

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
COLORADO RIVER BASIN REGION

BOARD ORDER R7-2014-0015

WASTE DISCHARGE REQUIREMENTS  
FOR  
IMPERIAL COUNTY GATEWAY SERVICES AREA, OWNER  
ROCKY VANDERGRIFF WATER TREATMENT SERVICES, OPERATOR  
GATEWAY OF THE AMERICAS WASTEWATER TREATMENT PLANT  
East of Calexico — Imperial County

The California Regional Water Quality Control Board, Colorado River Basin Region (Regional Water Board) finds that:

1. Imperial County Gateway Services Area (ICGSA or Discharger), 155 11<sup>th</sup> Street, El Centro, CA 92243, Owner, and Rocky Vandergriff Water Treatment Services, P.O. Box 815, Seeley, CA 92273, Operator, submitted a Report of Waste Discharge (ROWD) to revise existing Waste Discharge Requirements (WDRs) to accommodate an expansion of and an increase in the amount of wastewater discharged from the ICGSA wastewater treatment plant (WWTP or Facility).
2. ICGSA provides sewage collection, treatment and disposal services to a planned industrial/commercial complex in the Gateway Specific Planned Area (SPA). The SPA is located in an unincorporated area of Imperial County, approximately five miles east of the City of Calexico and encompasses approximately 1,775 acres. The SPA site is bounded on the west by Ash Canal, on the east by the Alamo River, and on the south by the International Border between the United States and Mexico. The northern boundary is approximately 1,300 feet north of State Route 98 (SR-98).
3. The WWTP is located seven miles east of Calexico, one-quarter mile north of Carr Road, on the east side of State Route 7, adjacent to the Alamo River. The WWTP and disposal site are on the Southwest  $\frac{1}{4}$  of Section 7, Township 17 South, Range 16 East, San Bernardino Baseline and Meridian as shown on the Location and Vicinity Map (Attachment A), incorporated herein and made part of this Board Order by reference.
4. The ICGSA WWTP discharge is currently regulated under Board WDRs Order R7-2009-0064, adopted November 19, 2009.

**Wastewater Treatment Plant and Discharge**

5. The existing treatment system at the facility is an integrated, multi-stage, anaerobic-aerobic biological reactor system consisting of two HDPE (60 mil) lined facultative lagoons that operate in parallel. The Facility also includes a pump station, metering instrumentation, and two evaporation/percolation basins. For effluent disposal. Aerators were installed in the facultative lagoons to allow full treatment capacity.
6. The Facility will be upgraded to a design treatment capacity of 0.20 MGD. The WWTP currently has a design capacity of 0.10 MGD. ICGSA has been operating the WWTP under Phase II of the planned industrial/commercial complex project in the Gateway SPA. Expansion under Phase II of the project is the basis for this revision. The expansion is intended to accommodate the addition of a 1,000-bed detention center (i.e., a jail) in the SPA. In addition, the WWTP is proposed to receive 15,000 gallons per day

from the U.S. General Services Administration (GSA), Calexico East Border Crossing Station when the GSA Wastewater Treatment Facility (currently regulated under Board Order R7-2013-0031) is discontinued. The ICGSA WWTP is currently a partially aerated facultative lagoon treatment facility. The facility will be converted to a partial mix, aerated lagoon facility by increasing the aeration in the lagoons, switching the flow path from parallel to series operation, and adding a polishing pond. The WWTP currently has the piping and valves in place to allow for series or parallel operation. Phase III of the project is projected to treat 1.1 MGD and may discharge under a National Pollutant Discharge Elimination System (NPDES) Permit if discharge is to the Alamo River or its tributaries.

7. The existing WWTP is equipped with a duplex influent pump station. Phase II design specifications indicate that the pumps are 280 gallons per minute (gpm) each with a Total Dynamic Head (TDH) of 37 feet and a rated horsepower of 7.5. The ROWD facility description states that one pump is capable of pumping peak daily flows, which the Discharger's engineering consultant, Valentine Environmental Engineers, indicated in a design report, dated June 21, 2013, would be 0.40 MGD. Adjustments to the influent pump station operation are not proposed at this time.
8. Wastewater flow entering the Facility is measured with an influent flow meter. Domestic wastewater from the detention center is to be pre-treated by screening prior to discharge into the ICGSA collection system. Screenings are to be dewatered and disposed of at a landfill. The proposed Facility expansion includes operation of the two partial mix aerated lagoons in series instead of in parallel, a new polishing pond, and five new evaporation/infiltration ponds. Secondary treated effluent is to be discharged to four of the seven evaporation/infiltration disposal ponds on a rotating basis to allow for drying and maintenance; one pond is to be held in reserve. Evaporation/infiltration ponds are designed with an infiltration rate of 0.09 ft/day/ft<sup>2</sup> and evaporation rate of 70 inches per year, which requires an area of approximately 250,000 ft<sup>2</sup> at the design flow rate of 0.20 MGD. Evaporation/infiltration pond area totals approximately 270,000 ft<sup>2</sup>. The flow treatment process is illustrated in the Flow Process Diagram (Attachment B), incorporated herein and made a part of this Order by reference.
9. Back-up power is provided for all treatment units at the WWTP.
10. Biosolids are to be removed periodically from the lagoons as maintenance requires.
11. ICGSA has submitted a workplan to install a groundwater monitoring system in the vicinity of the WWTP. The workplan proposes four monitoring well and includes well design, and a list of constituents proposed for monitoring. Groundwater monitoring well locations are shown in the Monitoring Well Site Plan (Attachment C), incorporated herein and made a part of this Order by reference.

### **Hydrogeologic Conditions**

12. Rainfall in the Imperial Valley averages about three inches per year. The project area experiences few storm events with significant intensity. Typically, storm events occur in late summer / early fall and mid-winter. The resulting runoff volumes are generally low due to flat grades and existing agricultural uses.
13. The depth to groundwater in the vicinity of the proposed wastewater treatment plant is

approximately 12 feet.

14. United States Geological Survey and Imperial County Planning Department records indicate no water wells within a two mile radius of the wastewater treatment plant site.
15. Data submitted in the Discharger's Self-Monitoring Reports (SMRs) from October 2008 through September 2013 show that water supply to the community has a total dissolved solids (TDS) concentration that ranges from 566 to 846 mg/L with an average 739 mg/L.
16. A groundwater investigation at the site performed on September 22, 2009, using three groundwater monitoring wells, produced the results shown in the following table:

Constituent	Units	GW Well P-1	GW Well P-2	GW Well P-3
Antimony	mg/L <sup>1</sup>	<0.500	<0.500	<0.500
Arsenic	mg/L	<1.00	<1.00	<1.00
Barium	mg/L	0.42	0.26	0.43
Beryllium	mg/L	<0.050	<0.050	<0.050
Cadmium	mg/L	<0.10	<0.10	<0.10
Chromium	mg/L	<0.050	<0.050	<0.050
Cobalt	mg/L	<0.10	<0.10	<0.10
Copper	mg/L	<0.100	<0.100	<0.100
Lead	mg/L	<0.500	<0.500	<0.500
Mercury	mg/L	<0.002	<0.002	<0.002
Molybdenum	mg/L	<0.20	<0.20	<0.20
Nickel	mg/L	<0.20	<0.20	<0.20
Selenium	mg/L	<2.00	<2.00	<2.00
Silver	mg/L	<0.10	<0.10	<0.10
Thallium	mg/L	<4.00	<4.00	<4.00
Vanadium	mg/L	<0.10	<0.10	<0.10
Zinc	mg/L	<1.00	<1.00	<1.00
Calcium	mg/L	433	289	490
Magnesium	mg/L	228.4	132	260
Sodium	mg/L	731	551	820
Potassium	mg/L	13.85	28.15	14.1
Bicarbonate	mg/L	301	333	337
Sulfate	mg/L	1682	1300	1560
Chloride	mg/L	1027	612	1440
Nitrate	mg/L	140	148	156
Nitrite	mg/L	ND	ND	ND
Fluoride	mg/L	0.52	0.78	0.57
pH	s.u. <sup>2</sup>	8.00	7.97	7.99
Specific Conductivity	µmhos/cm <sup>3</sup>	3170	1898	3460
Total Dissolved Solids	mg/L	4534	2762	4798
Hardness	mg/L	1400	924	1684

<sup>1</sup> milligrams per Liter.

<sup>2</sup> standard units.

<sup>3</sup> micromhos per centimeter.

17. Groundwater flow in the area of the WWTP is to the northeast toward the Alamo River.
18. The site is located in a seismically active desert region.

**Basin Plan, Beneficial Uses, and Regulatory Considerations**

19. The Basin Plan designates beneficial uses and establishes water quality objectives for ground and surface waters in the Region, and contains implementation programs and policies to achieve objectives. In addition, State Water Resources Control Board (State Water Board) Resolution 88-63 requires that, with certain exceptions, the Regional Water Board assign the municipal and domestic supply use to water bodies that do not have beneficial uses listed in the Basin Plan.
20. The designated beneficial uses of ground waters in the Imperial Hydrologic Unit are:
  - a. Municipal supply (MUN)<sup>4</sup> and
  - b. Industrial supply (IND)
21. The designated beneficial uses of the Alamo River are:
  - a. Freshwater Replenishment (FRSH),
  - b. Water Contact Recreation (RECI),
  - c. Non-Contact Water Recreation (RECI),
  - d. Warm Freshwater Habitat (WARM),
  - e. Hydropower Generation (POW), and
  - f. Preservation of Rare, Threatened, or Endangered Species (RARE)
22. WDRs implement numeric and narrative water quality objectives for ground and surface waters established by the Basin Plan. The numeric objectives for groundwater designated for municipal and domestic supply are the maximum contaminant levels (MCL), and bacteriological limits specified in Section 64421 et seq. of Title 22, California Code of Regulations (CCR). The narrative objectives are:
  - a. Ground water for use as domestic or municipal water supply (MUN) shall not contain taste or odor-producing substances in concentrations that adversely affect beneficial uses as a result of human activity (Basin Plan, page 3-8).
  - b. Discharges of water softener regeneration brines, other mineralized wastes, and toxic wastes to disposal facilities which ultimately discharge in areas where such wastes can percolate to ground water usable for domestic and municipal purposes are prohibited (Basin Plan, page 3-8).

---

<sup>4</sup> With respect to the MUN designation, the Basin Plan states: "At such time as the need arises to know whether a particular aquifer which has no known existing MUN use should be considered as a source of drinking water, the Regional Board will make such a determination based on the criteria listed in the 'Sources of Drinking Water Policy' in Chapter 2 of the Basin Plan. An indication of MUN for a particular hydrologic unit indicates only that at least one of the aquifers in that unit currently supports a MUN beneficial use. For example, the actual MUN usage of the Imperial Hydrologic Unit is limited only to a small portion of that ground water unit."

23. Section 13267 of the California Water Code (CWC) authorizes the Regional Water Boards to require technical and monitoring reports. The Monitoring and Reporting Program (MRP) establishes monitoring and reporting requirements to implement federal and state requirements.
24. This Order establishes WDRs pursuant to Division 7, Chapter 4, Article 4, of the CWC for discharges that are not subject to regulation under Clean Water Act (CWA) Section 402 (33 U.S.C. Section 1342).
25. Pursuant to CWC 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.
26. The discharge authorized by this Board Order, and treatment and treatment and storage facilities associated with discharges of treated municipal wastewater, except for discharges of residual sludge and solid waste, are exempt from the requirements of Consolidated Regulations for Treatment, Storage, Processing, or Disposal of Solid Waste, as set forth in Title 27, CCR, Division 2, Subdivision 1, commencing with section 20005. This exemption is based on Section 20090(a) of Title 27, which states in relevant part that discharges of domestic sewage or treated effluent are exempt provided that such discharges are regulated by WDRs, or for which WDRs have been waived, and which are consistent with applicable water quality objectives, and treatment or storage facilities associated with municipal wastewater treatment plants, provided that residual sludges or solid waste from wastewater treatment facilities shall be discharged only in accordance with the applicable Title 27 provisions. These requirements have been met. The discharge is domestic sewage, this Board Order regulates that discharge in a manner consistent with applicable surface and ground water quality objectives, and residual sludges or solid waste from the Facility will be managed pursuant to Title 27.

#### **Groundwater Degradation**

27. State Water Resources Control Board (State Water Board) Resolution 68-16 ("Policy with Respect to Maintaining High Quality Waters of the State"), hereinafter Resolution 68-16 states:

"Whenever the existing quality of water is better than the quality established in policies as of the date on which such policies become effective, such existing high quality will be maintained until it has been demonstrated to the State that any change will be consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial use of such water and will not result in water quality less than that prescribed in the policies."

Resolution 68-16 further states:

"Any activity which produces or may produce a waste or increased volume or concentration of waste and which discharges or proposes to discharge to existing high quality waters will be required to meet waste discharge requirements which will result in the best practicable treatment or control of the discharge necessary to assure that (a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained."

28. Some degradation of groundwater from the discharge to the evaporation/infiltration ponds is consistent with Resolution 68-16, provided that the degradation:

- a. Is confined to a reasonable area;
  - b. Is minimized by means of full implementation, regular maintenance, and optimal operation of BPTC measures;
  - c. Is limited to waste constituents typically encountered in domestic wastewater; and
  - d. Does not result in the loss of any beneficial use as prescribed in the applicable basin plan, or violation of any water quality objective.
29. The discharge of wastewater from the WWTP, as permitted herein, reflects BPTC. The controls assure the discharge does not create a condition of pollution or nuisance, and that water quality will be maintained which is consistent with the anti-degradation provisions of Resolution No. 68-16. The WWTP incorporates:
- a. Technology for secondary treated domestic wastewater;
  - b. Solids handling facilities;
  - c. An operation and maintenance manual;
  - d. Staffing to assure proper operation and maintenance; and
  - e. A standby emergency power generator of sufficient size to operate the treatment plant and ancillary equipment during periods of loss of commercial power.
30. Constituents in domestic WWTP effluent that present the greatest risk to groundwater quality are nitrogen, coliforms (pathogen-indicator organisms), and dissolved salts (TDS). The existing WWTP provides substantial removal of soluble organic matter, solids, and nitrogen. Monitoring data from November 2008 through October 2013 show an average effluent Total Nitrogen concentration of 17 mg/L. The Water Quality Objective for Total Nitrogen, specified in the Basin Plan for groundwater, is the Title 22 MCL of 10 mg/L. Therefore, the average Total Nitrogen concentration exceeds the Water Quality Objective by 70 per cent. With respect to coliforms, secondary treatment reduces fecal coliform densities by 90 to 99%. However, the remaining organisms in effluent are still  $10^5$  to  $10^6$  MPN/100 ml (United States Environmental Protection Agency, Design Manual, Municipal Wastewater Disinfection; October 1986). Therefore, due to the shallow depth to groundwater (12 feet), it is likely that some fraction of these remaining organisms will reach groundwater. With respect to dissolved salts (TDS), groundwater at the WWTP site is too saline for municipal use. This conclusion is based on the results the groundwater investigation at the site that was performed on September 22, 2009. The results of that investigation were previously described in detail in the table accompanying Finding 16, above. TDS values reported at the three monitoring wells sampled revealed concentrations ranging from 2762 mg/L to 4798 mg/L. To address the potential contamination by nitrogen, pathogens, and TDS to groundwater and to the Alamo River, the Discharger will be required in this Board Order to construct a representative groundwater monitoring network and to perform groundwater monitoring along the Facility boundary with the Alamo River and at an upgradient location. Groundwater monitoring is expected to begin 30 days after adoption of this Board Order to provide a background or baseline condition for these and other constituents of concern specified in the MRP.

### CEQA and Public Participation

31. The Imperial County Planning Department circulated a Program Environmental Impact Report (PEIR, State Clearing House No. 1996021019) for public review and comment. The Imperial County Planning Department indicated that the PEIR complies with all criteria, standards, and procedures of the California Environmental Quality Act (California Public Resources Code, Section 21000 et seq.), the state CEQA Guidelines (California Code of Regulations, Sections 15000 et seq.), and Imperial County's implementing guidelines. On August 26, 1997, the Board of Supervisors of the County of Imperial approved the Certification of the PEIR as recommended by the Planning Commission with the adoption of Resolution 97-073 ("Resolution of the Imperial County Board of Supervisors Certifying the Final Program Environmental Impact report for the Gateway of the Americas Project") and Findings of Fact, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program.
32. On January 30, 2009, the County Clerk, County of Imperial, posted a Notice of Exemption (NOE) filed by Imperial County Public Works Department stating that the proposed expansion of the publicly-owned utility used to provide sewerage was environmentally assessed under the Environmental Impact Report for the Gateway Specific Plan. The NOE cites a categorical exemption under Section 15301(b) of the CEQA Guidelines, which governs the operation of an existing public utilities services facility involving negligible or no expansion of use beyond that previously existing.
33. As a Responsible Agency under CEQA, the Colorado River Basin Water Board complies with CEQA by considering the EIR or Negative Declaration prepared by the Lead Agency and by reaching its own conclusions on whether and how to approve the project involved. The Board conducted this CEQA review prior to adoption of the first set of WDRs on June 20, 1999, Order No. 99-042, by reviewing the County's 1997 PEIR. In that Order the Board concluded in Finding No. 9 that compliance with specified requirements in the Order would mitigate or avoid adverse impacts on water quality. Accordingly, having complied with CEQA, the Board adopted Order No. 99-042. Although Finding No. 9 was based on the Phase I project's initial proposed discharge of 0.0315 MGD, the 1997 PEIR evaluated the potential wastewater impacts for a Phase I development that was anticipated to generate up to 0.500 MGD of effluent (PEIR, p. 4.3-8). In addition, the PEIR explained that the wastewater treatment system would utilize an "Advanced Integrated Pond System" that could add additional treatment modules to provide additional treatment capacity. (PEIR, pp. 3-20 and 4.3-8.) However, the PEIR also stated that "[t]reated wastewater would be discharged into the adjacent Alamo River." (PEIR, p. 3-20.)
34. Because the Lead Agency, the County of Imperial, prepared and certified the 1997 PEIR, the County may rely on that document for a later activity so long as the activity is within the scope of the program approved earlier and the PEIR adequately described the activity for the purposes of CEQA. (CEQA Guidelines Section 15168, subdivisions (c) and (e).) If a later activity would have effects that were not examined in the program EIR, however, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. (Id., subd. (c)(1).) Alternatively, if the agency finds that pursuant to CEQA Guidelines Section 15162 ("Subsequent EIRs and Negative Declarations"), no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.

(Id., subd. (c)(2).) Although the County filed the NOE in 2009, concluding that the current project was categorically exempt under CEQA Guidelines Section 15301(b) (existing facilities exemption involving negligible or no expansion of use), the NOE is not, by definition, an “environmental document” upon which the Board can rely for complying with CEQA. (CEQA Guidelines Section 15361.) Instead, the Board must independently determine, based on substantial evidence in light of the whole record, whether the current project qualifies for a categorical exemption.

35. In its review of the PEIR, the Board has concluded that the proposed project to increase the discharge from the currently permitted 0.10 MGD to 0.20 MGD is still within the discharge range evaluated in the PEIR of 0.50 MGD. Based on discharge volume alone, the proposed project is well within the scope of the program approved by the County in 1997, and thus, appears to be categorically exempt under CEQA Guidelines Section 15301(b). However, the PEIR contemplated a discharge of the treated effluent into the Alamo River. The proposed project contemplates discharging the proposed greater volume of effluent into five new infiltration/percolation ponds to supplement the existing two infiltration/percolation ponds. Even though the PEIR was predicated on a different disposal methodology—disposal into the Alamo River—this does not necessarily mean that the currently proposed disposal method has the potential for causing a significant impact on the environment. In fact, just as the Board reasoned in Finding No. 9 in Board Order No. 99-042, it is expected that compliance with this Order would similarly mitigate or avoid any adverse impacts. However, to validate this expectation, this Order will require the Discharger to conduct special studies regarding hydrology and water quality to ensure that potential water quality impacts, if any, associated with this specific project will be adequately assessed and mitigated, as necessary.
36. The Board has notified the Discharger and all known interested agencies and persons of its intent to draft WDRs for this discharge, and has provided them with an opportunity for a public meeting and an opportunity to submit comments.
37. The Board, in a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, that Board Order R7-2009-0064 is rescinded upon the effective date of this Order except for enforcement purposes, and, in order to meet the provisions contained in Division 7 of the CWC and regulations adopted thereunder, the Discharger shall comply with the following:

**A. Discharge Prohibitions**

1. Discharge of waste classified as “hazardous”, as defined in Title 23, CCR, Section 2521(a), or “designated”, as defined in California Water Code Section 13173, is prohibited.
2. Discharge of treated wastewater at a location other than the designated disposal areas is prohibited.
3. The WWTP shall be maintained to prohibit sewage or treated effluent from surfacing or overflowing.

4. The discharge of any wastewater from the facility to any surface waters or surface drainage courses is prohibited.
5. The Discharger shall not accept waste in excess of the design treatment capacity of the disposal system.
6. The discharge of waste to land not owned or authorized for such use by the Discharger is prohibited.
7. Surfacing or ponding of wastewater outside of the designated disposal locations is prohibited.
8. Bypass or overflow of untreated or partially treated waste is prohibited.

**B. Effluent Limitations**

1. Effluent discharged to the evaporation ponds for disposal shall not exceed the following effluent limits:

<u>Constituent</u>	<u>Units</u>	<u>Monthly Average</u>	<u>Weekly Average</u>
20° C BOD <sub>5</sub> <sup>5</sup>	mg/L	45	65
Total Suspended Solids (TSS)	mg/L	95	----
Settleable Matter	ml/L <sup>6</sup>	0.3	0.5

2. The 30-day monthly average daily discharge from the WWTP shall not exceed 0.20 MGD.
3. Effluent from the WWTP shall not have a pH below 6.0 or above 9.0 standard units.
4. The evaporative/storage basins shall be maintained so they will be kept in aerobic conditions. The dissolved oxygen content in the upper zone (one foot) of evaporative/storage basins shall not be less than 1.0 mg/L.

**C. Discharge Specification**

1. The treatment or disposal of wastes from the facility shall not cause pollution or nuisance as defined in Sections 13050(l) and 13050(m) of Division 7 of the California Water Code.
2. A minimum depth of two (2) feet of freeboard shall be maintained at all times in facultative ponds and evaporative/storage basins.
3. All treatment, storage, and disposal areas shall be designed, constructed, operated, and maintained to prevent inundation or washout due to floods with a 100-year return frequency.
4. Ponds shall have sufficient capacity to accommodate allowable wastewater flow, design

<sup>5</sup> 5-day Biochemical Oxygen Demand at 20 degrees Celsius.

<sup>6</sup> milliliters per Liter.

seasonal precipitation, ancillary inflow, and infiltration during the non-irrigation season. Design seasonal precipitation shall be based on total annual precipitation using a return period of 100 years, distributed monthly in accordance with historical rainfall patterns.

5. Public contact with non-disinfected wastewater shall be precluded through such means as fences, signs, and other acceptable alternatives.
6. Objectionable odors originating at this facility shall not be perceivable beyond the limits of the wastewater treatment and disposal area.

#### **D. Groundwater Limitations**

1. Discharge from the WWTP shall not cause groundwater to:
  - a. Contain waste constituents in concentrations statistically greater than background water quality.
  - b. Contain constituents in excess of California Maximum Contaminant Levels (MCLs), as set forth in the California Code of Regulations, Title 22, Section 64426.1 for bacteriological constituents; Section 64431 for inorganic chemicals; Section 64432.1 for nitrates; and Section 64444 for organic chemicals.
  - c. Acquire taste, odor, toxicity, or color that creates nuisance or impairs beneficial use.

#### **E. Provisions**

##### **Special Provisions**

1. The Discharger shall construct a groundwater monitoring system for the purpose of collecting groundwater monitoring samples. Groundwater monitoring shall be as specified in Monitoring and Reporting Program R7-2014-0015 and revisions thereto. The Discharger shall begin collection of groundwater samples within 30 days of adoption of this Board Order.
2. The Discharger shall conduct a study to determine if groundwater mounding and groundwater seepage caused by the discharge is occurring and, if so, their effects on groundwater quality. The study shall span a time period of five years. Annual reports shall be submitted providing an analysis of the findings to date. A final report shall be submitted that provides an analysis of the results of the study. At a minimum the study shall provide the following information:
  - a. Groundwater mounding caused by the discharge, if any. The analysis shall provide a discussion of the effects of mounding as the effluent flow rates increase to a projected discharge rate of 0.20 MGD.
  - b. Groundwater mounding caused by the discharge, if any. The analysis shall provide a discussion of the effects of mounding as the effluent flow rates increase to a projected discharge rate of 0.20 MGD.
  - c. Groundwater seepage into the Alamo River, if any. The analysis shall provide a discussion of the effects of seepage as the effluent flow rates increase to a projected discharge rate of 0.20 MGD.
  - d. Annual summary reports of water quality impacts by total nitrogen, pathogens and TDS, to groundwater and the Alamo River. The summary report shall specifically

address pathogen transport through groundwater to the Alamo River.

### **Standard Provisions**

3. The Discharger shall comply with all of the conditions of this Board Order. Noncompliance is a violation of the Porter-Cologne Water Quality Control Act (CWC Section 13000 et seq.), and is grounds for enforcement action.
4. The Discharger shall comply with Monitoring and Reporting Program (MRP) R7-2014-0015, and future revisions thereto, as specified by the Colorado River Basin Water Board Executive Officer.
5. The Discharger shall not cause degradation of any water supply in accordance with State Water Resources Control Board Resolution 68-16.
6. Standby, power generating facilities shall be available to operate the plant during a commercial power failure.
7. Adequate measures shall be taken to assure that flood or surface drainage waters do not erode or otherwise render portions of the discharge facilities inoperable.
8. The WWTP shall be supervised and operated by persons possessing certification of appropriate grade pursuant to Section 3680, Chapter 26, Division 3, Title 23 of the California Code of Regulations.
9. The Discharger shall at all times properly operate and maintain all systems and components of collection, treatment and control, installed or used by the Discharger to achieve compliance with this Board Order. Proper operation and maintenance includes effective performance, adequate process controls, and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities/systems when necessary to achieve compliance with this Board Order. All systems in service or reserved shall be inspected and maintained on a regular basis. Records of inspections and maintenance shall be retained, and made available to the Colorado River Basin Water Board Executive Officer on request.
10. The Discharger shall ensure that all site-operating personnel are familiar with the content of this Board Order, and shall maintain a copy of this Board Order at the site.
11. The Discharger shall allow the Colorado River Basin Water Board, or an authorized representative, upon presentation of credentials and other documents as may be required by law, to:
  - a. Enter the premises regulated by this Board Order, or the place where records are kept under the conditions of this Board Order;
  - b. Have access to and copy, at reasonable times, records kept under the conditions of this Board Order;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Board Order; and
  - d. Sample or monitor at reasonable times, for the purpose of assuring compliance with this Board Order or as otherwise authorized by the CWC, any substances or

- parameters at this location.
12. Ponds shall be managed to prevent breeding of mosquitoes. In particular,
    - a. An erosion control program should assure that small coves and irregularities are not created around the perimeter of the water surface.
    - b. Weeds shall be minimized through control of water depth, harvesting, or herbicides.
    - c. Dead algae, vegetation, and debris shall not accumulate on the water surface.
  13. Disposal of oil and grease, biosolids, screenings, and other solids collected from liquid wastes shall be pursuant to Title 27, and the review and approval of the Colorado River Basin Water Board Executive Officer.
  14. Any proposed change in use or disposal of biosolids requires the approval of the Colorado River Basin Water Board Executive Officer, and U.S. Environmental Protection Agency Regional Administrator, who must be notified at least 90 days in advance of the change.
  15. Sludge use and disposal shall comply with Federal and State laws and regulations, including permitting requirements, and technical standards in 40 CFR Part 503. If the State and Regional Water Boards are delegated the authority to implement 40 CFR Part 503 regulations, this Order may be revised to incorporate appropriate time schedules and technical standards. The Discharger shall comply with the standards and time schedules in 40 CFR part 503, whether or not part of this Order.
  16. The Discharger shall provide a plan as to the method, treatment, handling and disposal of sludge that is consistent with all State and Federal laws and regulations and obtain prior written approval from the Colorado River Basin Water Board specifying location and method of disposal, before disposing of treated or untreated sludge, or similar solid waste.
  17. The Discharger shall maintain a permanent log of all solids hauled away from the treatment facility for use/disposal elsewhere and shall provide a summary of the volume, type (screenings, grit, raw sludge, digested sludge), use (agricultural, composting, etc.), and the destination in accordance with the MRP of this Board Order. Sludge that is stockpiled at the treatment facility shall be sampled and analyzed for those constituents listed in the sludge monitoring section of the MRP of this Board Order and as required by Title 40, Code of Federal Regulations, Part 503. The results of the analyses shall be submitted to the Regional Board as part of the MRP.
  18. The Discharger shall provide a report to the Colorado River Basin Water Board when it determines that the plant's average dry-weather flow rate for any month exceeds 80 percent of the design capacity. The report should indicate what steps, if any, the discharger intends to take to provide for the expected wastewater treatment capacity necessary when the plant reaches design capacity.
  19. Prior to implementing a modification that results in a material change in the quality or quantity of wastewater treated or discharged, or a material change in the location of discharge, the Discharger shall report all pertinent information in writing to the Colorado River Basin Water Board, and obtain revised requirements.

20. Prior to a change in ownership or management of WWTP, the Discharger shall transmit a copy of this Board Order to the succeeding owner/operator, and forward a copy of the transmittal letter to the Colorado River Basin Water Board.
21. The Discharger shall provide adequate notice to the Colorado River Basin Water Board Executive Officer of the following:
  - a. The introduction of pollutants into any treatment facility described in the Findings of this Board Order from an indirect Discharger which would be subject to Section 301 or 306 of the Clean Water Act, if the pollutants were discharged directly;
  - b. Any substantial change in the volume or character of pollutants introduced into any treatment facility described in the Findings of this Board Order, by an existing or new source; and
  - c. Any planned physical alteration or addition to the facilities described in this Board Order, or change planned in the Discharger's sludge use or disposal practice, where such alterations, additions, or changes may justify the application of Board Order conditions that are different from or absent in the existing Board Order, including notification of additional disposal sites not reported during the Board Order application process, or not reported pursuant to an approved land application plan.
22. The Discharger shall report orally, any noncompliance that may endanger human health or the environment. The noncompliance shall be reported immediately to the Colorado River Basin Water Board Executive Officer, and the Office of Emergency Services as soon as:
  - a. The Discharger has knowledge of the discharge,
  - b. Notification is possible, and
  - c. Notification will not substantially impede cleanup or other emergency measures.

During non-business hours, the Discharger shall leave a message on the Regional Water Board office voice recorder at (760) 346-7491. A written report shall also be provided within five (5) business days of the time the discharger becomes aware of the incident. The written report shall contain a description of the noncompliance and its cause, the period of noncompliance, the anticipated time to achieve full compliance, and the steps taken or planned, to reduce, eliminate, and prevent recurrence of the noncompliance. The discharger shall report all intentional or unintentional spills in excess of one thousand (1,000) gallons occurring within the facility or collection system to the Regional Board office in accordance with the above time limits.
23. The Discharger shall report all instances of noncompliance. Reports of noncompliance shall be submitted with the Discharger's next scheduled SMRs or earlier if requested by the Colorado River Basin Water Board Executive Officer, or if required by an applicable standard for sludge use and disposal.
24. By-pass (i.e., the intentional diversion of waste streams from any portion of the treatment facilities, except diversions designed to meet variable effluent limits) is prohibited. The Colorado River Basin Water Board may take enforcement action against the Discharger for by-pass unless:
  - a. By-pass 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 causes them to be inoperable, or substantial and permanent loss of natural resources reasonably expected to occur in the absence of a by-pass. Severe property damage does not mean economic loss caused by delays in production; and

There were no feasible alternatives to by-pass, such as the use of auxiliary treatment facilities or retention of untreated waste. This condition is not satisfied if adequate back-up equipment was not installed to prevent by-pass occurring during equipment downtime, or preventive maintenance.

- b. By-pass is:
    - i. Required for essential maintenance to assure efficient operation; and
    - ii. Neither effluent nor receiving water limitations are exceeded; and
    - iii. The Discharger notifies the Colorado River Basin Water Board ten (10) days in advance.
25. In the event of an unanticipated by-pass, the Discharger shall immediately report the incident to the Colorado River Basin Water Board. During non-business hours, the Discharger shall leave a message on the Colorado River Basin Water Board office voice recorder. A written report shall be provided within five (5) business days the Discharger is aware of the incident. The written report shall include a description of the by-pass, any noncompliance, the cause, period of noncompliance, anticipated time to achieve full compliance, and steps taken or planned, to reduce, eliminate, and prevent recurrence of the noncompliance.

#### **Stormwater**

26. All storm water discharges from this facility must comply with the lawful requirements of municipalities, counties, drainage districts, and other local agencies, regarding discharges of storm water to storm water drain systems or other courses under their jurisdiction.
27. Storm water discharges from the facility shall not cause or threaten to cause pollution or contamination.
28. Storm water discharges from the facility shall not contain hazardous substances equal to or in excess of a reportable quantity listed in 40 CFR Part 117 and/or 40 CFR Part 302.

#### **Pretreatment**

29. In the event that the facility has an average dry weather flow or treatment capacity of 5 MGD or more and Industrial Users [40 CFR 403.3(h)] are discharging pollutants which Pass Through [40 CFR 403.3(n)] or Interfere [40 CFR 403.3(i)] with the operation of the wastewater treatment facility or are otherwise subject to National Pretreatment Standards [40 CFR 403.3(j)], (ii) California Code of Regulations, Title 23, Section 2233 requires the facility to have and enforce an adequate pretreatment program, or (iii) the Colorado River Basin Water Board or its Executive Officer determines that other circumstances warrant, then:
- a. The discharger shall notify the Colorado River Basin Water Board within 30 days after there are discharges that trigger the pretreatment requirements.

- b. The Discharger shall submit a revised Report of Waste Discharge and the pretreatment program for the Board review and approval as soon as possible but not later than one (1) year of the notice of pretreatment requirements.
  - c. The Discharger shall enforce the federal categorical pretreatment standards on all Categorical Industrial Users (CIUs).
  - d. The Discharger shall notify the CIU of its discharge effluent limits. The limits must be as stringent as the pretreatment standards contained in the applicable federal category (40 CFR Part 400-699). The discharger may develop more stringent, technically based local limits if it can show cause.
  - e. The Discharger shall notify the Board if the CIU violates its discharge effluent limits.
30. The Discharger shall provide the Colorado River Basin Water Board with an annual report describing the pretreatment program activities over the previous 12-month period. The report shall be transmitted to the Board office no later than January 31 of each year and include:
- a. A summary of actions taken by the discharger which ensures industrial-user compliance;
  - b. An updated list of industrial users (by Standard Industrial Classification categories) which were issued permits, and/or enforcement orders, and a status of compliance for each user; and
  - c. The name and address of each user that received a revised discharge limit.
31. This Board Order does not authorize violation of any federal, state, or local laws or regulations.
32. This Board Order does not convey property rights of any sort, or exclusive privileges, nor does it authorize injury to private property or invasion of personal rights, or infringement of federal, state, or local laws or regulations.
33. This Board Order may be modified, rescinded, or reissued, for cause. The filing of a request by the Discharger for a Board Order modification, rescission or reissuance, or notification of planned changes or anticipated noncompliance, does not stay any Board Order condition. Causes for modification include a change in land application plans, or sludge use or disposal practices, and adoption of new regulations by the State or Regional Water Board (including revisions to the Basin Plan), or Federal government.

I, Robert Perdue, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Colorado River Basin Region, on January 16, 2014.

Ordered By:



ROBERT PERDUE  
Executive Officer

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
COLORADO RIVER BASIN REGION**

MONITORING AND REPORTING PROGRAM R7-2014-0015  
FOR  
IMPERIAL COUNTY GATEWAY SERVICES AREA, OWNER  
ROCKY VANDERGRIFF WATER TREATMENT SERVICES, OPERATOR  
GATEWAY OF THE AMERICAS WASTEWATER TREATMENT PLANT  
East of Calexico - Imperial County

Location of Wastewater Treatment Facilities and Discharges:  
Latitude/Longitude: 32° 41' 02"N, 115° 22' 18"W

**A. Monitoring**

1. This Monitoring and Reporting Program (MRP) describes requirements for monitoring a wastewater system and groundwater quality (when needed). This MRP is issued pursuant to California Water Code (CWC) section 13267. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Executive Officer.
2. Water Code section 13267 states, in part:

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste 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 within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.”
3. Water Code section 13268 states, in part:

“(a) (1) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of § 13267, or failing or refusing to furnish a statement of compliance as required by subdivision (b) of Section 13399.2, or falsifying any information provided therein, is guilty of a misdemeanor, and may be liable civilly in accordance with subdivision (b). (b) (1) Civil liability may be administratively imposed by a regional board in accordance with Article 2.5 (commencing with § 13323) of Chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars (\$1,000) for each day in which the violation occurs.”
4. The Discharger owns and operates the wastewater system that is subject to Board Order R7-2014-0015. The reports are necessary to ensure that the Discharger complies

with the Order. Pursuant to Water Code Section 13267, the Discharger shall implement the MRP and shall submit the monitoring reports described herein.

5. All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. The time, date, and location of each grab sample shall be recorded on the sample chain of custody form. If composite samples are collected, the basis for sampling (time or flow weighted) shall be approved by Colorado River Basin Water Board staff.
6. Field test instruments (such as those used to test pH, dissolved oxygen, and electrical conductivity) may be used provided that:
  - a. The user is trained in proper use and maintenance of the instruments;
  - b. The instruments are field calibrated prior to monitoring events at the frequency recommended by the manufacturer;
  - c. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
  - d. Field calibration reports are submitted as described in the "Reporting" section of this MRP.
7. The collection, preservation and holding times of all samples shall be in accordance with United States Environmental Protection Agency (USEPA) approved procedures. Unless otherwise approved by the Regional Water Board's Executive Officer, all analyses shall be conducted by a laboratory certified by the State Department of Health Services. All analyses shall be conducted in accordance with the latest edition of the "Guidelines Establishing Test Procedures for Analysis of Pollutants" (40 CFR Part 136), promulgated by the USEPA.
8. All monitoring instruments and devices used by the discharger to fulfill the prescribed monitoring program shall be properly maintained and calibrated as necessary to ensure their continued accuracy. In the event that continuous monitoring equipment is out of service for period greater than 24-hours, the Discharger shall obtain representative grab samples each day the equipment is out of service. The Discharger shall correct the cause(s) of failure of the continuous monitoring equipment as soon as practicable. The Discharger shall report the period(s) during which the equipment was out of service and if the problem has not been corrected, shall identify the steps which the Discharger is taking or proposes to take to bring the equipment back into service and the schedule for these actions.
9. Samples shall be collected at the location specified in the WDRs. If no location is specified, sampling shall be conducted at the most representative sampling point available.
10. Given the monitoring frequency prescribed by MRP R7-2014-0015, if only one sample is available for a given reporting period, compliance with monthly average, or weekly average Discharge Specifications, will be determined from that sample.
11. The Discharger shall comply with the following:
  - a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.

- b. The Discharger shall retain records of all monitoring information, copies of all reports required by this Board Order, and records of all data used to complete the application for this Board Order, for a period of at least 5 years from the date of the sample, measurement, report or application.
  - c. Records of monitoring information shall include:
    - i. The date, exact place, and time of sampling or measurements.
    - ii. The individual(s) who performed the sampling or measurements.
    - iii. The date(s) analyses were performed.
    - iv. The individual(s) who performed the analyses.
    - v. The analytical techniques or methods used; and
    - vi. The results of such analyses.
12. If the facility is not in operation, or there is no discharge during a required reporting period, the Discharger shall forward a letter to the Regional Water Board indicating that there has been no activity during the required reporting period.

**Influent Monitoring**

13. Influent to the WWTP shall be monitored according to the following schedule:

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Monitoring Frequency</u>	<u>Reporting Frequency</u>
Flow	MGD <sup>1</sup>	Meter Reading	Daily	Monthly
20°C BOD <sub>5</sub> <sup>2</sup>	mg/L <sup>3</sup>	24-Hr. Composite	Monthly	Monthly
Total Suspended Solids	mg/L	24-Hr. Composite	Monthly	Monthly

**WWTP Effluent Monitoring**

14. Effluent from the WWTP shall be monitored according to the following schedule:

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Monitoring Frequency</u>	<u>Reporting Frequency</u>
Hydrogen Ion (pH)	s.u. <sup>4</sup>	Grab at Peak Flow	Weekly	Monthly
20°C BOD <sub>5</sub>	mg/L	24 Hr. Composite	Monthly	Monthly
Total Suspended Solids	mg/L	24 Hr. Composite	Monthly	Monthly

<sup>1</sup> Million Gallons per Day

<sup>2</sup> 5-day Biochemical Oxygen Demand at 20 degrees Celsius.

<sup>3</sup> milligrams per Liter

<sup>4</sup> standard units.

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Monitoring Frequency</u>	<u>Reporting Frequency</u>
Settleable Solids	ml/L <sup>5</sup>	24 Hr. Composite	Monthly	Monthly
Total Dissolved Solids	mg/L	Grab	Monthly	Monthly
Nitrate (As NO <sub>3</sub> )	mg/L	Grab	Monthly	Monthly
Total Nitrogen	mg/L	Grab	Monthly	Monthly
Ammonia	mg/L	Grab	Monthly	Monthly
Phosphate (As PO <sub>4</sub> )	mg/L	Grab	Monthly	Monthly
Total Coliforms	MPN/100mL <sup>6</sup>	Grab	Monthly	Monthly
Fecal Coliforms	MPN/100mL	Grab	Monthly	Monthly
Volatile Organics (EPA Methods 601, 602)	µg/L <sup>7</sup>	Grab	Annually	Annually
Pesticides (EPA Method 608)	µg/L	Grab	Annually	Annually

**Water Supply to the Community**

15. The domestic water supply shall be monitored according to the following schedule:

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Monitoring Frequency</u>	<u>Reporting Frequency</u>
TDS	mg/L	Grab	Monthly	Monthly

**Groundwater Monitoring**

16. The Discharger shall monitor groundwater wells MW-1, 2, 3 and 4 according to the following schedule:

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Monitoring Frequency</u>	<u>Reporting Frequency</u>
Depth to Groundwater (bgs) <sup>8</sup>	ft	measurement	Monthly <sup>9</sup>	Monthly <sup>9</sup>

<sup>5</sup> milliliters per liter

<sup>6</sup> Most Probable Number per 100 milliliters

<sup>7</sup> micrograms per liter

<sup>8</sup> Below ground surface.

<sup>9</sup> The Discharger may request to have the monitoring and reporting frequency revised after 24 months of continuous monitoring.

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Monitoring Frequency</u>	<u>Reporting Frequency</u>
Total Dissolved Solids	mg/L	Grab	Monthly <sup>9</sup>	Monthly <sup>9</sup>
Total Nitrogen	mg/L	Grab	Monthly <sup>9</sup>	Monthly <sup>9</sup>
Nitrate as N	mg/L	Grab	Monthly <sup>9</sup>	Monthly <sup>9</sup>
pH	mg/L	Grab	Monthly <sup>9</sup>	Monthly <sup>9</sup>
Total Coliforms	MPN/100 mL <sup>10</sup>	Grab	Monthly <sup>9</sup>	Monthly <sup>9</sup>
Fecal Coliforms	MPN/100mL	Grab	Monthly	Monthly
General Minerals <sup>11</sup>	mg/L	Grab	Annually	Annually
VOCs	µg/L	Grab	Annually	Annually

### Sludge Monitoring

17. The Discharger shall report annually on the quantity, location and method of disposal of all sludge and similar solid materials being produced at the WWTP. If no sludge is disposed of during the year being reported, the Discharger shall state “No Sludge Removed” in the annual monitoring report. Sludge that is generated at the WWTP shall be sampled and analyzed for the following:

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Monitoring Frequency</u>	<u>Reporting Frequency</u>
Arsenic	mg/kg <sup>12</sup>	Composite	Annually	Annually
Cadmium	mg/kg	Composite	Annually	Annually
Copper	mg/kg	Composite	Annually	Annually
Lead	mg/kg	Composite	Annually	Annually
Mercury	mg/kg	Composite	Annually	Annually
Molybdenum	mg/kg	Composite	Annually	Annually
Nickel	mg/kg	Composite	Annually	Annually
Selenium	mg/kg	Composite	Annually	Annually
Zinc	mg/kg	Composite	Annually	Annually
Fecal Coliform	MPN/gram <sup>13</sup>	Composite	Annually	Annually

## B. Reporting

<sup>10</sup> Most Probable Number per 100 millileters

<sup>11</sup> At a minimum, Standard Minerals shall include: calcium, chloride, fluoride, iron, magnesium, manganese, nitrate, potassium, sodium, sulfate, barium, total alkalinity, and hardness.

<sup>12</sup> milligrams per kilogram.

<sup>13</sup> Most Probable Number per gram.

1. The Discharger shall inspect and document any operation/maintenance problems by inspecting each unit process. In addition, calibration of flow meters and equipment shall be performed in a timely manner and documented. Operation and Maintenance reports shall be submitted to the Colorado River Basin Water Board Office annually.
2. The Discharger shall arrange the data in Self-Monitoring Reports (SMRs) in tabular form so that the specified information is readily discernible. The data shall be summarized in such a manner as to clearly illustrate whether the facility is operating in compliance with WDRs. Where appropriate, the Discharger shall include supporting calculations (e.g., for monthly averages).
3. The results of any analysis taken, more frequently than required at the locations specified in this MRP shall be reported to the Colorado River Basin Water Board.
4. SMRs shall be certified under penalty of perjury to be true and correct, and shall contain the required information at the frequency designated in this MRP.
5. Each Report shall contain the following statement:

"I declare under the penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations".
6. The SMRs, and other information requested by the Colorado River Basin Water Board, shall be signed by a principal executive officer or ranking elected official.
7. A duly authorized representative of the Discharger may sign the documents if:
  - a. The authorization is made in writing by the person described above;
  - b. The authorization specified an individual or person having responsibility for the overall operation of the regulated disposal system; and
  - c. The written authorization is submitted to the Colorado River Basin Water Board's Executive Officer.
8. The Discharger shall report any failure in the facility (wastewater treatment plant, and collection and disposal systems). The incident shall be reported immediately to the Colorado River Basin Water Board Executive Officer as soon as:
  - a. The Discharger has knowledge of the discharge,
  - b. Notification is possible, and
  - b. Notification will not substantially impede cleanup or other emergency measures.Results of analyses performed shall be provided within 15 days of sample collection.
9. The Discharger shall attach a cover letter to the SMRs. The information contained in the cover letter shall clearly identify violations of the WDRs, discuss corrective actions taken or planned and the proposed time schedule of corrective actions. Identified violations should include a description of the requirement that was violated and a description of the violation.

10. Daily, weekly, and monthly monitoring shall be included in the monthly monitoring report. Monthly monitoring reports shall be submitted to the Colorado River Basin Water Board by the 15<sup>th</sup> day of the following month. Quarterly monitoring reports shall be submitted by January 15<sup>th</sup>, April 15<sup>th</sup>, July 15<sup>th</sup> and October 15<sup>th</sup>. Annual monitoring reports shall be submitted by January 15<sup>th</sup> of the following year.

11. The Discharger shall submit monitoring reports to:

California Regional Water Quality Control Board  
Colorado River Basin Region  
73-720 Fred Waring, Suite 100  
Palm Desert, CA 92260

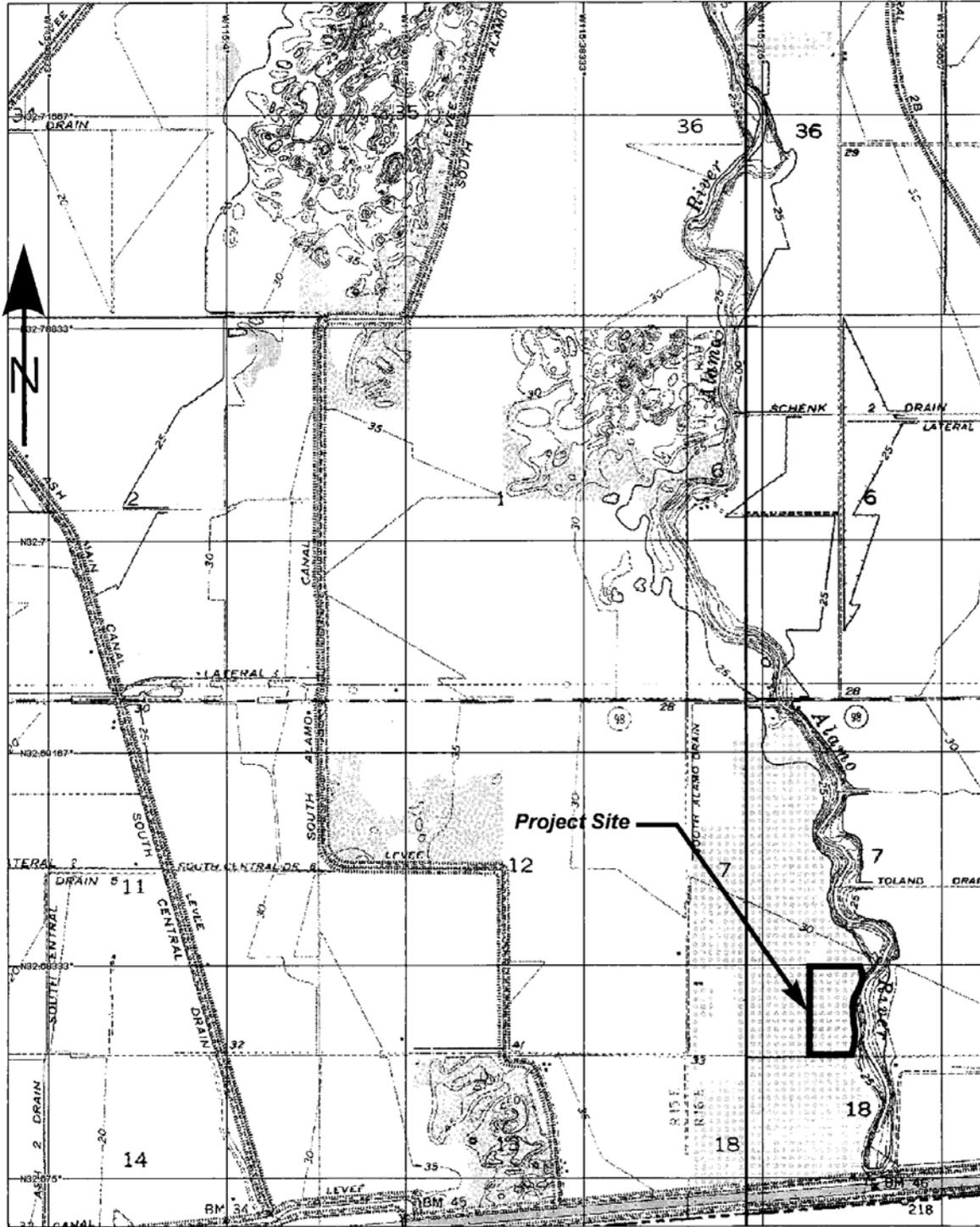
Ordered By:



ROBERT PERDUE  
Executive Officer

1/16/14  
Date

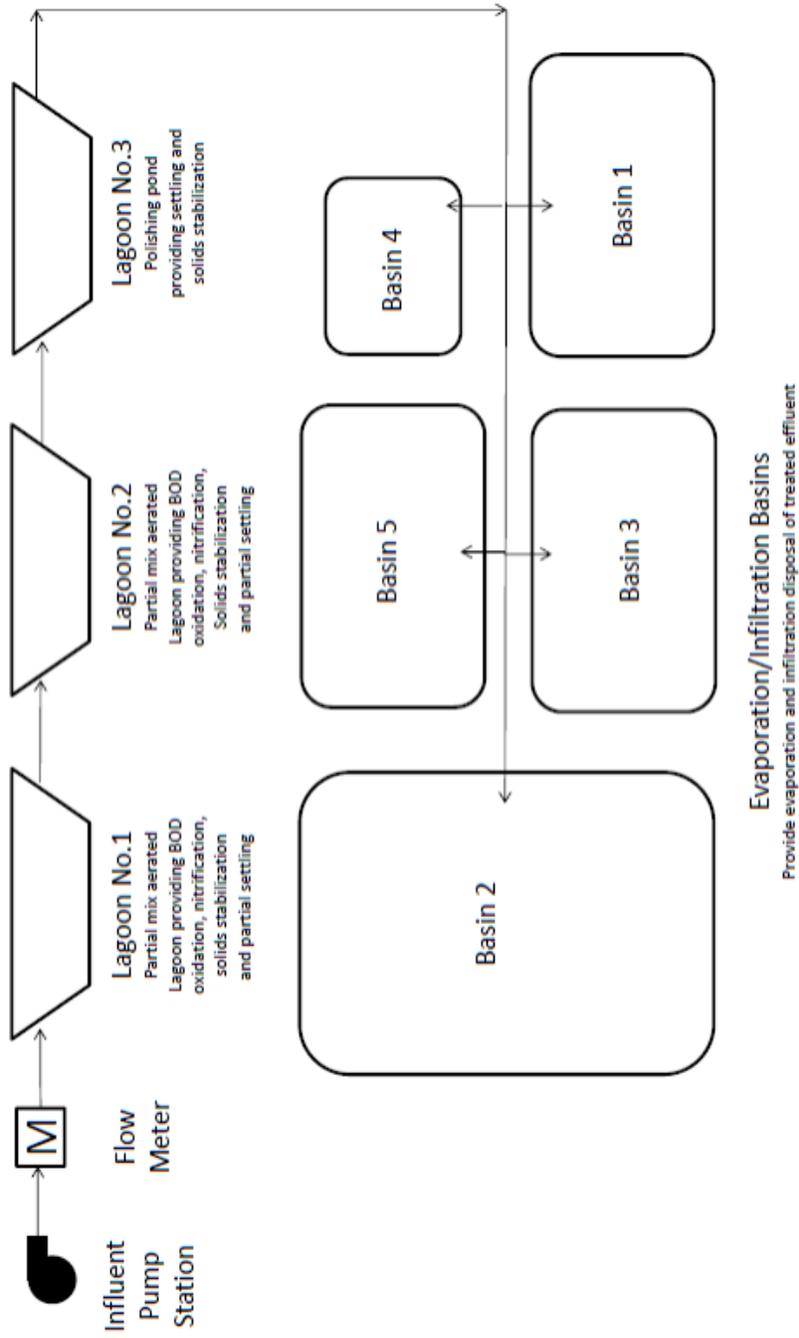
**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
COLORADO RIVER BASIN REGION**

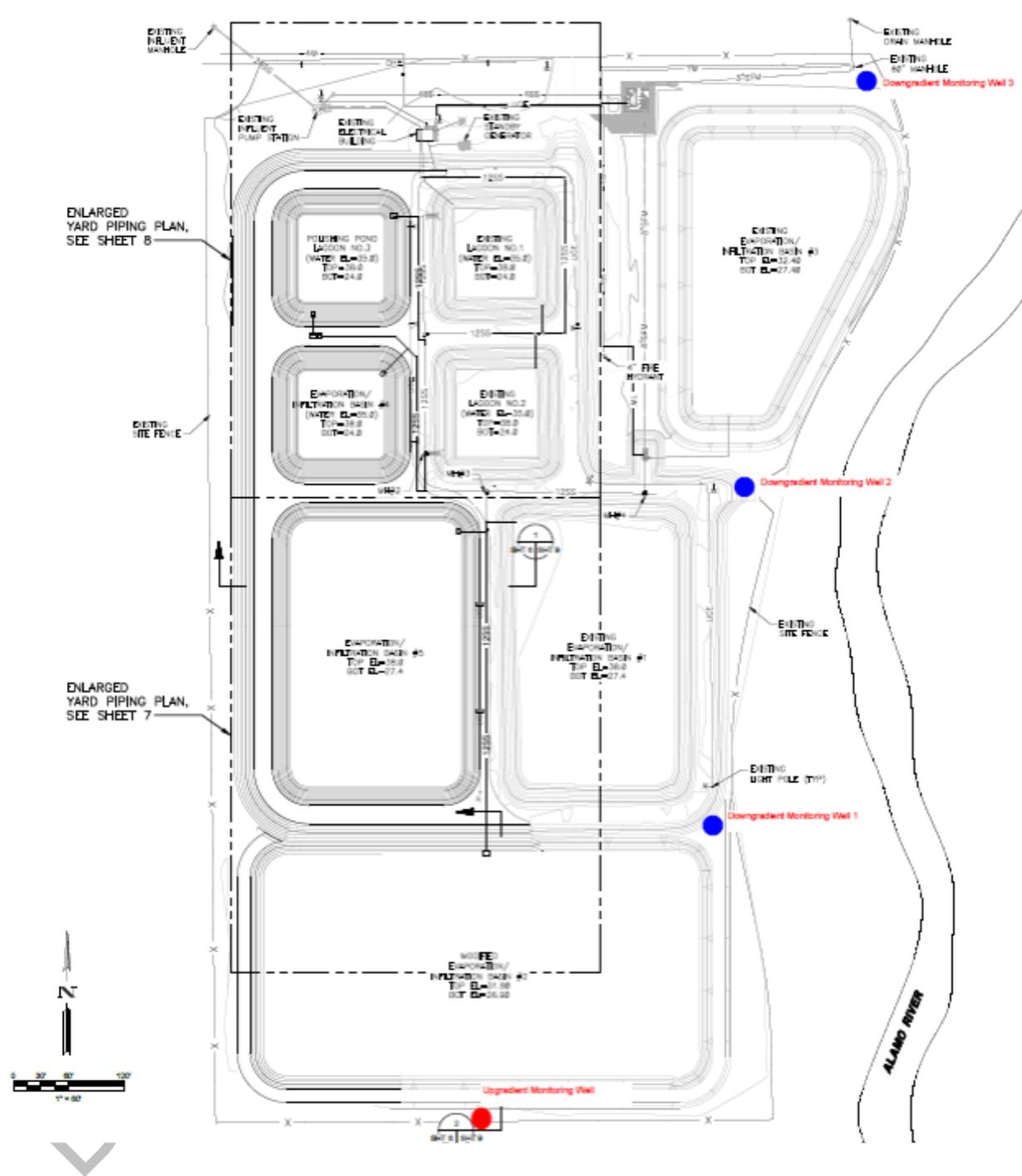


3-D TopoQuads Copyright © 1999 DeLorme Yarmouth, ME 04096 Source Data: USGS 450 ft Scale: 1:22,400 Detail: 13-2 Datum: WGS84

IMPERIAL COUNTY GATEWAY SERVICES AREA, OWNER  
 ROCKY VANDERGRIFF WATER TREATMENT SERVICES, OPERATOR  
 MUNICIPAL WASTEWATER TREATMENT PLANT  
 East of Calexico - Imperial County  
 Discharge Location: 32° 41' 02"N, 115° 22' 18"W

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
COLORADO RIVER BASIN REGION





Attachment C – Monitoring Well Site Plan