

State Water Resources Control Board

January 14, 2019

Ms. Lucia McGovern
Deputy Director of Public Works
City of Camarillo/ Camarillo Sanitary District
601 Carmen Drive
Camarillo, CA 93010

Dear Ms. McGovern:

ISSUANCE OF AMENDED TIME SCHEDULE ORDER (TSO) – CAMARILLO SANITARY DISTRICT (CAMARILLO SD), CAMARILLO WATER RECLAMATION PLANT (CAMARILLO WRP), (Order No. R4-2011-0126-A05, CI-1278)

In a letter dated November 28, 2018, the Los Angeles Regional Water Quality Control Board transmitted a tentative Amended Time Schedule Order (TSO), which was circulated for public comment.

The Los Angeles Regional Water Quality Control Board has delegated to its Executive Officer all powers and duties authorized by California Water Code (CWC) Section 13300. The Executive Officer of the Los Angeles Regional Water Quality Control Board, after having reviewed the written comments received regarding the proposed changes, made minor modifications to the TSO in response to those comments and administratively issued the enclosed amended TSO No. R4-2011-0126-A05, for the Camarillo Sanitary District's Camarillo Water Reclamation Plant.

If you have any questions, please contact Veronica Cuevas at (213) 576-6662 or via email at veronica.cuevas@waterboards.ca.gov or me at (213) 576-6616 or via email at jeong-hee.lim@waterboards.ca.gov.

Sincerely,



Jeong-Hee Lim, Ph.D., P.E., Chief
Municipal Permitting Unit (NPDES)
Los Angeles Regional Water Quality Control Board

Enclosures

cc: See mailing list

MAILING LIST

Environmental Protection Agency, Region 9, Permits Branch (WTR-2-3)
NOAA, National Marine Fisheries Service
Department of Interior, U.S. Fish and Wildlife Service
State Water Resources Control Board, Office of Chief Counsel
Afrooz Farsimadan, State Water Resources Control Board, NPDES Unit
Department of Fish and Wildlife, Region 5
State Coastal Conservancy
California State Parks and Recreation
California Coastal Commission, South Coast Region
Ventura County Watershed Protection
Ventura Coast Keeper
Heal the Bay
Los Angeles Waterkeeper
Natural Resources Defense Council
Environment Now

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

TIME SCHEDULE ORDER NO. R4-2011-0126-A05

**REQUIRING CAMARILLO SANITARY DISTRICT
(CAMARILLO WATER RECLAMATION PLANT)
TO COMPLY WITH REQUIREMENTS PRESCRIBED IN
ORDER NO. R4-2014-0062-A01
(NPDES PERMIT NO. CA0053597)**

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

1. Camarillo Sanitary District (hereafter Camarillo SD or Permittee) owns and operates the Camarillo Water Reclamation Plant (hereafter Camarillo WRP), a tertiary wastewater treatment plant located at 150 East Howard Road, Camarillo, California.
2. The Camarillo WRP discharges tertiary-treated wastewater under waste discharge requirements contained in Order No. R4-2014-0062-A01, which was adopted by this Regional Water Board on May 14, 2014 and amended on July 9, 2015. Order No. R4-2014-0062-A01 serves as a permit under the National Pollutant Discharge Elimination System (NPDES No. CA0053597) and regulates the discharge of treated wastewater to Conejo Creek, a water of the United States and of the State of California, within the Calleguas Creek Watershed (CCW).
3. Eleven of the fourteen reaches of the CCW were identified on the 2002 and the 2006 Clean Water Act (CWA) Section 303(d) List of water quality limited segments as impaired due to elevated levels of boron, chloride, sulfate, or total dissolved solids (TDS). These constituents are commonly referred to as salts. The reach to which Camarillo SD discharges remains on the most recent 303(d) List, *2014/2016 California List of Water Quality Limited Segments (2014/2016 303(d) List)*, which was approved by the United States Environmental Protection Agency (USEPA) on April 6, 2018. It is grouped under Category 4A of the 303(d) List because the impairments are being addressed by a USEPA-approved TMDL. Salts primarily impact two beneficial uses: agricultural supply (AGR) and ground water recharge (GWR).

BACKGROUND/HISTORY

4. Discharges from the Camarillo WRP were previously regulated under Order No. R4-2003-0079, adopted by this Regional Water Board on June 5, 2003, which prescribed the following final effluent limitations for protection of the AGR and GWR beneficial uses:

Constituent	Units	Effluent Limitations	
		Monthly Average	Daily Maximum
Total dissolved solids (TDS)	mg/L	850	--
	lbs/day	47,900	--

July 14, 2011

Corrected: 6/17/14

Amended: 9/12/13; 5/8/14; 12/17/15; 12/27/17; 01/14/19

Constituent	Units	Effluent Limitations	
		Monthly Average	Daily Maximum
Sulfate	mg/L	250	--
	lbs/day	14,000	--
Chloride (routine conditions)	lbs/day	2,300 ¹	--
Chloride (drought conditions)	lbs/day	2,200 ²	--

The final effluent limitations for TDS and sulfate were based upon Water Quality Objectives in the *Water Quality Control Plan, Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan). The final effluent limitations for chloride were based upon the Waste Load Allocations (WLAs) promulgated by USEPA in 2002 in the *Calleguas Creek Chloride Total Maximum Daily Load (Chloride TMDL)*.

- Also on June 5, 2003, concurrent with adoption of Order No. R4-2003-0079, this Regional Water Board adopted Time Schedule Order (TSO) No. R4-2003-0080, which prescribed the following interim effluent limitations for chloride:

Constituent	Units	Interim Effluent Limitations	
		Monthly Average	Daily Maximum
Chloride	mg/L	--	190
	lbs/day	--	10,700

- On July 7, 2003, the Camarillo SD filed a petition with the State Water Resources Control Board (State Water Board) seeking, in part, review of the chloride effluent limitations in Order No. R4-2003-0079 and TSO No. R4-2003-0080. Camarillo SD later requested that the State Water Board issue a stay of those limitations.
- On October 20, 2003, Camarillo SD, the City of Thousand Oaks, the City of Simi Valley and this Regional Water Board entered into a stipulation entitled *Stipulation for Further Order Issuing Stay*, which stayed the final chloride effluent limitations in the NPDES permits, as well as provisions pertaining to chloride limits in TSOs, for those three wastewater treatment plants. Specifically to the Camarillo WRP, the stipulation stayed the final chloride effluent limitations in Order No. R4-2003-0079 and the interim chloride effluent limitations in TSO No. R4-2003-0080. On November 19, 2003, the State Water Board adopted Order WQO 2003-0019 approving the stipulation.
- On April 2, 2007, the Executive Officer, by virtue of his delegated authority from the Regional Water Board, issued TSO No. R4-2007-0010 to the Camarillo SD for its Camarillo WRP. The TSO, which expired on January 31, 2011, contained the following performance-based

¹ This is the chloride waste load allocation (WLA) that applies under routine conditions, pursuant to the *Calleguas Creek Chloride Total Maximum Daily Load (Chloride TMDL)* promulgated by the United States Environmental Protection Agency (USEPA) on March 22, 2002.

² This is the chloride WLA that applies under drought conditions, pursuant to the *Chloride TMDL* promulgated by USEPA on March 22, 2002.

interim effluent limitations calculated using the ninety-fifth percentile of the Camarillo WRP's effluent data from August 2003 through May 2006:

Constituent	Units	Interim Effluent Limitations	
		Monthly Average	Daily Maximum
TDS	mg/L	1016	--
	lbs/day	57,200	--
Sulfate	mg/L	265	--
	lbs/day	14,900	--

An interim effluent limitation for chloride was not provided in TSO No. R4-2007-0010 because the stipulated stay on the chloride effluent limitation approved by the State Water Board remained in effect.

9. On October 4, 2007, the Regional Water Board adopted Resolution No. R4-2007-016, Amendment to the *Water Quality Control Plan for the Los Angeles Region to Incorporate a Total Maximum Daily Load for Boron, Chloride, Sulfate, and TDS (Salts) for Calleguas Creek Watershed (Salts TMDL)*. The Salts TMDL, which became effective on December 2, 2008, contains the following interim and final WLAs for the Camarillo WRP:

Constituent	Interim Monthly Average WLA (mg/L)	Final WLA (lb/day) ³
TDS	1012	850* Q - AF
Sulfate	283	250* Q - AF
Chloride	216	150* Q - AF
Boron	N/A	N/A

The WLAs for chloride contained in the Regional Water Board's *Salts TMDL* superseded the WLAs for chloride contained in the 2002 USEPA-promulgated *Chloride TMDL*.

10. In 2008, tentative waste discharge requirements prepared for the Camarillo WRP, and for other wastewater treatment plants in the Calleguas Creek watershed, were provided to interested persons and comments were solicited. However, Regional Water Board staff ultimately chose not to take those tentative waste discharge requirements to the Regional Water Board for consideration since, at that time, the State Water Board was in the process of developing a state-wide policy for chronic toxicity that could impact how the Regional Water Board implements Resolution No. R4-2005-009, Amendment to the *Water Quality Control Plan for the Los Angeles Region to Incorporate a Total Maximum Daily Load for Toxicity, Chlorpyrifos, and Diazinon in Calleguas Creek, its Tributaries, and Mugu Lagoon (Toxicity TMDL)*, in these waste discharge requirements. As of the date of this amendment to this Time Schedule Order, the State Water Board's plan for chronic toxicity is still under development.

³ AF represents the adjustment factor, which equals the difference between the minimum salts export requirement and the actual salts export.

Q represents the POTW flow at the time the water quality measurement is collected and a conversion factor to lbs/day based on the units of measurement for the flow.

In the past, this issue had delayed consideration of a renewed permit for Camarillo WRP and the other wastewater treatment plants in the Calleguas Creek watershed. As a result, prior to adoption of Order No. R4-2014-0062, the Regional Water Board had not incorporated the interim and final WLAs in the 2008 *Salts TMDL* as effluent limitations in the NPDES permit for the Camarillo WRP.

11. On December 7, 2010, the Camarillo SD submitted a letter to the Regional Water Board requesting an extension of the TDS and sulfate interim effluent limits in TSO No. R4-2007-0010. The Camarillo SD listed the following reasons to justify their request:
 - a. Camarillo SD's current treatment processes are unable to treat dissolved salts, such as TDS, sulfate, and chloride, in the potable water supply.
 - b. Camarillo SD and other stakeholders within Calleguas Creek Watershed have developed regional solution strategies to address the salt accumulation problem that is impairing surface waters, such as:
 - i. finding locations for brackish groundwater treatment facilities,
 - ii. constructing a regional salinity management pipeline also known as a "brine line", and
 - iii. increasing recycled water usage.

As an attachment to their letter, Camarillo SD submitted tabulated effluent water quality data for TDS and sulfate from January 2007 to October 2010.

12. TSO No. R4-2007-0010 expired on January 31, 2011. At that time, Camarillo SD was not eligible for another TSO under California Water Code (CWC) section 13385(j)(3)(B)(i) that would shield Camarillo SD from mandatory minimum penalties for violations of the final effluent limitations for TDS and sulfate, because Order No. R4-2003-0079 did not contain new, more stringent, or modified effluent limitations when compared to those found in the previous permit.
13. To provide Camarillo SD with higher interim effluent limitations based on the interim WLAs in the *Salts TMDL*, Regional Water Board staff proceeded to prepare a tentative NPDES permit, circulated it for public comment, received comments, responded to those comments, subsequently distributed a revised tentative NPDES permit, and noticed consideration of the permit for renewal at the April 14, 2011, Regional Water Board meeting.
14. On April 14, 2011, the Regional Water Board held a hearing to consider adoption of the proposed tentative NPDES permit for the Camarillo WRP. However, Camarillo SD testified that the interim effluent limits for salts (such as TDS, sulfate and chloride), based upon the interim WLAs in the *Salts TMDL*, would be unattainable during the period of time in which the Permittee has committed to constructing and finishing capital improvement projects to comply with the WLAs specified in the *Salts TMDL*. Camarillo SD requested higher performance-based interim effluent limits, stating that the concentrations of chloride, TDS, and sulfate in their potable water supply have increased since the time that the *Salts TMDL* was developed. The Regional Water Board directed its staff to pursue alternatives with the Permittee to resolve salts issues while implementing the regional salinity management pipeline solution.

15. On May 6, 2011, Camarillo SD submitted a letter requesting a TSO under CWC section 13385(j)(3)(B)(iii) and included the following supporting documentation:
 - a. A chronology of events that explained the City of Camarillo's unanticipated increase on the reliance of local groundwater as a source of potable water, that resulted from mandatory reductions in water use instituted by Metropolitan Water District (MWD) in July 2009. In order to implement the *Water Supply Action Plan* that was adopted by the MWD Board of Directors, member MWD agencies such as the Calleguas Municipal Water District supplied less imported water to Camarillo. Subsequently, Camarillo relied increasingly more on local groundwater which has a higher salt content than imported water. This ultimately resulted in unavoidable composition changes in Camarillo's potable water, influent and effluent. Consequently, Camarillo SD has exceeded its final effluent limitations by a larger margin;
 - b. Water quality data for its blended potable water supply (consisting of local groundwater from wells and imported water from MWD, the only available sources of potable water available to Camarillo) that showed, in Table 3 of their letter, that average concentrations for TDS, sulfate and chloride increased by 32%, 31%, and 20%, respectively, when comparing data between the periods of January 2004 to December 2006 and January 2007 to March 2011;
 - c. In an attachment to their letter titled *Groundwater vs. Import Water*, Camarillo SD provided quantity data for its blended water supply that showed that the amount of imported water from MWD has been steadily decreasing (by 728 acre-feet a year from 2008 to 2009, and by 1037 acre-feet a year from 2009 to 2010);
 - d. Additional final effluent data for chloride, TDS, and sulfate from November 2010 to March 2011; and,
 - e. Milestones and completion dates for capital improvement projects, which will take longer than thirty days to install and put into operation, including:
 - i. Constructing a connection from Camarillo WRP to Calleguas Municipal Water District's brine line by December 2013, and discharging to the brine line achieving compliance with the salts final effluent limitations between June and December 2014; and
 - ii. Constructing a connection from the Camarillo well desalting facilities to the Calleguas Municipal Water District's brine line by December 2015.
16. In response to Camarillo SD's 2011 request, the Regional Water Board issued TSO No. R4-2011-0126 on July 14, 2011.
17. On July 10, 2013, Camarillo SD submitted a letter requesting an additional year to complete the milestone deadlines included on provision 35 of this TSO. Camarillo SD staff informed Regional Water Board staff that additional time was needed to: design and construct a metering station for the brine line connection; amend the CEQA document for their project to address comments received during the public review period; conduct additional technical studies; perform biological/habitat fieldwork; gather additional stream flow information; and re-

circulate the CEQA document for public comment. Regional Water Board staff evaluated the request and modified completion dates as requested, granting an additional year.

18. Camarillo SD's conditions are unique because:
 - a. Their discharge is located a few miles upstream of a tidally-influenced reach of Calleguas Creek;
 - b. Camarillo SD worked effectively for many years to develop a regional solution to remedy salt impairments; and,
 - c. The solution involves desalting groundwater and building a regional brine line which will resolve surface water impairments as well as improve groundwater quality in the watershed.

19. In response to Camarillo SD's 2013 request, the Regional Water Board amended the TSO by issuing TSO No. R4-2011-0126-A01 on September 12, 2013.

CURRENT STATUS

20. NPDES Order No. R4-2014-0062, adopted by the Regional Water Board on May 8, 2014, prescribes the effluent limitations for TDS, chloride, and sulfate based upon the *Salts TMDL* presented in the Table below.

Table 1. Final Effluent Limitations

Parameter	Units	Effluent Limitations		
		Average Monthly	Average Weekly	Maximum Daily
Total dissolved solids (dry weather ⁴)	lbs/day	51,400 ⁵	--	--
Total dissolved solids (wet weather ⁴)	mg/L	850	--	--

⁴ This dry-weather final effluent limitation for chloride shall apply on January 1, 2016. See section VII.O. of the NPDES Order for definition of dry- and wet-weather.

⁵ These final effluent limitations are consistent with the following *Salts TMDL* Waste Load Allocations: (850 x Q – AF) for TDS; (250xQ – AF) for sulfate; and (150xQ – AF) for chloride, where:

Q represents the POTW effluent flow at the time the water quality measurement is collected and a conversion factor to lbs/day based on the units of measure for the flow.

AF represents the adjustment factor, which equals the difference between the minimum salts export requirement and the actual salts export. The minimum salts export requirement for Chloride = 460 lbs/day. The AF term is equal to zero since the Regional Board has not approved an AF for a facility. As a result, the AF term drops out of the equation, and the final effluent limitations are expressed as follows:

$$\begin{aligned}
 \text{Chloride, lbs/day} &= 150 \times Q = 150 \times 7.25 \times 8.34 = 9,070 \\
 \text{TDS, lbs/day} &= 850 \times Q = 850 \times 7.25 \times 8.34 = 51,400 \\
 \text{Sulfate, lbs/day} &= 250 \times Q = 250 \times 7.25 \times 8.34 = 15,100
 \end{aligned}$$

Parameter	Units	Effluent Limitations		
		Average Monthly	Average Weekly	Maximum Daily
Sulfate (dry weather ⁴)	lbs/day	15,100 ⁵	--	--
Sulfate (wet weather ⁴)	mg/L	250	--	--
Chloride (dry weather ⁴)	lbs/day	9,070 ⁵	--	--
Chloride (wet weather ⁴)	mg/L	150	--	--

21. Upon the effective date of NPDES Order No. R4-2014-0062, the stay for the chloride effluent limitations, associated with the former NPDES permit and TSO, contained in the State Water Board's WQO No. 2003-0019 dissolved.
22. The Discharger cannot consistently meet the final effluent limitations listed above in Table 1 on their respective compliance dates.
23. On February 13, 2014, the Discharger requested in writing a TSO for TDS, chloride and sulfate, under CWC section 13385(j)(3)(B)(iii) and included supporting documentation indicating that the conditions described in Finding 15 still continue.
24. On April 14, 2014, the Discharger requested in writing higher interim limits for salts based on anticipated changes to its potable water supply. Camarillo SD is concerned that the effluent concentrations may exceed final effluent limitations due to the new supply of Colorado River Water which is higher in salt content than State Project Water.
25. Regional Water Board staff requested specific information regarding the change in potable water supply for the City of Camarillo. On April 25, 2014, the Discharger submitted additional data indicating that its potable water supply was going to change to include 40% groundwater and 60% imported water, where the imported water supply would be changing from 100% State Project Water to 80% State Project Water and 20% Colorado River Water. Correspondence indicated that during 2013, Colorado River Water's concentrations of chloride, TDS, and sulfate are 9.2 mg/L, 241 mg/L, and 152 mg/L higher than State Project Water concentrations, respectively.
26. In response to Camarillo SD's 2014 request, the Regional Water Board amended the TSO a second time by issuing TSO No. R4-2011-0126-A02 on May 8, 2014.
27. On July 9, 2015, the Regional Water Board adopted Order No. R4-2014-0062-A01, which amended the chronic toxicity requirements in Order No. R4-2014-0062.
28. Camarillo SD has been making progress towards complying with the terms of this TSO (and amendments thereto) by completing several sections of the capital improvement project and by submitting timely progress reports regarding the status of the project. Camarillo SD notified the Regional Water Board that they encountered difficulties in obtaining the necessary easements to be able to construct two segments of the salinity management pipeline. On September 18, 2015, Camarillo SD requested in writing a 12-month extension of their TSO deadlines due to delays experienced in attempting to obtain voluntary right-of-way easements.

29. On September 24, 2015, Camarillo SD submitted additional information to the Regional Water Board documenting the status of the property rights and easement acquisition process. Although one of the two property owners was close to negotiating the terms of an easement, the other was not. Camarillo SD needed additional time to continue negotiating with property owners and, if necessary, to file an Eminent Domain Complaint in Ventura County Superior Court to acquire an easement to continue work on the construction of the last two segments of the salinity management pipeline. Based on this information, the Regional Water Board determined that a 12-month extension of certain interim milestone deadlines in this TSO was warranted.
30. In response to Camarillo SD's 2015 request, the Regional Water Board amended the TSO a third time by issuing TSO No. R4-2011-0126-A03 on December 17, 2015.
31. On September 7, 2017, Camarillo Sanitary District submitted a letter to the Regional Water Board requesting an extension of the December 31, 2017, final deadline contained in TSO No. R4-2011-0126-A03 because it was evaluating an alternative use of the excess tertiary treated effluent from the Camarillo WRP. Regional Water Board evaluated the request and on September 28, 2017, requested additional information.
32. On October 9, 2017, Camarillo SD submitted supplemental information, including milestones with proposed completion dates, and responded to questions raised by Regional Water Board staff. Originally, Camarillo SD planned on discontinuing its surface water discharge by discharging its excess tertiary-treated effluent to the Calleguas Municipal Water District's brine line, and thereby complying with the dry-weather WLAs in the *Salts TMDL*. On June 14, 2017, the City of Camarillo entered into an agreement with Camrosa Water District ("Customer") to provide them with recycled water for re-distribution and beneficial reuse, as irrigation water on agricultural fields, within the Camrosa Water District's service area. This project is referred to as the *Camarillo SD Interconnection Project*. To implement this alternative use project, additional time was required so that Camarillo SD could complete the CEQA process associated with their second supplemental EIR, obtain right-of-way easements for the pipeline that will convey recycled water to Camrosa Water District's recycled water distribution system, install the connective recycled water pipeline, install a recycled water metering service, and seek modifications of existing permits associated with the recycled water re-distribution proposal.
33. In response to Camarillo SD's 2017 request, the Regional Water Board amended the TSO a fourth time by issuing TSO No. R4-2011-0126-A04 on December 27, 2017.
34. On October 31, 2018, Camarillo SD submitted a letter to the Regional Water Board requesting an extension of the December 31, 2018, final deadline contained in TSO No. R4-2011-0126-A04 because it is continuing to work with Camrosa Water District and Pleasant Valley County Water District (Pleasant Valley CWD) to obtain regulatory approval from both the State Water Board's Division of Drinking Water (DDW) and the Regional Water Board for the *Camarillo SD Interconnection Project*. Additional time is needed to complete Site Use Reports for the new recycled water users; submit the Site Use Reports to DDW for approval; submit a Report of Waste Discharge (ROWD) to the Regional Water Board for modification of Camrosa Water District's Waste Discharge Requirements (WDRs) and Title 22 Water Reclamation Requirements (WRRs) Order No. R4-2015-0030; and, complete construction of the infrastructure for delivery and distribution of recycled water to the new use sites. Regional

Water Board staff met with Camarillo SD, Camrosa Water District, and Pleasant Valley CWD, on November 14, 2018, to discuss the project and gather additional information.

On December 21, 2018, Camarillo SD submitted a letter to the Regional Water Board, requesting an extension of the January 2019 interim milestone deadline, contained in the Tentative Amended TSO No. R4-2011-0126-AXX dated November 28, 2018. Camarillo informed the Regional Water Board that it will not be able to award the construction contract as previously planned because its City Council directed Camarillo staff to re-design certain aspects of the Pleasant Valley Desalter Project and return to seek City Council approval at a later date. The re-design efforts will result in a six to nine-month delay, after which the bidding phase will resume.

35. Camarillo SD has completed the following milestones required by TSO No. R4-2011-0126 and subsequent TSO amendments:

Task	Completion Date
Submitted a Pollution Prevention Plan (PPP) to the Regional Water Board	August 6, 2014
Installed Recycled Water Metering Device	December 31, 2017
Procured right-of-way for Pipeline that will connect Camarillo SD and Camrosa Water District Recycled Water Systems	February 1, 2018
Obtained bids for Recycled Water Pipeline Installation	February 28, 2018
Submitted Draft Salt and Nutrient Management Plan to the Regional Water Board for review	June 19, 2018
Installed Recycled Water Pipeline	June 30, 2018

36. Section 13300 of the CWC states:

“Whenever a regional board finds that a discharge of waste is taking place or threatening to take place that violates or will violate requirements prescribed by the regional board, or the state board, or that the waste collection, treatment, or disposal facilities of a discharger are approaching capacity, the board may require the discharger to submit for approval of the board, with such modifications as it may deem necessary, a detailed time schedule of specific actions the discharger shall take in order to correct or prevent a violation of requirements.”

37. Based on monitoring data, the Permittee cannot consistently achieve compliance with the final effluent limitations for TDS, chloride, and sulfate in Order No. R4-2014-0062-A01. Accordingly, pursuant to CWC section 13300, a discharge of waste is taking place and/or threatens to take place that violates requirements prescribed by the Regional Water Board.
38. Water Code section 13385, subdivisions (h) and (i), require the Regional Water Board to impose mandatory minimum penalties upon dischargers that violate certain effluent limitations. Section 13385(j)(3) exempts violations of an effluent limitation from mandatory minimum penalties "where the waste discharge is in compliance with either a cease and

desist order issued pursuant to Section 13301 or a time schedule order issued pursuant to Section 13300, *if all of the [specified] requirements are met.*" (emphasis added).

39. In accordance with CWC section 13385(j)(3)(B)(iii), the Regional Water Board finds that: (a) unanticipated changes in the quality of the municipal or industrial water supply available to the Permittee are the cause of unavoidable changes in the composition of the waste discharge, (b) the changes in the composition of the waste discharge are the cause of the inability to comply with the final effluent limitations for chloride, TDS and sulfate, (c) no alternative water supply is reasonably available to the Permittee, and (d) new or modified measures to control the composition of the waste discharge cannot be designed, installed, and put into operation within 30 calendar days.
40. Pursuant to California Water Code section 13385 (j)(3)(C)(ii)(II), a regional board may extend the time schedule for an additional period not exceeding five years in length, if the discharger demonstrates that the additional time is necessary to comply with the effluent limitation.

The time schedule for compliance with the TDS, chloride, and sulfate effluent limitations as provided in this Order exceeds five years from the date that a time schedule for compliance was initially provided in TSO No. R4-2011-0126-A02. In this case, the Regional Water Board finds that the additional period provided to achieve compliance with the TDS, chloride, and sulfate effluent limitations is justified because Camarillo SD has demonstrated that additional time is necessary to comply with these effluent limitations as noted in Findings 34 through 39.

41. Since the time schedule for completion of the actions necessary to bring the waste discharge into compliance exceeds one year from the effective date of this TSO, this TSO includes interim requirements and the dates for their achievement. The interim requirements include both interim effluent limitations for TDS, chloride, and sulfate and actions and milestones leading to compliance with the final effluent limitation for these pollutants. This TSO does not exceed five years.
42. This TSO establishes interim effluent limits for chloride, TDS, and sulfate and requires the Permittee to undertake specific actions to achieve compliance with the final effluent limitations for TDS, chloride, and sulfate in Order No. R4-2014-0062-A01. The established time schedule is as short as possible, taking into account the technological, operational, and economic factors that affect the design, development, and implementation of the control measures that are necessary to comply with the final effluent limitations for TDS, chloride, and sulfate. The Permittee is on a path to compliance following a two-pronged approach. In the short term, Camarillo SD will maximize distribution of recycled water by implementing the *Camarillo SD Interconnection Project*. In the long term, Camarillo SD will build a regional desalter to treat the groundwater portion of their potable water supply with reverse osmosis (RO) and dispose of the brine via the regional salinity management pipeline and associated facilities.
43. The monthly average interim effluent limits for TDS, chloride, and sulfate prescribed in this TSO are performance-based values set at the ninety-fifth percentile, derived from final effluent data, using MINITAB, the same statistical software used in the *Salts TMDL* development.

44. CWC section 13385(j)(3)(D) requires the Permittee to prepare and implement a Pollution Prevention Plan (PPP) pursuant to CWC section 13263.3. Therefore, a PPP will be necessary for chloride, TDS and sulfate.
45. A TSO is appropriate in these circumstances to allow time for the Permittee to complete capital improvement projects that will bring the Camarillo WRP into compliance with the final effluent limits for chloride, TDS, and sulfate. These capital improvement projects cannot be designed, installed, and put into operation within 30 calendar days. The temporary chloride, TDS, and sulfate exceedances allowed by this TSO are in the public interest given the significant environmental benefits associated with beneficially reusing tertiary-treated effluent and promptly achieving compliance with the final effluent limitations for these pollutants.
46. Pursuant to CWC section 13385(j)(3), full compliance with the requirements of this TSO exempts the Permittee from mandatory minimum penalties only for violations of the final effluent limitations for TDS, chloride, and sulfate in Order No. R4-2014-0062-A01 that occur after May 8, 2014.
47. This TSO concerns an existing facility and does not significantly alter the status with respect to the facility. This TSO is also being taken for the protection of the environment. Therefore, issuance of this TSO is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21100, et.seq.) in accordance with sections 15301 and 15321(a)(2) of title 14 of the California Code of Regulations (CCR).
48. The Regional Water Board has notified the Permittee and interested agencies and persons of its intent to issue this TSO concerning compliance with waste discharge requirements. The Regional Water Board considered all comments pertinent to this matter.
49. Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with CWC section 13320 and CCR, title 23, sections 2050 and following. The State Water Board must *receive* the petition by 5:00 p.m., 30 days after the Regional Water Board action, except that if the thirtieth day following the action falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

IT IS HEREBY ORDERED that, pursuant to CWC section 13300, Camarillo SD, as owner and operator of the Camarillo WRP, shall comply with the requirements listed below to ensure compliance with the final effluent limitations for TDS, chloride, and sulfate contained in Order No. R4-2014-0062-A01:

1. Comply immediately with the following interim effluent limits which will apply all year round, and which shall be deemed effective from May 8, 2014 to December 31, 2019:

Constituent	Units	Monthly Average	Daily Maximum
TDS	mg/L	1242 ⁶	--
	lbs/day ⁷	75,100	--
Sulfate	mg/L	359 ⁶	--
	lbs/day ⁷	21,700	--
Chloride	mg/L	351 ⁸	--
	lbs/day ⁷	21,200	--

If the analytical result of a single sample, monitored monthly, exceeds the monthly average interim effluent limitation for that constituent, Camarillo SD may collect up to four additional samples, at approximately equal intervals during that calendar month, and average all of the results collected during a given calendar month, to determine compliance with the monthly average interim effluent limitation.

- Complete the capital improvement projects according to the schedule proposed by Camarillo SD in their letters and other correspondence dated July 10, 2013, September 18, 2015, October 9, 2017, November 7, 2017, October 31, 2018, and December 21, 2018, with Regional Water Board modifications, as follows:

Item	Completion Date
Submit a Site Use Report to the Regional Water Board and to the State Water Board's Division of Drinking Water	February 28, 2019
Award construction contract for Northeast Pleasant Valley (NPV) Desalter and its connection to the Calleguas Municipal Water District brine line	December 31, 2019

- Achieve full compliance with the final effluent limitations for TDS, chloride, and sulfate as soon as possible, but no later than December 31, 2019.
- Submit quarterly progress reports of efforts taken by the Permittee towards achieving compliance with the final effluent limits for chloride, TDS, and sulfate. The reports shall summarize the progress to date, activities conducted during that quarter, and the activities planned for the upcoming quarters. The reports shall also state whether or not Camarillo SD was in compliance with the interim effluent limitations for chloride, TDS, and sulfate during the reporting period. Each quarterly report shall be received by the Regional Water Board by the 15th day of the first month following the reporting period (January 15, April 15,

⁶ This interim effluent limitation is based on effluent performance data from February 2007 through October 2012 for the Camarillo WRP. Consistent with the procedure contained in *Appendix E of USEPA's Technical Support Document For Water Quality-based Toxics Control* (USEPA's TSD), the monthly average was set at the 95th percentile. The interim limit was derived statistically from a probability plot, using the MINITAB statistical software, Release 14.

⁷ The mass emission rates are based on the existing plant design flow rate of 7.25 million gallons per day (mgd), and are calculated as follows: Flow (mgd) x Concentration (mg/L) x 8.34 (conversion factor) = mass emission rate (lbs/day). During wet-weather storm events in which the flow exceeds the design capacity, the mass discharge rate limitations shall not apply, and concentration limitations will provide the only applicable effluent limitations.

⁸ This interim effluent limitation is based on the maximum effluent concentration (MEC) from January 1, 2001 to March 9, 2014.

July 15, and October 15). The first progress report shall be received by the Regional Water Board by April 15, 2019, and will cover the months of January 2019 through March 2019.

5. Any person signing a document submitted under this TSO shall make the following certification:

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

6. If the Permittee fails to comply with any provision of this TSO, the Regional Water Board may take any further action authorized by law. The Executive Officer, or his/her delegee, is authorized to take appropriate enforcement action pursuant, but not limited to, CWC sections 13350 and 13385. The Regional Water Board may also refer any violations to the Attorney General for judicial enforcement, including injunction and civil monetary remedies.
7. All other provisions of NPDES Order No. R4-2014-0062-A01 not in conflict with this TSO are in full force and effect.
8. The Regional Water Board may reopen this TSO at its discretion or at the request of the Permittee, if warranted. Lack of progress towards compliance with this TSO may be cause for the Regional Water Board to modify the conditions of this TSO.
9. This TSO becomes effective immediately upon adoption by the Regional Water Board. This TSO expires on December 31, 2019.

I, Deborah J. Smith, 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 July 14, 2011, and amended on September 12, 2013, May 8, 2014, December 17, 2015, December 27, 2017, and January 14, 2019.



Deborah J. Smith,
Executive Officer