



## Central Valley Regional Water Quality Control Board

28 August 2019

Steve Kim, General Manager  
BSK Investment, LLC  
Comfort Inn & Suites Sequoia Kings Canyon  
40820 Sierra Drive  
Three Rivers, California 93271

**CERTIFIED MAIL**  
**7018 3090 0001 1194 6695**

**NOTICE OF APPLICABILITY (NOA), STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ-R5314, GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; BSK INVESTMENT, LLC; COMFORT INN & SUITES SEQUOIA KINGS CANYON ONSITE WASTEWATER TREATMENT SYSTEM; TULARE COUNTY**

On 29 October 2018, Rafael D. Divina, on behalf of BSK Investments, LLC (Discharger), submitted a Report of Waste Discharge (RWD) for the Comfort Inn & Suites Sequoia Kings Canyon (Comfort Inn & Suites) onsite waste treatment system (Facility). The Discharger 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 RWD included a completed and signed Form 200 and a technical report prepared by Rafael D. Divina, a California registered engineer (RCE 30011). Based on the information provided and a review of the available information, 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. You are hereby assigned General Order **2014-0153-DWQ-R5314** 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-R5314**. This MRP was developed after consideration of your waste characterization and site conditions described in the attached memorandum.

KARL E. LONGLEY SCD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

1685 E Street, Fresno, CA 93706 | [www.waterboards.ca.gov/centralvalley](http://www.waterboards.ca.gov/centralvalley)



### DISCHARGE DESCRIPTION

BSK Investments, LLC owns and operates the Comfort Inn & Suites and the associated Facility. The Comfort Inn & Suites is on the east side of Highway 198 about 1.1 miles south of Three Rivers in Tulare County (Section 26, Township 17 South, Range 28 East, Mount Diablo Base and Meridian) and provides lodging for the traveling public. Domestic wastewater from Comfort Inn & Suites, consisting of domestic wastewater generated from toilets, showers and washing machines, is conveyed to the Facility for treatment and disposal. The Facility consists of three septic tanks. From the septic tanks, wastewater is sent to a distribution box where wastewater is either discharged to a pressure-dosed leach bed or a subsurface irrigation system. Wastewater distributed to the subsurface irrigation system receives additional treatment prior to disposal, which includes an Orenco AX-Max 150-28 system (media bed filtration system).

### FACILITY SPECIFIC REQUIREMENTS AND EFFLUENT LIMITATIONS

The Discharger shall 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-R5314.

In accordance with Section B.1 of the General Order, the **monthly average daily discharge to the leach bed system shall not exceed 7,500 gallons per day (gpd), and the monthly average daily discharge to the media bed filtration system shall not exceed 3,750 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 below when discharging to the onsite subsurface drip irrigation system. Compliance with the effluent limitations specified in Table 1 shall be determined at the Media Filtration System Monitoring Location (Table 3 of the MRP).

**Table 1 - Effluent Limitations (Subsurface Drip Irrigation System)**

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**

<b>Equipment or Activity</b>	<b>Domestic Well</b>	<b>Flowing Stream</b> (see 1. below)	<b>Ephemeral Stream Drainage</b> (see 2. below)	<b>Property Line</b>
Septic Tank, Treatment System, or Collection System (see 3. Below)	150 ft. (see 4. below)	50 ft. (see 6. below)	50 ft.	5 ft. (see 6. below)
Leach Field (see 5. below)	100 ft, (see 6 and 7. below)	100 ft. (see 6. below)	5 ft	5 ft. (see 6. below)

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 “a” 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. Leach Field includes all subsurface dispersal systems, including mound systems except seepage pits.
6. Setback established by California Plumbing Code, Table K-1.
7. California Well Standards, part II, section 8.

The Discharger shall comply with the septic system requirements in Section B.2 of the General Order and the subsurface disposal system requirements in Section B.8 of the General Order. The General Order states in Section B.2.d that septic tanks shall be pumped when any of the following conditions exist:

- i. The combined thickness of sludge and scum exceeds one-third of the tank depth of the first compartment.
- ii. The scum layer is within 3 inches of the outlet device.
- iii. The sludge layer is within 8 inches of the outlet device.

Disposal systems that are classified as Class V wells must be registered with USEPA either by completing the [USEPA Underground Injection Well Registration Form](https://www.epa.gov/sites/production/files/2015-10/documents/7520-16_508c.pdf) ([https://www.epa.gov/sites/production/files/2015-10/documents/7520-16\\_508c.pdf](https://www.epa.gov/sites/production/files/2015-10/documents/7520-16_508c.pdf)).

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).

A copy of the Spill Prevention and Emergency Response Plan and the Sampling and Analysis Plan shall be maintained at the treatment facility and shall be presented to the Regional Water Board staff upon request.

As stated in Section E.2.w., in the event 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-R5314 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](mailto: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:** 848282,  
**Facility Name:** Comfort Inn & Suites Sequoia Kings Canyon,  
**Order:** 2014-0153-DWQ-R5314

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

([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)).

All documents, including responses to inspections and written notifications, submitted to comply with this NOA shall be directed, via the paperless office system, to the Compliance and Enforcement Unit, attention to Russell Walls. Mr. Walls can be reached at (559) 488-4392 or [Russel.Walls@waterboards.ca.gov](mailto:Russel.Walls@waterboards.ca.gov). Questions regarding the permitting aspects of the NOA, and notification for termination of coverage under the Small Domestic General Order, shall be directed, via the paperless office system, to the WDR Permitting Unit, attention Alexander Mushegan. Mr. Mushegan can be reached at (559) 488-4397 or by email at [Alexander.Mushegan@waterboards.ca.gov](mailto:Alexander.Mushegan@waterboards.ca.gov).

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Resources Control Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Resources Control Board must receive the petition by 5:00 p.m., 30 days after the date of this NOA, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Resources Control Board 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 or will be provided upon request. ([http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality)).

If you have any questions regarding this matter, please contact Daniel Benas by phone at (559) 445-5500, by email at [Daniel.Benas@waterboards.ca.gov](mailto:Daniel.Benas@waterboards.ca.gov).

*Original Signed by Scott Hatton for:*  
Patrick Pulupa  
Executive Officer

Enclosures:

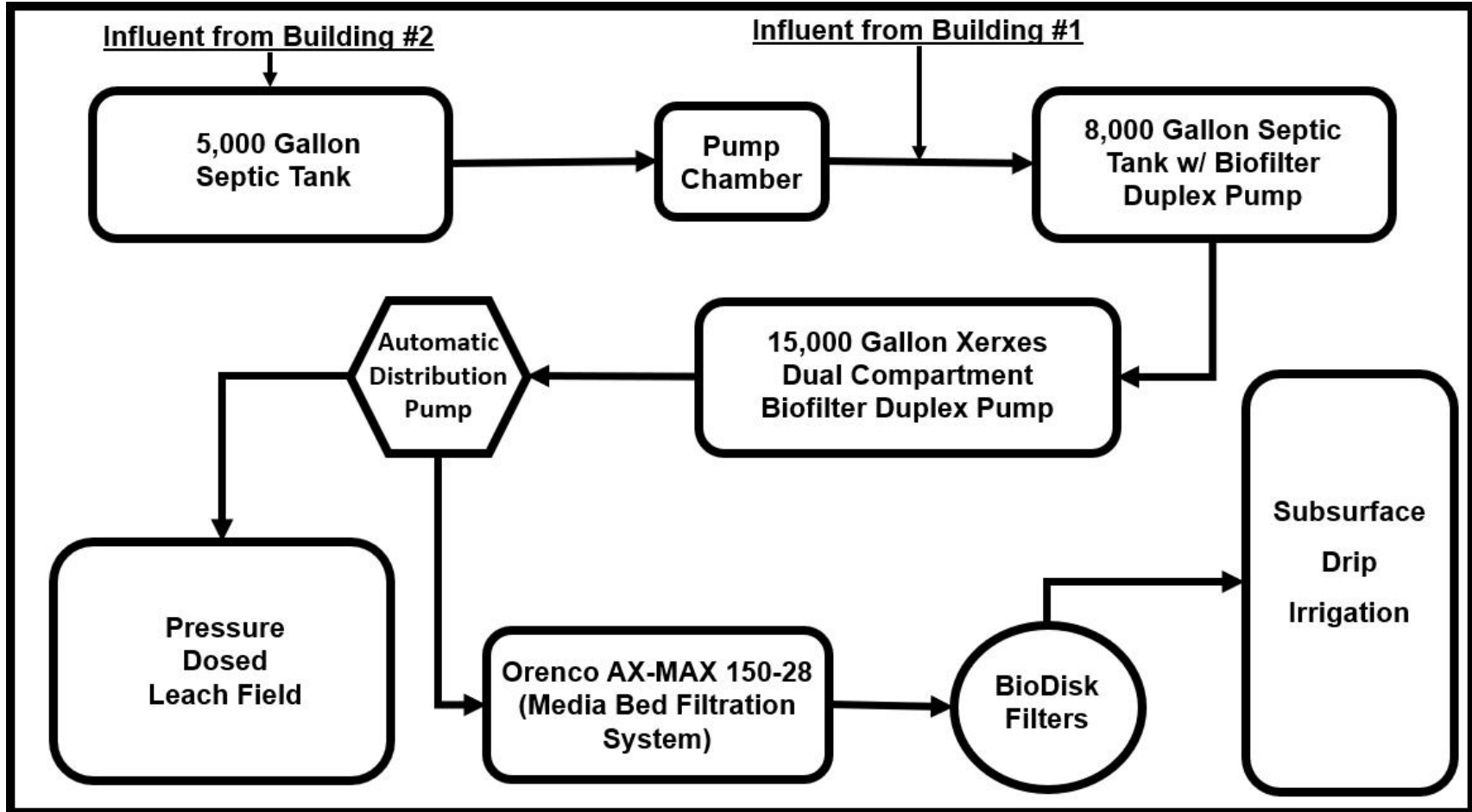
- Attachment A – Site Map
- Attachment B – Flow Schematic
- Monitoring and Reporting Program 2014-0153-DWQ-R5314
- Review Memorandum of Comfort Inn & Suites Sequoia Kings Canyon
- State Water Resources Control Board WQ 2014-0153-DWQ (Discharger Only)

cc:

- Tulare County Environmental Health Division, 5957 S. Mooney Boulevard, Visalia, California
- Rafael D. Divina P.E.; P.O. BOX 186; Madera, CA 93637
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**ATTACHMENT A – SITE MAP**  
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5314  
FOR  
BSK INVESTMENT, LLC;  
COMFORT INN & SUITES SEQUOIA KINGS CANYON  
ONSITE WASTEWATER TREATMENT SYSTEM TULARE COUNTY



**ATTACHMENT B – FLOW SCHEMATIC**  
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5314  
FOR  
BSK INVESTMENT, LLC;  
COMFORT INN & SUITES SEQUOIA KINGS CANYON  
ONSITE WASTEWATER TREATMENT SYSTEM TULARE COUNTY



**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION  
MONITORING AND REPORTING PROGRAM NO. 2014-0153-DWQ-R5314  
FOR  
BSK INVESTMENT, LLC  
COMFORT INN & SUITES SEQUOIA KINGS CANYON SYSTEM  
ONSITE WASTEWATER TREATMENT SYSTEM  
TULARE COUNTY**

This Monitoring and Reporting Program (MRP) describes requirements for monitoring a wastewater treatment system. This MRP is issued pursuant to Water Code section 13267, BSK Investments, LLC (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 Discharger owns and operates Comfort Inn & Suites Sequoia Kings Canyon that is subject to the Notice of Applicability (NOA) of Water Quality Order 2014-0153-DWQ-R5314. The reports are necessary to ensure that the Discharger complies with the NOA and General Order. Pursuant to Water Code section 13267, the

Discharger 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.

### SEPTIC TANK MONITORING

Effluent samples shall be taken from a location that represents the septic tank effluent quality distributed to the onsite leach field system. At a minimum, effluent monitoring shall include the following:

**Table 1 – Septic Tank Monitoring Requirements**

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Flow Rate	Gallons per day (gpd)	Metered (see 1. below)	Continuous	Annually
EC	µmhos/cm	Grab	Quarterly	Annually
Total Nitrogen (as N)	mg/L	Grab	Semi-annually (see 2. below)	Annually

1. Flow rate may be metered or estimated based on potable water supply meter readings or other approved method.
2. Once between January and June and once between July and December.

All septic tanks shall be inspected and/or pumped at least as frequently as described below in Table 2. Inspections of sludge and scum depth are not required if the tanks are pumped at least annually.

**Table 2 - Septic Tank Monitoring Requirements**

Parameter	Units	Measurement Type	Inspection/Reporting Frequency
Sludge depth and scum thickness in each compartment of each tank	Feet	Staff Gauge	Annually
Distance between bottom of scum layer and bottom of outlet device	Inches	Staff Gauge	Annually
Distance between top of sludge layer and bottom of outlet device	Inches	Staff Gauge	Annually
Effluent filter condition (if equipped, clean as needed)	NA	NA	Annually

Septic tanks shall be pumped when any one of the following conditions exists:

1. The combined thickness of sludge and scum exceeds one third of the tank depth of this first compartment.
2. The scum layer is within 3 inches of the outlet device.
3. The sludge layer is within 8 inches

If a septic tank is pumped during the year, the pumping report shall be submitted with the annual report. All pumping reports shall be submitted with the next regularly scheduled monitoring report. At a minimum, the record shall include the date, nature of service, service company name, and service company license number.

**MEDIA FILTRATION SYSTEM MONITORING**

Effluent samples shall be taken from a location that represents the treated effluent from the media bed filtration system distributed to the onsite subsurface drip irrigation system. At a minimum, effluent monitoring shall include the following:

**Table 3 - Media Filtration Effluent Monitoring Requirements**

Constituent	Units	Sample Type	Sample Frequency	Reporting Frequency
Flow Rate	gpd	Metered	Continuous	Quarterly
EC	µmhos/cm	Grab	Quarterly	Quarterly
TSS	mg/L	Grab	Quarterly	Quarterly
BOD <sub>5</sub>	mg/L	Grab	Quarterly	Quarterly
Total Nitrogen (as N)	mg/L	Grab	Annually	Annually

### **SUBSURFACE DISPOSAL AREA**

Monitoring for both the leach field system and subsurface drip irrigation system, shall include, at a minimum, the following:

**Table 4 - Subsurface Disposal Area Monitoring Requirements**

<b>Constituent</b>	<b>Inspection Frequency</b>	<b>Reporting Frequency</b>
Pump Controllers, Automatic Valves, ect. (see 1. below)	Quarterly	Quarterly
Nuisance Odor Condition	Quarterly	Quarterly
Saturated Soil Conditions (see 2. below)	Quarterly	Quarterly
Plant Growth (see 3. below)	Quarterly	Quarterly
Vectors or Animals Burrowing (see 4. below)	Quarterly	Quarterly

1. All pump controllers and automatic distribution valves shall be inspected for proper operation as recommended by the manufacturer.
2. Inspect a disposal area for saturated conditions. If a mound system is used.
3. Shallow rooted plants are generally desirable, deep rooted plants such as trees shall be removed as necessary.
4. Evidence of animals burrowing shall be immediately investigated, and burrowing animal populations controlled as necessary.

### **SLUDGE/BIOSOLIDS MONITORING**

The Discharger shall report the handling and disposal of all solids (e.g., screenings, grit, sludge, biosolids, ect) 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](mailto: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:** 848282,  
**Facility Name:** Comfort Inn & Suites Sequoia Kings Canyon,  
**Order:** 2014-0153-DWQ-R5314

#### **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 1<sup>st</sup>). 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 February 1<sup>st</sup> following the monitoring year. The Annual Report shall include the following:

1. Tabular and graphical summaries of all monitoring data collected during the 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 implement the above monitoring program on 1 October 2019 of this MRP.

Ordered by:

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

*28 August 2019*  
(Date)

## GLOSSARY

BOD <sub>5</sub>	Five-day biochemical oxygen demand
CaCO <sub>3</sub>	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 eight aliquots	Samples shall be a flow-proportioned composite consisting of at least 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

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## Central Valley Regional Water Quality Control Board

**TO:** Scott J. Hatton  
Supervising Water Resource Control Engineer

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

Ernesto P. Garcia  
Scientific Aid

**DATE:** 28 August 2019

### **APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ-R5314; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; BSK INVESTMENTS, LLC; COMFORT INN & SUITES SEQUOIA KINGS CANYON ONSITE WASTEWATER TREATMENT FACILITY; TULARE COUNTY**

On 29 October 2019 Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff received a Report of Waste Discharge (RWD) from Rafael D. Divina on behalf of BSK Investments (Discharger) for the Comfort Inn & Suites Sequoia Kings Canyon onsite wastewater treatment system (Facility) in Tulare County. The RWD requested coverage 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) for the Facility. The RWD includes a Form 200 and a technical report prepared by Rafael D. Divina, a California registered engineer (RCE 30011). Supplemental information was received from Mr. Divina on 1 August 2019 and from Mr. Armando G. Flores with O.S.T. System Designs, Inc. on 12 August 2019.

### **BACKGROUND INFORMATION**

The Facility is at 40820 Sierra Drive in Three Rivers (Section 26 Township 17 South, Range 28 East, Mount Diablo Base and Meridian) in Tulare County. The Comfort Inn & Suites provides lodging for travelers and tourists near the Three Rivers community. The Facility treats and disposes domestic wastewater from Comfort Inn & Suites.



The Facility was previously permitted under the Tulare County Division of Public Health Local Management Plan (LAMP). However, Central Valley Water Board received complaints in June 2018 alleging that wastewater was surfacing from the Facility and producing objectionable odors. In response to the complaints, Central Valley Water Board staff inspected the Facility on 19 June 2018 and 2 July 2018 and issued a Notice of Violation on 26 July 2018. The July 2018 Notice of Violation states that flows at the Facility are 6,000 to 8,000 gallons per day (gpd), which exceed the flow limitations of Tulare County's LAMP. Therefore, the July 2018 Notice of Violation required the Discharger to submit an RWD by 28 September 2018

### **DESCRIPTION OF DISCHARGE**

The Facility consists of septic tanks and both a leachfield system and subsurface drip irrigation system (with additional treatment) for disposal. Domestic wastewater from "Building #2" is discharged into a 5,000-gallon septic tank. From the 5,000-gallon septic tank, wastewater from "Building #2" is combined with wastewater from "Building #1" and discharged to a battery septic tank comprised of two 4,000-gallon tanks. Wastewater is then pumped, via a Biofilter Duplex Pump, into a third septic tank (15,000-gallon Xerxes Dual Compartment Biofilter Duplex Pump). A flow distribution box is used to distribute effluent into either a pressure-dosed leach bed system (consisting of four 60-foot laterals spaced 10 feet apart with a total disposal surface area of 2,400 square feet) or alternatively to a subsurface drip irrigation system. According to available documents, gate valves automatically divert 50 percent of the flow to the leach field system and the other 50 percent to the subsurface drip irrigation system.

The subsurface irrigation system requires a greater level of treatment. Therefore, wastewater is treated in an Orenco AX-MAX 150-28 system (media bed filtration system) before being discharged to the subsurface drip irrigation system. In the media bed filtration system, effluent is distributed on a media bed via sprinklers. Effluent trickles through the media and is then either conveyed to the subsurface irrigation system or returned to the beginning of the media bed filtration system for additional treatment (up to four times). The media bed filtration system has an average daily design flow of 3,750 gpd, the subsurface irrigation system has a peak flow design of 7,500 gpd, and the leach bed system is designed to handle flows up to 5,500 gpd. Therefore, the Notice of Applicability should specify a flow limitation of 3,750 gpd to the media bed filtration system and a 5,500 gpd flow limitation to the leach bed system. Flow meters should be added to ensure wastewater is evenly diverted.

As previously mentioned, the Facility reportedly has an average flow between 6,000 to 8,000 gpd. Since limited flow information is available, this memorandum provides a rough estimate of expected flowrates for the hotel using Tulare County's LAMP estimate of 100 gallons per day per room with private baths (Table 202 of the LAMP). The Facility has 64 rooms in Building #1 and 41 rooms in Building #2. When at full capacity, using this estimate, it appears the Facility could experience flows around 10,500 gpd (105 rooms x 100 gal/room\*day = 10,500 gpd). According to the RWD and

supplemental documents, the Facility's total peak flow design is 13,000 gpd (7,500 gpd for the media bed filtration system and subsurface irrigation system and 5,500 gpd for the leach bed system). As previously mentioned, flow metering is necessary to ensure the Facility is not receiving exceeding its design capacity.

The General Order states facilities discharging under 100,000 gpd are eligible for coverage. Furthermore, since the Facility has flows below 20,000 gpd no nitrogen evaluation necessary. However, the media bed filtration system supposedly provides 50 percent removal for nitrate. According to the RWD, the 5-day biochemical oxygen demand (BOD<sub>5</sub>) and total suspended solids (TSS) influent concentrations are 300 mg/L and 150 mg/L, respectively. The RWD predicts an effluent quality from the media bed filtration system of 30 mg/L for both BOD and TSS. *Table 4: Effluent Limitations for Wastewater Treatment Systems* of the General Order specifies different technology performance limitations based on the treatment provided. The BOD and TSS limits for Activated Sludge, MBR, or similar treatment system are applicable for the Facility's discharge from the media bed filtration system to the subsurface irrigation system (monthly average of 30 mg/L and 7-day average of 45 mg/L). Monitoring is necessary to confirm the media bed filtration system provides the level of treatment proposed in the RWD and to characterize the Facility's discharge.

#### **POTENTIAL THREAT TO WATER QUALITY**

According to the RWD, groundwater in the area is approximately 10 feet below ground surface. A domestic well is displayed on the property in a site drawing included with the RWD and appears to be at least 200 feet away from the Facility's subsurface irrigation and leach bed systems. As previously mentioned, complaints were received regarding the Facility due to the surfacing of effluent. At the time of the complaint, the only effluent disposal method at the Facility was the subsurface irrigation system. Subsequent to the 26 July 2018 inspection, the leach bed system was added.

#### **MONITORING REQUIREMENTS**

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

- Septic Tank Monitoring
- Subsurface Disposal Monitoring
- Solids Disposal

#### **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.