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Water Boards

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SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

July 15, 2013

Mr. Michael J. Hall-Mounsey
President/CEO
Ojai Valley School
723 El Paseo Road
Ojai, CA 93023

REVISED MONITORING AND REPORTING PROGRAM NO. 8728 – OJAI VALLEY SCHOOL–UPPER CAMPUS WASTEWATER TREATMENT PLANT, 10820 REEVES ROAD, OJAI, CA (FILE NO. 04-055, ORDER NO. 01-031, SERIES NO. 050, CI NO. 8728, GLOBAL ID WDR100000396)

Dear Mr. Hall-Mounsey:

On June 16, 2004, Ojai Valley School (hereafter Discharger) was enrolled under General Waste Discharge Requirements (WDR) No. 01-031, adopted by the Los Angeles Regional Water Quality Control Board (Regional Board) on February 22, 2001 for the above referenced site located at 10820 Reeves Road, Ojai, California (Site). On July 28, 2009, the Discharger applied to the Los Angeles Regional Water Quality Control Board (Regional Board) for renewal of coverage under the General WDRs Order No. 01-031 due to the abandonment of their conventional septic systems and the construction of an extended aeration wastewater treatment plant. The Monitoring and Reporting Program (MRP) No. 8728 was revised on September 30, 2011, and is still active today.

On February 5, 2013, Ventura Regional Sanitation District, on behalf of Ojai Valley School proposed to modify MRP CI No. 8728 as follows:

1. Reduce the monitoring and sampling frequency for the wastewater treatment plant effluent and groundwater monitoring wells. Ojai Valley School has been sampling the Upper Campus wastewater treatment plant biweekly for one year and the groundwater monitoring wells for eight years.

2. Remove the cross-gradient groundwater monitoring wells from the sampling and monitoring program.

3. The point of compliance for all parameters should be in groundwater well MW3 except for total dissolved solids and sulfate. The point of compliance for the total dissolved solids and sulfate should be the end-of-pipe.

Based on Regional Board staff's review, the MRP CI No. 8728 is modified as following:

1. Based on groundwater monitoring results from 2007 to 2012, the groundwater quality has been in compliance. Therefore, Regional Board staff concurs to reduce the sampling, analyses, and reporting frequency from quarterly to semi-annually except for total dissolved solids and sulfate in the effluent.

2. Monitoring groundwater wells MW1, MW2 and MW3 were constructed to monitor groundwater quality, to conduct monthly measurement of groundwater levels and to create groundwater contour map depicting the hydraulic gradient and direction of groundwater flow across the subject site. The Discharger has been sampling MW1, MW2 and MW3 for the past eight years to monitor groundwater quality and also creating groundwater contour maps. Based on eight years of groundwater sampling and results from the site, groundwater monitoring well MW2 is no longer needed since groundwater monitoring well MW1 (upgradient) and MW3 (downgradient) are appropriate to gauge the Discharger's overall compliance with the Basin Plans groundwater quality objectives. Your request for removal of cross-gradient groundwater monitoring well MW2 from the sampling program is hereby granted.

3. The Discharger's point of compliance for all parameters should be the receiving water (groundwater well MW3) except for total dissolved solids and sulfate. The Discharger's point of compliance for the total dissolved solids and sulfate shall be the effluent "end-of-pipe". Monitoring total dissolved solids and sulfate over a longer period of time is necessary to gauge the efficiency of wastewater treatment plant since it is known that the effluent from wastewater treatment plants adds dissolved solids to surface and groundwater.

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100000396. ESI training video is available at: https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b

Please see Paperless Office Notice for GeoTracker Users, dated December 12, 2011 for further details at:
http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20GT%20Users.pdf

To avoid paying future annual fees, please submit a written request for termination of your enrollment under the general permit in a separate letter if your facility is connected to a sewer and the permit is no longer needed. Be aware that the annual fee covers the fiscal year billing period beginning July 1 and ending June 30, the following year. You will pay the full annual fee if your request for termination is made after the beginning of the new fiscal year beginning July 1.

If you have any additional questions, please contact the Project Manager, Mr. Mercedes Merino at (213) 620-6156 (mmerino@waterboards.ca.gov) or the Unit Chief, Dr. Eric Wu at (213) 576-6683 (ewu@waterboards.ca.gov) regarding this matter.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosures: Revised Monitoring and Reporting Program CI No. 8728

cc (via email): Mr. Andy Hovey Ventura Regional Sanitation District
Mr. Peter Bozek, Environmental Health Division, County of Ventura

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

REVISED MONITORING AND REPORTING PROGRAM CI NO. 8728
FOR
OJAI VALLEY SCHOOL
UPPER CAMPUS WASTEWATER TREATMENT PLANT

ENROLLMENT UNDER GENERAL PERMIT
ORDER NO. 01-031 (SERIES NO. 050)
FILE NO. 04-055

I. REPORTING REQUIREMENTS

A. Ojai Valley School, Upper Campus (hereafter the Discharger) shall implement this revised monitoring program on July 15, 2013 under Regional Board Order No. 01-031. The first monitoring report under this program, for July to September 2013, shall be received at the Regional Board by October 15, 2013.

Monitoring reports shall be received by the dates in the following schedule:

Reporting 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.

C. By January 30 of each year, 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 explain 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 (WDRs).

D. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Public Health Environmental Laboratory Accreditation Program (ELAP). The laboratory must meet the United States Environmental Protection Agency (USEPA) Quality Assurance/Quality Control (QA/QC) criteria. Pollutants shall be analyzed using the methods described in 40 CFR Part 136; or where no methods are specified for a given pollutant, methods approved by the Regional Board shall be utilized.

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 Regional Board Executive Officer (Executive Officer). At least once a year, the Discharger shall submit a list of the analytical methods employed for each test and the associated laboratory QA/QC procedures.

F. 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.

Proper chain of custody procedures must be followed and a copy of the chain of custody documentation shall be submitted with the report.

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 Public Health, 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 chain of custody shall be submitted with the report.

H. For every item where the requirements are not met, the Discharger shall submit a statement of the cause(s), and actions undertaken or proposed which will bring the discharge into full compliance with waste discharge requirements at the earliest possible time, including a timetable for implementation of those actions.

I. The Discharger shall maintain all sampling and analytical results, including strip charts; 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. 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.

K. Any mitigation/remedial activity including any pre-discharge treatment conducted at the site must be reported in the quarterly monitoring report.

L. 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 WDRs. This section shall be located at the front of the report and shall

clearly list all non-compliance with WDRs, as well as all excursions of effluent limitations.

II. DISPOSAL SYSTEM MONITORING REQUIREMENTS

The quarterly reports shall contain the following information:

1. Estimated population served during each month of the reporting period.

2. Results of at least quarterly observations in the disposal areas for any overflow or surfacing of wastes.

III. WATER QUALITY MONITORING REQUIREMENTS

A. Wastewater Treatment System Effluent Monitoring

1. The following tests shall constitute the effluent monitoring program:

Constituent	Units[2]	Type of Sample	Minimum Frequency[3] of Analysis
Total flow[1]	gal/day	recorder	continuous
pH	pH Units	grab	semiannually
Total coliform	MPN/100mL	grab	semiannually
Fecal coliform	MPN/100mL	grab	semiannually
Enterococcus	MPN/100mL	grab	semiannually
Ammonia-N	mg/L	grab	semiannually
Nitrate-N	mg/L	grab	semiannually
Nitrite-N	mg/L	grab	semiannually
Organic nitrogen	mg/L	grab	semiannually
Total nitrogen[4]	mg/L	grab	semiannually
Total dissolved solids	mg/L	grab	Quarterly
Sulfate	mg/L	grab	Quarterly
Chloride	mg/L	grab	semiannually
Boron	mg/L	grab	semiannually

[1]For those constituents that are continuously monitored the Discharger shall report the minimum, maximum, and daily average values.
[2]mg/L=milligrams per liter; MPN/100mL=most probable number per 100 milliliters; NTU= Nephelometric turbidity units
[3]If any constituent exceeds the baseline water quality data, then the frequency of analysis shall increase to monthly until at least three consecutive test results have been obtained. After which if no constituents exceed the baseline, the frequency of analysis shall revert back to the minimum analysis frequency prescribed.
[4]Total nitrogen = nitrate-N + nitrite-N + ammonia-N + Organic Nitrogen

B. Groundwater Monitoring Program

A groundwater monitoring program was approved by the Regional Board in August 2004. The Discharger will continue to implement the groundwater monitoring program. To better evaluate the impact of the discharge to groundwater, upgradient groundwater samples must be collected at the same time as downgradient groundwater samples are collected.

1. The following shall constitute the groundwater monitoring program:

Constituent	Units[1]	Type of Sample	Minimum Frequency[2] of Analysis
pH	pH Units	grab	Quarterly
Total coliform	MPN/100mL	grab	Quarterly
Fecal coliform	MPN/100mL	grab	Quarterly
Enterococcus	MPN/100mL	grab	Quarterly
Ammonia-N	mg/L	grab	Quarterly
Nitrate-N	mg/L	grab	Quarterly
Nitrite-N	mg/L	grab	Quarterly
Organic nitrogen	mg/L	grab	Quarterly
Total nitrogen[3]	mg/L	grab	Quarterly
Total dissolved solids	mg/L	grab	Quarterly
Sulfate	mg/L	grab	Quarterly
Chloride	mg/L	grab	Quarterly
Boron	mg/L	grab	Quarterly

[1]mg/L=milligrams per liter; MPN/100mL=most probable number per 100 milliliters
[2]If any constituent exceeds the water quality objectives, then the frequency of analysis shall increase to monthly until at least three consecutive test results have been obtained. After which if no constituents exceed the baseline, the frequency of analysis shall revert back to quarterly.
[3]Total nitrogen = nitrate-N + nitrite-N + ammonia-N + Organic Nitrogen

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. Semiannually measurement of groundwater levels, recorded to 0.01 feet mean sea level;
d. Groundwater contour map depicting the direction of groundwater flow across the subject tract; and
e. Quarterly calculation of vertical separation of groundwater levels to the bottom of each septic disposal system.

IV. WASTE HAULING REPORTING

In the event that waste sludge, septage, or other wastes are hauled offsite, the name and address of the hauler shall be reported, along with types and quantities hauled during the reporting period and the location of final point of disposal. In the event that no wastes are hauled during the reporting period, a statement to that effect shall be submitted.

V. MONITORING FREQUENCIES

Specifications in this monitoring program are subject to periodic revisions. Monitoring requirements may be modified or revised by the Executive Officer based on review of monitoring data submitted pursuant to this Order. Monitoring frequencies may be adjusted to a less frequent basis or parameters and locations dropped by the Executive Officer if the Discharger makes a request and the request is backed by statistical trends of monitoring data submitted.

VI. ELECTRONIC SUBMITTAL OF INFORMATION

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100000396.

VII. CERTIFICATION STATEMENT

Each report shall contain the following completed 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)"

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: Samuel Unger

Samuel Unger, PE
Executive Officer

Date: July 15, 2013