

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

**WASTE DISCHARGE REQUIREMENTS
ORDER NO. R3-2011-0214
Waste Discharger Identification No. 3 351111422**

For

**THOUSAND TRAILS RV RESORT AND CAMPGROUND SAN BENITO
PAICINES, SAN BENITO COUNTY**

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

Facility Owner and Location

1. MHC TT, Inc. (Discharger), 2 North Riverside Plaza, Suite 800, Chicago, Illinois 60606, owns and operates the Thousand Trails RV Resort and Campground – San Benito (Facility) located at 16225 Cienega Road, Paicines, California 95043, as shown in Attachment A.

Purpose of the Order

The primary purpose of this Order is to regulate the handling and disposal of the Facility's sewage and wastewater to prevent water and soil contamination, and also protect public health.

Site/Facility Description

2. The Facility is located approximately 2.5 miles southwest of the Paicines Reservoir and is approximately 200 acres in size. The park consists of up to 25 long term occupancy trailers, 510 recreational vehicles (RV) sites, two swimming pools, and a conventional septic tank/leach field system. The estimated average wastewater flow is 4,800 gallons per day (GPD) with peak flows of 19,000 GPD, based on meter readings between January 2010 and April 2011. The RV Facility has been in existence for approximately 20 years and has never acquired a waste discharge permit from the Central Coast Water Board.
3. The Facility is located in the San Juan Sub-basin of the Gilroy-Hollister Groundwater Basin. Depth to first encountered groundwater around the Facility is unknown.
4. There exists two water supply wells (A and B) located within the Facility property lines, but are more than 400 feet away from the wastewater disposal fields. The two water supply wells are screened at a depth of 339 and 335 feet below ground surface.
5. The Pescadero Creek (ephemeral) flows along the southern property line of the Facility.

Discharge Type (Waste Classification)

6. The Facility's wastewater characteristics are similar to that of domestic wastewater with the addition of common RV holding tank additives, which can include formaldehyde, para-formaldehyde, glutaraldehyde, ammonia, para-dichlorobenzene, methanol, bronopol, soap and laundry detergent (sodium carbonate, sodium triphosphate, etc.), bleach (sodium perchlorate, sodium hypochlorite, etc.), baking soda (sodium bicarbonate), and vinegar (acetic acid), among others. The Threat to Water Quality and Complexity rating for this type of discharge is considered to be 2C.

Design and Current Capacity

7. Distribution Box: The below-ground distribution box is a pre-cast concrete tank with one baffle and six distribution outlets. The baffle is designed to control the rate at which waste flows through the outlets, ensuring the waste is distributed evenly to the system. The inlet pipe is six inches in diameter, while the outlet pipes are four inches in diameter.

Leach Field: The leach field consists of ten distribution boxes, each connected to six perforated pipes, for a total of 60 perforated pipes. These pipes have a 4-inch diameter, are 100 feet long, and are installed three feet below surface grade. Pipe trenches have a width of 1.5 feet. The side wall spacing is six feet. A full depth riser is installed at the midpoint of every other trench for monitoring of function. The piping is installed at no more than a one percent slope from the distribution box.

Lift Stations: Five lift stations sited around the Facility transport collected wastewater to a central septic tank. One final lift station located just after the central septic tank pumps the septic wastewater to the leach field. The lift stations were re-built in October 2009 due to several plumbing and electrical code violations observed by the San Benito County Environmental Health department.

Septic Tank: The 20,000 gallon capacity septic tank is an underground tank. A baffle creates separate compartments in the tank where the first compartment receives the effluent which is then decanted into the second compartment, just prior to discharge into the distribution boxes, and then the leach field.

There is no recycling of wastewater. Sludge is disposed of at an off-site facility.

Geology

8. Soils directly beneath the leach field consist of sandy alluvium from the ground surface to 12 feet below grade.

Proximity to Adjacent Property Owners

9. The RV Facility is bounded by roads on every side, including Cienega Road to the west. The types of usage for bordering lands include grazing and minimal prime farm land.

Monitoring and Reporting Program (MRP)

10. The MRP requires Water Supply Monitoring, Effluent Monitoring, Groundwater Monitoring, Septic Tank Monitoring, Solid Wastes Disposal Reporting, and Disposal Area Monitoring.
11. Monitoring reports are due semiannually in January and June of each year.

Basin Plan

12. The Regional Water Board has adopted the Water Quality Control Plan, Central Coast Basin (the Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for receiving waters within the Region.

Groundwater

13. Pursuant to the Basin Plan, existing and potential beneficial uses of groundwater within the Central Coast Region include:
 - a. Municipal and domestic supply
 - b. Agricultural supply
14. The Central Coast Water Board finds that the control of residential use of self-regenerating water softeners will contribute to the achievement of the groundwater quality objectives approved in the Basin Plan. This finding is based on evidence in the records of the Central Coast Water Board 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.

California Environmental Quality Act

15. These requirements are for an existing facility and their adoption is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et. Seq.) in accordance with Section 15301, Chapter 3, Title 14, of the California Code of Regulations (Existing Facilities Exemption).

Existing Orders and General Findings

16. There are currently no Waste Discharge Requirements from the Central Coast Region Water Board for this Facility.
17. In accordance with Water Code section 13263(g), the discharge of waste to waters of the state is a privilege, not a right, and authorization to discharge is conditional upon the discharge complying with provisions of Division 7 of the California Water Code, including water quality control plans, and protection of beneficial uses, and prevention of nuisance.
18. Antidegradation: State Water Board Resolution No. 68-16 *Statement of Policy with Respect to Maintaining High Quality of Waters in California* (Resolution No. 68-16) requires Regional Water Boards, in regulating the discharge of waste, to maintain high quality waters of the State until it is demonstrated that any change in quality will be consistent with maximum benefit to

the people of the State, will not unreasonably affect beneficial uses, and will not result in water quality less than that described in a Regional Water Board's policies (e.g., quality that exceeds applicable water quality standards). Resolution No. 68-16 also states, in part:

Any activity which produces or may produce a waste or increased volume or concentration of waste and which discharges or proposes to discharge to existing high quality waters will be required to meet waste discharge requirements which will result in best practicable treatment and control of the discharge necessary to assure that (a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained.

The discharges regulated by this Order are subject to waste discharge requirements that will result in best practicable treatment or control, the prevention of pollution and nuisance, and maintenance of the highest water quality consistent with maximum benefit to the people of the State.

19. **Water Code Section 13267.** The monitoring and reporting requirements in this WDR and in Monitoring and Reporting Program No. R3-2011-0214 are necessary to determine compliance with these waste discharge requirements and to determine the Facility's impacts, if any, on receiving water bodies. The evidence in support of requiring these reports is discussed in the above findings.
20. Violations of this Order will result in enforcement actions as authorized under the California Water Code.
21. On September 20, 2011, the Water Board notified the Discharger 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.
22. Any person aggrieved by this action of the Central Coast Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of the order, except that if the thirtieth day following the date of the order falls on a Saturday, Sunday, or state holiday, the petition must be received by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the internet at http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

IT IS HEREBY ORDERED, pursuant to authority in Sections 13263 and 13267 of the California Water Code, that MHC TT, Inc., its agents, successors, and assigns, may discharge waste at the above-described RV Facility providing compliance is maintained with the following:

All technical and monitoring reports submitted pursuant to this Order are required pursuant to Section 13267 of the California Water Code. Discharger is required to submit the reports because the Discharger filed a Report of Waste Discharge. More detailed information is available in the Board's public file on this matter. Failure to submit reports in accordance with schedules established by the Order, attachments to this Order, or failure to submit a report of sufficient technical quality to be acceptable to the Executive Officer, may subject the Discharger to enforcement action pursuant to Section 13268 of the California Water Code. The Water Board will base all enforcement actions on the date of Order adoption.

Other prohibitions and conditions, definitions, and the method of determining compliance are contained in the attached "Standard Provisions and Reporting Requirements for Waste Discharge Requirements," dated January 1984, referenced in Section C.17 of this Order.

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
PC Porter-Cologne Water Quality Control Act (California Water Code)

A. Discharge Prohibitions

1. Daily flow average over 30 days shall not exceed 15,000 GPD. Daily peak flow shall not exceed 20,000 GPD.
2. Discharge of wastewater to areas other than disposal areas shown in Attachment "A" is prohibited unless otherwise approved by the Executive Officer to meet requirements for additional disposal capacity as required herein.
3. Discharge of any wastes including overflow, bypass, seepage, collection system spills or overflows, or from transport, treatment, storage, or disposal systems to adjacent drainageways or adjacent properties not listed in this Order is prohibited.
4. Bypass of the septic system and discharge of untreated or partially treated wastes is prohibited.
PC
5. Discharge of sludges, residues, or any other wastes into surface waters or into any area where it may be washed into surface water is prohibited.^{PC}
6. Discharge of any waste, except in compliance with this Order or other applicable waste discharge requirements is prohibited.
7. Neither the treatment, storage nor disposal of waste shall create a pollution, contamination or nuisance, as defined by Section 13050 of the California Water Code.
8. The discharge of treated wastewater shall not cause a violation of the prohibitions contained in the Basin Plan.

B. Discharge Specifications

1. All collected screenings, sludges, and other solids removed from liquid wastes must be disposed of in a municipal solid waste landfill, reused by land application, or disposed of in a sludge-only landfill accordance with 40 CFR Parts 503 and 258, and Title 27 CCR.

C. Groundwater Limitations

1. The discharge shall not cause nitrate concentrations in the groundwater affected by disposal activities to exceed 10 mg/l (as N) or shall not cause a statistically significant increase of nitrate concentrations in underlying groundwater, whichever is more stringent.
2. Wastewater discharged to the leachfield shall not cause groundwater to contain taste- or odor-producing substances in concentrations that adversely affect beneficial uses.^{BP}
3. The discharge shall not cause the median concentration of fecal coliform organisms in groundwater over any seven-day period to be more than 2.2/100 mL.
4. 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}
5. To protect the *municipal and domestic supply* beneficial uses of groundwater underlying the leachfield, 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 radionuclides set forth in the California Code of Regulations, Title 22, Division 4, Chapter 15, Article 5, Section 64443.
6. The discharge shall not cause radionuclides to be present in groundwater in concentrations that are deleterious to human, plant, animal, or aquatic life, or result in the accumulation of radionuclides in the food web to an extent that presents a hazard to human, plant, animal, or aquatic life.^{BP}
7. Underlying groundwater shall not contain constituents in excess of the following limitations:

Parameter	Units	Maximum
Formaldehyde	mg/L	0.10
1,4-Dichlorobenzene	mg/L	0.005
Methanol	mg/L	0.012

8. The maximum groundwater constituent concentration shall apply to the results of a single grab sample.

D. PROVISIONS

1. **Duty to Comply:** The Discharger must comply with all conditions of this Order. Any noncompliance with this Order constitutes a violation of the California Water Code and is grounds for (a) enforcement action; (b) termination, revocation and reissuance, or modification of this Order; or (c) denial of a report of waste discharge in application for new or revised waste discharge requirements.

2. **Groundwater Monitoring Wells:** The Discharger shall install or locate monitoring wells upgradient and downgradient of the disposal area **by July 31, 2012**. The Discharger shall be responsible for determining the direction of groundwater flow and level to determine the appropriate location and depth of upgradient and downgradient wells, such that the wells monitor any impact on groundwater from the discharge. The Discharger must submit to the Executive Officer a report discussing the proposed location and depth of the monitoring wells and technical justification of the proposal, and receive Executive Officer concurrence, prior to the installation of monitoring wells. The monitoring wells shall meet or exceed well standards contained in the Department of Water Resources Bulletins 84-81 and 74-90. The Discharger shall also comply with the monitoring well reporting provisions of Sections 13750 through 13755 of the California Water Code.
3. **Entry and Inspection:** The Discharger shall allow the Water Board or its authorized representatives to:
 - a. Enter upon the Discharger's premises where a regulated facility or activity is located or conducted, or where records pertinent to this permit are kept;
 - b. Inspect and photograph any facilities, equipment (including monitoring and control equipment), practices, or operations pertinent to this Order;
 - c. Have access to and copy any records pertinent to this permit; and
 - d. Sample or monitor for the purposes of assuring permit compliance.
4. **Monitoring and Reporting:** The Discharger shall comply with the attached Monitoring and Reporting Program to Order No. R3-2011-0214 and future revisions thereto as specified by the Executive Officer. Monitoring results shall be reported at the intervals specified in the Monitoring and Reporting Program.
5. A copy of this Order shall be kept at the discharge Facility for reference by operating personnel. Key operating and site management personnel shall be familiar with its contents.
6. In the event the Discharger wishes to terminate authorization under this Order, the Discharger shall submit a Notice of Termination (NOT). A Water Board staff inspection of the Facility may be required prior to terminating coverage. Termination from coverage will occur on the date specified in the NOT, unless notified otherwise. All discharges shall cease before the date of termination, and any discharges on or after this date shall be considered in violation of this Order unless covered by other WDRs.
7. In the event of any change in control or ownership of land or waste discharge facilities presently owned or controlled by the Discharger, the Discharger shall notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be immediately forwarded to the Executive Officer.
8. The Discharger shall take all reasonable steps to prevent any discharge in violation of this Order.

9. The Discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) to achieve compliance with this Order. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with this Order.
10. The Discharger shall furnish the Water Board, within a reasonable time, any information that the Board may request to determine compliance with this Order.
11. 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 to be acceptable to the Executive Officer, may subject the Discharger to enforcement action pursuant to Section 13268 of the California Water Code. The Water Board will base all enforcement actions on the date of Order adoption.
12. **Document Signing and Certification:** All reports required by this Order and other information requested by the Water Board shall be signed by a person described below or by a duly authorized representative of that person.
 - a. For a corporation: by a responsible corporate officer such as: (a) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function; (b) any other person who performs similar policy or decision-making functions for the corporation; or (c) the manager of one or more manufacturing, production, or operating facilities if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
 - b. For a partnership or sole proprietorship: by a general partner or the proprietor.
13. Any person signing a document makes the following certification, whether written or implied:

"I certify under penalty of law this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."
14. The Discharger shall give notice to the Water Board as soon as possible of any planned alterations to the permitted Facility that may change the nature or concentration of pollutants in the discharge.
15. The Water Board may review this Order at any time and may modify or terminate this Order in its entirety as appropriate.
16. **Standard Provisions:** The Discharger shall comply with all applicable items of the attached "Standard Provisions and Reporting Requirements for Waste Discharge Requirements," dated January 1984.

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 December 1, 2011.

Roger W. Briggs
Executive Officer

ATTACHMENT:

A – Approved Disposal Location

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Thousand Trails WDR.docx

ORDER NO. R3-2011-0214
MHC THOUSAND TRAILS INC.
SAN BENITO PRESERVE
PAICINES, SAN BENITO COUNTY

ATTACHMENT A

