State Of California
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

MONITORING AND REPORTING PROGRAM NO. CI-7327
FOR
THE THACHER SCHOOL
(The Thacher School Wastewater Treatment Plant)
(File No. 93-16)

I. MONITORING AND REPORTING REQUIREMENTS

A. The Thacher School (hereinafter Discharger) shall implement this monitoring program on the effective date of this Order. The first monitoring report under this program, for July to September 2007 shall be received at the Regional Board by October 15, 2007. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

Monitoring Period	Report Due
January – March	April 15
April – June	July 15
July – September	October 15
October – December	January 15

B. If there is no discharge during any reporting period, the report shall so state. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.

C. By January 30th of each year, beginning January 30, 2008, the Discharger shall submit an annual summary report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous calendar year. In addition, the Discharger shall discuss the compliance record and the corrective actions taken, or planned, which may be needed to bring the discharge into full compliance with the waste discharge requirements.

D. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Health Services Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certification shall be provided each time a new and/or renewal certification is obtained from ELAP.

E. The method limits (MLs) employed for effluent analyses shall be lower than the permit limits established for a given parameter, unless the Discharger can demonstrate that a particular ML is not attainable and obtains approval for a higher ML from the Executive Officer. The Discharger shall submit a list of the analytical

methods employed for each test and the associated laboratory quality assurance/quality control (QA/QC) procedures upon request by the Regional Board.

F. Water/wastewater samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136.3. All QA/QC samples must be run on the same dates when samples were actually analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request by Regional Board staff.

G. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the California Department of Health Services, and in accordance with current United States Environmental Protection Agency (USEPA) guideline procedures or as specified in this Monitoring Program." Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report.

H. Each monitoring report shall contain a separate section titled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that may be needed to bring the discharge into full compliance with waste discharge requirements. This section shall be located at the front of the report and shall clearly list all non-compliance with discharge requirements, as well as all excursions of effluent limitations.

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

J. If the Discharger performs analyses on any effluent more frequently than required by this Order using approved analytical methods, the results of those analyses shall be included in the report. Those results shall also be reflected in the calculation of the average values used in demonstrating compliance with average effluent limitations.

K. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements and, where applicable, shall include results of receiving water observations.

II. EFFLUENT MONITORING

A sampling station shall be established where representative samples of treated wastewater can be obtained prior to discharge to the leachfield. Effluent samples may be

obtained at the same sampling station as has been previously used. Any proposed change of sampling location shall be identified and approved by the Executive Officer prior to its use.

The following shall constitute the effluent monitoring program for treated wastewater discharged to the leachfield:

Constituents	Units*	Type of Sample	Minimum Frequency of Analysis
Total flow[1]	gallons/day	-----	daily
pH	pH units	grab	monthly
Temperature	°F	grab	quarterly
BOD_5	mg/L	grab[4]	monthly[2]
Total dissolved solids	mg/L	grab	monthly[2]
Total suspended solids	mg/L	grab	monthly[2]
Oil and grease	mg/L	grab	monthly[2]
Sulfate	mg/L	grab[5]	monthly[2]
Chloride	mg/L	grab	monthly[2]
Boron	mg/L	grab	monthly[2]
Nitrate as nitrogen	mg/L	grab	monthly[2]
Nitrite as nitrogen	mg/L	grab	monthly[2]
Ammonia as nitrogen	mg/L	grab	monthly[2]
Organic Nitrogen	mg/L	grab	monthly[2]
Priority pollutants[3]	µg/L	grab	annually[6]

*MPN/100mL: Most Probable Number per 100 milliliter; pH: hydrogen ion activity of water; mg/L: milligrams per liter; µg/L: micrograms per litter

[1] For those constituents that are continuously monitored, the Discharger shall report the daily minimum, maximum, and average values. The Discharger shall report the estimated daily volume of wastewater discharged to the leachfield.

[2] The upgraded Plant has been operating for one year. If the results of the monthly analyses are in compliance with the limits prescribed in Order R4-2007-xxxx for a period of one year, the Discharger can request the Executive Officer for a re-evaluation of the monitoring frequency. The location(s) of the sampling point(s) shall remain the same as have been previously used and any proposed changes thereto must be approved by the Executive Officer, and the proposed changes shall not be made until such approval has been granted.

[3] A list of the priority pollutants is attached.

[4] At the same time as the effluent testing, the influent shall be analyzed for its BOD_5 and TSS concentrations. The Discharger can request the Executive Officer for a re-evaluation of the monitoring frequency if it can establish the effectiveness of the upgraded treatment plant.

[5] At the same time as the effluent testing, the potable water supply shall be analyzed for its sulfate concentration to determine if the sliding scale for sulfate would apply. If the results of the monthly analyses are in compliance with the limits prescribed in Order R4-2007-xxxx for a period of one year, the Discharger can request the Executive Officer for a re-evaluation of the monitoring frequency.

[6] The priority pollutants shall be tested annually for the first year and every two years, thereafter.

III. GROUNDWATER MONITORING

After evaluating the existing monitoring well network, Regional Board staff concluded that it is not adequate to detect potential impacts to the groundwater resulting from the discharge. A work plan detailing the proposed upgrade of the monitoring well network was submitted by the Discharger. The new monitoring well network will utilize two existing upgradient domestic irrigation wells (Well Nos. 1 and 2) and construct one replacement down-gradient well MW-1R. The existing down-gradient well (TS-MW-1) was abandoned because it did not penetrate water-bearing media.

Well No. 1 (Well 05N/R22W-33J01S) and Well No. 2 (Well 05N/RWW-33R01S) will establish background monitoring points up-gradient of the wastewater treatment facility. MW-1R will replace existing TS-MW-1, which is dry, and will serve as the down-gradient monitoring point. Well Nos. 1 and 2, in conjunction with MW-1R, will allow accurate determination of the groundwater flow direction and gradient in the vicinity of the site.

The following shall constitute the groundwater monitoring program:

Constituent	Units	Type of Sample	Minimum Frequency of Analysis
pH	pH units	grab	quarterly
Total dissolved solids	mg/L	grab	quarterly
Sulfate	mg/L	grab	quarterly
Chloride	mg/L	grab	quarterly
Boron	mg/L	grab	quarterly
Nitrate as nitrogen	mg/L	grab	quarterly
Nitrite as nitrogen	mg/L	grab	quarterly
Ammonia as nitrogen	mg/L	grab	quarterly
Organic Nitrogen	mg/L	grab	quarterly
Fecal Coliform	MPN/100ml	grab	quarterly
Total Coliform	MPN/100ml	grab	quarterly
Enterococcus	MPN/100ml	grab	quarterly
Priority Pollutants	µg/L	grab	annually[1]

[1]The priority pollutants will be tested annually for the first year and every two years, thereafter.

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

a. Well identification, date and time of sampling;
b. Sampler identification, and laboratory identification;
c. Quarterly observation of groundwater levels, recorded to .01 feet mean sea level, flow direction; and
d. Vertical separation of the water table from the bottom of the leach fields.

IV. WASTE HAULING REPORT

In the event that wastes are hauled for further treatment or to a disposal site, the name and address of the hauler of the waste shall be reported in each quarterly monitoring report, along with quantities hauled during the quarter, and the location of the final point of disposal. If no wastes are hauled during the reporting period, a statement to that effect shall be submitted in the quarterly monitoring report.

V. OPERATION AND MAINTENANCE REPORT

The Discharger shall file a technical report with the Regional Board no later than 30 days after receipt of these Waste Discharge Requirements relative to the operation and maintenance program for the discharge and facilities. The information to be contained in that report shall include, at a minimum, the following:

1. The name, address, signature, and telephone number of the person or company responsible for operation and maintenance of the facility.

2. Type of maintenance (preventive or corrective).

3. Frequency of maintenance, if preventive.

The operation and maintenance record shall be kept current and submitted with the annual report due on January 30th of each year.

VI. CERTIFICATION STATEMENT

Each report shall contain the following declaration:

"I certify under penalty of law that this document, including all attachments and supplemental information, was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment.

Executed on the _____day of _____

at _____

_____(Signature)

_____(Title)"

The Thacher School File No. 93-16
Monitoring and Reporting Program No. CI – 7327

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

Ordered by: _____ Date: August 9, 2007
Deborah J. Smith
Interim Executive Officer