

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

320 West 4th Street, Suite 200, Los Angeles, California 90013

**REVISED MONITORING AND REPORTING PROGRAM NO. CI-5322
FOR
THE LIMONEIRA WASTEWATER TREATMENT PLANT
(FILE NO. 66-066)
ISSUED TO
THE LIMONEIRA COMPANY**

The revised Monitoring and Reporting Program (MRP) is issued pursuant to California Water Code (CWC) section 13267, which authorizes the Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) to require the Limoneira Company (hereinafter Discharger) to submit technical and monitoring reports. The reports required herein are necessary to assure compliance with Waste Discharge Requirements (WDRs) and Water Reclamation Requirements (WRRs) Order No. R4-2024-XXXX and to protect the waters of the state and their beneficial uses. The evidence that supports the need for the reports is set forth in the WDRs and WRRs and the Los Angeles Water Board Record.

I. SUBMITTAL OF REPORTS

- A. The Discharger shall submit the following reports to the State Water Resources Control Board (State Water Board) GeoTracker database under Global ID WDR100017186 by the due dates listed in Table 1.
 - 1. **Quarterly Monitoring Reports** shall be received at the Los Angeles Water Board by the 15th day of the second month following the end of each quarterly monitoring period according to Table 1. The first monitoring report under this program shall be received at the Los Angeles Water Board by **July 15, 2024**.

Table 1. Quarterly Monitoring Reporting Period and Due Date

Monitoring Report	Reporting Period	Report Due Date
1 st Quarter	January 1 – March 31	April 15
2 nd Quarter	April 1 – June 30	July 15
3 rd Quarter	July 1 – September 30	October 15
4 th Quarter	October 1 – December 31	January 15

- 2. **Annual Summary Report** shall be received by the Los Angeles Water Board by March 1 of each year. The first Annual Summary Report under this program must be received by the Los Angeles Water Board no later than **March 1, 2025**.
- B. If there is no discharge during any reporting period, the report shall still be submitted and so state.

- C. The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including electronic data format (EDF) groundwater monitoring data, discharge location data, and monitoring reports in Portable Document Format (pdf) to the State Water Board GeoTracker database under Global ID WDR100017186.

II. MONITORING REQUIREMENTS FOR COMPLIANCE AND PERFORMANCE

- A. Monitoring shall be performed to determine compliance with the requirements of this Order and shall include, but is not limited to, implementation and documentation of the following.
1. Locations of each groundwater well where representative samples can be obtained and the rationale for the selection. The Discharger must include a map, at a scale of 1-inch equals 1,200 feet or less, that clearly identifies the locations of all groundwater monitoring wells.
 2. Sampling protocols (specified in 40 California of Federal Regulations [CFR] Part 136 or American Water Works Association [AWWA] standards where appropriate) and chain of custody procedures.
 3. For groundwater monitoring, outline the methods and procedures to be used for measuring water levels; purging wells; collecting samples; decontaminating equipment; containing, preserving, and shipping samples; and maintaining appropriate documentation. Also include the procedures for handling, storing, testing, and disposing of purged and decontamination waters generated from the sampling events.
 4. Laboratory or laboratories which conducted the analyses. Include copy or copies of laboratory certifications by the Environmental Laboratory Accreditation Program (ELAP) of the State Water Board Division of Drinking Water (DDW) every year or when the Discharger changes their contract laboratory.
 5. Analytical test methods used and the corresponding Detection Limits for Purposes of Reporting (DLR) for unregulated and regulated chemicals. Please see the DDW's website at Drinking Water Programs (https://www.waterboards.ca.gov/drinking_water/programs/index.html).
 6. Quality assurance and control measures.
- B. The samples shall be analyzed using analytical methods described in 40 CFR Part 136. Where no methods are specified for a given pollutant by commercially available methods approved by the Los Angeles Water Board and/or State Water Board, the Discharger shall select the analytical methods that provide DLRs lower than the limits prescribed in this Order.

- C. The Discharger shall instruct its laboratories to establish calibration standards so that the DLRs (or its equivalent if there is a different treatment of samples relative to calibration standards) are the lowest. At no time shall the Discharger use analytical data derived from extrapolation beyond the lowest point of the calibration curve.
- D. Upon request by the Discharger, the Los Angeles Water Board, in consultation with the State Water Board Quality Assurance Program, may establish DLRs in any of the following situations.
1. When the pollutant has no established method under 40 CFR Part 136 (revised May 14, 1999, or subsequent revision);
 2. When the method under 40 CFR Part 136 for the pollutant has a DLR higher than the limit specified in this Order; or
 3. When the Discharger agrees to use a test method that is more sensitive than those specified in 40 CFR Part 136 and is commercially available.
- E. Samples of disinfected effluent must be analyzed within allowable holding time limits as specified in 40 CFR section 136.3. All quality assurance/quality control (QA/QC) analyses 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 the Los Angeles Water Board. Proper chain of custody procedures must be followed, and a copy of that documentation shall be submitted with the quarterly monitoring report.
- F. Constituents of emerging concern (CECs): In recent years, the Los Angeles Water Board has required monitoring of a select group of anthropogenic chemicals, particularly pesticides, pharmaceuticals and personal care products, known collectively as CECs, into monitoring and program requirements to better understand the propensity, persistence and effects of CECs in our environment. Recently adopted permits in this region contain requirements for CEC effluent monitoring, including identification of the CECs to be monitored in the effluent, sample type, sampling frequency, and sampling methodology.
1. The Discharger shall monitor the CECs identified in Attachment B in the wastewater treatment plant's effluent. The reporting limits in Attachment B shall be used for these constituents.
 2. The Discharger shall select methods according to the following approach:
 - a. Use the United States Environmental Protection Agency (USEPA) drinking water methods, if available;
 - b. Use DDW-recommended methods for CECs, if available;

- c. If there is no DDW-recommended drinking water method for a chemical, and more than a single USEPA-approved method is available, use the most sensitive USEPA-approved method;
 - d. If there is no USEPA-approved method for a chemical, and more than one method is available from the scientific literature and commercial laboratory, after consultation with the DDW, use the most sensitive method; or
 - e. If no approved method is available for a specific chemical, the Discharger's laboratory may develop or use its own methods and should provide the analytical methods to the DDW or the Los Angeles Water Board for review and approval. Those methods may be used until DDW-recommended or USEPA-approved methods are available.
 - f. In the event that subsections II.F.2.a. or II.F.2.e. are applicable, the Discharger shall inform the Los Angeles Water Board.
3. The Discharger shall perform a baseline monitoring of CECs identified in Attachment B in its effluent no later than six months after the adoption of this permit. Thereafter, CECs shall be monitored every five years. The Los Angeles Water Board Executive Officer may add or delete chemicals from Attachment B as new analytical methods become available and may also make revisions to approved analytical methods as needed. A revised CECs list will be made available to the Discharger when changes occur. The Discharger shall request (and submit a justification for) any deviation from the attached list for Executive Officer approval, if a change is required before collecting samples.
4. Monitoring results shall be reported as part of the annual report. Analysis under this section is for monitoring purposes only as there are currently no standards for these constituents.
- G. The groundwater monitoring results shall be included in the quarterly monitoring reports and annual summary reports.
- H. All groundwater monitoring reports shall include, at minimum, the following.
 1. Groundwater monitoring well identification number, date, and time of sampling;
 2. Sampler identification, laboratory identification, and chain of custody;
 3. Depth to groundwater measured to the nearest 0.01 foot and groundwater elevation to the nearest 0.01 foot mean sea level (MSL);

4. Calculation of vertical separation of the water table from the bottom of the disposal system; and
5. Groundwater contour map depicting the hydraulic gradient and direction of groundwater flow.

III. MONITORING REQUIREMENTS FOR WASTEWATER AND RECYCLED WATER VOLUME REPORTING

Wastewater and recycled water volumes monitoring reports must include the information below in accordance with the Recycled Water Policy.

- A. Effluent: Monthly volume of wastewater collected and treated by the wastewater treatment plant
- B. Production: Monthly volume of wastewater treated
- C. Discharge: Monthly volume of treated wastewater discharged to land, where beneficial use is not taking place, including evaporation or percolation ponds, overland flow, or spray irrigation disposal, excluding pasture or fields with harvested crops
- D. Reuse: Monthly volume of recycled water distributed
- E. Reuse Categories: Annual volume of treated wastewater distributed for beneficial use in compliance with California Code of Regulations (CCR), Title 22 in each of the use categories listed below.
 - a. Agricultural irrigation: pasture or crop irrigation
 - b. Landscape irrigation: irrigation of parks, greenbelts, and playgrounds; school yards; athletic fields; cemeteries; residential landscaping, common areas; commercial landscaping; industrial landscaping; and freeway, highway, and street landscaping
 - c. Golf course irrigation: irrigation of golf courses, including water used to maintain aesthetic impoundments within golf courses
 - d. Commercial application: commercial facilities, business use (such as laundries and office buildings), car washes, retail nurseries, and appurtenant landscaping that is not separately metered
 - e. Industrial application: manufacturing facilities, cooling towers, process water, and appurtenant landscaping that is not separately metered
 - f. Geothermal energy production: augmentation of geothermal fields

- g. Other non-potable uses: including but not limited to dust control, flushing sewers, fire protection, fill stations, snow making, and recreational impoundments
- h. Groundwater recharge: the planned use of recycled water for replenishment of a groundwater basin or an aquifer that has been designated as a source of water supply for a public water system. Includes surface or subsurface application, except for seawater intrusion barrier use
- i. Reservoir water augmentation: the planned placement of recycled water into a raw surface water reservoir used as a source of domestic drinking water supply for a public water system, as defined in section 116275 of the Health and Safety Code, or into a constructed system conveying water to such a reservoir (Water Code § 13561)
- j. Raw water augmentation: the planned placement of recycled water into a system of pipelines or aqueducts that deliver raw water to a drinking water treatment plant that provides water to a public water system as defined in section 116275 of the Health and Safety Code (Water Code § 13561)
- k. Other potable uses: both indirect and direct potable reuse other than for groundwater recharge, seawater intrusion barrier, reservoir water augmentation, or raw water augmentation

IV. REPORTING REQUIREMENTS

The Discharger shall submit all reports to the Los Angeles Water Board by the dates indicated in Section I. All quarterly self-monitoring and annual summary reports shall clearly list all non-compliance with WDRs, as well as all excursions of effluent limits. All quarterly and annual monitoring reports shall contain a separate section titled "Summary of Non-Compliance", which discusses the compliance records and corrective actions taken or planned that may be needed to bring the discharge into full compliance with WDRs.

A. Quarterly Self-Monitoring Reports

- 1. The quarterly SMRs shall include, at a minimum, the following information:
 - a. Disposal areas in use each month.
 - b. Total flowrate in gallons per day (gpd) to the disposal area(s).
 - d. Total flowrate for the recycled water use with its application category.

- e. Vertical separation distance, in feet, between the bottom of each disposal area and its underlying groundwater table when discharging treated wastewater to the selected disposal area(s).
 - f. The date and time of sampling and analyses on the effluent and groundwater samples.
 - g. All analytical results of the effluent, and groundwater samples collected during the monitoring period.
 - h. A summary and discussion of any violations that occurred during the reporting period, and all actions taken or planned to correct these violations.
 - i. A description and graphical presentation (e.g., arrow on a map) of the direction of groundwater flow under the facility, based on groundwater level elevations taken during the collection of the groundwater quality samples.
 - j. Documentation of all QA/QC procedures that were followed during sampling and laboratory analyses.
 - k. Records of any operational problems, plant upset and equipment breakdowns or malfunctions, and any discharge(s) used for land disposal.
 - l. Discussion of compliance, non-compliance, or violation of waste discharge requirements.
 - m. All corrective and/or preventive action(s) taken or planned with a schedule of implementation, if any violation occurs.
2. For the purpose of reporting compliance with numerical limitations, analytical data shall be reported using the following reporting protocols.
- a. Sample results greater than or equal to the DLR must be reported “as measured” by the laboratory (i.e., the measured chemical concentration in the sample);
 - b. Sample results less than the DLR, but greater than or equal to the laboratory’s method detection limit (MDL), must be reported as “Detected, but Not Quantified,” or “DNQ.” The laboratory must write the estimated chemical concentration of the sample next to DNQ as well as the words “Estimated Concentration” (may be shortened to “Est. Conc.”); or

- c. Sample results less than the laboratory's MDL must be reported as "None-Detected," or "ND."
3. If the Discharger samples and performs analyses (other than for process/operational control, startup, research, or equipment testing) on any sample more frequently than required in this MRP using approved analytical methods, the results of those analyses shall be included in the report. These results shall be included in the calculation of the average used in demonstrating compliance with average effluent limits, receiving groundwater limits, etc.
4. The Los Angeles Water Board may request supporting documentation, such as daily logs of operations.

B. Annual Summary Reports

The Annual Summary Report shall include, at a minimum, the following information.

1. Tabular and graphical summaries of the monitoring data obtained during the previous calendar year.
2. Discussion of the compliance record and corrective and/or preventive action(s) taken or planned that may be needed to bring the treated effluent into full compliance with the requirements in this Order.
3. In-depth discussion of the results of the final effluent monitoring and groundwater monitoring conducted during the previous year includes:
 - a. Any change of receiving groundwater resulting from effluent discharges at disposal area(s); and
 - b. Any change of groundwater flow pattern resulting from discharge via the disposal area(s).

Temporal and spatial trends in the data shall be analyzed, with particular reference to comparisons between stations with respect to distances from the monitoring wells and comparisons to data collected during previous years.

4. Total volume of wastewater discharged to the disposal area(s).
5. Total volume of recycled water distributed to the recycled water use areas.
6. Description of any changes and anticipated changes, including any impacts on the operation of any unit processes or facilities.

7. List of the analytical methods employed for each test and associated laboratory QA/QC procedures. The report shall restate the laboratories used by the Discharger to monitor compliance with the accompanying Order, their status of certification, and provide a summary of analyses.
8. Confirmation of the operator's certification and a list of current operating personnel, their responsibilities, and their corresponding grade of certification.
9. Operation and maintenance report. The information to be contained in the report shall include, at a minimum, the following:
 - a. The name and address of the person or company responsible for the operation and maintenance of the facility;
 - b. Type of maintenance (preventive or corrective action performed);
 - c. Frequency of maintenance, if preventive; and
 - d. Maintenance record of disposal areas and waste sludge drying beds, including the results of at least monthly observations in the areas for any overflow.
10. Summary of any change of the Operation, Maintenance, and Monitoring Plan (OMM Plan) due to the optimization of the existing wastewater treatment plant operation.

V. WATER QUALITY MONITORING REQUIREMENTS

A. Effluent Monitoring Requirements for Recycled Water Application and Disposal

1. The sampling point shall be located where representative samples for recycled water application and disposal shall be obtained at the outlet of the clear well after disinfection.
2. The following shall constitute the effluent monitoring program for recycled water application and disposal, specified in Tables 2A and 2B.

Table 2A. Recycled Water Monitoring

Constituent	Unit ^[1]	Type of Sample	Minimum Frequency of Analysis
Total flowrate for recycled water application	gpd	Recorder	Continuous
Turbidity	NTU	Recorder	Continuous

Constituent	Unit ^[1]	Type of Sample	Minimum Frequency of Analysis
Total coliform	MPN/100 mL	Grab	Daily

Table 2B. Effluent Monitoring for Disposal

Constituent	Unit ^[1]	Type of Sample	Minimum Frequency of Analysis
Total flowrate for disposal	gpd	Recorder	Continuous
pH	pH units	Grab	Monthly
Turbidity	NTU	Grab	Continuous
Nitrite as nitrogen	mg/L	Grab	Monthly
Nitrate as nitrogen	mg/L	Grab	Monthly
Ammonia as nitrogen	mg/L	Grab	Monthly
Organic nitrogen	mg/L	Grab	Monthly
Total Kjeldahl nitrogen	mg/L	Grab	Monthly
Total nitrogen	mg/L	Grab	Monthly
Total coliform	MPN/100 mL	Grab	Monthly
Fecal coliform	MPN/100 mL	Grab	Monthly
Enterococcus	MPN/100 mL	Grab	Monthly
Biochemical oxygen demand 5-day (BOD5 @20°C)	mg/L	Grab	Quarterly
Total suspended solids	mg/L	Grab	Quarterly
Oil and grease	mg/L	Grab	Quarterly
Total dissolved solids	mg/L	Grab	Quarterly
Boron	mg/L	Grab	Quarterly
Chloride	mg/L	Grab	Quarterly
Sulfate	mg/L	Grab	Quarterly
Total residual chlorine	Mg/L	Grab	Quarterly
Methylene blue active substances (MBAS)	mg/L	Grab	Quarterly

Constituent	Unit ^[1]	Type of Sample	Minimum Frequency of Analysis
Total phosphorus as P	mg/L	Grab	Quarterly
Glyphosate	mg/L	Grab	Quarterly
Simazine	mg/L	Grab	Quarterly
Abamectin	mg/L	Grab	Quarterly
Norflurazon	mg/L	Grab	Quarterly
Chlorpyrifos	mg/L	Grab	Quarterly
Metoldehyde	mg/L	Grab	Quarterly
Inorganic chemicals (Constituents listed in Attachment A-1)	various	Grab	Every Five Years
Radionuclides (Constituents listed in Attachment A-2)	various	Grab	Every Five Years
Organic Chemicals (Constituents listed in Attachment A-3)	various	Grab	Every Five Years
Disinfection Byproducts (Constituents listed in Attachment A-4)	various	Grab	Every Five Years
Secondary Constituents (Constituents listed in Attachment A-5)	various	Grab	Every Five Years
Constituents of Emerging Concern (CECs) in Attachment B	various	Grab	Every Five Years
Priority pollutants in Attachment D	µg/L	Grab	Every Five Years

Table 2B notes:

^[1]mg/L: milligrams per liter; µg/L: micrograms per liter; MPN/100 mL: most probable number per 100 milliliters; NTU: Nephelometric turbidity units; gpd: gallons per day

The total effluent flowrate shall be reported as the daily minimum, maximum, and average values.

Total nitrogen is the sum of ammonia as nitrogen, nitrite as nitrogen, nitrate as nitrogen, and organic nitrogen.

Monitoring of constituents listed in Attachments A-1 through A-5, Attachment B, and Attachment D shall be performed during the first year of the WDRs and WRRs adoption, and every five (5) years thereof.

B. Groundwater Monitoring

1. The Discharger shall continue to conduct groundwater monitoring from all existing monitoring wells, including MW-M1, MW-M2, MW-M3, MW-M4, MW-A1, MW-A2, MW-A3, MW-A4, OL-1, OL-2, and OL-3.
2. The required groundwater monitoring of constituents/parameters with sample type and frequencies is specified in Table 3.

Table 3. Groundwater Monitoring

Constituents	Units	Type of Sample	Minimum Frequency of Analysis
Water level elevation	feet	Recorder	Quarterly
pH	pH units	Grab	Quarterly
BOD ₅ @20°C	mg/L	Grab	Quarterly
Nitrite as nitrogen	mg/L	Grab	Quarterly
Nitrate as nitrogen	mg/L	Grab	Quarterly
Ammonia as nitrogen	mg/L	Grab	Quarterly
Organic nitrogen	mg/L	Grab	Quarterly
Total nitrogen	mg/L	Grab	Quarterly
Total dissolved solids	mg/L	Grab	Quarterly
Sulfate	mg/L	Grab	Quarterly
Chloride	mg/L	Grab	Quarterly
Boron	mg/L	Grab	Quarterly
Total coliform	MPN/100 mL	Grab	Quarterly
Fecal coliform	MPN/100 mL	Grab	Quarterly
Enterococcus	MPN/100 mL	Grab	Quarterly
Total phosphorus as P	mg/L	Grab	Quarterly
MBAS (surfactants)	mg/L	Grab	Quarterly
Glyphosate	mg/L	Grab	Quarterly
Simazine	mg/L	Grab	Quarterly
Abamectin	mg/L	Grab	Quarterly
Norflurazon	mg/L	Grab	Quarterly

Constituents	Units	Type of Sample	Minimum Frequency of Analysis
Chlorpyrifos	mg/L	Grab	Quarterly
Metalddehyde	mg/L	Grab	Quarterly
Constituents listed in Attachments A-1 through A-5	various	Grab	Every Five Years
Constituents of Emerging Concern (CECs) in Attachment B	various	Grab	Every Five Years
Priority pollutants in Attachment D	µg/L	Grab	Every Five Years

Table 3 notes:

^[1]mg/L: milligrams per liter; µg/L: micrograms per liter; MPN/100 mL: most probable number per 100 milliliters

Water level elevations must be measured to the nearest 0.01 feet and referenced to mean sea level.

Total nitrogen is the sum of ammonia as nitrogen, nitrite as nitrogen, nitrate as nitrogen, and organic nitrogen.

Monitoring of constituents listed in Attachments A-1 through A-5, Attachment B, and Attachment D shall be performed during the first year of the WDRs and WRRs adoption, and every five (5) years thereof.

VI. GENERAL MONITORING AND REPORTING REQUIREMENTS

- A. The Discharger shall comply with all Standard Provisions (Attachment C) related to monitoring, reporting, and recordkeeping.
- B. Monitoring reports shall be signed by either the principal Executive Officer or ranking elected official.
- C. Each monitoring 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

- D. The Discharger shall retain records of all monitoring information, including all calibration and maintenance, monitoring instrumentation, and copies of all reports required by this Order, for a period of at least three (3) years from the date of sampling measurement, or report. This period may be extended by request of the Los Angeles Water Board at any time and shall be extended during the course of any unresolved administrative proceeding or judicial litigation regarding the regulated activity.

VII. WASTE HAULING REPORTING

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

VIII. MONITORING FREQUENCIES

The Los Angeles Water Board Executive Officer is delegated authority to revise this monitoring and reporting program, including monitoring frequencies and parameters. The Discharger may make a request for modifying the monitoring frequency or the list of monitoring parameters with justification. The Discharger shall not make any adjustment until the Executive Officer provides a written approval after determining that the request is adequately justified.

These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the Los Angeles Water Board.

Ordered by Date: June 27, 2024

Susana Arredondo

Executive Officer