



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

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Arnold Schwarzenegger
Governor

October 18, 2010

Mr. Bill Dawson
Senior Manager, CEO
Los Angeles County
Chief Executive Office
Real Estate Division
222 S. Hill St. 3rd Floor
Los Angeles CA 90012

Dear Mr. Dawson

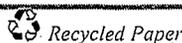
ENROLLMENT IN GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL COMMERCIAL AND MULTIFAMILY RESIDENTIAL SUBSURFACE SEWAGE DISPOSAL SYSTEMS, POINT DUME COUNTY BEACH LIFEGUARD AND COMFORT STATIONS # 1, # 2, AND # 3, LOCATED AT 6900, 7100, AND 7180 WESTWARD BEACH ROAD, MALIBU, CALIFORNIA, (FILE NO. 02-185, ORDER NO. 01-031 (Series No. 121), CI-8556).

Los Angeles County (Discharger) operates the Point Dume County Beach Lifeguard and Comfort Stations No. 1, No. 2, and No.3 located at 6900, 7100, and 7180 South Westward Beach Road, respectively (Facility). On July 7, 2003, the Discharger was issued general waste discharge requirements (WDR) for the Facility under State Water Resources Control Board (State Board) Order No. 97-10-DWQ, "General Waste Discharges to Land by Small Domestic Wastewater Treatment Systems". As part of a Mitigation Plan dated April 15, 2009, the Discharger proposed to upgrade the current standard septic systems with an advanced onsite wastewater treatment system (OWTS), and to move the disposal fields inland. In addition, groundwater monitoring data indicated there was adequate vertical separation between the disposal fields and groundwater. Thus, the Facility qualifies for enrollment under the Los Angeles Regional Water Quality Board's (Regional Board) general waste discharge requirements (WDR), Order No. 01-031 for "Small Commercial and Multifamily residential Subsurface Sewage Disposal Systems". Effective enrollment in general WDR Order No. 01-031, coverage under general WDR Order No. 97-10-DWQ for this Facility is terminated.

On March 12, 2010, a public notice under general WDR Order No. 01-031 was issued. The Discharger initially proposed a centralized advanced OWTS, but after local residents expressed concern, the Discharger decided that each Comfort Station would have its own advanced OWTS which discharges to a landscaped disposal field. Major components of the advanced OWTS will be located below ground. In addition, the treated wastewater disposal fields will be moved off the beach and farther from the ocean, landward of each Comfort Station. The geoflow disposal fields will be located approximately 190 to 270-feet north of the ocean. The three new discharge locations will meet both the horizontal setback from the ocean and vertical separation from groundwater. The Facility meets requirements for enrollment in Order No. 01-031.

Modification of the existing Monitoring and Reporting Program (MRP) No. CI-8556 is necessary because the Discharger is replacing the three standard septic systems at Point Dume County Beach with three separate advanced OWTS with disinfection. Each system will discharge to a

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separate geoflow disposal field located 12 inches beneath landscape areas created from removal of some of the public parking spaces.

The three existing septic tanks and leachfields at each Comfort Station will be replaced by advanced treatment systems consisting of a 2,500-gallon sand trap, a 3,000-gallon primary collection tank, an Advantex AX20-RT dual compartment treatment tank, and a 1,000-gallon dosing tank which will discharge 660 square-foot geoflow disposal field. The Discharger is also installing Ultra-violet (UV), chlorination-dechlorination and ozone disinfection units at each Comfort Station.

The discharge volume at the three Comfort Stations located in Point Dume County Beach varies considerably, both seasonally and daily. Winter discharge volumes are almost negligible for all three Comfort Stations. The summer seasonal average discharge volume is 1,140 gallons per day (gpd) and the maximum discharge volume for the three Comfort Stations is 4,470 gpd.

Currently, the only groundwater monitoring wells are located at Comfort Station #2. The new advanced OWTS will be located adjacent to each Comfort Station, and the disposal fields will be located 50 to 70 feet landward of the Comfort Stations. Therefore, the installation of new groundwater monitoring wells up and down-gradient to the new leachfields is required. A new groundwater monitoring plan must be submitted by December 18, 2010 for approval by the Executive Officer.

The treated wastewater discharge must not exceed the water quality objectives listed in the appropriate Plan for this site, which is the State Board's California Ocean Plan. The treated wastewater discharge shall not cause groundwater to exceed geometric mean bacterial limits for body contact recreation (200 MPN/100mL Fecal coliform and 35 MPN/100mL Enterococcus). Any exceedance of a single sample maximum (SSM) for Fecal coliform density of 400 MPN per 100 mL or an Enterococcus density of 104 per 100 mL will require repeat weekly sampling for the next 30 day period. In addition, shellfish harvesting is included in the Basin Plan as a beneficial use of Point Dume Beaches. Total coliform limits where shellfish harvesting is a beneficial use are as follows: the mean total coliform density shall not exceed 70 per 100mL, and not more than 10 percent of the samples shall exceed 230 per 100mL. The 2009 Ocean Plan has narrative limits for nutrients... "Nutrients materials shall not cause objectionable aquatic grows or degrade indigenous biota." Regional Board staff concluded a Total Nitrogen limit of 10 mg/L is protective of indigenous marine biota in the coastal areas of Malibu. Thus, reference to Attachment A: "Water Quality Objectives for Selected Constituents in Regional Ground Waters" in Order No. 01-031 shall be replaced with a reference to the 2009 Ocean Plan which is available on the State Water Quality Control Board website.

After installation of the advanced OWTS, the Discharger shall be required to monitor the advanced OWTS treatment system performance by measuring treated effluent at end of pipe for the following parameters: Flow rate, Total Suspended Solids (TSS); 5-Day Biological Oxygen Demand (BOD₅); Total Nitrogen (Ammonia+Nitrite+Nitrate), and Turbidity. In addition,

the 2009 California Ocean Plan limits for total coliform, fecal coliform and enterococcus bacteria, residual chlorine and ammonia must be measured at "end of pipe". However, under Order No. 01-031 the Discharger may choose to meet the limits in the receiving water (groundwater) rather than "end of pipe".

Based on our review of the Discharger's modified mitigation plan, the proposed advanced OWTS is acceptable provided that the effluent meets the daily maximum requirements. Treated domestic wastewater effluent shall be monitored based on the frequency detailed in Table 1. Effluent discharged shall not contain constituents in excess of the following limits, or cause the receiving water (defined as no more than 50 feet down-gradient of the point of disposal) to exceed the following limits:

Table 1

Constituents	Unit	Limits ⁶	Test Frequency
Total Flow	gal/day	-	Metered
pH	pH Units	6-9	Monthly
Total Suspended Solids (TSS)	mg/L	30 ⁴	Monthly
BOD ₅ 20°C	mg/L	30 ⁴	Monthly
Turbidity	NTU	10 ⁴	Monthly
Total Coliform	MPN ¹ /100mL	70/230 ⁵	Monthly
Fecal Coliform	MPN ¹ /100mL	400	Monthly
Enterococcus	MPN ¹ /100mL	104	Monthly
Total Nitrogen ²	mg/L	10	Monthly
Ammonia-N	mg/L	2.4	Monthly
Nitrate-Nitrogen	mg/L	<10	Monthly
Nitrite-Nitrogen	mg/L	<1.0	Monthly
Residual Chlorine ³	µg/L	8	Monthly

¹MPN/100mL: Most Probable Number per 100 milliliter; mg/L: milligrams per liter.

²Total nitrogen includes ammonia-n, organic nitrogen, nitrite-n and nitrate-n.

³Required if Chlorine is used for disinfection.

⁴OWTS performance evaluation.

⁵Ocean Plan limits for shellfish harvesting area. Mean total coliform density shall not exceed 70 MPN per 100mL, and not more than 10% of the samples shall exceed 230 MPN per 100mL.

⁶After start-up, the Discharger will be allowed a 12-week start-up period to meet the effluent discharge limits in Table 1.

Your enrollment under Order No. 01-031 is subject to periodic review. Based on the technical information collected from monitoring of treated OWTS effluent and groundwater, the Regional Board Executive Officer (Executive Officer) may determine that the discharge would be better regulated under a different general WDR or an individual, site specific WDR. If such a decision is made, you will be notified 30 days before any Regional Board action. If the discharge is

Mr. Bill Dawson
Point Dume County Beach
Lifeguard and Comfort Stations

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regulated under another general WDR, or a site- specific WDR, which requires Regional Board action, the applicability of Order No. 01-031 will be immediately terminated on the effective date of the issuance of a new WDR.

Enclosed is your WDR, consisting of Order No. 01-031, for your Facility eferences to Attachment A - Water Quality Objectives for Selected Constituents in Regional Ground Waters¹, Standard Provisions-Applicable to Waste Discharge Requirements, and Modified MRP No. CI-8556 contains with site specific monitoring requirements which supersede the monitoring requirements in MRP No. CI-8556 dated July 7, 2003. For your coastal facility, all Order No. 01-031 references to Attachment A¹ should be replaced with a reference to the 2009 Ocean Plan.

Should future changes to either the advanced OWTS or the leachfields be necessary, revised engineering drawings showing the changes must be filed with the Regional Board a minimum of thirty days prior to the change and the Discharger must receive approval for such change.

The following actions must be taken after receipt of this modified enrollment and installation of proposed centralized advanced OWTS at Point Dume County Beach:

1. Submit a new groundwater monitoring plan within 60 days of the effective date (October 18, 2010) of Order No. 01-031 enrollment that includes the installation of up-gradient and down-gradient monitoring wells. The purpose of the new groundwater monitoring program is to delineate up-gradient pollution and evaluate possible impacts to down-gradient surface water;
2. Complete installation of the advanced OWTS and geoflow disposal fields at Comfort Stations #1, #2, and #3 by March 4, 2011; and,
3. Submit an installation completion report for the advanced OWTS installation within 60 days of completion.

Revised MRP No. CI-8556 requires you to implement a monthly effluent-monitoring program for the new AdvanTex™ treatment system which shall commence upon completion of installation. All monitoring reports should be sent to the Regional Board, ATTN: Information Technology Unit. When submitting monitoring or technical reports to the Regional Board per these requirements, please include a reference to "Compliance File No. CI-8556", to insure that the reports are directed appropriately. Also, please do not combine other correspondence or reports with your monitoring reports.

¹ Attachment A: Water Quality Objectives for Selected Constituents in Regional Ground Waters referenced in Order No. 01-031 is replaced by the 2009 Ocean Plan which is available on the State Water Quality Control Board website.

Mr. Bill Dawson
Point Dume County Beach
Lifeguard and Comfort Stations

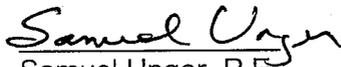
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We are sending a copy of Regional Board Order No. 01-031, Standard Provisions Applicable to Waste Discharge Requirements, and the modified MRP No. CI-8556 only to the Discharger. Additional copies will be furnished to anyone who requests it.

If you have any additional questions, please contact Project Manager, Ms. Toni Callaway at (213) 620-2259 or Chief of Groundwater Permitting and Land Disposal Section, Dr. Rebecca Chou at (213) 576-6618.

Sincerely,


Samuel Unger, P.E.

Executive Officer

Enclosures:

1. Regional Water Resources Control Board Water Quality Order No. 01-031- General Waste Discharge Requirements for Discharges to Land by Small Commercial and Multifamily Residential Subsurface Sewage Disposal Systems.
2. Standard Provisions and Reporting for Waste Discharge Requirements
3. Modified Monitoring and Reporting Program No. CI-8556

cc: Mr. Diego Cadena, Los Angeles County, Department of Public Works
Mr. Alex Villarama, Los Angeles County, Department of Public Works
Ms. Wai So, Los Angeles County, Department of Public Works, Water Resources Division
Mr. Craig George, City of Malibu
Ms. Susan Nissman, Los Angeles County, Third District Supervisor's Office
Mr. Earle Goodman, Malibu Resident
Ms. Denise Beckstead, Malibu Resident
Mr. Chuck Galbraith, Malibu Resident
Mr. Christopher Godbille, Malibu Resident
Ms. Mary Gerdts, Malibu Resident
Mr. Jerry Hritz, Malibu Resident

California Environmental Protection Agency



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STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
REVISED MONITORING AND REPORTING PROGRAM NO. CI-8556
FOR
LOS ANGELES COUNTY, DEPARTMENT OF PUBLIC WORKS
POINT DUME COUNTY BEACH
LIFEGUARD AND COMFORT STATIONS
6900, 7100, AND 7180 SOUTH WESTWARD BEACH ROAD
MODIFICATION OF ENROLLMENT
UNDER CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
ORDER NO. 01-031, SERIES NO. 121
(FILE NO. 02-185)

I. REPORTING REQUIREMENTS

- A. The effective date of this modified enrollment under Regional Board Order No. 01-031 is October 18, 2010. Los Angeles County, (hereafter Discharger), shall implement this monitoring program immediately upon completion of the installation of the advanced onsite wastewater treatment system (OWTS). The first monitoring report under this revised program shall be submitted for the quarter in which the OWTS upgrade is completed.

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

<u>Reporting Period</u>	<u>Report Due</u>
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 15th of each year, beginning January 15, 2011, 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 WDRs.
- D. The objectives of this Monitoring and Reporting Program (MRP) are to demonstrate performance of the new onsite wastewater treatment system (OWTS), and determine whether the treated wastewater discharge at this site will impact down-gradient receptors and surface water quality.

- E. 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 136.3, 136.4, and 136.5; or where no methods are specified for a given pollutant, methods approved by the Regional Board shall be utilized.
- F. 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). The Discharger shall submit a list of the analytical methods employed for each test and the associated laboratory QA/QC procedures upon the request of the Regional Board.
- 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 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. Each monitoring report shall contain a separate section titled "Summary of Non-Compliance" which discusses any items where the discharge limitations were not met. The Discharger shall include a statement about the cause(s) of non-compliance 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 items non-compliant with WDRs, as well as any excursion of effluent limitations.
- 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.

II. EFFLUENT MONITORING REQUIREMENTS

- A. Prior to installation of the advanced OWTS effluent monitoring is not required. The Discharger shall implement the effluent monitoring within 24 hours of the installation and start-up of the advanced OWTS. The quarterly reports shall contain the following

information:

- a. Average and maximum daily waste flow for each month in the quarter, in gallons per day.
 - b. Estimated population served during each month of the quarter.
 - c. Results of at least monthly observations in the disposal area for any overflow or surfacing of wastewater.
- B. In addition, the Discharger shall submit an installation completion report within 30 days after the three advanced OWTS and geoflow disposal fields have been installed (Please see Figure 1). The information contained in this summary shall include, at a minimum, the following:
- a. Maintenance records for the treatment systems;
 - b. Type of preventive or corrective action performed;
 - c. Frequency of maintenance;
 - d. Periodic pumping schedule of the primary treatment tanks; and
 - e. The name of the person responsible for the operation and maintenance of the treatment systems.
- C. Effluent sampling stations shall be established at locations where representative samples of treated effluent from each treatment system can be obtained prior to discharge to the leachfields. The following shall constitute the effluent monitoring program:

Constituent	Units	Type of Sample	Frequency of Analysis
Total Flow	gal/day	Metered	Monthly
pH	pH units	Grab	Monthly
Turbidity ⁴	NTU	Grab	Monthly
Total Suspended Solids (TSS) ⁴	mg/L	Grab	Monthly
BOD ₅ 20°C ⁴	mg/L	Grab	Monthly
Ammonia-N	mg/L	Grab	Monthly
Nitrate-N	mg/L	Grab	Monthly
Nitrite-N	mg/L	Grab	Monthly
Organic Nitrogen	mg/L	Grab	Monthly
Total Nitrogen ³	mg/L	Grab	Monthly
Total coliform	MPN/100mL ¹	Grab	Monthly
Fecal coliform	MPN/100mL ¹	Grab	Monthly
Enterococcus	MPN/100mL ¹	Grab	Monthly
Residual Chlorine ²	µg/L	Grab	Monthly

¹ MPN/100mL: Most Probable Number per 100 milliliter; mg/L: milligrams per liter.

² Required if Chlorine is used for disinfection

³ Total Nitrogen includes nitrate-N, nitrite-N, ammonia-N and organic nitrogen

⁴ OWTS performance standards

After start-up the Discharger will be allowed a 12-week start-up period to be the effluent limits which are detailed in Table 1 in the WDR transmittal cover letter.

III. GROUNDWATER MONITORING PROGRAM

The Discharger must submit a new groundwater monitoring plan by December 14, 2010 for review and approval. The new monitoring wells must be installed and sampled prior to discharge from the new advanced OWTS and replacement leachfields. The groundwater monitoring program shall be designed to adequately evaluate the hydraulic connection and impact to the groundwater nearby ocean. Construction and development of the proposed wells shall be completed in accordance with the standards in Bulletins 74-81 and 74-90 of California Department of Water Resources. Within 60 days after installation of monitoring wells, a well installation report including a scaled plot plan, soil boring logs, water quality data, well permits and as-built well construction diagrams shall be submitted to this Regional Board. This groundwater monitoring schedule may be subject to revision after completion of the first year of baseline water quality monitoring.

The monitoring program must be prepared under the direction of a California Registered Geologist, or Certified Engineering Geologist, or a California Registered Civil Engineer with appropriate experience in hydrogeology.

The following shall constitute the groundwater monitoring program:

Constituent	Units	Type of Sample	Minimum Frequency of Analysis
pH	pH units	Grab	quarterly
Total coliform	MPN/100 mL	Grab	quarterly
Fecal coliform	MPN/100 mL	Grab	quarterly
Enterococcus	MPN/100 mL	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*	mg/L	Grab	quarterly
Residual Chlorine	mg/L	Grab	quarterly

* Total Nitrogen includes nitrate-N, nitrite-N, ammonia-N and 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. Quarterly measurement of groundwater levels, recorded to 0.01 feet using a National Geodetic Survey approved datum;
- d. Groundwater contour map depicting the hydraulic gradient and direction of groundwater flow across the subject tract; and

- e. Quarterly calculation of vertical separation of groundwater elevation to bottom of the geoflow disposal field.

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 the 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. 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, P.E.
Executive Officer

Date: October 18, 2010