



Central Valley Regional Water Quality Control Board

03 April 2024

Josh Casas
Public Works Superintendent
City of Ceres
2220 Hackett Road
Ceres, CA, 95307

VIA EMAIL
JOSH.CASAS@CI.CERES.CA.US

NOTICE OF APPLICABILITY (NOA); GENERAL WASTE DISCHARGE REQUIREMENTS ORDER R5-2022-0006-02 FOR LIMITED THREAT DISCHARGES TO SURFACE WATER; CITY OF CERES, CITY OF CERES FILTER BACKWASH PROJECT, STANISLAUS COUNTY

Our office received a Notice of Intent dated 11 September 2023 from City of Ceres (hereinafter Discharger), for discharge of filter backwash process water to surface water. Based on the application packet and subsequent information submitted by the Discharger, staff has determined that the project meets the required conditions for approval under the General Order for Limited Threat Discharges to Surface Water (Limited Threat General Order), as a process water project type. This project is hereby assigned Limited Threat General Order **NOA No. R5-2022-0006-031** and National Pollutant Discharge Elimination System (NPDES) Permit No. CAG995002. Please reference your NOA number in your correspondence and submitted documents.

The project activities shall be operated in accordance with the requirements contained in the Limited Threat General Order and as specified in this NOA. You are urged to familiarize yourself with the entire contents of the enclosed [Limited Threat General Order](#) (https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2022-0006-02.pdf)

CALIFORNIA TOXICS RULE / STATE IMPLEMENTATION POLICY MONITORING

The Limited Threat General Order incorporates the requirements of the California Toxics Rule (CTR) and the State Water Resources Control Board's (State Water Board), *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California*, 2005, also known as the State Implementation Policy (SIP). Screening levels for CTR constituents and other constituents of concern are found in Attachment I of the Limited Threat General Order. Review of your water quality data in comparison to the screening values, showed no reasonable potential for the discharge to cause or contribute to an exceedance of water quality objectives in the Tuolumne River, which is a water of the United States.

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

PROJECT DESCRIPTION

The City of Ceres (Discharger) has four well sites with six potable drinking water wells equipped with granular activated carbon (GAC) filters for the treatment of 1,2,3-Trichloropropane (TCP). The GAC filters require backwashing and replacement intermittently as a part of their maintenance. This NOA permits the disposal of backwash water to the City of Ceres' storm drain system.

TCP levels in the backwash water tested as a part of the application for this NOA are lower than the screening level for TCP; therefore, the discharge does not have reasonable potential to cause or contribute to an exceedance of water quality objectives in the Tuolumne River.

The City's storm drain system is divided into several Watershed Areas, see Attachment A, that flow to different outfalls of the system. The discharge locations for each well site are below:

- Site 1 – Well No. 16 is equipped with two GAC filter vessels. It is located in the river watershed area and has a maximum backwash volume of 10,500 gallons. This well discharges directly to the Tuolumne River from the storm drain system.
- Site 2 – Well No. 22: is equipped with four GAC filter vessels. It is located in the river watershed area and has a maximum backwash volume of 22,500 gallons. This well discharges to a detention basin from the storm drain system.
- Site 3 – Well No. 28 and No. 38 are equipped with 6 GAC filter vessels. They are located in the river watershed area and have a maximum backwash volume of 22,500 gallons. These wells discharge to the storm drain system and into a detention basin that may flow to the Tuolumne River.
- Site 4 – Well No. 39 and No. 40 are equipped with 6 GAC filter vessels. They are located in the river watershed area and have a maximum backwash volume of 22,500 gallons. These wells discharge to the storm drain system to Symra Park Field which percolates to groundwater.

The filter media will be replaced and backwashed as needed. The frequency of backwashing is expected to range between three times per year to once every 3 years; and only one vessel is expected to be backwashed in a day; therefore, the maximum daily discharge is estimated to be 22,500 gallons.

DISCHARGE PROHIBITIONS

Discharge prohibitions are specified in Section IV Discharge Prohibitions of the Limited Threat General Order. Based on the information provided in the NOI, the following discharge prohibitions are applicable to this discharge:

- Prohibition IV.A
- Prohibition IV.B
- Prohibition IV.C
- Prohibition IV.D. The flow rate shall not exceed 0.25 MGD.

EFFLUENT LIMITATIONS

Effluent limitations are specified in Section V. Effluent Limitations and Discharge Specifications of the Limited Threat General Order. Based on the information provided in the NOI, effluent limitations are only required for the parameter identified in item 1, below:

- 1. pH (Section V.A.1.b.i).** The pH of all limited threat discharges within the Sacramento and San Joaquin River Basins (except Goose Lake in Modoc County) shall at all times be within the range of 6.5 and 8.5.

The Tuolumne River (Don Pedro Reservoir to San Joaquin River) is listed for Group A Pesticides, Chlorpyrifos, Diazinon, Mercury, Toxicity, and Temperature on the Clean Water Act 303(d) List of impaired water bodies. A Total Maximum Daily Load (TMDL) has not yet been established for the Tuolumne River. Therefore, no additional 303(d) based effluent limitations or monitoring requirements are included in this NOA (R5-2022-0006-031).

RECEIVING WATER LIMITATIONS

The Limited Threat General Order includes receiving surface water limitations in Section VIII.A. Based on the information provided in the NOI, receiving surface water limitations are not applicable to this discharge.

SPECIAL PROVISIONS

The Limited Threat General Order contains Provisions in Section IX.C. Based on information provided in the NOI the following site-specific special provisions are applicable to the Project.

Salinity Evaluation and Minimization Plan – The Limited Threat General Order in Section IX.C.3.c requires Dischargers with projects greater than or equal to 180 days in duration to submit and implement a Salinity Evaluation and Minimization Plan to identify and address sources of salinity discharged from the Facility. The Limited Threat General Order allows under limited circumstances to waive this requirement, such as for construction dewatering project where salinity is naturally high. Therefore, best management practices through implementation of a Salinity Evaluation and Minimization Plan are necessary to manage salinity levels. A Salinity Evaluation and Minimization Plan shall be submitted by **1 April 2025**.

For enrollees under the Salinity Control Program's Alternative Salinity Permitting Approach, Table 15 of the Limited Threat General Order includes performance-based electrical conductivity (EC) triggers to be included in the NOA to ensure the Salinity Evaluation and Minimization Plan is effective. The Discharge submitted a Notice of Intent for the Salinity Control Program in July 2023 indicating its intent to comply with the Alternative Salinity Permitting Approach and participate in the CV-SALTS Prioritization and Optimization Study. Based on effluent EC data from September 2022, the effluent concentration for EC was 736 µmhos/cm, which results in an maximum EC effluent trigger of 1,100 µmhos/cm per Table 16 of the Limited Threat General Order. If the calendar annual average effluent EC exceeds 1,100 µmhos/cm, the Salinity

Evaluation and Minimization Plan shall be reviewed and updated. The updated Salinity Evaluation and Minimization Plan shall be submitted by 1 April following the calendar year in which the electrical conductivity concentration exceeded the trigger.

MONITORING AND REPORTING

Monitoring and reporting requirements are contained in Attachment C of the Limited Threat General Order. The Discharger is required to comply with the following specific monitoring and reporting requirements for the effluent in accordance with Attachment C of the Limited Threat General Order.

Monitoring Locations – The Discharger shall monitor the effluent at the specified location as follows:

Table 2. Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
001	EFF-001	A location where a representative sample of the effluent from Well No. 16 can be collected prior to discharging to City of Ceres Storm Water System.
002	EFF-002	A location where a representative sample of the effluent from Well No. 22 can be collected prior to discharging to City of Ceres Storm Water System.
003	EFF-003	A location where a representative sample of the effluent from Wells No. 28 and No. 38 can be collected prior to discharging to City of Ceres Storm Water System.
004	EFF-004	A location where a representative sample of the effluent from Well No. 39 and No. 40 can be collected prior to discharging to City of Ceres Storm Water System.

Effluent Monitoring – When discharging to surface water, the Discharger shall monitor the effluent at EFF-001, EFF-002, EFF-003, and EFF-004 in accordance with Table C-3 of the Limited Threat General Order and this NOA. The applicable monitoring requirements are as follows in Table 3 and subsequent Table 3 Notes:

Table 3. Effluent Monitoring Requirements

Parameter	Units	Sample Type	Minimum Sampling Frequency
Discharge Flow Rate	MGD	Calculated	1/Discharge Event
Electrical Conductivity @ 25 °C	µmhos/cm	Grab	1/Discharge Event
pH	standard units	Grab	1/Discharge Event

Parameter	Units	Sample Type	Minimum Sampling Frequency
Turbidity	NTU	Grab	1/Discharge Event
Temperature	°F	Grab	1/Discharge Event
Dissolved Oxygen (DO)	mg/L	Grab	1/Discharge Event
Total residual chlorine	mg/L	Grab	1/Discharge Event
1,2,3-Trichloropropane (TCP)	ug/L	Grab	1/Discharge Event

Table 3 Notes

- 1. Electrical conductivity, pH, turbidity, temperature, and DO.** A hand-held field meter may be used, provided the meter utilizes a U.S. EPA-approved algorithm/method and is calibrated and maintained in accordance with the manufacturer's instructions. A calibration and maintenance log for each meter used for monitoring required by this Monitoring and Reporting Program shall be maintained at the Facility.
- 2. All parameters, except flow.** Pollutants shall be analyzed using the analytical methods described in 40 C.F.R. part 136 or by methods approved by the Central Valley Water Board or the State Water Board.

Long Term Discharges: Section II.B.2 of the Limitations and Discharge Requirements section of the Limited Threat General Order requires that dischargers submit new analytical results every 5 years for pollutants specified in Table I-1 of Attachment I. The Project is considered a process water discharge. Therefore, the Discharger shall submit monitoring results by **1 July 2028** for the following constituents shown in Table 4 and subsequent Table 4 Notes, below:

Table 4. Effluent Characterization Monitoring

Parameter	Units	Sample Type
Biochemical Oxygen Demand (BOD)	mg/L	Grab
Total Suspended Solids (TSS)	mg/L	Grab
Dissolved Oxygen (DO)	mg/L	Grab
Hardness	mg/l	Grab
pH	standard units	Grab
Temperature	°F	Grab
Electrical Conductivity @ 25 ° C	µmhos/cm	Grab
Total Dissolved Solids (TDS)	mg/L	Grab
Turbidity	NTU	Grab
CTR Priority Pollutants	See Attachment I, Table I-3 of the Limited Threat General Order	See Attachment I, Table I-3 of the Limited Threat General Order

Table 4 Notes

- 1. For all parameters.** The Discharger is not required to conduct effluent

monitoring for constituents that have already been sampled in a given month, as required in Table E-3, except for hardness, pH, and temperature, which shall be conducted concurrently with the effluent sampling.

2. **For all parameters.** Pollutants shall be analyzed using the analytical methods described in 40 C.F.R. part 136 or by methods approved by the Central Valley Water Board or the State Water Board.
3. **For DO, pH, temperature, electrical conductivity, TDS, and turbidity.** A hand-held field meter may be used, provided the meter utilizes a U.S. EPA-approved algorithm/method and is calibrated and maintained in accordance with the manufacturer's instructions. A calibration and maintenance log for each meter used for monitoring required by this Monitoring and Reporting Program shall be maintained at the Facility.
4. **For CTR Priority Pollutants.** See Attachment I, Table I-3 of the Limited Threat General Order.

Receiving Water Monitoring - Not required. The Project discharges to the City of Ceres storm drain system which has multiple inputs before reaching the Tuolumne River. Therefore, receiving water monitoring in the Tuolumne River would not provide sufficient information to evaluate compliance with the receiving water limitations. Where feasible, compliance with the receiving water limitations will be evaluated through monitoring of the effluent.

Monitoring Report Submittals - Monitoring in accordance with the Limited Threat General Order shall begin upon initiation of discharge. Monitoring Reports shall be submitted to the Central Valley Water Board on a quarterly basis, beginning with the **Second Quarter 2024**. This report shall be submitted on **1 August 2024**. All Monitoring Reports shall specify the dates during the monitoring period the discharge did or did not occur. If discharge has not begun there is no need to monitor. However, a certified Monitoring Report must be submitted stating that there has been no discharge. Table 5, below, summarizes the Monitoring Report due dates required under the Limited Threat General Order. Quarterly Monitoring Reports must be submitted until your coverage is formally terminated in accordance with the Limited Threat General Order, even if there is no discharge during the reporting quarter.

Table 5. Monitoring Periods and Reporting Schedule

Monitoring Period for All Sampling Frequencies	Quarterly Report Due Date
First Quarter (1 January through 31 March)	1 May
Second Quarter (1 April through 30 June)	1 August
Third Quarter (1 July through 30 September)	1 November
Fourth Quarter (1 October through 31 December)	1 February of the following year

GENERAL INFORMATION AND REQUIREMENTS

The Discharger must notify Central Valley Water Board staff within 24 hours of having knowledge of 1) the start of each new discharge, 2) noncompliance, and 3) when the discharge ceases. The Central Valley Water Board shall be notified immediately if any effluent limit violation is observed during implementation of the project.

Discharge of material other than what is described in the application is prohibited. The required annual fee (as specified in the annual invoice you will receive from the State Water Resources Control Board) shall be submitted until this NOA is officially terminated. You must notify this office in writing when the discharge regulated by the Limited Threat General Order is no longer necessary by submitting the Request for Termination of Coverage (Attachment E). If a timely written request is not received, the Discharger will be required to pay additional annual fees as determined by the State Water Resources Control Board.

ENFORCEMENT

Failure to comply with the Limited Threat General Order may result in enforcement actions, which could include civil liability. Effluent limitation violations are subject to a Mandatory

Minimum Penalty (MMP) of \$3,000 per violation. In addition, late Monitoring Reports may be subject to MMPs or discretionary penalties of up to \$1,000 per day late. When discharges do not occur during a quarterly monitoring period, the Discharger must still submit a quarterly certified Monitoring Report indicating that no discharge occurred to avoid being subject to enforcement actions.

COMMUNICATION

We have transitioned to a paperless office; therefore, please convert all documents to a searchable Portable Document Format (pdf). All documents, including Monitoring Reports, written notifications, and documents submitted to comply with this NOA and the Limited Threat General Order, should be submitted to the NPDES Compliance and Enforcement Unit, Attention: Mohammad Farhad at centralvalleysacramento@waterboards.ca.gov and mohammad.farhad@waterboards.ca.gov. Mr. Farhad may also be reached by phone at (916) 464-1181.

Please include the following information in the body of the email:

- Attention: NPDES Compliance Unit
- Discharger: City of Ceres
- Facility: City of Ceres Filter Backwash Project
- County: Stanislaus County
- CIWQS place ID: 890478

Documents that are 50 megabytes or larger must be transferred to a DVD, or flash drive and mailed to our office, attention "ECM Mailroom-NPDES".

ATTACHMENT A – PROJECT LOCATION MAP

