



Central Valley Regional Water Quality Control Board

17 May 2022

Neal Hay
Robbins Wastewater Treatment Facility
1130 Civic Center Blvd
Yuba City, CA 95993

CERTIFIED MAIL
7021-0950-0001-0236-0680

NOTICE OF APPLICABILITY

**GENERAL WASTE DISCHARGE REQUIREMENTS FOR
SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS
ORDER WQ 2014-0153-DWQ
FOR
SUTTER COUNTY WATERWORKS DISTRICT NO. 1
ROBBINS WASTEWATER TREATMENT FACILITY
SUTTER COUNTY**

Sutter County Waterworks District No. 1 (Discharger) submitted a Report of Waste Discharge (RWD) dated 24 October 2018 describing the Robbins wastewater treatment facility (WWTF) in Sutter County. The WWTF provides treatment and disposal service for domestic wastewater generated from residences and various community facilities, including a school, fire station, trailer park, and community hall. The WWTF discharge has been regulated by Waste Discharge Requirements (WDR) Order No. 96-137, which was adopted on 3 May 1996. Based on information provided in the RWD, the wastewater treatment system and discharge are consistent with the requirements of the State Water Resources Control Board (State Water Board) *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems*, Order WQ 2014-0153-DWQ (General Order). This Notice of Applicability (NOA) serves as formal notice that upon rescission of Order 96-137 at an upcoming Board meeting, the discharge shall be regulated pursuant to the General Order and this NOA. You are hereby assigned Order WQ 2014-0153-DWQ-R5299 for the discharge.

A copy of the General Order is enclosed and on the [State Water Board's Webpage](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf).
(http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf)

You should familiarize yourself with the entire General Order and its attachments, which describe mandatory discharge and monitoring requirements. The General Order contains operational and reporting requirements by wastewater system type. Sampling, monitoring,

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

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) 2014-0153-DWQ-R5299. The Discharger is responsible for all the applicable requirements that exist in the General Order and this NOA.

Existing Facility and Discharge Description

The Robbins WWTF is owned and operated by Sutter County Waterworks District No. 1 (Discharger) and is located at 17200 Acacia Street in Sutter County as shown on Attachment A. The WWTF services the rural community of Robbins, which is an agricultural community with 350 residents. Single family residences, agricultural related structures, a post office, an elementary school, a fire station, a trailer park, and several other community facilities discharge to the WWTF. Recreational vehicles (RV) waste and portable toilet waste are not allowed to be discharged into the WWTF. The WWTF is located in an area without a regional wastewater collection system; therefore, wastewater is collected and treated on-site.

The treatment system is a secondary trickling filter plant consisting of on-site Septic Tank Pumping (STEP) tanks, recirculation tanks, secondary treatment pods, and clay-lined evaporation ponds. Primary treatment takes place in the 1,000-gallon concrete STEP tanks located on each customers property. Effluent from the tanks is pumped into the WWTF collection system and then pumped to the recirculation tanks at the WWTF. The wastewater is then directed to secondary treatment pods. Treated effluent is pumped to one of three clay-lined evaporation ponds. Each pond is approximately four acres in size and is surrounded by a berm/levee approximately four feet high.

Source water for the area is supplied by three drinking water wells and one 0.75-million-gallon storage tank. Source water quality data are summarized below.

Table 1. Source Water Quality

TDS (mg/L) see note 1	EC (µmhos/cm) see note 1	Chloride (mg/L) see note 1	Nitrate (mg/L) see note 2
2,400	3,700	1,160	4.7

Table Note 1: Data Source: [State Water Resources Control Board Drinking Water Quality Data website](https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/EDTlibrary.html) for 2021

(https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/EDTlibrary.html)

Table Note 2: the *Annual Water Quality Report for 2020*, Sutter County Community Services District.

The average daily inflow to the WWTF is shown below. The influent flow meter location is shown on Attachment B.

Table 2. Influent Flow Rates (gallons per day [gpd])

2019	2020	2021
16,375	14,997	14,184 (see table note)

Note: Data for September, November, and December 2021 were not available.

Effluent wastewater samples are collected prior to discharging to the ponds. Annual average concentrations of select constituents are summarized on Table 3.

Table 3. Effluent Wastewater Quality

Year	TDS (mg/L)	Total Nitrogen (mg/L)	BOD (mg/L)	EC (µmhos/cm)
2019	2,150	11.7	29.9	3,608
2020	2,475	12.8	32.6	3,855
2021 (see table note)	3,125	9.9	61	4,269

Table note: Data for January, February, and March 2021 were not available.

Four groundwater monitoring wells are located around the evaporation ponds, as shown on Attachment A. Between 2015 and 2020, depths to groundwater in the four wells ranged from 3.67 feet to 9.85 feet below ground surface (bgs) depending on rainfall and flooding of the adjacent rice field. Horizontal groundwater gradients in the area are relatively flat; therefore, no specific groundwater flow direction was used for evaluating groundwater conditions. Groundwater data collected quarterly for 2018 to 2020 for the four groundwater monitoring wells is summarized below. (Data for 2021 were not available.) Analytical units are as follows: µmhos/cm for EC; mg/L for nitrate as nitrogen, ammonia, TKN, chloride, and sodium; and MPN/100 mL for total coliform.

Table 4. MW-1

Year	EC	Nitrate as Nitrogen	Ammonia	TKN	Chloride	Sodium	Total Coliform
2018	1,400	24.1	ND	0.11	151	89.5	<1.8
2019	1,450	21.5	ND	0.13	142	100	<1.8
2020	2,500	17.8	8.1	0.13	644	93	>1600

Table 5. MW-2

Year	EC	Nitrate as N	Ammonia	TKN	Chloride	Sodium	Total Coliform
2018	1,250	15.2	ND	ND	113	44.5	<1.8
2019	1,300	15.2	ND	0.2	127	58	<1.8
2020	2,550	16.2	8.1	0.1	618	47	>1600

Table 6. MW-3

Year	EC	Nitrate as N	Ammonia	TKN	Chloride	Sodium	Total Coliform
2018	1,350	4.2	ND	0.19	181	47.5	<1.8
2019	1,250	6.8	ND	0.2	148	42	<1.8
2020	2,850	9.2	16	0.11	705	220	>1600

Table 7. MW-4

Year	EC	Nitrate as N	Ammonia	TKN	Chloride	Sodium	Total Coliform
2018	1,450	2.3	ND	0.18	296	210	<1.8
2019	1,800	4.7	ND	0.26	283	100	<1.8
2020	2,550	11.3	16	0.06	658	46	>1600

Site-specific Requirements and Effluent Limits

Note that the General Order contains prohibitions and specifications that apply to all wastewater treatment systems as well as those that only apply to specific treatment and/or disposal systems. The specific requirements and effluent limits for your treatment system are summarized below. The wastewater treatment operator must be certified and familiar with the requirements contained in the General Order, this NOA, and the MRP.

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

1. Requirements A. Prohibitions.

2. Requirements B.1.a.

The Discharger shall comply with the following flow limit: Influent flows into treatment system shall not exceed 32,100 gpd as a monthly average, based on the design flow of the treatment system.

3. Requirements B1.b through B1.l.

For Section B.1.l, the Discharger shall comply with the following setback requirements listed in Table 3 of the General Order:

Table 1. Setbacks

Equipment or Activity	Domestic Well	Flowing Stream	Ephemeral Stream Drainage	Property Line	Lake or Reservoir
Treatment System & Collection System	150 feet	50 feet	50 feet	5 feet	200 feet
Wastewater Storage and/or Treatment Ponds	150 feet	150 feet	150 feet	50 feet	200 feet

This is an existing facility, constructed prior to the issuance of the new General Order for Small Domestic Wastewater Treatment Systems, and the wastewater treatment facility may not be compliant with the setbacks included in the General Order. However, the WWTF will still be permitted under this General Order provided that nuisance conditions do not result from noncompliance. Expansion of a noncomplying

wastewater treatment system shall trigger further evaluation of the setback, as described in Section B.1.I of the General Order.

4. Requirements B.2 Septic Systems
5. Requirements B.3 Aerobic Treatment Systems
6. Requirements B.5 Pond Systems
7. Requirements B.8 Sludge/Solids/Biosolids Disposal
8. Requirements C. Groundwater and Surface Water Limitations
9. Requirements D. Effluent Limitations
Effluent discharged to the evaporation ponds shall not exceed BOD5 of 90 mg/L.
10. Based on Senate Bill 317 (attached), starting 1 January 2022, the trailer park owner should certify that signage for the prohibition/use of RV sanitation chemicals is posted onsite. For more information, please see California Legislative Information at [Bill Text - SB-317 Hazardous waste: waste facilities: prohibited chemicals.](#)

On 31 May 2018, the Central Valley Water Board adopted Basin Plan amendments incorporating new strategies for addressing ongoing salt and nitrate accumulation in the Central Valley as part of the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) initiative. The Discharger has selected the Alternative Salinity path (Prioritization & Optimization Study). Further details of these strategies are discussed in the enclosed memorandum. As these strategies are implemented, the Central Valley Water Board may find it necessary to modify the requirements of this NOA to ensure the goals of the Salt and Nitrate Control Program are met.

Monitoring and Reporting Program

WDRs Order 96-137 will be rescinded at an upcoming Central Valley Water Board meeting. Effective upon the first day of the month following rescission of WDRs Order 96-137, the Discharger shall comply with MRP WQ 2014-0153-DWQ-R5299, which is incorporated herein.

Enforcement

Please review this NOA carefully to ensure that it completely and accurately reflects the discharge. Discharge of wastes other than those described in this NOA is prohibited. Prior to allowing changes to the wastewater strength or generation rate, or to the method of waste disposal, you must contact the Central Valley Regional Water Board to determine if submittal of an RWD is required.

The Discharger generates the waste subject to the terms and conditions of WQ 2014-0153-DWQ-R5299 and will maintain exclusive control over the discharge. As such, the Discharger is primarily responsible for compliance with this NOA, MRP, and General Order, with all attachments. Failure to comply with the requirements in the General Order or this NOA could result in an enforcement action as authorized by provisions of the California Water Code.

Document Submittal

All monitoring reports and other correspondence should be converted to searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50 MB should be emailed to:

centralvalleysacramento@waterboards.ca.gov.

To ensure that your submittal is routed to the appropriate staff person, the following information should be included in the body of the email or any documentation submitted to the mailing address for this office:

Facility Name:	Robbins WWTF, Sutter County
Program:	Non-15 Compliance
Order:	2014-0153-DWQ-R5299
CIWQS Place ID:	253008

Documents that are 50 MB or larger should be copied to a CD, DVD, or flash drive and mailed to:

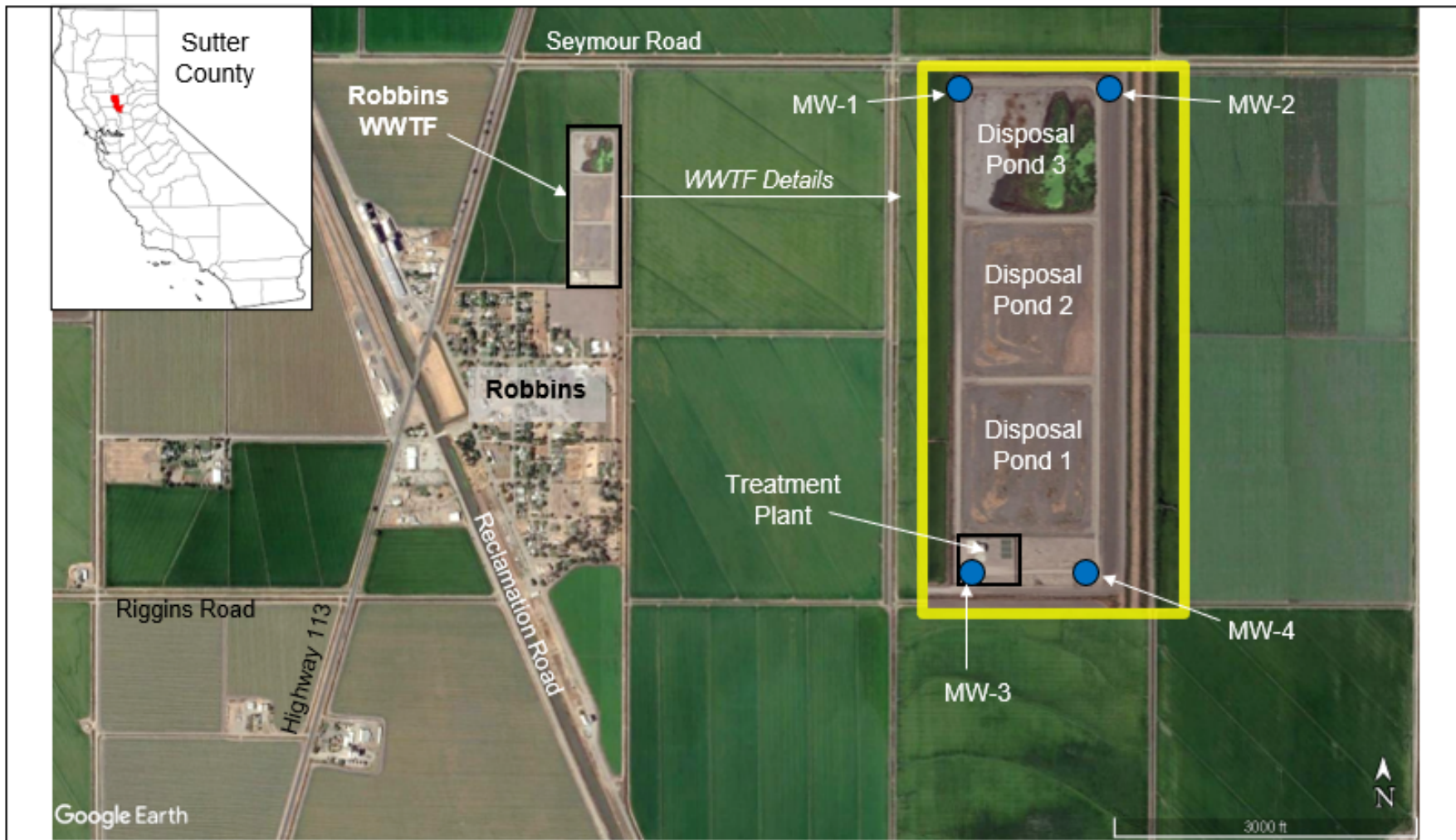
Central Valley Regional Water Quality Control Board
ECM Mailroom
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Now that the Notice of Applicability has been issued, the Board's Compliance and Enforcement section will take over management of your case. Brendan Kenny is your new point of contact for any questions about the General Order. If you find it necessary to make a change to your permitted operations, Brendan will direct you to the appropriate Permitting staff. You may contact Brendan at (916) 464-4635 or at bkenny@waterboards.ca.gov.

for Patrick Pulupa
Executive Officer

enc: Water Quality Order WQ 2014-0153-DWQ
Monitoring and Reporting Program 2014-0153-DWQ-R5299
Attachment A, Site Location and Site Plan
Attachment B, Wastewater Treatment System Schematic
Staff Memorandum
Senate Bill 317 (included in hard copy version only)

cc w/out enc: Sutter County Environmental Health Department, Yuba City



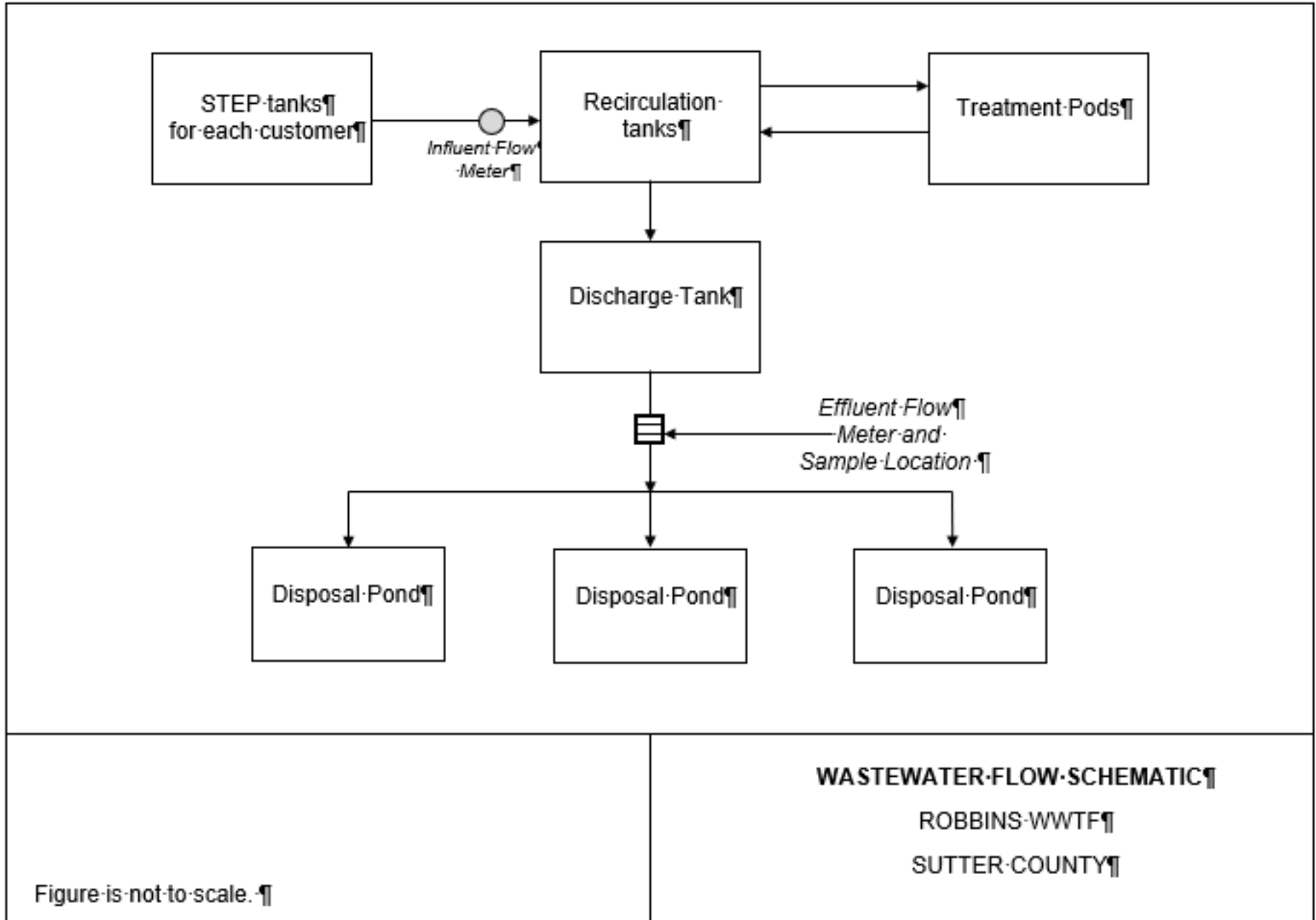
SITE LOCATION AND SITE PLAN

ROBBINS WWTF
SUTTER COUNTY

Figure Reference:
Google Earth, 2018

ORDER WQ 2014-DWQ-R5299

ATTACHMENT B



TO: Robert Busby
Supervising Engineering Geologist

FROM: Scott Armstrong
Senior Engineering Geologist

DATE: 13 May 2022

APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; SUTTER COUNTY WATERWORKS DISTRICT NO. 1 ROBBINS WASTEWATER TREATMENT FACILITY, SUTTER COUNTY

On 24 October 2018, Sutter County Waterworks District No. 1 (Discharger) submitted a Report of Waste Discharge for the Robbins Wastewater Treatment Facility (WWTF) to obtain coverage under the State Water Resources Control Board (State Water Board) General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems, Order 2014-0153-DWQ (General Order). This memorandum provides a summary of the applicability of this discharge for coverage under the General Order.

Regulatory Background

Waste Discharge Requirements (WDRs) 96-137, adopted by the Central Valley Region Water Quality Control Board (Central Valley Water Board) on 3 May 1996 prescribes requirements for the Robbins WWTF, and allows a dry weather average discharge flow limit of 30,000 gallons per day (gpd). Effective upon rescission of Order 96-137, the discharge described in this NOA shall be regulated pursuant to the General Order.

Monitoring and Reporting Program WQ 2014-0153-DWQ-R5299 shall be implemented by the Discharger within 30 days following rescission of Order No. 96-137.

Existing Facility and Discharge Description

The Robbins WWTF is owned and operated by the Discharger and is located at 17200 Acacia Street in Sutter County as shown on Attachment A. The WWTF services the rural community of Robbins, which is an agricultural community with 350 residents. Single family residences, agricultural related structures, a post office, an elementary school, a fire station, a trailer park, and several other community facilities discharge to the WWTF. Recreational vehicles (RV) waste and portable toilet waste are not allowed to be discharged into the WWTF. The WWTF is located in an area without a regional wastewater collection system; therefore, wastewater is collected and treated on-site.

The treatment system is a secondary trickling filter plant consisting of on-site Septic Tank Pumping (STEP) tanks, recirculation tanks, secondary treatment pods, and evaporation ponds. Primary treatment takes place in the 1,000-gallon concrete STEP tanks located on each customers property. Effluent from the tanks is pumped into the WWTF collection system and then pumped to the recirculation tanks at the WWTF. The wastewater is then directed to secondary treatment pods. Treated effluent is pumped to one of three clay-lined

evaporation ponds. Each pond is approximately four acres in size and is surrounded by a berm/levee approximately four feet high.

Site Conditions

Source water for the area is supplied from three groundwater wells and a 0.75-million-gallon water tank, to provide residents with potable water. Water quality samples were collected in December 2018 and September 2021. Data from the source water, effluent, and groundwater monitoring wells are summarized below for select constituents.

Table 2. Data Comparison

	EC (μmhos/cm)	Nitrate (mg/L)
Source Water	3,700	4.7
Effluent (2021)	4,269	9.9 (total nitrogen)
Shallow Groundwater Monitoring Wells (2020)	2,850 (see note 1)	17.8

Note 1: The maximum annual average concentration is from MW-3.

Shallow groundwater concentration trends for EC and nitrate as nitrogen show stable trends (no statistically significant trends) from 2017 to 2020. While concentrations in effluent for select constituents are higher than groundwater concentrations, it does not appear that the discharge is causing groundwater degradation beyond what limited degradation is allowed pursuant to this General Order.

Site-specific Requirements and Effluent Limits

The Discharger shall comply with an influent flow limit of 32,100 gpd as a monthly average, based on the design flow of the treatment system.

A nitrogen effluent limit is not required at this time. Flow rates into the treatment system are generally less than 20,000 gpd. In addition, concentrations of nitrate as nitrogen are higher in groundwater in three of the four shallow groundwater monitoring wells than total nitrogen in the treated effluent. It does not appear that the discharge of treated wastewater to the evaporation ponds is degrading groundwater beyond existing conditions.

Groundwater limits are not required at this time because groundwater in the area has already been degraded. The degradation is likely the result of long-term agricultural uses in the surrounding area. It does not appear that the discharge of treated wastewater to the evaporation ponds is causing groundwater degradation beyond what limited degradation is allowed pursuant to this General Order.

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. The Basin Plan amendments were conditionally approved by the State Water Board on 16 October 2019 (Resolution 2019-0057) and by the Office of Administrative Law on 15 January 2020 (OAL Matter No. 2019-1203-03).

For nitrate, dischargers that are unable to comply with stringent nitrate requirements will be required to take on alternate compliance approaches that involve providing replacement drinking water to persons whose drinking water is affected by nitrates. Dischargers may comply with the new nitrate program either individually or collectively with other dischargers. For the Nitrate Control Program, the facility falls within Non-Prioritized Groundwater Basins. Notices to Comply for Non-Prioritized Basins will be issued within two to four years after the effective date of the Nitrate Control Program.

For salinity, dischargers that are unable to comply with stringent salinity requirements will instead need to meet performance-based requirements and participate in a basin-wide effort to develop a long-term salinity strategy for the Central Valley. Dischargers received a Notice to Comply with instructions and obligations for the Salt Control Program within one year of 17 January 2020, the effective date of the amendments. Upon receipt of the Notice to Comply, the discharger had no more than six months to inform the Central Valley Water Board of their choice between Option 1 (Conservative Option for Salt Permitting) or Option 2 (Alternative Option for Salt Permitting).

As these strategies are implemented, the Central Valley Water Board may find it necessary to modify the requirements of this Order to ensure the goals of the Salt and Nitrate Control Programs are met. This order may be amended or modified to incorporate newly applicable requirements. More information regarding this regulatory planning process can be found on the [Central Valley Water Board CV-SALTS website](https://www.waterboards.ca.gov/centralvalley/water_issues/salinity) (https://www.waterboards.ca.gov/centralvalley/water_issues/salinity).