order to determine whether it is still capable of evaluating impacts from the discharge to the groundwater.
 14. On September 19, 2002, Regional Board staff received a complaint from a resident near the School regarding odor originating from the Plant. On September 30, 2002, Regional Board staff performed an inspection at the Plant and noticed that corrective action had been taken by the Discharger by placing activated carbon on top of the aeration tanks to control the odor. In October 2002, the complainant acknowledged that the odor originating from the Plant had been abated.

15. The site is located in Section 3 and 4, Township 4N, Range 22W (San Bernardino Base Line & Meridian). Its approximate latitude is 34⁰27'49" and longitude is 119⁰10'50".
16. The Thacher Creek runs through the northwest section of the campus. Most of the time the creek is dry except during the winter months when there is rain.
17. The Plant is located in the East of San Antonio – Senior Canyon Creeks Area of the Lower Ojai Valley Groundwater Basin.

APPLICABLE LAWS, PLANS, POLICIES AND REGULATIONS

18. On June 13, 1994, the Regional Board adopted a revised *Water Quality Control Plan for Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) which was amended on January 27, 1997 by Regional Board Resolution No. 97-02. The Basin Plan (i) designates beneficial uses for surface waters and groundwater, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State antidegradation policy (*Statement of Policy with Respect to Maintaining High Quality Waters in California*, State Water Resources Control Board (State Board) Resolution No. 68-16, October 28, 1968), and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates by reference applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Regional Board prepared the 1994 update of the Basin Plan to be consistent with previously adopted State and Regional Board plans and policies. This Order implements the plans, policies and provisions of the Regional Board's Basin Plan.
19. The Basin Plan designated beneficial uses and water quality objectives for groundwater within the Lower Ojai Valley Groundwater Basin (East of San Antonio – Senior Canyon Creeks Area) which underlies the Thacher School as follows:

Existing: municipal and domestic supply; industrial service supply; industrial process supply; and agricultural supply.
20. The requirements contained in this Order are based on the *Basin Plan*, and, as they are met, will be in conformance with the goals of the aforementioned water quality control plans and will protect and maintain existing beneficial uses of the groundwater.
21. The Discharger will need to complete studies and potentially implement design changes before the system is capable of achieving compliance with the effluent limitations. As a result, the Discharger is not able to immediately comply with the effluent limitations. In order to provide the Discharger time to come into compliance with the limits without being in immediate violation thereof, a Time Schedule Order (TSO) has been prepared to allow the Discharger to complete all needed Plant upgrades and to meet the effluent limitations within a specified timeframe.

CEQA and NOTIFICATION

22. The County of Ventura Planning Division adopted Resolution No. 93-06 in February 1993, resolving that a Negative Declaration be certified for the installation of the Plant in accordance with the California Environmental Quality Act (Public Resources Code section 21000 et seq.). The Plant is an exempt existing facility within the meaning of California Code of Regulations, title 14, section 15301.
23. The Regional Board has notified the Discharger, the VRSD, and interested agencies and persons of its intent to revise waste discharge requirements for this discharge and has provided them an opportunity to submit their views and recommendations for the requirements.
24. The Regional Board, in a public meeting, heard and considered all comments pertaining to the discharge and to the tentative requirements.
25. Pursuant to California Water Code section 13320, any aggrieved party may seek review of this Order by filing a petition with the State Water Resources Control Board (State Board). A petition must be received by the State Board, P.O. Box 100, Sacramento, California, 95812, within 30 days of the date of adoption of the Order.

IT IS HEREBY ORDERED that the Discharger, The Thacher School, shall comply with the following requirements in connection with the disposal operations at the Plant:

A. EFFLUENT LIMITATIONS

1. Effluent discharged shall be limited to treated domestic wastewater only.
2. There shall be no discharge of wastes to surface water or watercourses at any time.
3. Effluent discharged shall not contain constituents in excess of the following limits:

<u>Constituent</u>	<u>Units*</u>	Effluent Limitations	
		<u>Monthly Average</u>	<u>Daily Maximum</u>
BOD ₅	mg/L	30	45
Suspended solids	mg/L	30	45
Total Dissolved Solids	mg/L	700	----
Sulfate	mg/L	200	----
Chloride	mg/L	50	----
Boron	mg/L	0.5	----
Nitrate + Nitrite + Ammonia (as Nitrogen)	mg/L	10	----
<u>Oil & Grease</u>	<u>mg/L</u>	<u>15</u>	<u>----</u>

* mg/L: milligrams per liter

4. The effluent discharge shall not contain concentrations of heavy metals, arsenic, cyanide, or other United States Environmental Protection Agency (USEPA) priority pollutants in concentrations exceeding the limits contained in the State Department of Health Services' Primary Drinking Water Standards.
5. The pH of wastes discharged shall at no time be less than 6.5 or more than 8.5 pH units.
6. The arithmetic mean of BOD₅ (20°C) and suspended solids values for the effluent samples collected in a period of 30 consecutive calendar days shall not exceed 15 percent of the arithmetic mean of values for influent samples collected at approximately the same time during the same period.
7. Radioactivity of the waste discharged shall not exceed the limits specified in California Code of Regulations, title 22, section 64441 et seq., or subsequent revisions.

B. GROUNDWATER LIMITATIONS

1. The concentration of total coliform in receiving water over any seven-day period shall be less than 1.1 most probable number (MPN) per 100 milliliters.
2. Receiving water, for the purpose of these waste discharge requirements, shall be defined as groundwater at the downgradient monitoring well, TS-MW-1.
3. Ammonia shall not be present at levels that, when oxidized to nitrate, will impact groundwater quality.

C. GENERAL REQUIREMENTS

1. Adequate facilities shall be provided to divert storm waters away from the Plant and from areas where any potential pollutants are stored.
2. Waste discharged shall be retained in an area of the Plant from which the public is effectively excluded, and shall not be permitted to escape therefrom as overland flow.
3. All wastes which do not meet each of the foregoing requirements shall be held in impervious containers and, if transferred elsewhere, the final disposal shall be only at a legal point of disposal. For the purpose of these requirements a legal point of disposal is one for which requirements have been established by a California regional water quality control board, and which is in full compliance therewith.

4. All permanent structures shall be adequately protected from inundation by floods having a predicted frequency of occurrence of once in 100 years. All percolation/evaporation ponds shall be adequately protected from inundation by floods having a predicted frequency of occurrence of once in 25 years.
5. Standby or emergency power facilities, sufficient storage capacity, or some other means shall be provided so that in the event of plant upsets or outages due to power failure or other cause, discharge of raw or inadequately treated sewage does not occur.

D. PROHIBITIONS

1. The discharge or use of raw or inadequately treated sewage at any time is prohibited.
2. The discharge of wastes to any point(s) other than specifically described in this Order is prohibited and constitutes a violation thereof.
3. Neither the treatment nor the discharge of waste shall create a condition of pollution, contamination, or nuisance.
4. Wastes shall not be disposed in geologically unstable areas or so as to cause earth movement.
5. Waste discharged shall not impart taste, odors, color foaming, or other objectionable characteristics to the receiving water.
6. Sewage odors shall not be detectable.
7. Waste discharged shall at no time contain any substances in concentrations toxic to human, animal, plant, or aquatic life.
8. The surfacing or overflow of sewage from the Plant at any time and at any location and the direct or indirect discharge of wastes to waters of the State (including storm drains, groundwater or surface water drainage courses) is prohibited.
9. No part of the treatment or disposal system shall be closer than 150 feet to any water well or closer than 100 feet to any stream, channel, or other watercourse.
10. No part of the Plant shall extend to a depth where waste may deleteriously affect any underground water stratum that is usable for domestic purposes. In no case may the sewage treatment or disposal system extend to within 10 feet of a zone of historic or anticipated high groundwater level.

E. PROVISIONS

1. A copy of this Order shall be maintained at the Plant so as to be available at all times to operating personnel.
2. In the event of any change in name, ownership, or control of this waste treatment and disposal facility, the Discharger shall notify the Regional Board of such change and shall notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be forwarded to the Regional Board.
3. The Discharger shall file with the Regional Board technical reports on self-monitoring work performed according to the detailed specifications contained in Monitoring and Reporting Program No. CI-7327 attached hereto and incorporated herein by reference, as directed by the Regional Board Executive Officer (Executive Officer). The results of any monitoring done more frequently than required at the location and/or times specified in the Monitoring and Reporting Program shall also be reported to the Regional Board.
4. In accordance with section 13260(c) of the California Water Code, the Discharger shall file a report of any material change or proposed change in the character, location, or volume of the discharge.
5. The Discharger shall file a written report with the Regional Board within 90 days after the average dry-weather flow for any month equals or exceeds 90 percent of the design capacity of the waste treatment and/or disposal facilities. The report shall detail provisions to cope with flows in excess of 90 percent of the design capacity.
6. 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.
7. The Discharger shall notify the Regional Board within 24 hours, by telephone or electronically, of any violations of effluent limitations or any adverse conditions resulting from this discharge; written confirmation shall follow within one week. This information shall be confirmed in the next monitoring report; in addition, the report shall also include the reason for the violations or adverse conditions, the steps to be taken to correct the problem (including dates thereof), and the steps being taken to prevent a recurrence.
8. Should monitoring data indicate impacts to groundwater, the Discharger shall submit, within 90 days after determination of the problem, plans for measures that will be taken, or have been taken, to mitigate any long-term effects that may result from the subsurface disposal of wastes. Any water quality impact to groundwater such as, but not limited to, risks to human health from pathogens shall be reported.

9. Should the nitrate concentration in any downstream monitoring well reach or exceed 34 mg/L (75% of the State Department of Health Services Maximum Contaminant Level of 45 mg/L), the Discharger must submit a plan to remediate nitrate pollution in the groundwater, so as to preclude any exceedance of the 45 mg/L Maximum Contaminant Level. The plan must contain a detailed description of mitigation measures including any upgrade of the treatment system, together with the time schedule of implementation, and must be submitted within 60 days of recording the nitrate exceedance of 34 mg/L.
10. The Discharger shall submit to the Regional Board, within 60 days of the date of adoption of this Order, procedures that will be, or have been, taken to ensure that no discharge of any untreated sewage or partially-treated sewage from the treatment facility will result in the event of equipment failure.
11. This Order does not relieve the Discharger from 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.
12. This Order includes the attached Monitoring and Reporting Program. If there is any conflict between provisions stated in the Monitoring and Reporting Program and the Standard Provisions, those provisions stated in the Monitoring and Reporting Program prevail.
13. This Order includes the attached *Standard Provisions Applicable to Waste Discharge Requirements* which are incorporated herein by reference. If there is any conflict between provisions stated herein and the *Standard Provisions Applicable to Waste Discharge Requirements*, the provisions stated herein will prevail.
14. The Discharger shall furnish, within a reasonable time, any information the Regional Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The Discharger shall also furnish to the Regional Board, upon request, copies of records required to be kept by this Order.
15. After notice and opportunity for a hearing, this Order may be terminated or modified for cause, 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;
 - c) A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

16. The waste discharge requirements contained in this Order will remain in effect for a period of (5) years. Should the Discharger wish to continue discharging to groundwater for a period of time in excess of five years, the Discharger must file an updated Report of Waste Discharge with the Regional Board, no later than 180 days in advance of the expiration date of this Order, for consideration of issuance of new or revised waste discharge requirements. Any discharge of waste five years after the date of adoption of this Order, without filing an updated Report of Waste Discharge with the Regional Board is a violation of California Water Code section 13264. The Regional Board is authorized to take appropriate enforcement action for any noncompliance with this provision including assessment of penalties.
17. 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. All discharges of waste into the waters of the State are privileges, not rights.

F. RESCISSION

Waste Discharge Requirements Order No. 93-56 adopted by the Regional Board on September 27, 1993, is hereby rescinded, except for enforcement purposes.

I, Dennis A. Dickerson, 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 June 5, 2003.

Dennis A. Dickerson
Executive Officer