28 August 2019

James Harris, Maintenance Supervisor
Sierra Unified School District
33220 Lodge Road
Tollhouse, CA 93667

CERTIFIED MAIL
7018 3090 0001 1194 6701

NOTICE OF APPLICABILITY (NOA), STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ-R5320, GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; SIERRA UNIFIED SCHOOL DISTRICT; SIERRA JOINT UNION HIGH SCHOOL WASTEWATER TREATMENT FACILITY; FRESNO COUNTY

On 15 May 2019, Alfonso Manrique, on behalf of the Sierra Unified School District (District or Discharger), submitted a Report of Waste Discharge (RWD) for the Sierra Joint Union High School onsite waste treatment facility (Facility). The District is requesting coverage under the State Water Resources Control Board (State Water Board) Water Quality Order 2014-0153-DWQ *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order). The Facility is currently regulated by Waste Discharge Requirements (WDRs) Order 85-230. The RWD included a completed and signed Form 200 and a technical report prepared by Alfonso Manrique (RCE 6367), a California registered engineer with AM Consulting Engineers, Inc. Based on the information provided and a review of available records, the Facility treats and disposes of less than 100,000 gallons of domestic wastewater per day and is eligible for coverage under the General Order. This letter serves as formal notice that the General Order is applicable to your system and the wastewater discharge described below upon rescission of Order 85-230. You are hereby assigned General Order **2014-0153-DWQ-R5320** for your system.

You should familiarize yourself with the entire General Order and its attachments enclosed with this letter, which describe mandatory discharge and monitoring requirements. Sampling, monitoring, and reporting requirements applicable to your treatment and disposal methods must be completed in accordance with the appropriate treatment system sections of the General Order and the attached *Monitoring and Reporting Program* (MRP) No. **2014-0153-DWQ-R5320**. This MRP was developed after consideration of your waste characterization and site conditions described in the attached memorandum.

DISCHARGE DESCRIPTION

The District owns and operates the Facility which provides wastewater treatment and disposal for Sierra Joint Union High School at 33220 Lodge Road near Tollhouse in Fresno County (Latitude 37.034622°, Longitude -119.460317°) approximately 3.5 miles east of Prather. Sierra Joint Union High School currently serves approximately 600 students and about 80 staff members.

The Facility consists of a headworks with an inline grinder and a manually cleaned bar screen followed by an activated sludge package treatment plant. Disposal is by evaporation/percolation ponds. A Site Plan showing the Facility is provided as **Attachment A**. The package plant is set below grade and consists of an aerated reactor compartment followed by a secondary clarifier. An airlift pump removes sludge from the bottom of the clarifier and returns it to the aerated reactor compartment. Wasted sludge is periodically removed and disposed of by a septic tank hauler. A flow schematic is provided as **Attachment B**. Treated effluent is disposed of by five evaporation/percolation ponds. During most of the year treated effluent is only sent to Ponds 1 and 2. Pond 3 only receives effluent during winter months when evaporation rates are lower. The remaining two ponds (Ponds 4 and 5) provide backup and generally do not receive effluent. Current flows at the Facility range from about 3,300 to 12,600 gallons per day (gpd).

FACILITY SPECIFIC REQUIREMENTS AND EFFLUENT LIMITATIONS

The Discharger will maintain exclusive control over the discharge and shall comply with the terms and conditions of this NOA, General Order 2014-0153-DWQ, with all attachments, and MRP No. 2014-0153-DWQ-R5320.

In accordance with Section B.1 of the General Order and the information provided in the attached memorandum, treated wastewater discharged to the evaporation/percolation ponds shall not exceed a **monthly average daily discharge of 20,000 gpd.** In accordance with the requirements of the General Order, this NOA does not specify a nitrogen effluent limitation since the Facility flow rate is less than 20,000 gpd.

As discussed in the attached memorandum, the Discharger shall comply with the effluent limitations specified in Table 1. Compliance with the effluent limitations specified in Table 1 shall be determined after all treatment prior to discharge to the evaporation/percolation ponds (Table 2 of the MRP).

Table 1 - Effluent Limitations

Constituent	Unit	Average Monthly Limit	7-Day Average Limit
Biochemical Oxygen Demand (BOD)	Milligrams per liter (mg/L)	30	45
Total Suspended Solids (TSS)	mg/L	30	45

The General Order states in Section B.1 that the Discharger shall comply with the setbacks as described in Table 3 of the General Order. This table summarizes different setback requirements for wastewater treatment system equipment, activities, land application areas, and storage and/or treatment ponds from sensitive receptors and property lines where applicable. The Discharger shall comply with the applicable setback requirements, as summarized in the following table:

Table 2 - Site-Specific Applicable Setback Requirements

Equipment or Activity	Domestic Well	Flowing Stream[1]	Ephemeral Stream Drainage[2]	Property Line
Septic Tank, Treatment System, or Collection System[3]	150 ft.[4]	50 ft.[5]	50 ft.	5 ft.[5]
Impoundment (undisinfected secondary recycled water)[6]	150 ft.[7]	150 ft.	150 ft.	50 ft.

[1] A flowing stream shall be measured from the ordinary high-water mark established by fluctuations of water elevation and indicated by characteristics such as shelving, changes in soil character, vegetation type, presence of litter or debris, or other appropriate means.

[2] Ephemeral Stream Drainage denotes a surface water drainage feature that flows only after rain or snowmelt and does not have sufficient groundwater seepage (baseflow) to maintain a condition of flowing surface water. The drainage shall be measured from a line that defines the limit of the ordinary high-water mark (described in “1” above). Irrigation canals are not considered ephemeral streams drainage.

[3] Septic Tank, Treatment System, or Collection System addresses equipment located below ground or that impedes leak detection by routine visual inspection.

[4] Setback established by Onsite Wastewater Treatment System Policy, section 7.5.6.

[5] Setback established by California Plumbing Code, Table K-1.

[6] Undisinfected secondary recycled water is defined in California Code of Regulations, title 22, section 60301.900.

[7] Setback established by California Code of Regulations, title 22, section 60310(d).

The Discharger shall comply with all applicable sections in the General Order, including:

1. Activated Sludge System requirements specified in Section B.4 of the General Order;
2. Pond System requirements specified in Section B.5 of the General Order; and
3. Sludge/Solids/Biosolids Disposal requirements specified in Section B.8 of the General Order.

Provision E.1 of the General Order requires dischargers enrolled under the General Order to prepare and implement the following reports within **90 days** of the issuance of the NOA **(26 November 2019)**:

Spill Prevention and Emergency Response Plan (Provision E.1.a.).
Sampling and Analysis Plan (Provision E.1.b).
Sludge Management Plan (Provision E.1.c).

The General Order requires that the Sludge Management Plan be submitted to the Central Valley Water Board within 90 days of the issuance of the NOA. Copies of the Spill Prevention and Emergency Response Plan, Sampling and Analysis Plan, and Sludge Management Plan shall be maintained at the treatment facility and shall be presented to Regional Water Board staff upon request.

As stated in Section E.2.w., in the event of any change in control or ownership of the Facility or wastewater disposal areas, the Discharger must notify the succeeding owner or operator of the existence of this General Order by letter, a copy of which shall be immediately forwarded to the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) Executive Officer.

Failure to comply with the requirements in this NOA, General Order 2014-0153-DWQ, with all attachments, and MRP No. 2014-0153-DWQ-R5320 could result in an enforcement action as authorized by provisions of the California Water Code. Discharge of wastes other than those described in this NOA is prohibited. If the method of waste disposal changes from that described in this NOA, you must submit a new Report of Waste Discharge describing the new operation.

The Central Valley Water Board adopted Basin Plan amendments incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting. These programs, once effective, could change how the Central Valley Water Board permits discharges of salt and nitrate.

The required annual fee specified in the annual billing from the State Water Board shall be paid until this NOA is officially terminated. You must notify this office in writing if the discharge regulated by the General Order ceases, so that we may terminate coverage and avoid unnecessary billing.

The Central Valley Water Board has gone to a Paperless Office System. All regulatory documents, submissions, materials, data, monitoring reports, and correspondence

should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to: centralvalleyfresno@waterboards.ca.gov. Documents that are 50MB or larger should be transferred to a disk and mailed to the Central Valley Water Board office at 1685 E Street, Fresno, CA 93706. To ensure that your submittals are routed to the appropriate staff, the following information block should be included in any email used to transmit documents to this office:

Program: Non-15,
Place ID: 273188,
Facility Name: Sierra Joint Union High School WWTF,
Order: 2014-0153-DWQ-R5320

In order to conserve paper and reduce mailing costs, a paper copy of the General Order has been sent only to the Discharger. Others are advised that the General Order is available on the State Water Board's website at: (http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf).

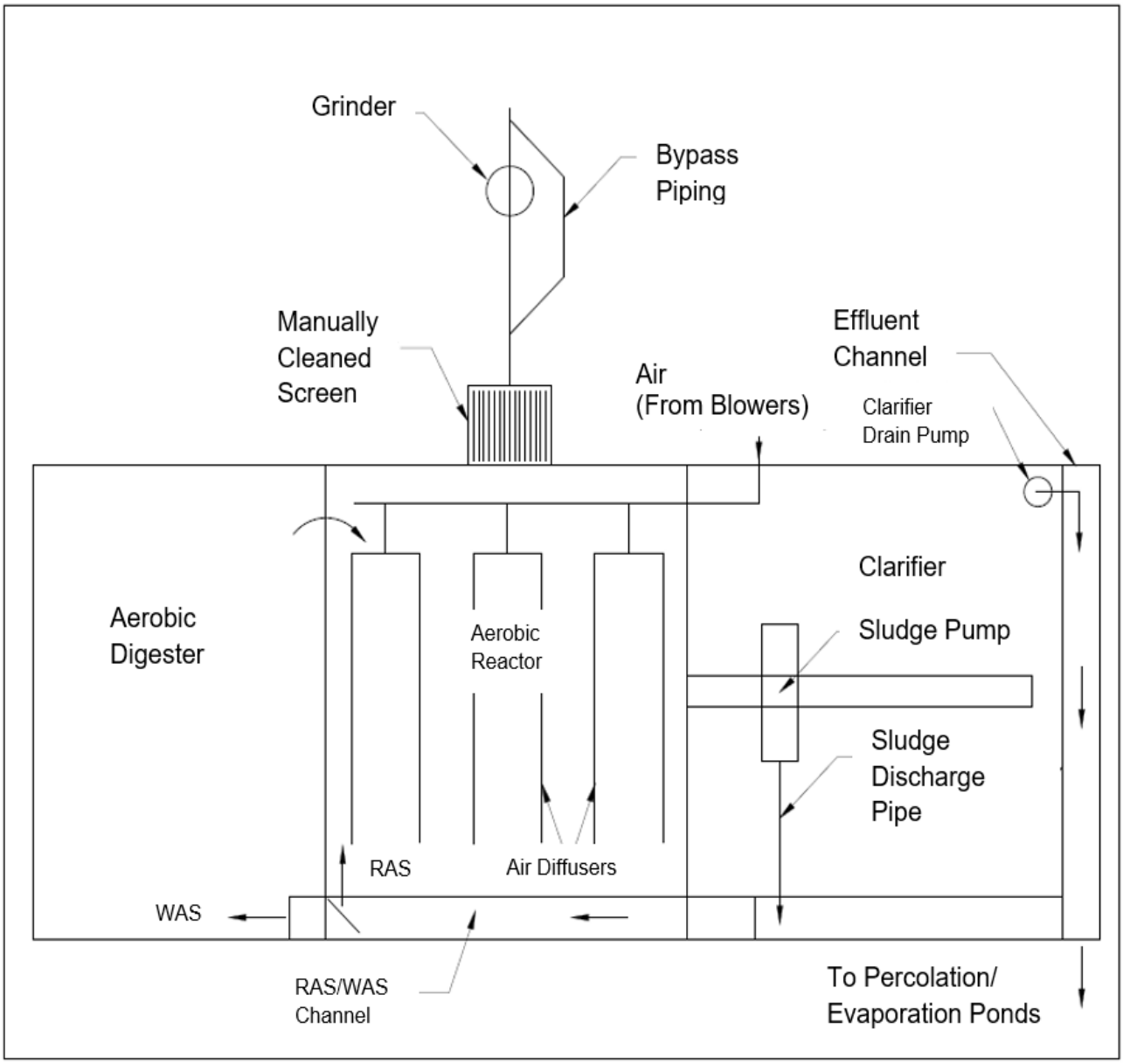
Please note that WDRs Order 85-230 is proposed to be rescinded at the **December 2019** meeting of the Central Valley Water Board. Upon rescission of your individual WDRs, coverage for your facility under the General Order shall become applicable subject to this Notice of Applicability. If you have any questions regarding this matter, please contact Katie Carpenter by phone at (559) 445-5551, by email at Katie.Carpenter@waterboards.ca.gov.

Original Signed by Scott Hatton for:
Patrick Pulupa
Executive Officer

Attachments:
- Attachment A - Site Plan
- Attachment B – Flow Schematic
- Monitoring and Reporting Program 2014-0153-DWQ-R5320
- Review Memorandum of Sierra Unified School District, Sierra Joint Union High School Wastewater Treatment Facility
- State Water Resources Control Board Order WQ 2014-0153-DWQ (Discharger only)

cc:
- Fresno County Environmental Health, 1221 Fulton Street, 3rd Floor, P.O. Box 11867, Fresno, CA 93775
- Alfonso Manrique; AM Consulting Engineers, 1550 N. Sixth Street, Fresno, CA 93710

ATTACHMENT A – SITE PLAN
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5320
FOR
SIERRA UNIFIED SCHOOL DISTRICT;
SIERRA JOINT UNION HIGH SCHOOL WASTEWATER TREATMENT FACILITY
FRESNO COUNTY



Drawing Reference:
Report of Waste Discharge, May 2019 Technical Report

ATTACHMENT B – FLOW SCHEMATIC
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5320
FOR
SIERRA UNIFIED SCHOOL DISTRICT;
SIERRA JOINT UNION HIGH SCHOOL WASTEWATER TREATMENT FACILITY
FRESNO COUNTY

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM NO. 2014-0153-DWQ-R5320 FOR SIERRA UNIFIED SCHOOL DISTRICT SIERRA JOINT UNION HIGH SCHOOL WASTEWATER TREATMENT FACILITY FRESNO COUNTY

This Monitoring and Reporting Program (MRP) describes requirements for monitoring the Sierra Joint Union High School onsite wastewater treatment facility (Facility). This MRP is issued pursuant to Water Code section 13267, the Sierra Unified School District (District or Discharger) shall not implement any changes to this MRP unless and until a revised MRP is issued by the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) or Executive Officer.

Section 13267 of the California Water Code states, in part:

> *"In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports and shall identify the evidence that supports requiring that person to provide the reports."*

Section 13268 of the California Water Code states, in part:

> *"(a) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of Section 13267, or failing or refusing to furnish a statement of compliance as required by subdivision (b) of Section 13399.2, or falsifying and information provided therein, is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).*
>
> *(b)(1) Civil liability may be administratively imposed by a regional board in accordance with Article 2.5 (commencing with section 13323) of Chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars ($1,000) for each day in which the violation occurs."*

The District owns and operates the Facility that is subject to the Notice of Applicability (NOA) of Water Quality Order 2014-0153-DWQ-R5320. The reports are necessary to ensure that the District complies with the NOA and General Order. Pursuant to Water

Code section 13267, the District shall implement this MRP and shall submit the monitoring reports described herein.

All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. The name of the sampler, sample type (grab or composite), time, date, location, bottle type, and any preservative used for each sample shall be recorded on the sample chain of custody form. The chain of custody form must also contain all custody information including date, time, and to whom samples were relinquished. If composite samples are collected, the basis for sampling (time or flow weighted) shall be approved by Central Valley Water Board staff.

Field test instruments (such as those used to test pH, dissolved oxygen, and electrical conductivity) may be used provided that they are used by a State Water Resources Control Board, Environmental Laboratory Accreditation Program (ELAP) certified laboratory, or:

1. The user is trained in proper use and maintenance of the instruments;
2. The instruments are field calibrated prior to monitoring events at the frequency recommended by the manufacturer;
3. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
4. Field calibration reports are maintained and available for at least three years.

If monitoring consistently shows no significant variation in magnitude of a constituent concentration or parameter after at least 12 months of monitoring, the Discharger may request this MRP be revised to reduce monitoring frequency. The proposal must include adequate technical justification for reduction in monitoring frequency.

ACTIVATED SLUDGE MONITORING

Samples of the effluent shall be taken at an area that represents the effluent quality distributed to the evaporation/percolation ponds. At a minimum, effluent monitoring shall consist of the following:

Table 1 - Influent Monitoring Requirements

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
EC	µmhos/cm	Grab	Semi-annually [1]	Annually
Biochemical Oxygen Demand (BOD)	mg/L	Grab	Semi-annually	Annually
Total Suspended Solids (TSS)	mg/L	Grab	Semi-annually	Annually
Total Nitrogen (as N)	mg/L	Grab	Semi-annually	Annually

Table 2 - Effluent Monitoring Requirements

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Flow Rate	Gallons per day (gpd)	Metered [2]	Continuous	Quarterly
EC	µmhos/cm	Grab	Monthly	Quarterly
Biochemical Oxygen Demand (BOD)	mg/L	Grab	Monthly	Quarterly
Total Suspended Solids (TSS)	mg/L	Grab	Monthly	Quarterly
Total Nitrogen (as N)	mg/L	Grab	Quarterly	Quarterly

POND SYSTEM MONITORING

All wastewater and treated wastewater storage/disposal ponds (lined and unlined) shall be monitored as specified below:

Table 3 – Wastewater Pond Monitoring Requirements

Constituent	Units	Sample Type	Sample Frequency	Reporting Frequency
Dissolved Oxygen	mg/L	Grab	Weekly	Quarterly
Freeboard	0.1 feet	Measurement	Monthly	Quarterly
Odors		Observation	Monthly	Quarterly
Berm Condition		Observation	Monthly	Quarterly

[1] Once between January and June and once between July and December.

[2] Flow rate may be metered or estimated based on potable water supply meter readings or other approved method. Calculations used to estimate wastewater flows shall be provided in the quarterly monitoring report.

SLUDGE/BIOSOLIDS MONITERING

The Discharger shall report the handling and disposal of all solids (e.g., screenings, grit, sludge, biosolids, etc.) generated at the wastewater system. Records shall include the name/contact information for the hauling company, the type and amount of waste transported, the date removed from the wastewater system, the disposal facility name and address, and copies of analytical data required by the entity accepting the waste. These records shall be submitted as part of the annual monitoring report.

REPORTING

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, solids, etc.), and reported analytical or visual inspection results are readily discernable. The data shall be summarized to clearly illustrate compliance with the General Order and NOA as applicable. The results of any monitoring done more frequently than required at the locations specified in the MRP shall be reported in the next regularly scheduled monitoring report and shall be included in calculations as appropriate.

The Central Valley Water Board has gone to a Paperless Office System. All regulatory documents, submissions, materials, data, monitoring reports, and correspondence should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to: centralvalleyfresno@waterboards.ca.gov. Documents that are 50MB or larger should be transferred to a disk and mailed to the appropriate Regional Water Board office, in this case 1685 E Street, Fresno, CA 93706. To ensure that your submittals are routed to the appropriate staff, the following information block should be included in any email used to transmit documents to this office:

Program: Non-15,
Place ID: 273188,
Facility Name: Sierra Joint Union High School WWTF,
Order: 2014-0153-DWQ-R5320

A. Quarterly Monitoring Reports

Quarterly reports shall be submitted to the Regional Water Board on **the first day of the second month after the quarter ends** (e.g. the January-March Quarterly Report is due by May 1st). The reports shall bear the certification and signature of the Discharger's authorized representative. At the minimum, the quarterly reports shall include:

1. Results of all required monitoring.
2. A comparison of monitoring data to the requirements (including the flow limitation), disclosure of any violations of the NOA and/or General Order, and an explanation of any violation of those requirements. (Data shall be presented in tabular format).
3. Copies of laboratory analytical report(s) and chain of custody form(s).

B. Annual Report

Annual Reports shall be submitted to the Regional Water Board by **March 1st** following the monitoring year. The Annual Report shall include the following:

1. Tabular and graphical summaries of all monitoring data collected during the calendar year.
2. An evaluation of the performance of the wastewater treatment system, including discussion of the capacity issues nuisances' conditions, system problems and a forecast of the flows anticipated in the next year. A flow rate evaluation, as described in the General Order (Provision E.2.c), shall also be submitted.
3. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into compliance with the NOA and/or General Order.
4. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
5. The name and contact information for the wastewater operator responsible for operation, maintenance, and system monitoring.

A letter transmitting the monitoring reports shall accompany each report. The letter shall report violations found during the reporting period, and actions taken or planned to correct the violations and prevent future violations. The transmittal letter shall contain the following penalty of perjury statement and shall be signed by the Discharger or the Discharger's authorized agent:

> *"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."*

The Discharger shall begin implementation of the above monitoring program upon the first day of the month following rescission of WDRs Order 85-230.

Ordered by:

Original Signed by Scott Hatton for:
PATRICK PALUPA, Executive Officer

28 August 2019
(Date)

GLOSSARY

BOD_5	Five-day biochemical oxygen demand
CaCO3	Calcium carbonate
DO	Dissolved oxygen
EC	Electrical conductivity at 25° C
FDS	Fixed dissolved solids
TDS	Total dissolved solids
TKN	Total Kjeldahl nitrogen
TSS	Total suspended solids
Continuous	The specified parameter shall be measured by a meter continuously.
24-hr Composite	Samples shall be a flow-proportioned composite consisting of at least eight aliquots over a 24-hour period.
Daily	Every day except weekends or holidays.
Twice Weekly	Twice per week on non-consecutive days.
Weekly	Once per week.
Twice Monthly	Twice per month during non-consecutive weeks.
Monthly	Once per calendar month.
Quarterly	Once per calendar quarter.
Semiannually	Once every six calendar months (i.e., two times per year) during non-consecutive quarters.
Annually	Once per year.
mg/L	Milligrams per liter
mg/kg	Milligrams per kilogram
mL/L	Milliliters [of solids] per liter
µg/L	Micrograms per liter
µmhos/cm	Micromhos per centimeter
gpd	Gallons per day
mgd	Million gallons per day
MPN/100 mL	Most probable number [of organisms] per 100 milliliters
NA	Denotes not applicable

TO: Scott J. Hatton
Supervising Water Resource Control Engineer

FROM: Alexander S. Mushegan
Senior Water Resource Control Engineer
RCE 84208

Kathleen Carpenter
Engineering Geologist
PG 8014

DATE: 28 August 2019

APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER DISCHARGE SYSTEMS; SIERRA UNIFIED SCHOOL DISTRICT; SIERRA JOINT UNION HIGH SCHOOL WASTEWATER TREATMENT FACILITY; FRESNO COUNTY

On 15 May 2019, Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff received a Report of Waste Discharge (RWD) consisting of a Form 200 and technical report for Sierra Unified School District's Sierra Joint Union High School Wastewater Treatment Facility (Facility). The technical report was prepared and signed by Alfonso Manrique (RCE 63673) a registered professional engineer with AM Consulting Engineers, Inc. This memorandum provides a summary of the applicability of this discharge to be covered under the State Water Resources Control Board's WQ Order 2014-0153-DWQ, *General Waste Discharger Requirements for Small Domestic Wastewater Treatment Systems* (General Order).

BACKGROUND INFORMATION

Sierra Unified School District (hereafter District or Discharger) owns and operates the Facility which provides wastewater treatment and disposal for Sierra Joint Union High

School at 33220 Lodge Road near Tollhouse in Fresno County (Latitude 37.034622°, Longitude -119.460317°). Sierra Joint Union High School currently serves approximately 600 students and 80 staff members.

The Facility is currently regulated by Waste Discharge Requirements (WDRs) Order 85-230. A 9 September 2013 staff letter informed the District that Order 85-230 was due for review and update and gave the District the option of requesting coverage under Water Quality Order 97-10-DWQ, *General Waste Discharge Requirements for Discharges to Land by Small Domestic Wastewater Treatment Systems*. In September 2014, Water Quality Order 97-10-DWQ was replaced by State Water Resources Control Board Order 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems*. In a 14 February 2019 email, Central Valley Water Board staff again requested that the District submit a complete RWD and technical report to enrollee the Facility under the new General Order 2014-0153-DWQ. On 15 May 2018, the District submitted a RWD and technical report for coverage under the General Order.

DESCRIPTION OF DISCHARGE

According to the RWD, the Facility consists of a headworks with an inline grinder and a manually cleaned bar screen followed by an activated sludge package treatment plant. The package plant is set below grade and consists of an aerated reactor compartment followed by a secondary clarifier. An airlift pump removes sludge from the bottom of the clarifier and returns it to the aerated reactor compartment. Wasted sludge is periodically removed and disposed of by a septic tank hauler. Treated effluent is disposed of by five percolation/evaporation ponds. During most of the year treated effluent is only sent to Ponds 1 and 2. Pond 3 only receives effluent during winter months when evaporation rates are lower. The remaining two ponds (Ponds 4 and 5) provide backup and generally do not receive effluent. The water balance provided with the RWD shows that the WWTF has capacity to handle flows up to the design flow limit of 31,000 gallons per day (gpd) using only the first three ponds.

The General Order states facilities discharging under 100,000 gpd are eligible for coverage. Waste Discharge Specification B.4 in the existing Order 85-230 specifies a 30-day average daily flow limit of 31,000 gpd. However, current average monthly flows at the Facility range from about 3,300 to 12,600 gpd (based on records from January 2016 through December 2018). In a 28 May 2019 email, Alfonso Manrique, after speaking with the District, confirmed that flows at the Facility are consistently below 20,000 gpd and are not expected to increase. Given that the Facility's flows are below 20,000 gpd a nitrogen evaluation is not required.

POTENTIAL THREAT TO WATER QUALITY

According to the RWD, groundwater in the area is approximately 30 feet below ground surface (about 26 feet below the bottom of the ponds). For undisinfected secondary-treated wastewater the General Order requires a setback distance from a wastewater treatment

and/or storage ponds of 50 feet from the property line and 150 feet from a domestic well. From Google Earth Pro® the closest disposal pond (Pond 4) appears to be just about 50 feet from the property line and is greater than 200 feet from the nearest residence and domestic supply well. The primary disposal ponds (Ponds 1 and 2) are greater than 250 feet from the property line and about 400 feet from the nearest residence and domestic supply well.

EFFLUENT LIMITS

Existing Order 85-230 does not include effluent limits for biochemical oxygen demand (BOD) or total suspended solids (TSS) and the monitoring and reporting program (MRP) does not require monitoring for BOD or TSS either; therefore, no data is available on BOD and TSS concentrations in the effluent. However, the General Order prescribes effluent limits for an activated sludge treatment system of 30 mg/L (monthly average) and 45 mg/L (7-day median) for both BOD and TSS. Given the level of treatment provided at the Facility by the activated sludge treatment system the NOA should include the effluent limits for BOD and TSS from the General Order. With average daily flows less than 20,000 gpd the NOA should not include a nitrogen effluent limit.

MONITORING REQUIREMENTS

Monitoring requirements included in the following sections from Attachment C of the General Order are appropriate for this discharge:

- Activated Sludge Monitoring
- Pond Monitoring
- Solids Disposal Monitoring

SALT AND NITRATE CONTROL PROGRAMS

The Central Valley Water Board adopted Basin Plan amendments incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting. These programs, once effective, could change how the Central Valley permits discharges of salt and nitrate.