Central Valley Regional Water Quality Control Board

13 March 2020

Monica Parra, Director of Operations
National Chavez Center
P.O. Box 62
Keene, California 93531

Certified Mail:
7019 2970 0001 5206 2889

NOTICE OF APPLICABILITY (NOA), STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ-R5321, GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS, NATIONAL CHAVEZ CENTER, CESAR CHAVEZ NATIONAL MONUMENT WASTEWATER TREATMENT SYSTEM; KERN COUNTY

On 4 September 2019, EnviroTech Consultants, Inc. (EnviroTech), on behalf of the National Chavez Center (Discharger), submitted a technical report for coverage of the Cesar Chavez National Monument Wastewater Treatment System (Facility) in Kern County under 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). On 10 December 2019, EnviroTech Consultants, Inc., on behalf of the Discharger, submitted an updated Report of Waste Discharge (RWD) with additional details for enrolling the Facility under the General Order.

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 therefore 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 the rescission of Waste Discharge Requirements (WDRs) Order 86-032. You Facility's coverage under the General Order is hereby assigned enrollee number **2014-0153-DWQ-R5321**.

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 enclosed *Monitoring and Reporting Program* (MRP) No. **2014-0153-DWQ-R5321**. This MRP was developed after consideration of your waste characterization and site conditions described in the attached memorandum.

DISCHARGE DESCRIPTION

The Discharger owns the National Chavez Center and Facility that receives wastewater from several buildings including the Villa Las Paz Conference Center, six residential homes, and the Cesar Chavez National Monument building as shown in **Attachment A**, which is incorporated by reference and considered part of this Notice of Applicability (NOA).

WDRs Order 86-032 currently regulates the Facility and associated discharge. Order 86-032 authorizes a 30-day dry weather discharge of up 28,000 gallons per day (gpd) to four unlined effluent retention/storage ponds, as shown in **Attachment B** which is incorporated by reference and considered part of this NOA. Flows have decreased significantly since 1986 with the closing of a former hospital that was onsite. Wastewater flow is currently estimated at the site based on occupancy of the various structures. The RWD indicates the average flow to the ponds is 790 gpd, less than 1,000 gpd.

FACILITY 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-R5321.

In accordance with Section B.1 of the General Order, treated wastewater discharged to the Facility's effluent retention pond system **shall not exceed 5,000 gpd as a monthly average**.

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 septic tanks, treatment systems, or collection systems. The Discharger shall comply with the applicable setback requirements, as summarized in the following table:

Site-Specific Applicable Setback Requirements

Equipment or Activity	Domestic Well	Flowing Stream	Ephemeral Stream Drainages	Property Line
Septic Tank, Treatment System, or Collection System	150 feet	50 feet	50 feet	5 feet
Impoundment (undisinfected water)	150 feet	150 feet	50 feet	50 feet

The Discharger shall comply with the septic system requirements in Section B.2 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.

The Discharger shall comply with the pond system requirements specified in Section B.5 of the General Order and all relevant sections of the septic system requirements specified in Section B.2 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:

- 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)

A copy of the Spill Prevention and Emergency Response Plan, the Sampling and Analysis Plan, and Sludge Management Plan shall be maintained at the Facility and shall be presented to the Regional Water Board staff upon request. The Sludge Management Plan shall be submitted to the Central Valley Water Board **within 90 days** of the issuance of the NOA.

Failure to comply with the requirements in this NOA, General Order 2014-0153-DWQ**,** with all attachments, and MRP No. 2014-0153-DWQ-R5321 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.

As stated in Section E.2.w of the General Order, 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 Central Valley Water Board Executive Officer.

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.

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. 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

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 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: 273155,
Facility Name: Cesar Chavez National Monument Facility
Order: 2014-0153-DWQ-R5321

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).

All documents, including responses to inspections and written notifications, submitted to comply with this General Order 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. Questions regarding the permitting aspects of the General Order, and notification for termination of coverage under the Waiver, shall be directed, via the paperless office system, to the WDR Permitting Unit, attention Jeff Pyle. Mr. Pyle can be reached at (559) 445-5145 or by email at Jeffrey.Pyle@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).

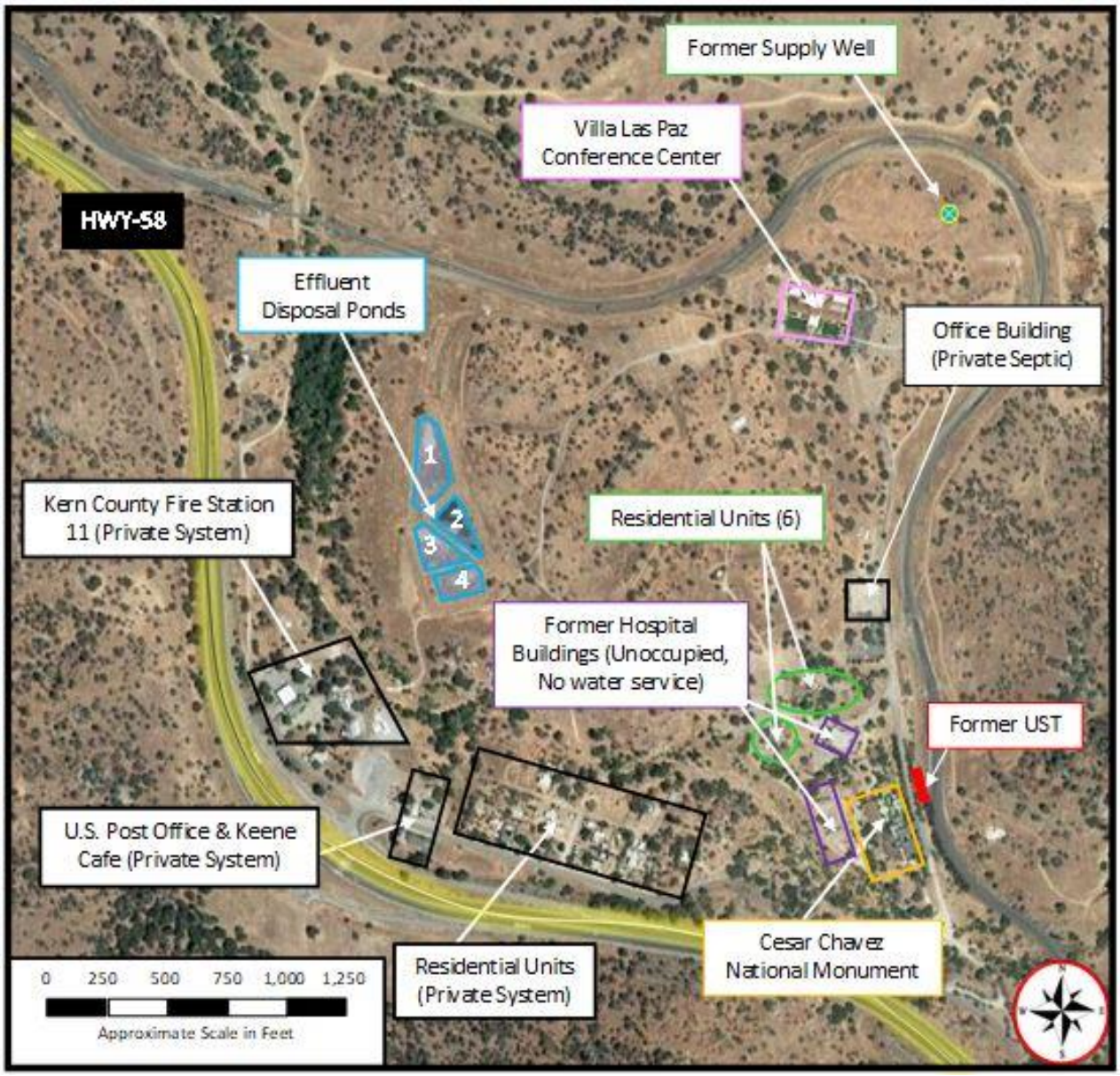
WDRs Order 86-032 are proposed to be rescinded at the 4/5 June 2020 meeting of the Central Valley Water Board. Upon rescission of your individual WDRs, coverage for your Facility under the General Order shall become applicable under this Notice of Applicability.

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

Attachments:
- Attachment A – Site Map
- Attachment B – Disposal Ponds Map

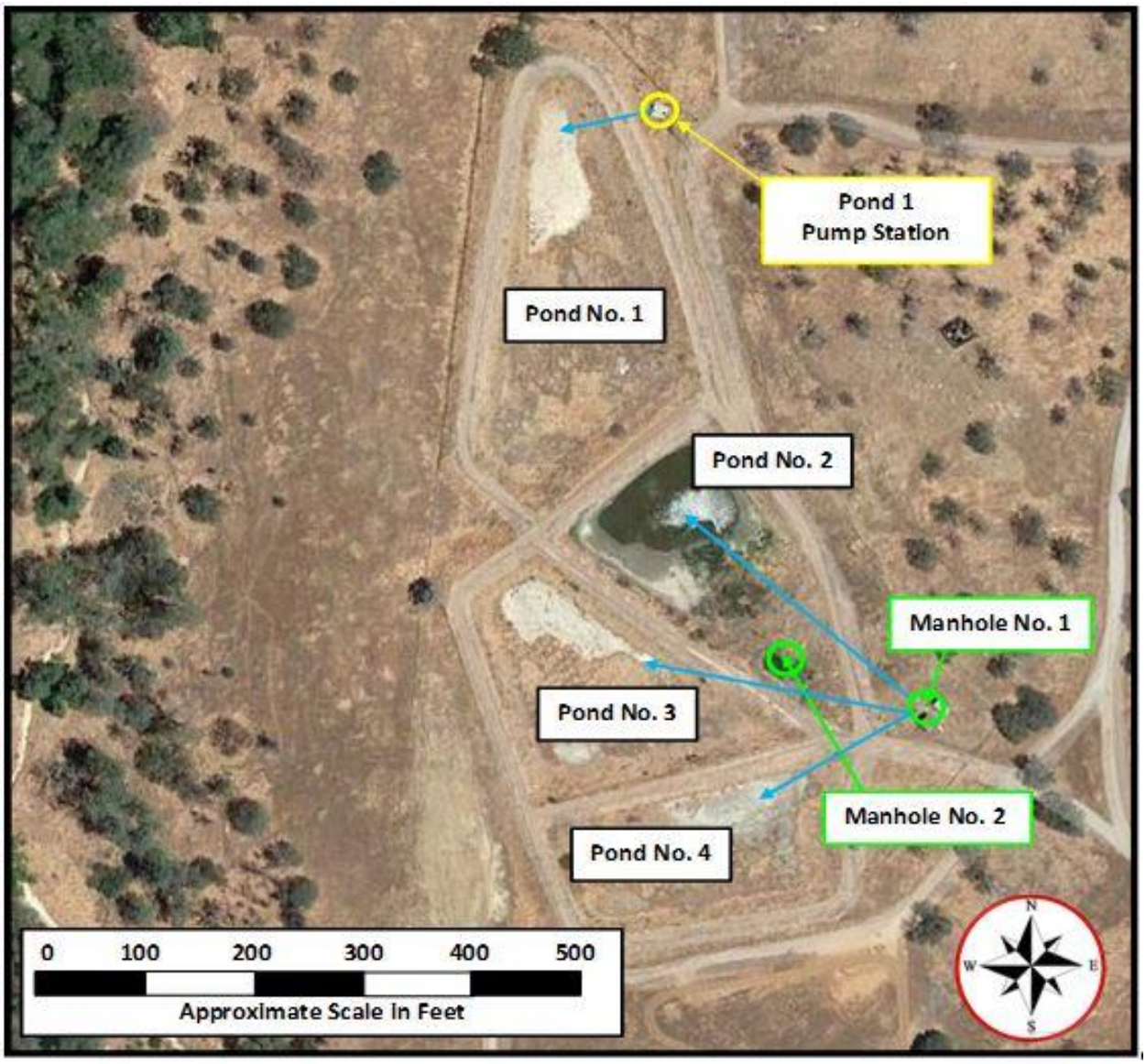
Enclosures:
- Monitoring and Reporting Program 2014-0153-DWQ-R5321
- 13 March 2020 Regional Water Board Staff Memorandum
- State Water Resources Control Board Order WQ 2014-0153-DWQ (Discharger Only)

cc:
- Scott Couch, State Water Resources Control Board, Division of Water Quality (via email)
- Russell Walls, Central Valley Regional Water Quality Control Board (via email)
- Brian Potter, State Water Resources Control Board, Division of Drinking Water (via email)
- Amy Rutledge, Kern County Environmental Health Department
- Carly Miser, EnviroTech Consultants, Inc., Bakersfield,



ATTACHMENT A – SITE MAP

NOTICE OF APPLICABILITY 2014-0153-DWQ-R5321
FOR
NATIONAL CHAVEZ CENTER
CESAR CHAVEZ NATIONAL MONUMENT WASTEWATER TREATMENT SYSTEM
KERN COUNTY



ATTACHMENT B – DISPOSAL PONDS

NOTICE OF APPLICABILITY 2014-0153-DWQ-R5321

FOR

NATIONAL CHAVEZ CENTER

CESAR CHAVEZ NATIONAL MONUMENT WASTEWATER TREATMENT SYSTEM

KERN COUNTY

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM NO. 2014-0153-DWQ-R5321
FOR
NATIONAL CHAVEZ CENTER
CESAR CHAVEZ NATIONAL MONUMENT WASTEWATER TREATMENT SYSTEM
KERN 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 to the National Chavez Center (Discharger). The 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 any 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 the Cesar Chavez National Monument Wastewater Treatment System (Facility) that is subject to the Notice of Applicability (NOA) of Water

Quality Order 2014-0153-DWQ-R5321. The reports are necessary to ensure that the Discharger complies with the NOA and the 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 (COLLECTION SYSTEM) MONITORING

Concrete vaults shall be inspected and/or pumped at least as frequently as described below. Inspections of sludge and scum depth are not required if the tanks are pumped at least annually.

Table 1 - Septic/Collection System 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

Parameter	Units	Measurement Type	Inspection/Reporting Frequency
Effluent filter condition (if equipped, clean as needed)	NA	NA	Annually

Septic tanks and vaults 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 the first compartment.
2. The scum layer is within 3 inches of the outlet device.
3. The sludge layer is within 8 inches of the outlet device.

If a septic tank or vault 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.

POND SYSTEM MONITORING

Influent samples shall be taken from a location that provides representative samples of the wastewater and flow rate. At a minimum, influent monitoring shall include the monitoring specified in Table 2 below. Influent flow shall be measured/estimated prior to discharge to the effluent retention ponds.

Table 2 - Pond Influent Monitoring Requirements

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Flow	gpd	Metered/Estimated (see 1 below)	Continuous	Quarterly
BOD	mg/L	Grab	Monthly	Quarterly
EC	µmhos/cm	Grab	Monthly	Quarterly
Total Nitrogen (as N)	mg/L	Grab	Quarterly	Quarterly

1 Flow may be metered or estimated based on potable water supply meter reading or other approved method.

All wastewater ponds shall be monitored and observed as specified in Table 3 below. Monitoring shall be conducted for all parameters listed in Table 3 for each pond that contained wastewater during the month/quarter.

Table 3 - Wastewater Pond Observation Monitoring Requirements

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Freeboard	0.1 feet	Measurement	Monthly	Quarterly
Odors	---	Observation	Monthly	Quarterly
Berm Condition	---	Observation	Monthly	Quarterly

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
DO (see 1 below)	mg/L	Grab	Monthly	Quarterly

1 DO shall be measured between 8:00 am and 10:00 am and shall be taken opposite the pond inlet at a depth of approximately one foot**.** Should the DO be below 1.0 mg/L during a weekly sampling event, the Discharger shall take all reasonable steps to correct the problem and commence daily DO monitoring in the affected ponds until the problem has been resolved.

SLUDGE/BIOSOLIDS DISPOSAL MONITORING

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 shall 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: 273155,
Facility Name: Cesar Chavez National Monument Facility
Order: 2014-0153-DWQ-R5321

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 during the quarter.
2. A comparison of monitoring data to the discharge specifications, applicable effluent limits, 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 year.
2. An evaluation of the performance of the wastewater treatment system, including discussion of the capacity issues nuisance 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. Copies of laboratory analytical report(s) and chain of custody form(s).
4. 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.
5. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
6. 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 in the first month following the rescission of Order 86-032.

Ordered by:

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

13 March 2020
(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
MPN/100 mL	Most probable number [of organisms] per 100 milliliters

CALIFORNIA
Water Boards

GAVIN NEWSOM
GOVERNOR

JARED BLUMENFELD
SECRETARY FOR
ENVIRONMENTAL PROTECTION

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

Jeffrey S. Pyle
Engineering Geologist
PG 7375

DATE: 13 March 2020

APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ-2014-0153-DWQ-R5321; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; NATIONAL CHAVEZ CENTER; CESAR CHAVEZ NATIONAL MONUMENT WASTEWATER TREATMENT SYSTEM; KERN COUNTY

On 5 September 2019, EnviroTech Consultants, Inc. (EnviroTech), on behalf of the National Chavez Center (Discharger), submitted a technical report to address potential coverage of the Cesar Chavez National Monument Wastewater Treatment System (Facility) 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). On 10 December 2019, EnviroTech Consultants, Inc., on behalf of the Discharger, submitted a Report of Waste Discharge (RWD) applying for coverage under the General Order. The RWD was stamped and signed by Gary Brierley (PG 4916). This memorandum provides a summary of the applicability of the Facility and its associated discharge under the General Order.

BACKGROUND INFORMATION

The Discharger owns the National Chavez Center and the wastewater treatment/disposal system that services several buildings including the Villa Las Paz

Conference Center, six residential homes, and the Cesar Chavez National Monument. Waste Discharge Requirements (WDRs) Order 86-032, adopted by the Central Valley Water Board on 24 January 1986, prescribes requirements for the discharge.

Order 86 032 allows a monthly average wastewater flow of up to 0.028 gallons per day (gpd). On 9 December 2011, the Stonybrook Corporation completed a "Certificate of Amendment of Articles of Incorporation for The Stonybrook Corporation" changing the corporation's name from The Stonybrook Corporation to the National Chavez Center

Additionally, the Discharger owns and operates an office building that is connected to a separate septic tank/leachfield system, which does not discharge to the Facility. The septic system for this building is regulated by Kern County. Furthermore, the other buildings in the vicinity of the National Chavez Center, as shown on Attachment A of the Notice of Applicability (NOA), do not discharge to the Facility and discharge to private disposal systems that are regulated by Kern County.

DESCRIPTION OF DISCHARGE

WDRs Order 86-032 allows a 30-day dry weather discharge of up 28,000 gpd to be discharged to four unlined effluent retention ponds. The flows have decreased significantly since the closing of two former hospital buildings in the late 1960's. The northern effluent disposal pond is identified as Pond 1, the eastern effluent disposal pond as Pond 2, the western effluent disposal pond as Pond 3, and the southern effluent disposal pond is identified as Pond 4 as shown in Attachments A and B of the NOA. According to the RWD, only Pond 2 was observed to contain wastewater in the fall of 2019. The capacity of the ponds are listed in the table below.

Table 1 - Pond Capacities

Pond Number	Volume (gallons)
1	590.900
2	392,700
3	471,240
4	291,240

Domestic wastewater from the Villa Las Paz Conference Center gravity flows to a 2,000-gallon concrete vault at Pump 1 (referred to as "Pond 1 Pump Station in Attachment B"). When the vault is full, the pump turns on and discharges primary treated wastewater to Pond 1 via a 6-inch pipeline. Measured wastewater flows to the ponds were not reported in the December 2019 RWD, they were estimated based on the building's occupancy. The Villa Las Paz building is estimated to generate about 30 gpd at current occupancy (two people). At a rate of 30 gpd, the vault would pump about once every 67 days. This is likely why no standing effluent was observed in Pond No. 1 in 2019. The RWD also provided the maximum capacity of the Villa Las Paz Conference Center (245 people) and estimated the peak flow to be 1,470 gpd if the Conference Center was at maximum capacity.

Wastewater generated by the six residences and the Cesar Chavez National Monument gravity flows to a second 2,000-gallon concrete vault at Manhole No. 1 just east of Ponds 2, 3, and 4 (shown in Attachment B). Manhole No. 1 has two pipes that can be opened or closed. The northern pipe allows discharge into Pond No. 2 that is currently the primary pond in use. The southern pipe allows wastewater to gravity flow to Manhole No. 2 that has two outlet pipes that can be opened or closed to allow discharge into either Pond 3 or 4. The RWD estimates the flow from the six residences and the Cesar Chavez National Monument to be about 760 gpd. At a rate of 760 gpd the vault would pump about every 2.5 days.

When the estimated Pond 1 discharge (30 gpd) is combined with the estimated Pond 2 discharge (760 gpd), the total estimated discharge is 790 gpd. 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 pursuant to the General Order is required at this time.

POTENTIAL THREAT TO WATER QUALITY

Effluent

WDRs Order 86-032 requires effluent monitoring for only electrical conductivity (EC), dissolved oxygen (DO), and to measure the flow. As previously discussed, flow from the Facility is estimated. The RWD reviewed EC (637 µmhos/cm) and DO (6.9 mg/L) results for the August 2019 monitoring event. The average effluent result for DO and EC from January 2019 through January 2020 (13 samples) are presented in Table 2.

Table 2 – Effluent Results (January 2019 through January 2020)

Dissolved Oxygen	Electrical Conductivity
4.6	716
(0.5 - 11)	(351 - 980)

WDRs Order 86-032 also contains Discharge Specification B.8 that requires the discharge to not exceed the average EC of the source water source plus 500 umhos/cm, which was an EC effluent limitation specified in the Tulare Lake Basin Plan for discharges of domestic wastewater to land. Source water results were not available for the Facility, so it's not possible to evaluate if the discharge is in compliance with the. However, this limit was recently removed from the Basin Plan (as a part of the Basin Plan amendments adopted in Resolution R5-2018-0034 on 31 May 2019, which became effective on 17 January 2020). As part of the Basin Plan Amendments, all discharges of salts regulated by the Central Valley Water Board will soon (approximately in March 2020) receive a Notice to Comply with new regulations (i.e., Salt Control Program). Further discussion of the Salt and Nitrate Control Programs is included at the end of this memorandum.

Groundwater

Groundwater information for the area is limited, but using the State Water Resources Control Board's GeoTracker database the depth to groundwater at the National Chavez Center in 2004 (during the excavation for the removal of an underground storage tank)

was reported to be about 22 feet below the ground surface (bgs). The former underground storage tank was just east of the Cesar Chavez National Monument as shown on Attachment A. Groundwater beneath the facility is contained in fractured bedrock environment. The direction of groundwater flow in fractured bedrock is primarily based on the direction of the fractures. Staff's review of available sources of groundwater data did not find information pertaining to the direction of groundwater flow.

Using the State Water Resources Control Board's *Groundwater Ambient Monitoring and Assessment Program* (or GAMA), data for the former underground storage tank was reviewed and presented in Table 3 below. MW-1 through Mw-3 had depths of 30 feet bgs and were screened from 10 to 30 feet bgs. MW-4 through MW-6 had depths of 80 feet bgs and were screened from 50 to 80 feet bgs. The results are presented in milligrams per liter (mg/L) and in micrograms per liter (µmhos/cm).

Table 3 – 2004 Onsite Groundwater Results

		Well Number				
Constituent	**Units**	**MW-1**	**MW-2**	**MW-3**	**MW-4**	**MW-5**
Total Dissolved Solids	mg/L	530	470	1,400	590	550
Nitrate as nitrogen	mg/L	10.9	9.3	< 0.5	14.2	16.7
Sodium	mg/L	84	52	170	72	74
Chloride	mg/L	14	11	100	35	37
Sulfate	mg/L	100	81	120	120	110
Total Alkalinity as $CaCO_3$	mg/L	220	190	810	210	---
Iron	ug/L	<0.1	<0.1	20	<0.1	<0.1
Manganese	ug/L	70	75	102	54	0.06

Based on the data, nitrate concentrations were elevated in all wells except MW-3. However, salinity constituents in MW-3 were significantly higher than the other monitoring wells.

Using the GAMA database, staff located two old inactive supply wells in the area. One well (well 1502664-001) appears to be an older supply well for the National Chavez Center, but no owner is listed. The well is/was located about 550 feet north/northeast of the Villa Las Paz conference building. The results are shown in Table 4.

Table 4 – Former Onsite Supply Well Groundwater Results

Constituent	Units	Date			
		Aug-96	Jul-97	Nov-99	Jul-02
Specific Conductance	umhos/cm	1,410	1,720	1,200	1,850
Total Dissolved Solids	mg/L	805	845	---	1,250
Nitrate as NO_3 (see 1 below)	mg/L	0.4	0.4	2.4	0.9
Sodium	mg/L	244	257	---	350
Chloride	mg/L	124	127	---	385
Sulfate	mg/L	73.7	72.2	---	75
Total Alkalinity as $CaCO_3$ (see 2 below)	mg/L	477	489	---	420
Total Hardness as $CaCO_3$ (see 2 below)	mg/L	188	198	---	276
Arsenic	ug/L	2	2	---	3.7
Iron	ug/L	442	1,500	3,180	1,200
Manganese	ug/L	70	75	102	54

1. NO_3 = Nitrate
2. $CaCO_3$ = Calcium carbonate.

The results from the former supply well are similar to those reported for MW-3 above and suggest a regional water quality issue with respect to salinity constituents.

Based on available information, including the depth to groundwater, underlying soil conditions, expected strength of the domestic wastewater, and proposed flowrate, the proposed Facility appears to meet the conditions of the Small Domestic General Order.

MONITORING REQUIREMENTS

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

- Septic Tank (Vault) Monitoring
- Pond Monitoring
- Solids Disposal

SALT AND NITRATE CONTROL PROGRAMS

As part of the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) initiative, the Central Valley Water Board adopted Basin Plan amendments (Resolution R5-2018-0034) incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting. On 16 October 2019, the State Water Resources Control Board adopted Resolution No. 2019-0057 approving the Central Valley Water Board Basin Plan amendments and

also directed the Central Valley Water Board to make targeted revisions to the Basin Plan amendments within one year from the approval of the Basin Plan amendments by the Office of Administrative Law. The Office of Administrative Law approved the Basin Plan amendments on 15 January 2020 (OAL Matter No. 2019-1203-03).

Pursuant to the Basin Plan amendments, dischargers will receive a Notice to Comply with instructions and obligations for the Salt Control Program within one year of the effective date of the amendments. Upon receipt of the Notice to Comply, the Discharger will have 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). For the Nitrate Control Program, the Facility falls outside of Groundwater Basin 5-022.14 (San Joaquin Valley – Kern County), and therefore, is in a non-prioritized basin/sub-basin. Implementation within a non-prioritized basin/sub-basin will occur as directed by the Central Valley Water Board Executive Officer.

More information on the Salt and Nitrate Control Program may be found on the internet (https://www.cvsalinity.org/public-info).