

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401**

WASTE DISCHARGE REQUIREMENTS ORDER NO. R3-2012-0015

Waste Discharger Identification No. 3 350103001
Proposed for Consideration at the February 1-2, 2012 Meeting

For

**TRES PINOS COUNTY WATER DISTRICT
WASTEWATER TREATMENT PLANT
SAN BENITO COUNTY**

The California Regional Water Quality Control Board, Central Coast Region (Water Board) finds that:

FACILITY OWNER AND LOCATION

1. The Tres Pinos County Water District (hereafter "Tres Pinos CWD") owns and operates the Tres Pinos Wastewater Treatment Plant (hereafter "Facility"). The Tres Pinos CWD is overseen by an elected five-member Board of Directors. The unincorporated town of Tres Pinos is located in San Benito County, seven miles southeast of Hollister.
2. The Facility is located approximately 1,200 feet west of Southside Road at Bolado Road, in the town of Tres Pinos. Tres Pinos CWD is responsible for providing wastewater collection, treatment, and disposal services to the community of Tres Pinos. Tres Pinos has an estimated population of 476 people as reported in the 2010 census.

PURPOSE OF ORDER

3. On April 27, 2011, Water Board staff requested the Discharger to submit a Report of Waste Discharge (ROWD). The Discharger submitted a complete ROWD on June 29, 2011.
4. Staff's review of existing Waste Discharge Requirements (WDR) Order No. 99-101 and available data indicates deficiencies in Facility treatment performance and potential for groundwater quality impacts.
5. Order No. R3-2012-0015 revises waste discharge requirements to require improved wastewater treatment and monitoring at the site.
6. Order No. R3-2012-0015 significantly revises monitoring and reporting requirements to reflect the need for additional data required to adequately evaluate the Facility and develop a plan to decrease the amounts of salts and nutrients discharged and submit follow-up progress reports.
7. The Water Board requested on September 10, 2007, that the Tres Pinos CWD develop a Work Plan to quantify and reduce the sources and levels of total dissolved solids (TDS), chloride, and sodium in the effluent and groundwater. San Benito Engineering, on behalf of the Tres Pinos

CWD, submitted the Work Plan on September 26, 2007. The work plan outlined five tasks to be completed by August 2008.

- Task No. 1 is the project initiation to inform the Tres Pinos CWD of the project.
 - Task No. 2 is to investigate and assess potential salts sources.
 - Task No. 3 is to report findings of investigation and assessment by May 2008.
 - Task No. 4 is to develop a work plan to decrease salts sources by July 2008.
 - Task No. 5 is to provide a final progress report to the Water Board by August 2008.
8. The Water Board received the results of Task No. 3 in November 2008. The results indicate an average of 700 mg/L of salts are added to the water supply as it makes its way through the water distribution system and ends up at the wastewater treatment plant.
 9. Task No. 4 was re-scheduled to be completed by February 2009. As of the date of this Order, the Water Board has not received the Task No. 4 work plan and has not yet received a progress report as required in Task No. 5.
 10. Water Board staff's review of historical wastewater effluent characteristics from the Facility indicates there is the potential for adverse impacts to groundwater due to high salt levels in the discharge.
 11. Local agencies, including the San Benito County Water District, the City of Hollister, and the Sunnyslope County Water District, are moving forward with regional plans to reduce salt loading to the Hollister groundwater basin. The Water Board supports these efforts.

FACILITY DESCRIPTION

Treatment Facility and Wastewater Disposal

12. The Facility has an influent wet well, flow meter, and two acres of treatment and disposal ponds
13. Wastewater is treated in two clay-lined, mechanically aerated ponds (hereafter "Pond 1" and "Pond 2"). Wastewater is treated by partial-mix facultative (aerobic-anaerobic) stabilization. Wastewater is disposed of through a percolation pond and an evaporation pond (hereafter "Pond 3" and "Pond 4") in series.
14. The treatment ponds are adjacent to Tres Pinos Creek on gently rolling terrain. Depth to groundwater is generally less than 20 feet below ground surface. The general groundwater gradient is to the northwest.
15. The percolation ponds discharge to the San Juan Sub-basin of the Gilroy-Hollister Groundwater Basin.
16. In 2009, Pond 4 was taken off-line, dried, deep ripped, and disked to improve percolation. The Facility appears to be handling wastewater flows.

17. Vegetative growth around the ponds, roadway to the ponds, the lift station, and all other areas pertaining to the wastewater facility is maintained by contract. Weeds are cut and sprayed with herbicide in the fall.
18. There is no erosion control around the edges of ponds No. 3 and 4. Erosion is apparent in pond No. 4.
19. The Facility has an on-site portable emergency generator in case of power failure to operate the influent lift station pump and its components.

Current Capacity

20. The Facility is designed to serve a maximum population of 750 persons and permitted to have a daily flow of 60,000 gallons averaged over each month (30-day average). The historical average 30-day wastewater flow (2006 through 2010) is approximately 23,000 gpd.

Compliance History

21. Report reviews and inspections performed by Water Board staff of the Facility in November 2003 and February 2006 revealed broken flow meters that were unreported, disposal pond bank destabilization, and pond bank vegetation overgrowth. Other reports cite Tres Pinos CWD as having discussed reducing aerator operation based on the Water District's inability to pay its electrical bills. The Tres Pinos CWD re-evaluated its operations and addressed the aforementioned Facility maintenance requirements in June 2006.

Treatment Efficiency

22. Three monitoring wells upgradient and downgradient of the treatment and disposal pond areas produce representative samples and establish groundwater gradient. These wells are located such that proper triangulation can be made to determine the wastewater disposal's impact on the surrounding groundwater.
23. Previous monitoring requirements provide only limited data regarding Pond 1 and Pond 2 treatment efficiencies. Existing effluent sampling consists of daily flow measurements, monthly dissolved oxygen and freeboard measurements, and semiannual (April and October) TDS, sodium, chloride, nitrate, and pH analyses.
24. Organic stabilization (reduction of biochemical oxygen demand [BOD]) and total suspended solids (TSS) removal efficiencies are essentially undocumented. Influent wastewater sampling was not required in the previous permit.
25. Elevated levels of TDS, sodium and chloride (salts) are present in the wastewater effluent. Increases in salt concentrations at the Facility are primarily attributable to the domestic use of water softening devices in the community and concentration through evaporation of wastewater in the treatment and disposal ponds.
26. Data from a 2008 evaluation indicate that there is an observed 45% to 50% increase in TDS between the water supply and the community wastewater.

27. Table 1 compares the community water supply and Facility effluent TDS, sodium and chloride data. The data indicate increases for sodium and chloride averages of 115% and 164%, respectively:

Table 1: Semiannual Effluent TDS, Sodium, & Chloride Data

<i>Parameter</i>	<i>Water Supply (mg/L)</i>			<i>Effluent (mg/L)</i>		
	<i>Min</i>	<i>Max</i>	<i>Avg</i>	<i>Min</i>	<i>Max</i>	<i>Avg</i>
TDS	1,215	1,440	1,289	1,652	2,200	1,894
Na	96	338	218	196	673	470
Cl	170	190	182	387	600	480

Notes:

- a) Minimum, maximum and average values calculated from April 2005 to December 2010 semiannual monitoring data

SITE DESCRIPTION

Land Uses

28. The surrounding area is principally composed of mixed farming, with sparse rural development.

Geographic Setting & Geology

29. The Facility is located within an active seismic zone. The Calaveras Fault zone lies to the south and west. The Tres Pinos Fault zone, a branch of the Calaveras Fault, passes through the development immediately south and parallel to Airline Highway. The San Andreas Rift zone is located several miles to the south.

30. The alluvial materials in the Hollister Valley include Quaternary alluvium and terrace deposits, with terrace deposits more prevalent along the east side of the valley. As such, the surface layers in the development/facility area are composed of undifferentiated alluvium and San Benito Gravels (clay, sand and gravel).

Surface Water

31. The Facility treatment and disposal ponds are approximately 100 feet from the banks of Tres Pinos Creek with a portion of the Facility within the flood plain of the creek. However, the treatment ponds are outside the flood plain. There is hydraulic connectivity between the percolation ponds and Tres Pinos Creek's hyporheic flow (underflow) due to its close proximity to the creek.

32. No other major surface water bodies are near the Facility. The next nearest major surface water bodies are the Paicines Reservoir and the San Justo Reservoir, both approximately five miles away.

Groundwater

33. The Facility is located within the San Juan Valley groundwater sub-basin of the Gilroy-Hollister Groundwater Basin.

34. Groundwater in the basin is generally of poor quality as a result of high mineral content. Elevated TDS and the components of TDS such as chloride, sodium, sulfate, boron, and metals, particularly iron and manganese, are common. Various areas within the basin show elevated levels of nitrate, presumably as a result of historical agricultural practices.
35. Depth to groundwater beneath the two treatment and disposal ponds is generally less than 20 feet with the groundwater flowing west to northwest.
36. Table 2 compares effluent and groundwater monitoring well data:

Table 2: Semiannual Groundwater TDS, Sodium and Chloride Data Synopsis

Parameter	Effluent (mg/L)			MW-1 Upgradient (mg/L)			MW-2 Downgradient (mg/L)			MW-3 Downgradient (mg/L)		
	Min	Max	Avg	Min	Max	Avg	Min	Max	Avg	Min	Max	Avg
TDS	1,652	2,200	1,894	990	1,528	1,408	970	1,532	1,194	982	1,527	1,326
Na	196	673	470	170	730	487	180	645	397	204	640	444
Cl	387	600	480	131	479	371	127	457	265	130	457	363
NO ₃ (As N)	0.28	7	4	1	6	3.42	1	5	3.32	1	5	3.60

Notes:

- a) Minimum, maximum and average values for effluent, MW-1 and MW-2 calculated from April 2005 to December 2010 semiannual monitoring data.
- b) Min, max and average of MW-3 calculated from October 2008 and October 2010 sample data.

37. Historical groundwater levels show that MW-1 is generally upgradient and wells MW-2 and MW-3 are generally downgradient. Table 3 shows historic groundwater elevations.

Table 3: Historical Groundwater Levels from 2006-2010

Date	MW-1 Depth (Ft. MSL)	MW-2 Depth (Ft. MSL)	MW-3 Depth (Ft. MSL)
April 2006	431.27	440.12	NA
Oct 2007	425.8	427.52	NA
April 2008	418.5	420.6	411.2
Oct 2008	423	419.2	408.4
Apr 2009	426.7	425.3	401
Oct 2009	428.2	425.3	400.5
Apr 2010	426.5	420.9	410.4
Oct 2010	422.1	419.6	Not Reported
Average	425.88	422.1	405.1

Notes:

- a) Ft. MSL = Feet above mean sea level.

BASIN PLAN

38. The Water Board has adopted the *Water Quality Control Plan for the Central Coastal Basin* (the Basin Plan), which designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for receiving waters within the Region.
39. The Basin Plan designates the existing and anticipated beneficial uses of groundwater in the vicinity of the Facility to include:
- a) Domestic and municipal water supply
 - b) Agricultural water supply
 - c) Industrial water supply
40. The Basin Plan designates existing and anticipated beneficial uses of Tres Pinos Creek that could be affected by the discharge to include:
- a) Municipal and Domestic Supply
 - b) Agricultural Water Supply
 - c) Industrial Service Supply
 - d) Groundwater Recharge
 - e) Water Contact Recreation
 - f) Non-Contact Water Recreation
 - g) Wildlife Habitat
 - h) Warm Freshwater Habitat
 - i) Spawning, Reproduction, and/or Early Development
 - j) Commercial and Sport Fishing.
41. For receiving waters with designated beneficial uses of municipal and domestic water supply, the Basin Plan establishes the primary drinking water maximum contaminant levels (MCLs), listed at Title 22 of the California Code of Regulations, Sections 64431 (inorganic compounds) and 64444 (organic compounds), as applicable water quality objectives.

MONITORING PROGRAM

42. Monitoring and Reporting Program No. R3-2012-0015 (MRP) is a part of the proposed Order. The MRP requires routine water supply, influent, effluent, groundwater, and facility monitoring to verify compliance and ensure protection of groundwater quality.
43. Monitoring reports are due quarterly by January 31, April 30, July 31, and October 31. An annual report summarizing the year's events and monitoring is due by January 31.

RECYCLED WATER POLICY

44. The Strategic Plan Update 2008-2012 for the Water Boards includes a priority to increase sustainable local water supplies available for meeting existing and future beneficial uses by 1,725,000 acre-feet per year, in excess of 2002 levels, by 2015, and ensure adequate water flows for fish and wildlife habitat. The State Water Resources Control Board adopted the Recycled Water Policy via Resolution No. 2009-0011 on February 3, 2009¹. The Recycled

¹ http://www.swrcb.ca.gov/board_decisions/adopted_orders/resolutions/2009/rs2009_0011.pdf

Water Policy is intended to support the Strategic Plan priority to Promote Sustainable Local Water Supplies. Increasing the acceptance and promoting the use of recycled water is a means towards achieving sustainable local water supplies and can result in reduction in greenhouse gases, a significant driver of climate change. The Recycled Water Policy is also intended to encourage beneficial use of, rather than solely disposal of, recycled water.

45. The Recycled Water Policy calls for the development of regional groundwater basin/sub-basin salt/nutrient management plans. The State Water Resources Control Board recognizes that, pursuant to the letter from statewide water and wastewater entities² dated December 19, 2008, and attached to Resolution No. 2009-0011 adopting the Recycled Water Policy, the local water and wastewater entities, together with local salt/nutrient contributing stakeholders, will fund locally driven and controlled, collaborative processes open to all stakeholders that will prepare salt and nutrient management plans for each basin/sub-basin in California, including compliance with CEQA and participation by Water Board staff.
46. It is the intent of the Recycled Water Policy that salts and nutrients from all sources be managed on a basin-wide or watershed-wide basis in a manner that ensures attainment of water quality objectives and protection of beneficial uses. The State Water Resources Control Board finds that the appropriate way to address salt and nutrient issues is through the development of regional or subregional salt and nutrient management plans rather than through imposing requirements solely on individual projects. The Water Board finds that a combination of regional management plans and individual or programmatic project requirements may be necessary to protect beneficial uses.
47. One of the primary components of the required regional salt/nutrient management plans is the development and implementation of groundwater basin/sub-basin monitoring programs. As specified in the Recycled Water Policy, salt/nutrient contributing stakeholders will be responsible for conducting, compiling, and reporting the monitoring data once the regional groundwater monitoring programs are developed.
48. A large number of technical reports and data contained within Water Board files document widespread and increasing salt and nutrient impacts within the groundwater basins throughout the Central Coast Region, including the San Juan groundwater sub-basin of the Gilroy-Hollister groundwater basin.

SALT MANAGEMENT

49. On October 11, 2009, the State of California enacted Water Code Section 13148, relating to water softeners. This new law authorizes any local agency that owns or operates a community sewer system or water recycling facility to take action, by ordinance or resolution, after a public hearing on the matter, to control salinity inputs from residential self-regenerating water softeners to protect the quality of the waters of the state, if the appropriate Water Board makes a finding that the control of residential salinity input will contribute to the achievement of water quality objectives. Water Code Section 13148 allows local agencies more control over salinity by giving local agencies additional authority to regulate residential self-regenerating

²http://www.waterboards.ca.gov/board_info/agendas/2009/feb/020309_7_%20rw_policy_funding_letter.pdf

water softeners, especially in areas of the state with water bodies adversely impacted by salinity and high use groundwater basins that are hydrogeologically vulnerable to contamination.

50. The Pajaro River Watershed and the groundwater basins of Bolsa, Bolsa SE, San Juan, Hollister West, Hollister East, Tres Pinos, and Pacheco face water quality challenges due to salinity issues from legacy pollution resulting from agricultural and other activities and new discharges of waste from ongoing activities. Producing high quality recycled water is imperative to the regional initiative in San Benito County to maximize beneficial reuse of recycled water through landscape irrigation, agricultural irrigation, industrial reuse, and groundwater recharge. Reuse of recycled water is a critical component of the regional plans to reliably meet current and future water needs for the cities of Hollister, San Juan Bautista, and Tres Pinos and other communities within San Benito County.
51. The control of residential use of self-regenerating water softeners will contribute to the achievement of the water quality objectives approved in the Basin Plan. This finding is based on evidence^{3,4} in the record of the Water Board, as described in this Order, demonstrating that salinity input from residential use of self-regenerating water softeners is a significant source of controllable salts within the County of San Benito and there are regional economic impacts if residential use of self-regenerating water softeners is not controlled.

ENVIRONMENTAL ASSESSMENT

California Environmental Quality Act (CEQA)

52. These waste discharge requirements are for an existing facility and are exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et. seq.) in accordance with Section 15301, Article 19, Chapter 3, Division 6, Title 14 of the California Code of Regulations.

Total Maximum Daily Load

53. California's 2010 303 (d) list of impaired water bodies, which was approved by USEPA in October 2011, identifies the Pajaro River as being impaired for boron and fecal coliform.
54. A Total Maximum Daily Load (TMDL) for fecal coliform bacteria for the Pajaro River watershed, which includes the Pajaro River and Llagas Creek, has been adopted by the Water Board (Water Board Order No. R3-2009-0008). The TDML for fecal coliform prohibits all fecal coliform loading from human sources to the Pajaro River.
55. TMDLs have also been adopted and approved by USEPA for sediment (Resolution No. R5-2005-0132) and nitrate (Resolution No. R5-2005-0131) for the Pajaro River watershed. The

³ HDR. *Hollister Urban Area Water and Wastewater Master Plan*. Produced by City of Hollister, San Benito County, San Benito County Water District, and Sunnyslope County Water District. November 2008

⁴ Bracewell, L. (Bracewell Engineering Inc.). *A Technological and Economic Feasibility Study of Alternatives to Limiting or Prohibiting Water Softeners Per Section 116786 of the Health and Safety Code*. January 2007.

TMDL for nitrate finds that current actions of the Water Board adequately implement the TMDL and will be adequate to correct the impairment due to nitrate. The TMDL for sediment includes a wasteload allocation, which is not applicable to discharges from this Facility.

56. This Order includes requirements of all TMDLs that are applicable to the Facility.

EXISTING ORDERS AND GENERAL FINDINGS

57. The discharge was previously regulated by Waste Discharge Requirements Order No. 99-101, adopted by the Water Board on October 22, 1999.

58. Since the Discharger's wastewater flows are less than one million gallons per day (MGD), storm water discharges from the facility are not subject to the State Water Resources Control Board's General Industrial Activities Storm Water Permit.

59. Discharge of waste is a privilege, not a right, and authorization to discharge is conditional upon the discharger's complying with provisions of Division 7 of the California Water Code and any more stringent effluent limitations necessary to implement water quality control plans, to protect beneficial uses, and to prevent nuisance. Compliance with this order should ensure this and mitigate potential adverse changes in water quality due to the discharge.

60. On August 30, 2011, the Water Board notified the Tres Pinos CWD and interested parties of its intent to issue waste discharge requirements for the discharge and has provided them with a copy of the proposed Order and an opportunity to submit written views and comments.

61. After considering all comments pertaining to this discharge during a public hearing on February 2, 2012, this Order was found consistent with the above findings.

62. Any person affected by this action of the Board may petition the State Water Resources Control Board to review the action in accordance with Section 13320 of the California Water Code and Title 23 of the California Code of Regulations, Section 2050. The State Water Resources Control Board must receive the petition within 30 days of the date of this Order. Copies of the law and regulations applicable to filing petitions will be provided upon request.

IT IS HEREBY ORDERED, that to meet the provisions contained in division 7 of the California Water Code (commencing with section 13000) and regulations adopted thereunder, and the provisions of the federal Clean Water Act (CWA) and regulations and guidelines adopted thereunder, the Discharger shall comply with the requirements in this Order. Pursuant to authority in Sections 13263 and 13267 of the California Water Code, the Tres Pinos CWD, its agents, successors, and assigns, may discharge waste at the above-described Facility providing compliance is maintained with the following:

Throughout these requirements footnotes are listed to indicate the source of requirements specified. Requirement footnotes are as follows (requirements without footnotes are BPJ unless otherwise noted):

BPJ	Best Professional Judgment of Regional Water Quality Control Board Staff
ROWD	The Discharger's Report of Waste Discharge
40CFR	Title 40 Code of Federal Regulations

BP Central Coast Regional Water Quality Control Plan
 T22 Title 22 CCR, Division 4, Chapter 3, Water Reclamation Criteria
 PC Porter-Cologne Water Quality Control Act (California Water Code)

A. DISCHARGE PROHIBITIONS

1. Discharge of treated wastewater to areas other than the treatment and disposal areas shown in Attachment "A" is prohibited.
2. Discharge of any wastes including overflow, bypass, seepage, or overspray from transport and treatment, or disposal systems to Tres Pinos Creek, adjacent drainageways, or onto adjacent properties is prohibited.
3. Bypass of the treatment facility and discharge of untreated or partially treated wastes is prohibited.^{PC}
4. A discharge of sludge, residues, or any other wastes into surface waters or into any area where it may be washed into surface water is prohibited.^{PC}
5. Discharge of waste classified as "hazardous" or "designated" as defined in CCR, Title 23, Chapter 15, Section 2521 (a) and CWC Section 13173, respectively, to any part of the wastewater disposal system is prohibited.
6. The treatment and disposal of wastes at the facility shall not cause pollution, contamination, or nuisance as defined in CWC Section 13050.

B. SPECIFICATIONS

Effluent Limitations

1. Total wastewater flows to the Facility shall not exceed a 30-day running average flow of 0.06 MGD.^{ROWD}
2. Odors associated with the treatment and disposal of wastewater shall not be perceivable beyond the limits of the Discharger's property boundary.
3. Wastewater discharged to designated land disposal areas shall not exceed the following limitations according to the prescribed time-schedule:^{BPJ}

Table 4: Phased Effluent Limitations for Salt Constituents

Effective Date	Limitations^a (mg/L)		
	TDS	Sodium	Chloride
February 2, 2012	Narrative B.9 and B.10	Narrative B.9 and B.10	Narrative B.9 and B.10
January 30, 2014	1,500	300	300
September 30, 2016	1,200	200	200

Notes:

- a. 30-day average

Table 5: Phased Effluent Limitations for Nutrients

Effective Date	Limitation^a (mg/L as N)	
	Nitrate	Ammonia^b
February 2, 2012	Narrative B.9 and B.10	Narrative B.9 and B.10
January 30, 2014	10	10
September 30, 2016	5	5

Notes:

- a. 30-day average
- b. Total ammonia as nitrogen

Table 6: Phased BOD and TSS Effluent Limitations

Effective Date	Limitation^a (mg/L)	
	BOD₅	TSS
February 2, 2012	Narrative B.9 and B.10	Narrative B.9 and B.10
January 30, 2014	60	60
September 30, 2016	30	30

Notes:

- a. 30-day average

4. Effluent discharged to the disposal ponds shall have a pH between 6.5 and 8.4. ^{BP/BPJ}
5. The uppermost one foot of wastewater in the disposal ponds shall have a dissolved oxygen concentration greater than 1.0 mg/L.

Groundwater Limitations

6. The discharge shall not cause total nitrogen concentrations in the groundwater affected by disposal activities to exceed 5 mg/L (as N) or shall not cause a statistically significant increase of total nitrogen concentrations in underlying groundwater, whichever is more stringent.
7. Wastewater discharged to the disposal ponds shall not cause groundwater to contain taste- or odor-producing substances in concentrations that adversely affect beneficial uses. ^{BP}
8. Discharge shall not cause the median concentration of human fecal coliform organisms in groundwater over any seven-day period to be more than 2.2/100 ml.
9. The discharge shall not cause a statistically significant increase of mineral or organic constituent concentrations in underlying groundwater, as determined by statistical analysis of samples collected from wells in the vicinity of the treatment and disposal area. ^{BP}
10. To protect the municipal and domestic supply beneficial uses of groundwater underlying the disposal ponds, treated wastewater discharged from the Facility shall not cause groundwater to: ^{BP/BPJ/T22}
 - a) exceed the Primary Maximum Contaminant Levels for organic chemicals set forth in the California Code of Regulations, Title 22, Division 4, Chapter 15, Article 5.5, Section 64444.
 - b) exceed the Primary Maximum Contaminant Levels for inorganic chemicals set forth in the California Code of Regulations, Title 22, Division 4, Chapter 15, Article 4, Section 64431.

- c) exceed the levels for radionuclide set forth in the California Code of Regulations, Title 22, Division 4, Chapter 15, Article 5, Section 64443.
11. The discharge shall not cause radionuclide to be present in groundwater in concentrations that are deleterious to human, plant, animal, or aquatic life, or result in the accumulation of radionuclide in the food web to an extent that presents a hazard to human, plant, animal, or aquatic life.^{BP}

System Operation

12. Treatment and disposal areas shall be fenced and posted (English and Spanish) to advise the public that the Facility contains domestic wastewater.
13. All storm water contacting domestic wastewater shall be contained on the site.
14. Freeboard shall exceed two feet in all designated wastewater treatment, storage, and disposal ponds.^{BPJ}
15. Wastewater shall be confined to land owned or controlled by the Discharger.^{BPJ}
16. All solids generated from the screening and treatment process must be reclaimed or disposed of in a manner acceptable to the Executive Officer.

Wastewater Disposal

17. Effluent shall not be discharged within 100 feet of any existing water supply well.
18. Wastewater shall be confined within bermed areas.^{BPJ}
19. Wastewater application rates shall be consistent with accepted engineering practice.^{BPJ}
20. Disposal ponds shall be alternated to maximize disposal rates and permit emptying/drying for maintenance purposes.
21. Disposal ponds shall be dried and disked or plowed annually, or at a sufficient frequency to keep the disposal ponds operating in a proper manner.^{BPJ}
22. The Facility shall be managed so as to minimize mosquito-breeding habitat.^{BPJ}

C. SALT AND NUTRIENT MANAGEMENT PROGRAM

1. A workplan to quantify sources of total dissolved solids (TDS), chloride, and sodium in the Discharger's effluent was developed by San Benito Engineering, on behalf of the Discharger, and presented to the Water Board in September 2007. The workplan indicated the Discharger would conduct a salts study around the town of Tres Pinos in October 2007. The workplan indicated test results would be presented to the Water Board by May 2008 and a salts reduction workplan would be produced by August 2008 and presented to the Water Board for approval.
2. Water Board staff received on November 5, 2008, a report from the Discharger summarizing the salinity assessment test results. The report concluded that there is no single area of

excessive contribution to the levels of TDS in Tres Pinos wastewater and the next step was to develop a workplan to decrease salt sources.

3. The Tres Pinos CWD shall submit a Salts and Nutrient Management Program to the Water Board **by January 30, 2013**.
4. The Tres Pinos CWD shall maintain an ongoing salt and nutrient management program with the intent of reducing mass loading of salts and nutrients (with an emphasis on nitrogen species) in treated effluent to a level that will ensure compliance with effluent limitations and protect beneficial uses of groundwater.
5. Salt reduction measures shall focus on all potential salt contributors to the collection system, including water supply, commercial, industrial and residential dischargers. The salt and nutrient management program shall address the concentration of salts in the wastewater treatment process as a result of excessive hydraulic retention times and/or chemical addition.
6. Nutrient reduction measures shall focus on optimizing wastewater treatment processes for nitrification and denitrification, or other means of nitrogen removal. Reduction measures may also include source control (non-human waste from commercial and industrial sources) as appropriate.
7. As part of the salt and nutrient management program, the Discharger shall submit an annual report of salt and nutrient reduction efforts. This salt and nutrient management report shall be included as part of the annual report described in Monitoring and Reporting Program No. R3-2012-0015. The report shall be submitted by January 30th, and shall include (at a minimum):

Salt Component

- a. Calculations of annual salt mass discharged to (influent) and from (effluent) the wastewater treatment facility with an accompanying analysis of contributing sources;
- b. Analysis of wastewater evaporation/salt concentration effects;
- c. Analysis of groundwater monitoring results related to salt constituents;
- d. Analysis of potential impacts of salt loading on the groundwater basin;
- e. A summary of existing salt reduction measures; and
- f. Recommendations and time schedules for implementation of any additional salt reduction measures.

Nutrient Component

- a. Calculations of annual nitrogen mass (for all identified species) discharged to (influent) and from (effluent) the wastewater treatment facility with an accompanying analysis of contributing sources;
 - b. Analysis of wastewater treatment facility ability to facilitate nitrification and denitrification, or other means of nitrogen removal;
 - c. Analysis of groundwater monitoring results related to nitrogen constituents;
 - d. Analysis of potential impacts of nitrogen loading on the groundwater basin;
 - e. A summary of existing nitrogen loading reduction measures; and,
 - f. Recommendations and time schedules for implementation of any additional nitrogen loading reduction measures.
8. As an alternative to the salt and nutrient management program requirements described above, upon Executive Officer approval, the Tres Pinos CWD may submit documentation

and a summary of participation in a regional salt and nutrient management plan implemented under the provisions of State Water Resources Control Board Resolution No. 2009-0011 (Recycled Water Policy).

9. **The salt and nutrient management reports are due biennially (every two years) on January 30th** and may be included as part of the annual monitoring report. The first salinity and nutrient management report is due **January 30, 2014**.

D. LONG-TERM WASTEWATER MANAGEMENT PLAN

1. The Tres Pinos CWD shall take necessary steps to develop and implement a long-term wastewater management plan (LTWMP or plan), in accordance with the following schedule and requirements:
 - a) **By September 30, 2012**, the Tres Pinos CWD shall submit a workplan and time schedule for the development of a long-term wastewater management plan. The workplan shall address the evaluation of treatment system performance and disposal capacity with the intent of developing and implementing a LTWMP that will enable the facility to meet the phased effluent limitations prescribed in this Order and provide adequate treatment and disposal capacity for projected future flows. The plan shall consider connection to the City of Hollister wastewater collection system. The plan shall also consider recycling and reuse as alternatives to disposal. The plan shall also include an analysis of existing fiscal resources that are available for use in the development and implementation of the LTWMP. Development of the LTWMP shall be performed in coordination with all appropriate stakeholders to ensure steps are taken to obtain all necessary approvals and permits, and ensure compliance with all applicable regulations prior to implementation of the plan. Reclamation and reuse options for treated wastewater must be considered in the development of the plan, and the level of treatment shall be appropriate for the projected end-use of treated wastewater and be protective of all applicable beneficial uses. The LTWMP shall describe how and when Tres Pinos CWD will conduct improved collection system maintenance in portions of the collection system most likely to affect impaired surface water bodies, with the end result being compliance with the human fecal coliform zero wasteload allocation as required by the Pajaro River Watershed TMDL for fecal coliform. This includes, but is not limited to:
 - (1) stream monitoring for fecal coliform or another fecal indicator bacteria, and reporting of these monitoring activities,
 - (2) annual reporting of self-assessment as to whether the sanitary collection system jurisdiction is in compliance with the Pajaro River Watershed fecal coliform TMDL.
 - b) **By March 31, 2013**, the Discharger shall submit the Tres Pinos CWD's options for a LTWMP for approval by the Executive Officer.
 - c) **By January 30, 2016**, the Discharger shall complete improvements to the facility to meet the phased effluent limitations in this Order and provide adequate excess disposal capacity.
- b) All plan documents and reports shall be prepared by, or under the supervision/review of, and be certified by a registered professional engineer registered in California and possessing applicable experience in wastewater engineering and planning.

E. GENERAL PROVISIONS

1. Order No. 99-101, "Waste Discharge Requirements for Tres Pinos County Water District," adopted by the Water Board on October 22, 1999, is hereby rescinded, except for enforcement purposes.
2. The Discharger shall comply with MRP No. R3-2012-0015, as specified by the Executive Officer. The Executive Officer is authorized to revise the MRP at any time during the Permit term.
3. All technical and monitoring reports submitted pursuant to this Order are required pursuant to Section 13267 of the California Water Code. Failure to submit reports in accordance with schedules established by this Order, attachments to this Order, or failure to submit a report of sufficient technical quality acceptable to the Executive Officer, may subject the discharger to enforcement action pursuant to Section 13268 of the California Water Code.
4. The Discharger shall comply with all applicable items of the attached "Standard Provisions and Reporting Requirements for Waste Discharge Requirements," dated January 1984.
5. Physical facilities shall be designed and constructed according to accepted engineering practices and shall be capable of full compliance with this Order when properly operated and maintained. Operation and maintenance of the wastewater system shall conform to the Operations and Maintenance Plan, which shall be periodically reviewed, and, if appropriate, revised. The Operations and Maintenance Plan is subject to review by the Executive Officer, who shall be provided a current copy within ten days of any significant revision.
6. All discharges from the Facility shall comply with lawful requirements of the municipalities, counties, irrigation districts, drainage districts, and other local agencies regarding discharges of waste to land and surface waters within their jurisdiction.
7. **Biennially, by January 30th**, the Discharger shall submit an engineering technical report to the Executive Officer that evaluates the performance and capacity of the wastewater treatment and disposal system. The report shall contain a hydraulic balance analysis of facility inputs and outputs including influent flow, precipitation, infiltration/percolation, and evaporation and shall quantify disposal capacity of the facility based on actual operating data. The first annual engineering technical report is due January 30, 2013.
8. The Discharger shall give advance notice to the Water Board of any planned changes in the permitted facility or waste management activities that may result in noncompliance with this Order.
9. This Order may be reopened to address any changes in State or Federal plans, policies, or regulations that would affect the requirements for the discharge.
10. In the event of any change in control or ownership of land or facilities presently owned or utilized by the Discharger, the Discharger shall notify the succeeding owner(s) or operator(s) of the existence of this Order by letter, a copy of which shall be forwarded to the Water Board.
11. The Discharger shall file a Report of Waste Discharge in accordance with Title 23, Chapter 3, Subchapter 9, of the California Administrative Code given a material change in the character, location, or volume of the discharge. Changes or modification to the Facility as a

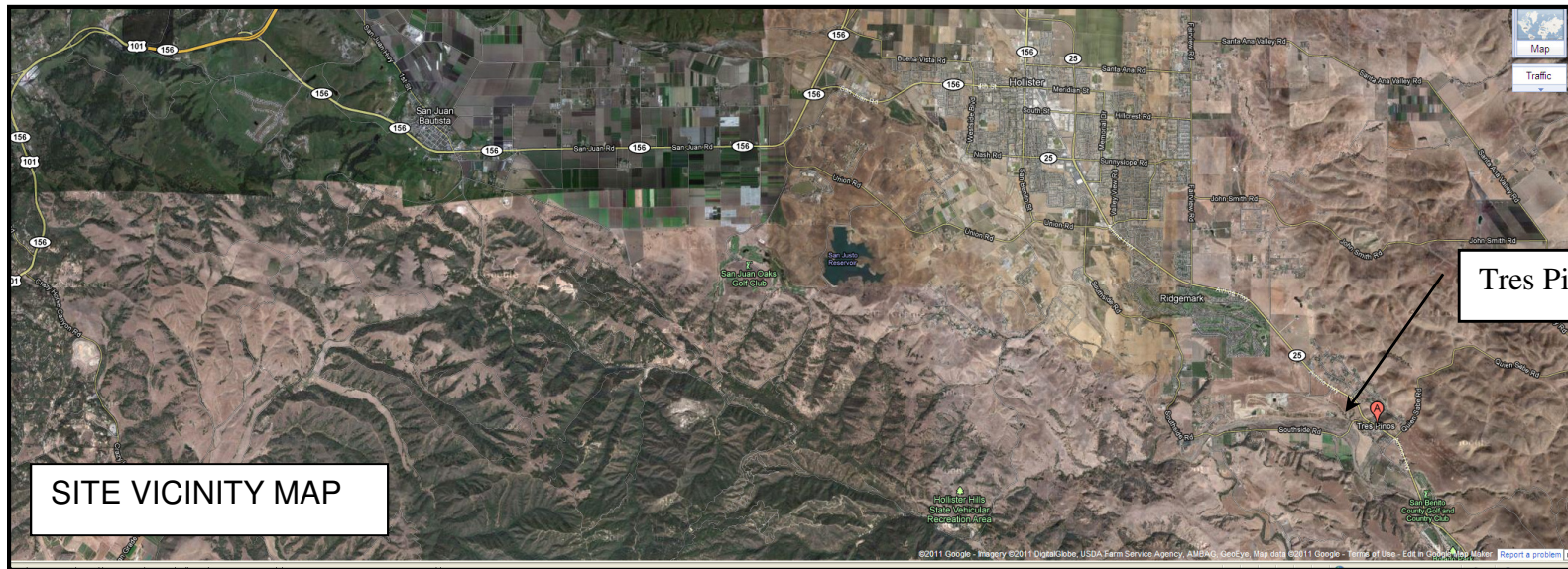
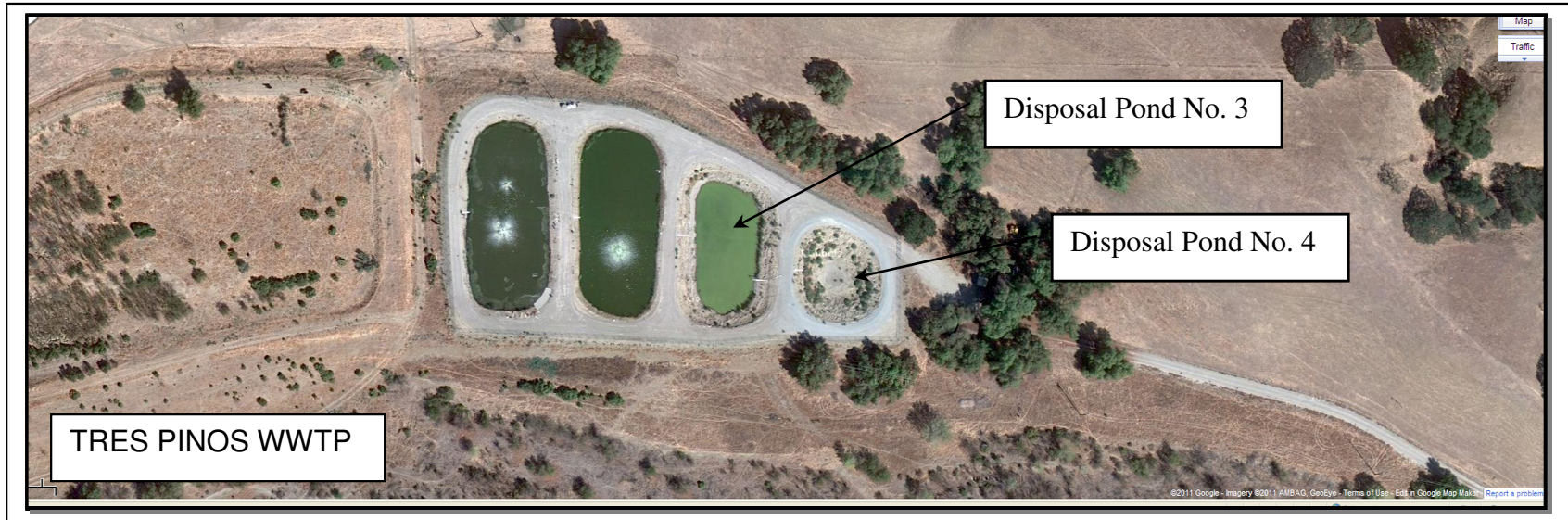
result of LTWMP implementation may require a Report of Waste Discharge submittal and update of the Permit. Material changes warranting submittal of a Report of Waste Discharge include, but are not limited to, the following:

- a) Addition of a major industrial waste discharge to a discharge of essentially domestic sewage, or the addition of a new process or product by an industrial facility resulting in a change in the character of the waste.
 - b) Significant change in disposal method, e.g., change from a land disposal to a direct discharge to water, or change in the method of treatment which would significantly alter the characteristics of the waste.
 - c) Significant change in the disposal area, e.g., moving the discharge to another drainage area, to a different water body, or to a disposal area significantly removed from the original area potentially causing different water quality or nuisance problems.
 - d) Increase in flow beyond that specified in the waste discharge requirements.
12. The Water Board retains the authority to amend the time schedules for any or all of the effluent limitations or Long-Term Wastewater Management Plan compliance deadlines if it determines delays are due to circumstances beyond the Tres Pinos CWD's control.

I, Roger W. Briggs, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, Central Coast Region, on February 2, 2012.

Roger W. Briggs, Executive Officer

**TRES PINOS WATER DISTRICT WDR ORDER NO. R3-2012-0015
ATTACHMENT A**



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401**

MONITORING AND REPORTING PROGRAM NO. R3-2012-0015
Waste Discharge Identification No. 3 350103001
Proposed for Consideration at the February 1-2, 2012 Meeting

For

**TRES PINOS COUNTY WATER DISTRICT
WASTEWATER TREATMENT PLANT
SAN BENITO COUNTY**

Reporting responsibilities are specified in Sections 13225(a) and 13267(b) of the California Water Code. This Discharge Monitoring and Reporting Program is issued in accordance with Provision E.2 of Regional Board Order No. R3-2012-0015.

WATER SUPPLY MONITORING

1. Representative samples of the Tres Pinos County Water District (Tres Pinos CWD) water supply shall be collected and analyzed for the constituents and at the frequency specified below:

Parameter/Constituent^{a,b,c}	Units	Sample Type	Minimum Sampling and Analyzing Frequency
Total Dissolved Solids	mg/L	Grab	Semiannually (March & September)
Sodium	mg/L	Grab	Semiannually (March & September)
Chloride	mg/L	Grab	Semiannually (March & September)
Sulfate	mg/L	Grab	Semiannually (March & September)
Boron	mg/L	Grab	Semiannually (March & September)
Nitrate (as Nitrogen)	mg/L	Grab	Semiannually (March & September)

Notes:

- a) Sampling results for the Department of Health Services may be submitted to satisfy these requirements.
- b) Data shall be reported as individual concentrations for each water supply well sampled and calculated as flow weighted averages to represent as delivered water supply quality.
- c) Sampling for specific analytes may be reduced or discontinued upon Discharger request and Executive Officer approval for parameters/constituents for which additional data provides no benefit.

INFLUENT MONITORING

1. Representative samples of the influent shall be collected and analyzed for the parameters/constituents and at the frequencies specified in the following table for the Tres Pinos CWD wastewater treatment facility:

Parameter/Constituent ^{a,b}	Units	Sample Type ^a	Minimum Sampling and Analyzing Frequency
Flow Volume	GPD	Metered	Daily
Maximum Daily Flow	GPD	Metered	Monthly
Average Daily Flow	GPD	Calculated	30-day Running Average
pH	-	Grab	Quarterly
BOD ₅	mg/L	24 hr Composite	Quarterly
Total Suspended Solids	mg/L	24 hr Composite	Quarterly
Total Dissolved Solids	mg/L	24 hr Composite	Quarterly
Sodium	mg/L	24 hr Composite	Quarterly
Chloride	mg/L	24 hr Composite	Quarterly
Nitrate (as N)	mg/L	24 hr Composite	Quarterly
Nitrite (as N)	mg/L	24 hr Composite	Quarterly
Ammonia (as N)	mg/L	24 hr Composite	Quarterly
Total Nitrogen	mg/L	24 hr Composite	Quarterly
Sulfate	mg/L	24 hr Composite	Semiannually (March & September)
Boron	mg/L	24 hr Composite	Semiannually (March & September)

Notes:

- Composite samples shall be flow weighted. Monthly 24 hr composite samples shall be collected on a Monday through Friday rotating schedule and subsequent sampling events shall be separated by at least 16 days and no greater than 30 days.
- Sampling for specific analytes may be reduced or discontinued upon Discharger request and Executive Officer approval for parameters/constituents for which additional data provides no benefit.

TREATMENT AND DISPOSAL POND MONITORING

- Representative sampling measurements shall be taken in each treatment and disposal pond for the parameters/constituents and at the frequency specified below:

Parameter/Constituent ^{a,b}	Units	Sample Type ^a	Minimum Sampling and Analyzing Frequency
pH	-	Grab	Weekly
Dissolved Oxygen (DO)	mg/l	Grab	Weekly
Sludge Depth ^b	feet	Measured	Annually (September)
Freeboard	Feet	Measured	Monthly

Notes:

- Grab sample for pH and DO shall be collected at one-foot depth from at least three representative locations within each treatment and disposal pond.
- Sludge depth shall be measured within the first two treatment ponds at each facility. A sufficient number of measurements shall be taken to provide representative estimates of sludge volumes within each pond.

EFFLUENT MONITORING

1. Representative samples of wastewater being discharged shall be collected and analyzed for the parameters/constituents and at the frequencies specified in the following table:

Parameter/Constituent^{a,b}	Units	Sample Type	Minimum Sampling and Analyzing Frequency
pH	-	Grab	Quarterly
BOD ₅	mg/L	Grab	Quarterly
Total Suspended Solids	mg/L	Grab	Quarterly
Total Dissolved Solids	mg/L	Grab	Quarterly
Sodium	mg/L	Grab	Quarterly
Chloride	mg/L	Grab	Quarterly
Nitrite (as N)	mg/L	Grab	Quarterly
Nitrate (as N)	mg/L	Grab	Quarterly
Ammonia (as N)	mg/L	Grab	Quarterly
Total Nitrogen	mg/L	Grab	Quarterly
Boron	mg/L	Grab	Semiannually (March & September)
Sulfate	mg/L	Grab	Semiannually (March & September)

Notes:

- a) Effluent samples shall be collected from locations representative of final effluent being discharged to the subsurface.
- b) Sampling for specific analytes may be reduced or discontinued upon Discharger request and Executive Officer approval for parameters/constituents for which additional data provides no benefit.

2. Monthly evaporation and infiltration/percolation volumes shall also be estimated monthly for each facility by conducting a hydraulic balance using available facility flow data and facility area specific evaporation rates as determined by the pan evaporation method and using appropriate pan coefficients. Alternatively, using data from a nearby California Irrigation Management Information System (CIMIS) Station is acceptable in calculating monthly evaporation.

GROUNDWATER MONITORING

1. Representative samples of groundwater shall be collected from shallow wells upgradient and downgradient of disposal areas. To ascertain compliance with waste discharge requirements in establishing new, or verifying existing upgradient and downgradient monitoring wells, the monitoring network shall be supported by sufficient, as determined by the Executive Officer, geologic and hydrogeologic documentation. Samples of groundwater shall be collected and analyzed for the constituents and at the frequencies specified in the following table:

Parameter/Constituent^a	Units	Sample Type	Minimum Sampling and Analyzing Frequency
Depth to Groundwater	Ft above MSL	Measured	Quarterly (March, June, Sept. Dec.)
pH	-	Grab	Quarterly (March, June, Sept. Dec.)
Total Dissolved Solids	mg/L	Grab	Quarterly (March, June, Sept. Dec.)
Sodium	mg/L	Grab	Quarterly (March, June, Sept. Dec.)
Chloride	mg/L	Grab	Quarterly (March, June, Sept. Dec.)
Nitrite (as N)	mg/L	Grab	Quarterly (March, June, Sept. Dec.)
Nitrate (as N)	mg/L	Grab	Quarterly (March, June, Sept. Dec.)

Parameter/Constituent ^a	Units	Sample Type	Minimum Sampling and Analyzing Frequency
Total Kjeldahl Nitrogen (as N)	mg/L	Grab	Quarterly (March, June, Sept. Dec.)
Total Nitrogen (as N)	mg/L	Grab	Quarterly (Dec., March, June, Sept.)
Boron	mg/L	Grab	Semiannually (March & September)
Sulfate	mg/L	Grab	Semiannually (March & September)

Notes:

- a) Sampling for specific analytes may be reduced or discontinued upon Discharger request and Executive Officer approval for parameters/constituents for which additional data provides no benefit.

SOLIDS/BIOSOLIDS MONITORING

1. The following information shall be submitted with the Annual Report required by Standard Provision C.16:
 - a) Annual depth measurements (with a map) and the average depth of solids in the first two ponds of each facility with an estimate of the total volume of solids within each pond.
 - b) Annual biosolids removed in dry tons and percent solids.
 - c) If appropriate, a narrative description of biosolids dewatering and other treatment processes, including process parameters. For example, if drying beds are used, report depth of application and drying time. If composting is used, report the temperature achieved and duration.
 - d) A description of disposal methods, including the following information related to the disposal methods used at the facility. If more than one method is used, include the percentage of annual biosolids production disposed by each method.
 - i. For landfill disposal include: 1) the Regional Board WDR numbers that regulate the landfills used, 2) the present classifications of the landfills used, and 3) the names and locations of the facilities receiving biosolids.
 - ii. For land application include: 1) the location of the site(s), 2) the Regional Board's WDR numbers that regulate the site(s), 3) the application rate in lbs/acre/year (specify wet or dry), and 4) subsequent uses of the land.
2. A representative sample of residual solids (biosolids) as obtained from the last point in the handling process (i.e., in the drying beds just prior to removal or from pond bottom) shall be analyzed for the constituents in the table below prior to being reclaimed/disposed. The sample shall be documented to show it is representative of biosolids from the facility. All constituents shall be analyzed for total concentrations for comparison with the Total Threshold Limit Concentration (TTLC). The Waste Extraction Test (WET) shall be performed on any constituent when the total concentration of the waste exceeds ten times the Soluble Threshold Limit Concentration (STLC) for that substance.

Parameter/Constituent ^a	Units	Sample Type	Minimum Sampling and Analyzing Frequency ^b
Quantity	Tons or yds ³	Measured during removal	Each load
Moisture Content	%	Grab	Prior to transport/disposal
Nitrate (as N)	mg/kg	Grab	Prior to transport/disposal
Total Phosphorus	mg/kg	Grab	Prior to transport/disposal
pH	pH units	Grab	Prior to transport/disposal
Grease & Oil	mg/kg	Grab	Prior to transport/disposal
Arsenic	mg/kg	Grab	Prior to transport/disposal
Antimony	mg/kg	Grab	Prior to transport/disposal
Barium	mg/kg	Grab	Prior to transport/disposal
Beryllium	mg/kg	Grab	Prior to transport/disposal
Boron	mg/kg	Grab	Prior to transport/disposal
Cadmium	mg/kg	Grab	Prior to transport/disposal
Cobalt	mg/kg	Grab	Prior to transport/disposal
Copper	mg/kg	Grab	Prior to transport/disposal
Chromium, VI & Total	mg/kg	Grab	Prior to transport/disposal
Lead	mg/kg	Grab	Prior to transport/disposal
Mercury	mg/kg	Grab	Prior to transport/disposal
Molybdenum	mg/kg	Grab	Prior to transport/disposal
Nickel	mg/kg	Grab	Prior to transport/disposal
Selenium	mg/kg	Grab	Prior to transport/disposal
Silver	mg/kg	Grab	Prior to transport/disposal
Thallium	mg/kg	Grab	Prior to transport/disposal
Tin	mg/kg	Grab	Prior to transport/disposal
Vanadium	mg/kg	Grab	Prior to transport/disposal
Zinc	mg/kg	Grab	Prior to transport/disposal
Pesticides ^c	mg/kg	Grab	Prior to transport/disposal ^c
Organic Lead ^c	mg/kg	Grab	Prior to transport/disposal ^c
PCBs ^c	mg/kg	Grab	Prior to transport/disposal ^c

Notes:

- Characterization required by disposal facility may be submitted in place of this list.
- If no need for sludge/biosolids removal occurs during a given year, the Discharger will have no obligation for biosolids monitoring. Reporting in this case shall explain the absence of this monitoring.
- Sampling for pesticides, organic lead and PCBs is only required at least once every 5 years prior to transport or disposal

FACILITY MONITORING

- Weekly inspections shall be made of the wastewater treatment and disposal pond areas. During the inspection, notes shall be kept of any violations of waste discharge requirements. A log of these inspections shall be maintained and a summary of observations made during the inspections shall be submitted with each quarterly monitoring report.

REPORTING

- Monitoring reports are required quarterly, by the 30th of January, April, July, and October**, and shall contain all data collected or calculated over the previous three months. Data shall be tabulated in a logical and coherent format and be accompanied by laboratory analytical data sheets.

2. **By January 30th of each year** the Discharger shall submit an annual monitoring report Pursuant to Standard Provisions and Reporting Requirements, General Reporting Requirement C.16 which states:

By January 30 of each year, the discharger shall submit an annual report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous year. The Discharger shall discuss the compliance record and corrective actions taken, or which may be needed, to bring the discharger into full compliance. The report shall address operator certification and provide a list of current operating personnel and their grade of certification. The report shall inform the Board of the date of the Facility's Operation and Maintenance Manual, of the date the manual was last reviewed, and whether the manual is complete and valid for the current facility.

3. **Biennially, by January 30th** the Discharger shall submit an engineering technical report as specified in provision E.7 of Order No. R3-2012-0015 that evaluates the performance and capacity of the wastewater treatment and disposal system. The first report is due January 30, 2013.
4. **Biennially, by January 30th** the Discharger shall submit a Salt and Nutrient Management report as specified in provision C.9 of Order No. R3-2012-0015. The first report is due January 30, 2014.
5. If the Discharger monitors any pollutant designated more frequently than is required by this Monitoring and Reporting Program, the results of such monitoring shall be included in the monitoring reports.

PROVISIONS

1. All quarterly monitoring shall be performed any time during the monitoring quarter (calendar quarter), but samples representative of two consecutive quarterly periods must be separated by at least one month. Monthly sampling shall be conducted at regularly scheduled times during each month and consecutive events should be approximately four weeks apart and no less than two weeks apart. Unless otherwise specified by the Monitoring and Reporting Program, annual sampling shall be performed any time during the calendar year, but samples representative of two consecutive annual periods must be obtained at least six months apart.
2. All monitoring must be conducted according to test procedures established by 40 Code of Federal Regulations Part 136, entitled, "Guidelines Establishing Test Procedures for Analysis of Pollutants." All sampling analyses shall be conducted at the lowest practical quantitation limits achievable under U.S. EPA specified methodology. In cases where effluent limits are set below the lowest achievable practical quantitation limits, constituents not detected at the practical quantitation limit will be considered in compliance with effluent limitations.
3. All samples collected shall be tracked and submitted under chain of custody and analyzed by a laboratory certified by California Department of Health Services for the specified analysis.
4. This Monitoring and Reporting Program may be revised at any time during the Permit term, as necessary, under the authority of the Executive Officer.

IMPLEMENTATION

This monitoring and reporting program shall be implemented immediately. However the Discharger will be allowed a two month grace period to procure equipment and establish new sampling protocols and sampling locations for monthly influent and effluent monitoring. Monthly influent and effluent monitoring shall commence no later than April 2012.

ORDERED BY _____
Executive Officer

Date