California Regional Water Quality Control Board
Los Angeles Region

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Linda S. Adams
Agency Secretary

Arnold Schwarzenegger
Governor

December 19, 2008

Mr. Peter DeLuca
Thomas Aquinas College
10000 North Ojai Road
Santa Paula, CA 93060

Dear Mr. DeLuca:

WASTE DISCHARGE REQUIREMENTS AND MONITORING AND REPORTING REQUIREMENTS FOR THOMAS AQUINAS COLLEGE, 10000 NORTH OJAI ROAD, SANTA PAULA, CALIFORNIA (FILE NO. 77-049, R4-2008-0206, CI-6410)

Our letter of October 22, 2008, transmitted tentative Waste Discharge Requirements (WDR) and Monitoring and Reporting Program (MRP) for Thomas Aquinas College located at 10000 North Ojai Road, Santa Paula, California. In response to comments received concerning the initial WDR, revised WDR and MRP reflecting those comments were retransmitted by our letter dated November 25, 2008.

Pursuant to Division 7 of the California Water Code, this Regional Board at a public meeting held on December 11, 2008, reviewed the revised tentative WDR and MRP, considered all factors in the case, and adopted WDR Order No. R4-2008-0206 and MRP No. CI-6410 (copies enclosed) relative to this discharge. Standard Provisions, which are a part of the WDR, are also enclosed

You are required to implement the Monitoring and Reporting Program No. CI-6410 on the effective date of Order No. R4-2008-0206. Your first monitoring report under these Requirements is due to this Regional Board by April 15, 2009. All monitoring reports should be sent to the Regional Board, Attn: Information Technology Unit, and referenced to our Compliance File No. CI 6410

The WDR, MRP and Standard Provisions are enclosed for the addressee only. However, these are on file in our office, and a copy will be sent to interested parties upon request.

If you have any questions or need additional information, please call Project Manager, Ms. Dionisia Rodriguez at (213) 620-6122 or me at (213) 620-6156.

Sincerely,

Rebecca Chou, Ph.D., P.E.
Chief of Groundwater Permitting Unit

Enclosures: Waste Discharge Requirements Order No. R4-2008-0206
Monitoring and Reporting Requirements CI 6410
Standard Provisions Applicable to WDR

cc: Mr. Robert Gallagher, County of Ventura, Environmental Health Division
Mr. William C. Stratton, Environmental Health Division, County of Ventura
Mr. Andy Hovey, Ventura Regional Sanitation District
Ms. Heather M. O'Connell, Water Resource Engineering Associates

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

ORDER NO. R4-2008-0206

WASTE DISCHARGE REQUIREMENTS
FOR
THOMAS AQUINAS COLLEGE
(The Thomas Aquinas College Wastewater Treatment Plant)
(File No. 77-049)

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

BACKGROUND AND PURPOSE OF ORDER

1. The Thomas Aquinas College (hereinafter Discharger) owns an onsite waste water treatment plant (Plant) at 10000 North Ojai Road, Santa Paula, California (Site) (Figure 1). Thomas Aquinas College was founded in 1971 as a private, coeducational institution with a 4-year undergraduate curriculum in liberal arts. It is located on a 131-acre property located 65 miles northwest of the City of Los Angeles. The Discharger discharges domestic and commercial wastewater from twenty buildings on campus, including a cafeteria and six dormitories for students. In 2006, the Discharger informed the Regional Board that it had replaced modular office buildings with the construction of a Chapel building and a Faculty Office building. The construction of the two buildings included the addition of eleven toilets, three urinals, one shower and sixteen sinks. The demolition of the modular buildings abandoned six showers, ten sinks and four toilets. However, the population of 350 students and 50 faculty and staff has not changed. There is no plan to increase the student population, as stated in the Discharger's letter. Figure 1 is the site map.

2. The Discharger discharges domestic and commercial wastewater through the Plant under Waste Discharge Requirements (WDR) and Water Reclamation Requirements (WRR) Order No. 94-018 adopted by this Regional Board on February 28, 1994. The Ventura Regional Sanitation District (VRSD) is currently operating, monitoring, and maintaining the Plant.

3. Section 13263(e) of the California Water Code (CWC) provides that all WDRs be reviewed periodically and, upon such review, may be revised by the Regional Board. Order No. 94-018 is a revision of Order No. 86-22, a revised WDR adopted by this Regional Board for the Discharger on March 24, 1986. Order 94-018 allows the Discharger to reclaim treated wastewater for on campus irrigation under the water reclamation requirements specified in Order No. 86-22. Following a review of the requirements in Order No. 94-018, and an inspection of the Site on October 8, 2008, the Regional Board is updating waste discharge requirements for the Discharger.

4. On August 3, 2006, the Discharger submitted a proposal to replace and upgrade the existing Plant. The Discharger studied several design proposals and

alternatives to upgrade the Plant. On March 12, 2007, the Discharger filed a completed Application/Report of Waste Discharge General Information Form for Waste Discharge Requirements (Form 200) to update the existing WDR. The Discharger stated that the age of the Plant had caused the discharges to intermittently exceed the permitted parameters and made it necessary to upgrade the Plant. The Discharger also requested that the revised permit be written solely as a WDR. It cited that the many complicated considerations required in determining the level of treatment and the effluent disposal to meet the requirements of both the Regional Board and the State Department of Public Health (DPH), led to its decision to abandon the Water Reclamation Requirements. The revised WDR will not include the beneficial use of treated effluent for landscape irrigation. The Discharger will continue to dispose of the treated effluent in the restricted spray fields specified in Order 86-22.

FACILITY DESCRIPTION

5. The Site location is in an undeveloped area of Ventura County, outside the service area of any public sewer system. The Discharger claims that connection to the sewer system would require an extensive system of wastewater force mains and pumping lift stations approximately 3.44 miles long. It would also require obtaining easements for the pipeline alignment to cross over private property and the project would cost approximately $2 million.

6. The Site is located within the Santa Paula Creek drainage area at the easterly end of Sulphur Mountain immediately northeast of the confluence of Santa Paula Creek and Sisar Creek. The Site occupies a 60-acre plain approximately 60 feet above the Santa Paula Creek bed. Run-off from the hillside areas above the site is naturally diverted around the Site to Santa Paula Creek. Surface runoff from the Site is collected in the campus storm drain system and flows into the Santa Paula Creek.

7. Subsurface water is present within the geologic formations beneath the campus. The area has traditionally been known for having a high groundwater condition, reportedly within three feet of the surface at some locations. The site is also located in an area where groundwater is used for domestic purposes.

8. Water supply for the Site is provided by a self-contained system that includes on-site wells, treatment, storage, and distribution facilities. The system is classified as a State, non-community, non-transient, public water system (DPH Water System No. 5601139.) The wells are up-gradient and several thousand feet away from the existing Plant, including the disposal field. The Replacement Plant is located beside the existing Plant.

9. The County of Ventura, Water Resources Division (VWRD) well location map shows that the closest well to the Site is located approximately 1,000 feet to the south on the south side of Ojai Santa Paula Road (well No. 04N21W16P01S on the well location map.) The proposed site for the new wastewater treatment plant and the effluent disposal area is up-gradient of this well. The next closest well is cross-gradient of the proposed disposal site and approximately 2,000 feet west (Well No. 04N21W16M02S). The well location map is shown as Figure 2.

10. According to a staff from VWRD, water quality data is available for these water wells, but because of the intervening distance and topography between the wells and the proposed effluent disposal location the data would not represent groundwater conditions at the Site.

11. The Discharger claims that during the school year, the Site uses approximately 20,000 to 22,000 gallons per day (gpd) of potable water for showers, bathrooms, laundry, kitchen and associated domestic consumption. Irrigation use varies from 60,000 to 100,000 gpd. During the summer, potable water usage drops to approximately 10,000 to 12,000 gpd, but the irrigation usage does not decrease.

TREATMENT PROCESS DESCRIPTION

Existing Treatment System

12. The existing treatment process consists of a grit chamber, primary sedimentation, aeration (activated sludge process) secondary sedimentation/clarification, sludge return and media filtration and chlorination. The existing system is designed to treat 30,000 gpd of wastewater. Figure 3 is the flow diagram of the existing system.

13. Pretreatment occurs in the grit chamber equipped with a trash trap that removes any untreatable objects. Effluent gravity flows from the grit chamber into the 1,750 gallon wet well/lift station that pumps the liquid into the flow divider/splitter box. The splitter box split the flow equally between the two sides of the plant and enters the four 5,000-gallon aeration chambers. The aeration process holds the effluent for 24 hours while aerobic bacteria are mixed in the oxygen-controlled environment and destroy organic material.

14. After 24 hours in the aeration chamber, the wastewater flows into two 5,000-gallon capacity clarification chambers. Settling removes the activated sludge and small organic particulate matter. The activated sludge is returned by airlift sludge pumps to the aeration chamber to complete the aeration process. Surface skimmers in the settling chambers intermittently operate to remove floating particles. The liquid is held in clarification chambers for four hours after which the clear liquid is pumped into the 2,500 gallon holding tank and then through the secondary filtration unit at approximately 35 gallons per minute (gpm).

15. Disinfection of the effluent occurs in the 1,200-gallon chlorine contact chamber where the effluent is in contact with chlorine for a minimum of 30-minutes for average flows. All the treated wastewater is pumped to a 2.12 million gallon bentonite sealed holding pond, prior to being pumped to the disposal spray field. The treated wastewater is pumped from the bentonite sealed holding pond on an "as needed basis to regulate pond volume due to varying volume of plant effluent as well as the evaporation and precipitation frequency.

Replacement Treatment System

16. The recommended replacement treatment system is an extended aeration type system capable of treating up to 50,000 gpd, with tertiary treatment and disinfection. The treated wastewater will be disposed of in the existing restricted spray areas. Figure 4 shows the location of existing and proposed disposal areas.

17. The Discharger will continue to use the existing 2.5 acres spray field disposal area shown south-east of the Plant in Figure 4. The future faculty housing shown to be in the same area is in the Discharger's Master Plan for the College, but there is no immediate plan to build the faculty housing, according to the Vice-President of the College. The 3.5 acres existing spray field disposal area shown north-west of the Plant is plumbed and ready to be used should there be a need for another spray field disposal area. There is also a proposed 2.5 acre spray field disposal area north of the plant and a proposed 17.0 acres spray field disposal area for 100% expansion. All the spray field areas have restricted public access.

18. The Replacement Plant has been designed to handle three waste flow rates. The first design flow rate is for 5,000 gpd for those periods when the student population is at a minimum. The treatment system is designed to treat this minimum flow rate by maneuvering valves, weirs, and blower speeds. Figure 5 is the flow chart for low flow rate operation. The second design flow rate is for 25,000 gpd, for by pass operations during maintenance periods and the flow chart is shown as Figure 6. The third design flow rate is for 50,000 gpd during the school year when classes are in session and the wastewater flow reaches the maximum anticipated flow. Figure 7 is the flow chart for 100% operation.

19. In the primary treatment process, the flow from the renovated grit chamber and upgraded lift station will be received at the flow proportioning chamber located at the top of a flow equalization chamber. Flow passes through a baffled area, where the flow velocity is reduced allowing for primary grit sedimentation. The main wastewater flow continues to a division zone. The average design flow passes through an adjustable V-notch weir, while the surge flow is directed over a flat weir and by-passed to the flow equalization chamber. The surge pumps automatically energize the surge back to the flow proportioning chamber. The enhanced flow equalization method is designed to increase plant efficiency and enhance the Plant's capability to treat average and peak flows. Initial air supply in the flow equalization tank will be supplied by blowers triggered by a liquid level sensor. The flow equalization pump will be the submersible type.

20. The proposed replacement treatment system is characterized as "Advanced Secondary Treatment". The primary treated wastewater will move to two 25,000 gallon aeration chambers, located on each side of the Plant, for a total capacity of 50,000 gallons. The aeration chambers will be equipped with longitudinal air distribution manifolds with diffuser drop assemblies and associated regulating/shut off valves, diffuser valves and diffuser bars, and non-clog air diffuser nozzles. After aeration detention time of 36-hours, the liquid will enter the clarifier chambers with dual hopper configurations. The chamber influent baffle will slow the flow to begin the settling process and prevent the floating particles from entering the settling area. Settled sludge will be returned from the hopper floor to

the aeration chamber by two positive displacement sludge return systems. A sludge measuring devise will be provided for each return system. The clarifier effluent will then pass over a baffle weir plate into a through to the tertiary treatment.

21. The extra sludge is collected in an 8,300 gallon capacity holding tank and is transported to an approved facility for disposal approximately every four months. The disposal site for the sludge is Santa Clara Waste Water Treatment Plant.

22. Tertiary treatment is commonly referred to as a rapid sand filter, which is a factory-built separate unit. Influent connection to the tertiary filter system will consists of a flow trough that receives flow from the clarifiers and a manual filter by pass to direct flow around the filter cells. The two filter cells will be sized for an overflow rate of one gallon per minute per square foot (gpm/sf). Filter media will be sand and anthracite. The tertiary treatment unit will also contain a mudwell chamber, a clear well, a blower unit, pumps and associated appurtenances. The mudwell chamber will contain duplex pumps capable of returning the filtrate backwash to the secondary treatment unit. The clear well contains two backwash pumps providing sufficient volume and pressure for backwashing the filter cells at a rate of 15 gpm/sf on five-minute backwash cycles. The blower unit will supply the necessary air scour distribution under the filter media and for clear well aeration. An overflow weir will provide effluent gravity discharge to the disinfection chamber. Figure 8 is the general lay-out of the Replacement Plant.

23. The disinfection chamber will consist of a chlorine contact chamber with a volume of 1,042 gallons. The unit will contain an automatic feed chlorine tablets system and shall be complete with de-chlorination. A 45° V-notch weir for effluent flow measurement within the chamber will be included. Monitoring equipment. Including ultrasonic flow meter, high water alarms, and remote monitoring software maybe utilized to assists operators in maintaining optimal conditions in the Plant.

24. All of the treated wastewater will be pumped to the existing 2.12 million gallon bentonite sealed holding pond. The treated effluent, up to 50,000 gpd, will be disposed of in the restricted access spray field that was originally permitted in Order No. 80-23. The existing spray field area is only 2.5 acres as shown in Figure 4. The capacity of that area to evapotranspirate all the treated effluent and prevent infiltration to the underlying groundwater has not been determined. The existing spray field is approximately 100 feet away from Santa Paula Creek. The spray field is fenced to restrict public access. At the location within the facility, along the perimeter, at points of access to the area where treated wastewater is disposed, signs shall be posted with the following warning: "ATTENTION: TREATED WASTEWATER AVOID CONTACT- DO NOT DRINK."

    The Discharger has not provided sufficient information to quantify the capacity of the 2.5-acre spray disposal area to evapotranspirate the treated effluent, especially during critical periods of rain and high student and faculty population. Accordingly, after April 30, 2009, the Executive Officer will make a determination on the need for groundwater monitoring, which gives the Discharger an opportunity to assess the capabilities of the 2.5-acre spray disposal field, the merit

of groundwater monitoring. Should the Discharger fail to provide adequate evidence of the spray disposal capacity by April 30, 2009, the Executive Officer will require that the Discharger implement a groundwater monitoring program.

25. The Replacement Plant will be located west and parallel to the existing plant. Its footprint will be slightly larger than that of the existing plant because of a larger flow equalization chamber.

26. The construction of the Replacement Plant has started and was observed during the facility inspection conducted on October 8, 2008. According to the consulting engineers, the final plan check by the Ventura County Department of Building and Safety was done in August 2008. The permit to construct was issued at the same time. The Discharger has hired HMH Construction to build the Replacement Plant. The foundation slab was poured in August 2008 and the package treatment Plant was delivered to the Site and set on foundation pads in September 2008. The construction is estimated to finish in December 2008. The Replacement Plant will start operating in December 2008, but the existing Plant will continue to be on line. The consulting engineers will monitor and review the Replacement Plant for three months. The Replacement Plant is expected to be fully operational by February 2009. The existing Plant will be abandoned and demolished at that time. A demolition permit from the County of Ventura has already been granted for the existing Plant demolition.

27. During the October 8, 2008 facility inspection, it was noted that the treatment plant was already in place. The Plant had to be built above ground because groundwater is very shallow at this location, according to the consulting engineers. It was also noted that a brick wall was being constructed around the perimeter of the Plant. The brick wall will have a gate that will be locked at all times, except when a facility operator is on site. The wall performs two functions: limit public access to the Plant and aesthetic reason to hide the view of the treatment Plant from the campus.

APPLICABLE LAWS, PLANS, POLICIES AND REGULATIONS

28. On June 13, 1994, this Regional Board adopted a revised *Water Quality Control Plan for Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan) which has been subsequently amended. The Basin Plan (i) designates beneficial uses for surface waters and groundwater, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State antidegradation policy (*Statement of Policy with Respect to Maintaining High Quality Waters in California*, State Water Resources Control Board (State Board) Resolution No. 68-16, October 28, 1968), and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates by reference applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Regional Board prepared the 1994 update of the Basin Plan to be consistent with previously adopted State and Regional Board plans and policies. This Order implements the plans, policies and provisions of the Regional Board's Basin Plan.

29. The Plant and the spray field disposal areas overlie the Santa Paula Hydrogeologic Subarea (East of Peck Road) of the Santa Clara River Valley Groundwater Basin. The facility's approximate latitude is 34° 21' 58"; its longitude is 119° 3' 30".

30. The beneficial uses for groundwater within the Santa Paula Hydrogeologic Subarea (East of Peck Road) of the Santa Clara River Valley Groundwater Basin which underlies the Thomas Aquinas College as designated by the Basin Plan are:

    Existing: municipal and domestic supply; industrial service supply; industrial process supply; and agricultural supply.

31. The requirements contained in this Order are based on the Basin Plan and, as they are met, will be in conformance with the goals of the aforementioned water quality control plans and will protect and maintain existing beneficial uses of the groundwater.

CEQA AND NOTIFICATION

32. On July 25, 2006, the Discharger filed an application for exemption under the California Environmental Quality Act (CEQA) for the proposed 50,000 gallon capacity wastewater treatment plant and disinfection at the Site. On October 2, 2006, the Resource Management Agency, Planning Division, of the County of Ventura determined that the project qualifies for a Categorical Exemption under the provision of Section 15301 of CEQA.

33. The Regional Board has notified the Discharger and interested agencies and persons of its intent to revise waste discharge requirements for this discharge and has provided them an opportunity to submit their views and recommendations for the requirements.

34. The Regional Board, in a public meeting, heard and considered all comments pertaining to the discharge and to the tentative requirements.

35. Pursuant to California Water Code section 13320, any aggrieved party may seek review of this Order by filing a petition with the State Water Resources Control Board (State Board). A petition must be received by the State Board, P.O. Box 100, Sacramento, California, 95812, within 30 days of the date of adoption of the Order.

IT IS HEREBY ORDERED that the Discharger, Thomas Aquinas College, shall comply with the following requirements in connection with the disposal operations at the Plant:

A. EFFLUENT LIMITATIONS

1. Effluent discharged shall be limited to treated domestic and commercial wastewater only.

2. There shall be no discharge of wastes to surface water or watercourses at any time.

3. The pH of the effluent discharged shall at all times be within the range 6.5 to 8.5 pH units.

4. Effluent discharged to the bentonite-lined holding pond shall not contain constituents in excess of the following limits:

Constituent	Units	Effluent Limitation Monthly Average	Effluent Limitation Daily Maximum
Total Dissolved Solids	mg/L[1]	1,200	-------
Sulfate	mg/L	600	-------
Chloride	mg/L	100	-------
Boron	mg/L	1	-------
Nitrate (N) +nitrite (N) + ammonia (N) + Organic (N)	mg/L	10	-------
Oil and grease	mg/L	15	-------
Suspended Solids	mg/L	30	45
Total Organic Carbon	mg/L	20	-------
BOD_5 20°C	mg/L	30	45

[1] mg/L: - milligrams per liter

5. The effluent discharge shall not contain concentrations of heavy metals, arsenic, cyanide, or other United States Environmental Protection Agency (USEPA) priority pollutants in concentrations exceeding the limits contained in the State DPH Primary Drinking Water Standards.

6. The arithmetic mean of BOD_5 (20°C) and suspended solids values for the effluent samples collected in a period of 30 consecutive calendar days shall not exceed 15 percent of the arithmetic mean of values for influent samples collected at approximately the same time during the same period.

7. Effluent discharged to the bentonite-lined holding pond must meet as minimum California Code of Regulations Section 60301.225 California Title 22 Requirements for Disinfected Secondary-23 Recycled Water.

> "Recycled water that has been oxidized and disinfected so that the median concentration of the total coliform in the disinfected effluent does not exceed a Most Probable Number (MPN) of 23 per 100 milliliters (ml) utilizing the bacteriological results of the last seven days for which analyses have been completed and the number of total coliform bacteria does not exceed an MPN of 240 per 100 ml in more than one sample in any 30 day period."

8. Radioactivity of the waste discharged shall not exceed the limits specified in California Code of Regulations, title 22, section 64441 et seq., or subsequent revisions.

B. GROUNDWATER MONITORING

The Discharger shall conduct a three-month study of the evapotranspiration rate at the disposal area during critical conditions (wet weather, and peak student/faculty population) to demonstrate the impact of the waste discharge to underlying groundwater. By April 30, 2009, the Discharger shall submit a technical report that adequately summarizes the findings of the three-month study on the spray disposal field capacity and impact of the discharge to the underlying groundwater and nearby surface water. Upon review, the Executive Officer will determine if a groundwater monitoring is required. Should the Executive Officer determine that a groundwater monitoring program is required; the Discharger shall submit a proposal for a groundwater monitoring plan by May 30, 2009 for the Executive Officer's approval.

C. GENERAL REQUIREMENTS

1. Adequate facilities shall be provided to divert storm waters away from the Plant, holding pond, and from areas where any potential pollutants are stored.

2. Waste shall be discharged at the designated spray fields from which the public is effectively excluded, and shall not be permitted to escape therefrom as overland flow.

3. All wastes which do not meet each of the foregoing requirements shall be held in impervious containers and, if transferred elsewhere, the final disposal shall be only at a legal point of disposal. For the purpose of these requirements a legal point of disposal is one for which requirements have been established by a California regional water quality control board, and which is in full compliance therewith.

4. All permanent structures shall be adequately protected from inundation by floods having a predicted frequency of occurrence of once in 100 years. The holding pond shall be adequately protected from inundation by floods having a predicted frequency of occurrence of once in 25 years.

5. Standby or emergency power facilities, sufficient storage capacity, or some other means shall be provided so that in the event of plant upsets or outages due to power failure or other cause, discharge of raw or inadequately treated sewage does not occur.

D. PROHIBITIONS

1. The discharge or use of raw or inadequately treated sewage at any time is prohibited.

2. The discharge of wastes to any point(s) other than specifically described in this Order is prohibited and constitutes a violation thereof.

3. Neither the treatment nor the discharge of waste shall create a condition of pollution, contamination, or nuisance.

4. Wastes shall not be disposed in geologically unstable areas or so as to cause earth movement.

5. Waste discharged shall not impart taste, odors, color foaming, or other objectionable characteristics to the receiving groundwater.

6. Sewage odors shall not be detectable at the property line.

7. Waste discharged shall at no time contain any substances in concentrations toxic to human, animal, plant, or aquatic life.

8. The surfacing or overflow of sewage from the Plant, holding pond and/or the spray disposal areas at any time and at any location and the direct or indirect discharge of wastes to waters of the State (including storm drains, groundwater or surface water drainage courses) is prohibited.

9. No part of the treatment or disposal system shall be closer than 150 feet to any water well or closer than 100 feet to any stream, channel, or other watercourse.

10. No part of the Plant, holding pond, and/or spray disposal area shall extend to a depth where waste may deleteriously affect any underground water stratum that is usable for domestic purposes. In no case may the sewage treatment, holding pond or spray disposal area extend to within 10 feet of a zone of historic or anticipated high groundwater level.

E. PROVISIONS

1. A copy of this Order shall be maintained at the Plant so as to be available at all times to operating personnel.

2. In the event of any change in name, ownership, or control of this waste treatment and disposal facility, the Discharger shall notify the Regional Board of such change and shall notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be forwarded to the Regional Board.

3. The Discharger shall file with the Regional Board technical reports on self-monitoring work performed according to the detailed specifications contained in Revised Monitoring and Reporting Program No. CI-6410 attached hereto and incorporated herein by reference, as directed by the Regional Board Executive Officer (Executive Officer). The results of any monitoring done more frequently than required at the location and/or times specified in the Monitoring and Reporting Program shall also be reported to the Regional Board.

4. In accordance with section 13260(c) of the California Water Code, the Discharger shall file a report of any material change or proposed change in the character, location, or volume of the discharge.

5. The Discharger shall file a written report with the Regional Board within 90 days after the average dry-weather flow for any month equals or exceeds 90 percent of the design capacity of the waste treatment and/or disposal facilities. The report shall detail provisions to cope with flows in excess of 90 percent of the design capacity.

6. The Discharger shall take all reasonable steps to minimize or prevent any discharge that has a reasonable likelihood of adversely affecting human health or the environment.

7. The Discharger shall notify the Regional Board within 24 hours, by telephone or electronically, of any violations of effluent limitations or any adverse conditions resulting from this discharge; written confirmation shall follow within one week. This information shall be confirmed in the next monitoring report; in addition, the report shall also include the reason for the violations or adverse conditions, the steps to be taken to correct the problem (including dates thereof), and the steps being taken to prevent a recurrence.

8. Should monitoring data indicate impacts to groundwater, the Discharger shall submit, within 90 days after determination of the problem, plans for measures that will be taken, or have been taken, to mitigate any long-term effects that may result from the subsurface disposal of wastes. Any water quality impact to groundwater such as, but not limited to, risks to human health from pathogens shall be reported.

9. The Discharger shall submit to the Regional Board, within 60 days of the date of adoption of this Order, procedures that will be, or have been, taken to ensure that no discharge of any untreated sewage or partially-treated sewage from the treatment facility will result in the event of equipment failure.

10. This Order does not relieve the Discharger from responsibility to obtain other necessary local, state, and federal permits to construct facilities necessary for compliance with this Order; nor does this Order prevent imposition of additional standards, requirements, or conditions by any other regulatory agency.

11. This Order includes the attached Monitoring and Reporting Program. If there is any conflict between provisions stated in the Monitoring and Reporting Program and the Standard Provisions, those provisions stated in the Monitoring and Reporting Program prevail.

12. This Order includes the attached *Standard Provisions Applicable to Waste Discharge Requirements* which are incorporated herein by reference. If there is any conflict between provisions stated herein and

the *Standard Provisions Applicable to Waste Discharge Requirements*, the provisions stated herein will prevail.

13. The Discharger shall furnish, within a reasonable time, any information the Regional Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order. The Discharger shall also furnish to the Regional Board, upon request, copies of records required to be kept by this Order.

14. After notice and opportunity for a hearing, this Order may be terminated or modified for cause, including, but not limited to:

    a) Violation of any term or condition contained in this Order;

    b) Obtaining this Order by misrepresentation, or failure to disclose all relevant facts;

    c) A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

16. The waste discharge requirements contained in this Order will remain in effect until November 13, 2013. Should the Discharger wish to continue discharging to groundwater after the expiration date of this Order, the Discharger must file an updated Report of Waste Discharge with the Regional Board, no later than 180 days in advance of the expiration date, for consideration of issuance of new or revised waste discharge requirements. Any discharge of waste after this Order has expired, without filing an updated Report of Waste Discharge with the Regional Board, is a violation of California Water Code section 13264. The Regional Board is authorized to take appropriate enforcement action for any noncompliance with this provision including assessment of penalties.

17. In accordance with California Water Code section 13263(g), these requirements shall not create a vested right to continue to discharge and are subject to rescission or modification. All discharges of waste into the waters of the State are privileges, not rights.

F. RESCISSION

Waste Discharge Requirements Order No. 94-018 adopted by the Regional Board on January 11, 1994, is hereby rescinded, except for enforcement purposes.

I, Tracy J. Egoscue, 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 December 11, 2008.

Tracy J. Egoscue
Executive Officer

Figure 1 – Thomas Aquinas Site Map

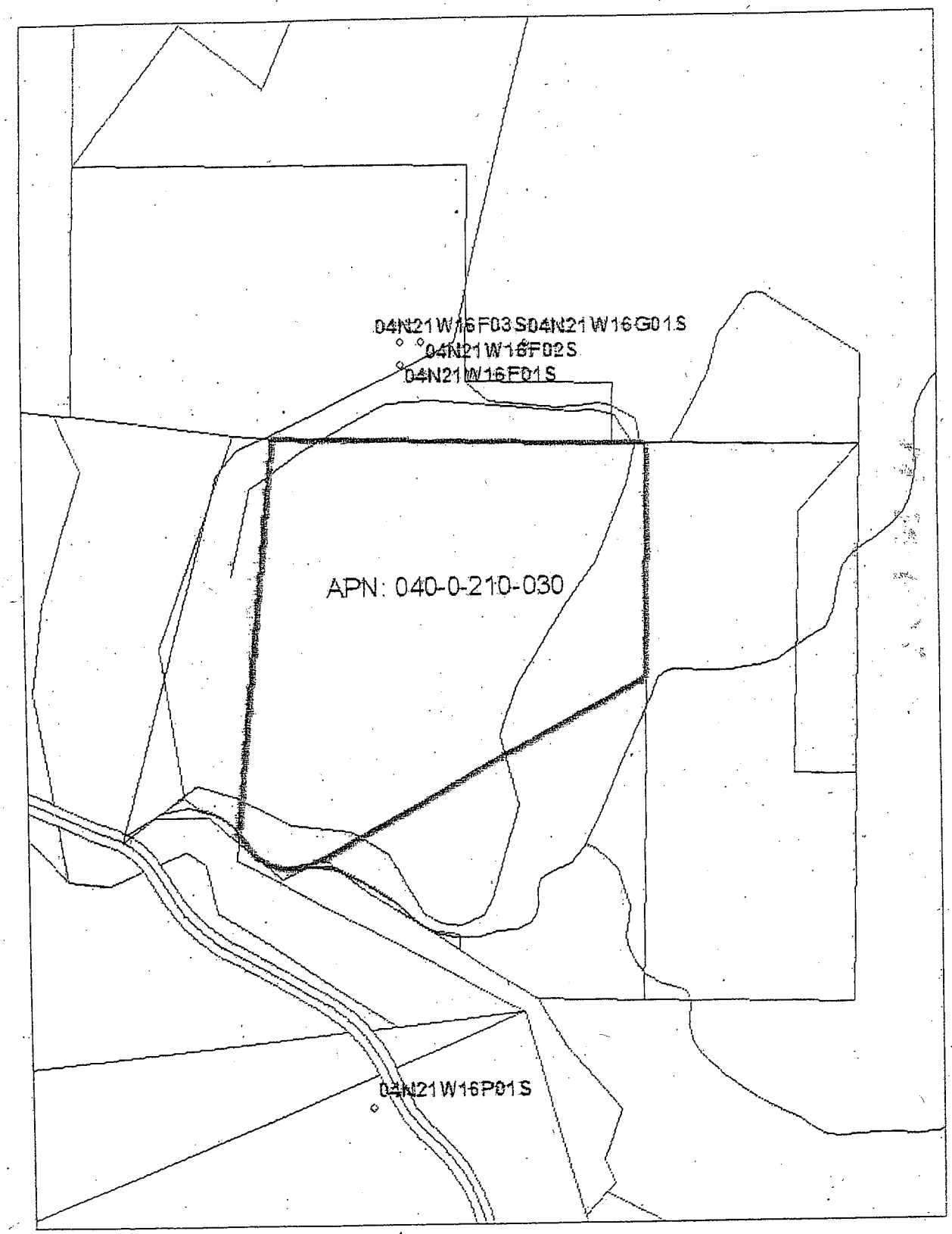
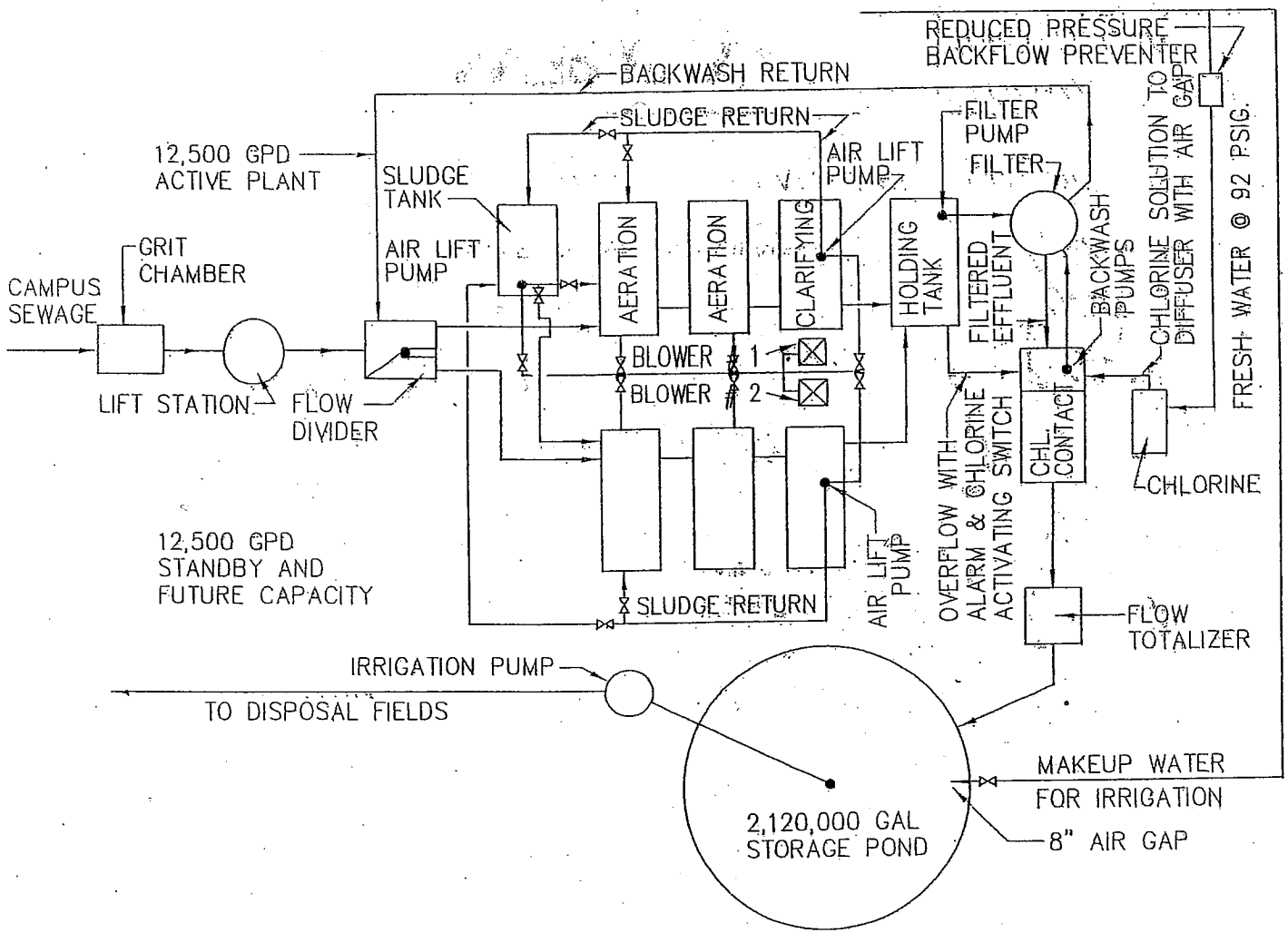


Figure 2 – Water Well Location Map



EXISTING WASTEWATER TREATMENT PROCESS FLOW DIAGRAM

NOT TO SCALE

REGISTERED PROFESSIONAL ENGINEER
LOUIS M. NAGY
No. 47648
EXP. 12-31-09
CIVIL
STATE OF CALIFORNIA

Figure 3- Existing Wastewater Treatment Process Flow Diagram

PREPARED BY:
WREA
WATER RESOURCE ENGINEERING ASSOCIATES
2300 ALESSANDRO DR, SUITE 215, VENTURA, CA 93001 • 805.653.7900 • 800-25-WATER • FAX: 805.653.0610

LOUIS M. NAGY R.C.E. NO. 047648 EXP. 12-31-09 DATE

THOMAS AQUINAS COLLEGE
10000 N. OJAI ROAD, SANTA PAULA
APN 040-0-210-030

PAGE 1 OF 1

Oct 07, 2008

N:\DWGS\1600's\1603 Thomas Aquinas College\Exhibits\1603-FLOW-DIAGRAM.dwg 12-25

AVAILABLE EDA SUMMARY

TOTAL AVAILABLE SFD (RPA)
= 25.5 ± ACRES

LEGEND

(E)	EXISTING
(P)	PROPOSED
EDA	EFFLUENT DISPOSAL AREA
SFD	SPRAYFIELD DISPOSAL
RPA	RESTRICTED PUBLIC ACCESS
EXP	EXPANSION AREA
←	DENOTES DRAINAGE DIRECTION
- - -	(P) APPROX. BOUNDARY OF EDA

NOTES:

FINAL EFFLUENT DISPOSAL AREAS TO BE DETERMINED ACCORDING TO ENGINEERING AND SITE DESIGN CONSIDERATIONS, AND LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD RECOMMENDATIONS. AREAS IN ADDITION TO THOSE SHOWN MAY BE UTILIZED.

SITE PLAN BASED ON THOMAS AQUINAS MASTER BUILD OUT PLAN FOR CUP 3609-2.

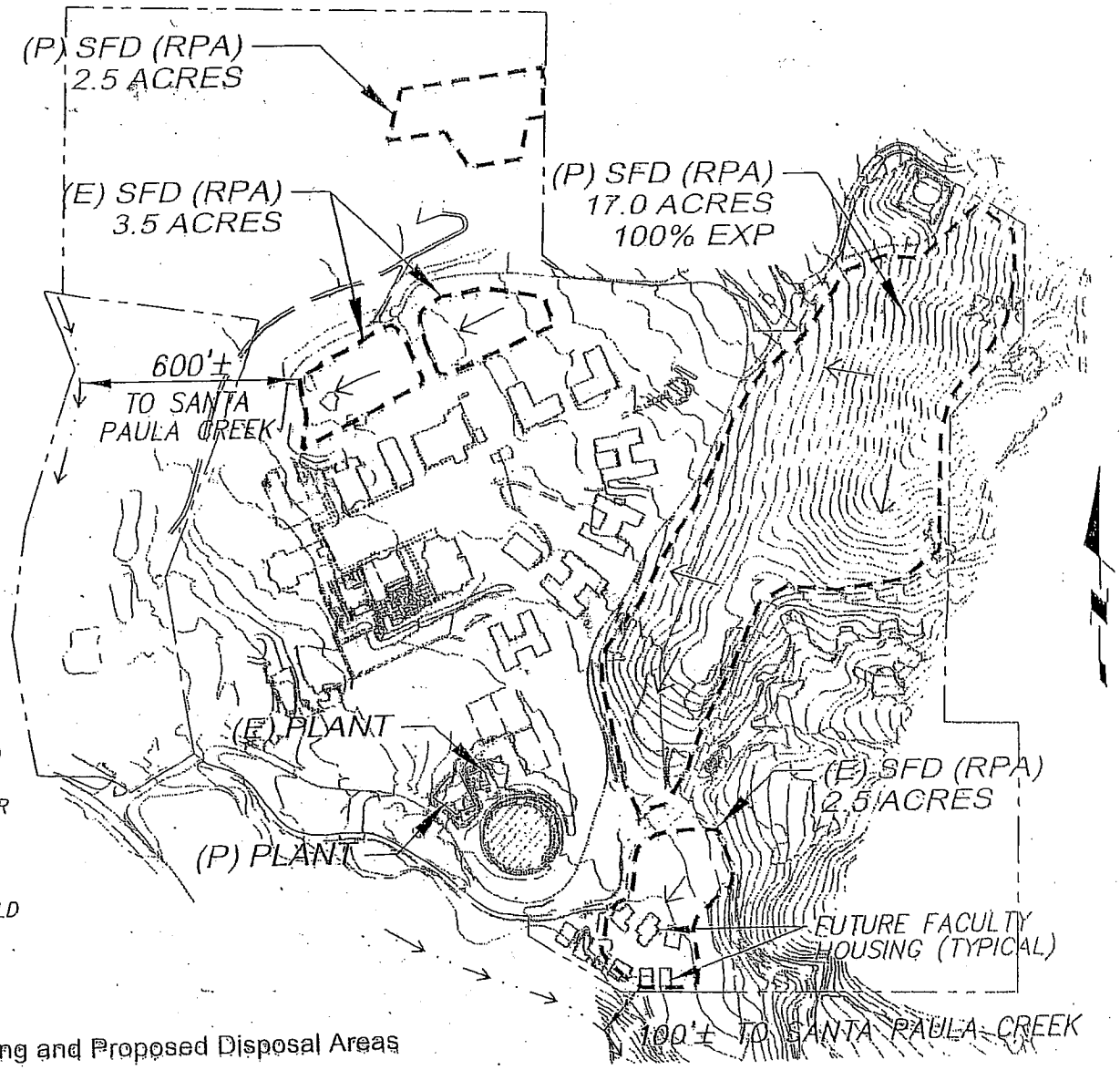


Figure 4- Existing and Proposed Disposal Areas

OVERALL SITE PLAN - EFFLUENT DISPOSAL AREAS

SCALE: 1"=500'

REGISTERED PROFESSIONAL ENGINEER
LOUIS M. NAGY
No. 47648
EXP. 12-31-07
CIVIL
STATE OF CALIFORNIA

J BY:
WREA
WATER RESOURCE ENGINEERING ASSOCIATES
SANDRO DR, SUITE 215, VENTURA, CA 93001 • 805.653.7900 800-25-WATER • FAX: 805.653.0610

THOMAS AQUINAS COLLEGE
10000 N. OJAI RD, SANTA PAULA
APN 040-0-210-030

Mar 12, 2007

Figure 5

Replacement Plant Flow Chart for Low Flow Operation

PROJECT NAME
THOMAS AQUINAS COLLEGE
SANTA PAULA, CA
REVISIONS
DATE BY DESCRIPTION
DRAWN BY
CHECKED BY
APPROVED BY
PROJECT NO.
SCALE
DATE
4-6-04
DRAWING
FLOW DIAGRAM
SHEET

Figure 6

Replacement Plant Flow Chart for Half Flow Operation

PROJECT NAME
THOMAS AQUINAS COLLEGE
SANTA PAULA, CA

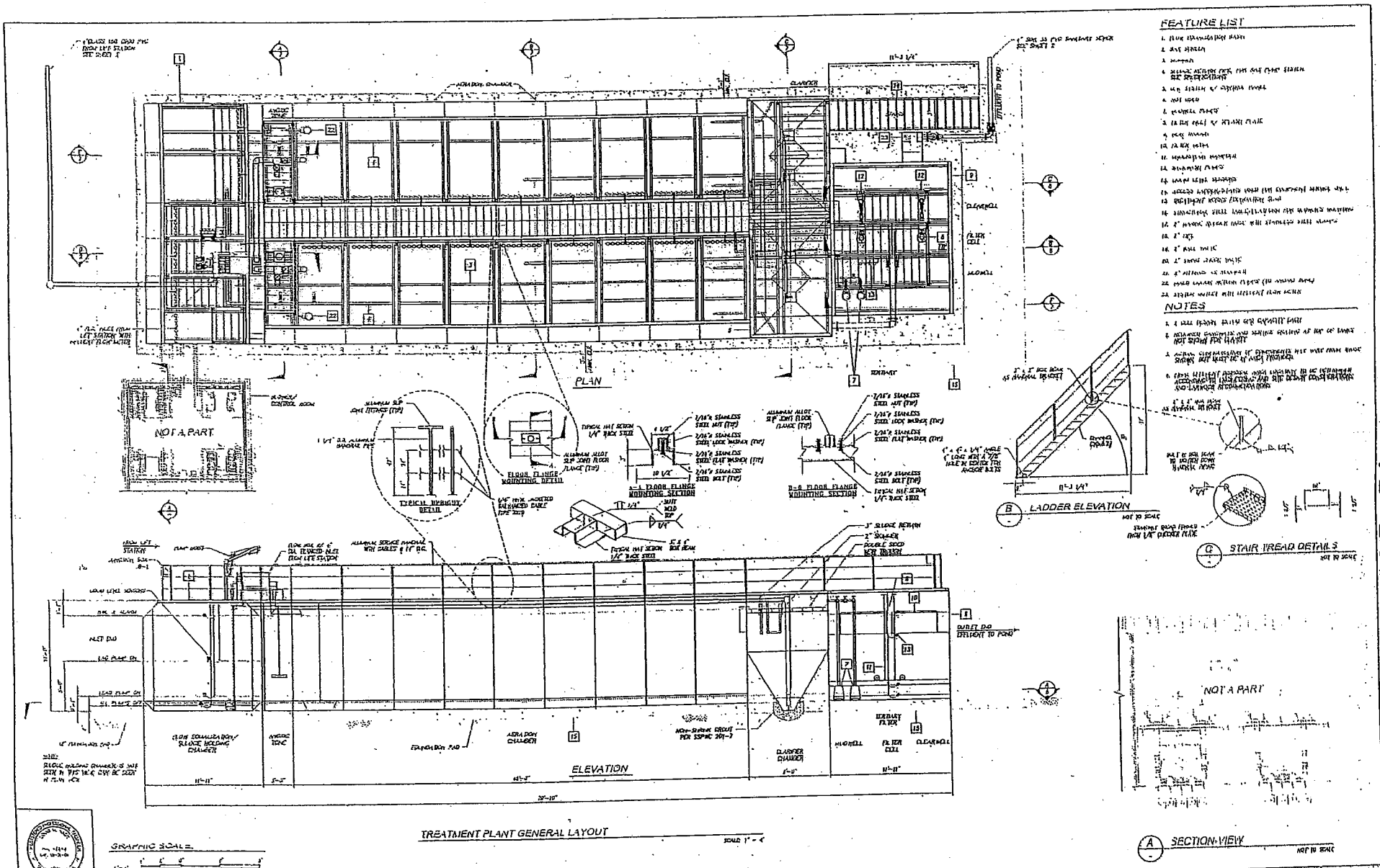
REVISIONS
DATE BY DESCRIPTION

Figure 7

Replacement Plant Flow Chart for 100% Flow Operation

PROJECT NAME
THOMAS AQUINAS COLLEGE
SANTA PAULA, CA

REVISIONS
NO. DESCRIPTION DATE



REVISIONS	BY	DATE	PROGRESS	BY	DATE
			PLOT FOR SUBMITTAL	JL	06/15/06
			PLOT FOR BID SET	JL	01/22/07
			PRELIMINARY PLOT	AG	01/23/07

WREA
WATER RESOURCE ENGINEERING ASSOCIATES

TREATMENT PLANT
PLAN AND
ELEVATION

THOMAS AQUINAS COLLEGE
10000 N. OJAI ROAD, SANTA PAULA, CA
APN 040-0-210-030

SHEET 5
OF 24

Sept 22, 2008

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

MONITORING AND REPORTING PROGRAM NO. CI-6410
FOR
THOMAS AQUINAS COLLEGE
(The Thomas Aquinas College Wastewater Treatment Plant)
(File No. 77-049)

I. MONITORING AND REPORTING REQUIREMENTS

A. Thomas Aquinas College (hereinafter Discharger) shall implement this monitoring program on the effective date of this Order. The first monitoring report under this program, for October to December 2008 shall be received at the Regional Board by January 15, 2009. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

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

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

C. By January 30th of each year, beginning January 30, 2010, the Discharger shall submit an annual summary report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous calendar year. In addition, the Discharger shall discuss the compliance record and the corrective actions taken, or planned, which may be needed to bring the discharge into full compliance with the waste discharge requirements.

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

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

laboratory quality assurance/quality control (QA/QC) procedures upon request by the Regional Board.

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

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

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

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

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

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

Effluent Monitoring

A sampling station shall be at the end of the treatment system where representative samples of treated wastewater can be obtained prior to discharge to the holding pond. Effluent samples may be obtained at the same sampling station as has been previously used. Any proposed change of sampling location shall be identified and approved by the Executive Officer prior to its use.

The following shall constitute the effluent monitoring program for treated wastewater discharged to the bentonite-lined holding pond:

Constituents	Units*	Type of Sample	Minimum Frequency of Analysis
Total flow[1]	gallons/day	-----	daily
pH	pH units	grab	weekly
Temperature	°F	grab	weekly
BOD_5	mg/L	grab[4]	weekly
Total dissolved solids	mg/L	grab	monthly
Total suspended solids	mg/L	grab[4]	weekly
Oil and grease	mg/L	grab	monthly
Sulfate	mg/L	grab	monthly
Chloride	mg/L	grab	monthly
Boron	mg/L	grab	monthly
Nitrate as nitrogen	mg/L	grab	monthly
Nitrite as nitrogen	mg/L	grab	monthly
Ammonia as nitrogen	mg/L	grab	monthly
Organic Nitrogen	mg/L	grab	monthly
Fecal coliform[2, 5]	MPN/100mL	grab	weekly
Total coliform[2]	MPN/100mL	grab	weekly
Enterococcus[2]	MPN/100mL	grab	weekly
Priority pollutants[3]	µg/L	grab	annually

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

[1] For those constituents that are continuously monitored, the Discharger shall report the daily minimum, maximum, and average values. The Discharger shall report the estimated daily volume of wastewater discharged to the pond and disposed at each of the spray disposal fields.

[2] Coliform and enterococcus samples shall be obtained at the designated sampling station at a time when wastewater flow and characteristics are most demanding on the treatment facilities and disinfection processes. The location(s) of the sampling point(s) shall remain the same as have been previously used and any proposed changes thereto must be approved by the Executive Officer, and the proposed changes shall not be made until such approval has been granted.

[3] A list of the priority pollutants is attached. (See Attachment A.)

[4] At the same time as the effluent testing, the influent shall be analyzed for its BOD_5 and TSS concentrations.

[5] For total coliform testing, 5 samples per week of total coliform monitoring in a 7-day period during the initial start up period of 12 weeks. When the Plant consistently proves meeting the prescribed coliform limits, monitoring frequency will be reduced to weekly frequency.

II. GROUNDWATER MONITORING

The Discharger shall conduct a three-month study of the evapotranspiration rate at the disposal area during critical conditions (wet weather, and peak student/faculty population) to demonstrate the impact of the waste discharge to underlying groundwater. By April 30, 2009, the Discharger shall submit a technical report that adequately summarizes the findings of the three-month study on the spray disposal field capacity and impact of the discharge to the underlying groundwater and nearby surface water. Upon review, the Executive Officer will determine if a groundwater monitoring is required. Should the Executive Officer determine that a groundwater monitoring program is required; the Discharger shall submit a proposal for a groundwater monitoring plan by May 30, 2009 for the Executive Officer's approval.

IV. WASTE HAULING REPORT

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

V. OPERATION AND MAINTENANCE REPORT

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

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

2. Type of maintenance (preventive or corrective).

3. Frequency of maintenance, if preventive.

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

VI. CERTIFICATION STATEMENT

Each report shall contain the following declaration:

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

Executed on the _____day of _____

at _____

_____(Signature)

_____(Title)"

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: _____
Tracy J. Egoscue
Executive Officer

Date: December 11, 2008