Central Valley Regional Water Quality Control Board

19 November 2021

David Rosenbaum
DRM Riverland, LLC and ARO Riverland, LP
150 Rockledge Terrace
Laguna Beach, California 92651

CERTIFIED MAIL
7018 1830 0001 2774 7800

NOTICE OF APPLICABILITY (NOA), STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ, GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; DRB RIVERLAND, LLC AND ARO RIVERLAND, LP; RIVERLAND RV RESORT WASTEWATER TREATMENT FACILITY; TULARE COUNTY

*PLEASE READ CAREFULLY – THIS NOTICE OF APPLICABILITY (BEGINNING ON PAGE 5 AND IN ATTACHMENTS C AND D) INCLUDES LEGAL REQUIREMENTS FOR THE **SALT AND NITRATE CONTROL PROGRAMS***

On 12 October 2018, DRB Riverland, LLC and ARO Riverland, LP (collectively referred to as Discharger) submitted a Report of Waste Discharge (RWD) consisting of a Form 200 and technical report for the Riverland RV Resort Wastewater Treatment Facility (Facility or WWTF). The Discharger is requesting coverage 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). The RWD included a completed and signed Form 200 and a technical report prepared and signed by Garth Pecchinino (RCE 52678) with QK, Inc.

Based on the information provided and a review of available information, the Facility treats and disposes of less than 100,000 gallons per day (gpd) of domestic wastewater 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. You are hereby assigned General Order **2014-0153-DWQ-R5373** 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-R5373**. This MRP was developed after consideration of your waste characterization and site conditions described in the attached memorandum.

DISCHARGE DESCRIPTION

The Riverland RV Resort consists of 8 mobile home units with sewer connection, 38 recreational vehicle (RV) sites with sewer connection (and 64 RV sites without sewer connection), 20 campsites, public restrooms and laundry facilities, a bar/restaurant, a 24-room motel, and a dump station that discharges to the WWTF.

The WWTF consists of six septic tanks, an aerated treatment system (325 gallon-settling tank and two 1,280-gallon clarifiers operated in parallel), seven lift pumps, and two leach fields. The leach fields are reported to have a combined disposal capacity of 52,000 gpd. The peak flow rate into the wastewater system is reported to be 19,500 gpd. Septic tank solids are removed every three to six months.

FACILITY SPECIFIC REQUIREMENTS AND EFFLUENT LIMITATIONS

The Discharger will maintain exclusive control over the discharge and shall comply with the terms and conditions of this NOA, General Order 2014-0153-DWQ, with all attachments, and MRP No. 2014-0153-DWQ-R5373.

In accordance with Section B.1 of the General Order, the **treated wastewater discharged to the combined leach field system shall not exceed a 20,000 gpd as a monthly average**. In accordance with the requirements of the General Order, this NOA does not specify a nitrogen effluent limitation since this NOA does not authorize a monthly average flow greater than 20,000 gpd.

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 1 - Site-Specific Applicable Setback Requirements

Equipment or Activity	Domestic Well	Flowing Stream	Property Line
Septic Tank, Aerobic Treatment Unit, Treatment System, or Collection System	150 ft. (see 1 below)	50 ft.	5 ft.
Leach Field	100 ft.	100 ft.	5 ft.

1 Some of the existing septic tanks and the existing aerobic treatment unit have a setback distance of less than 150 feet (see enclosed memo for more information). Any new septic tanks or treatment systems must comply with the 150-foot setback distance unless the Discharger provides proper justification for a reduced setback.

Disposal systems (such as leach fields) 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).

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

1. Septic Systems requirements specified in Section B.2 of the General Order;
2. Aerobic Treatment Units requirements specified in Section B.3 of the General Order;
3. Subsurface Disposal Systems requirements specified in Section B.6 of the General Order;
4. Sludge/Solids/Biosolids Disposal requirements in Section B.8 of the General Order; and
5. Groundwater and Surface Water Limitations specified in Section C.1 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 **(17 February 2022)**:

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

The General Order requires that the Sludge Management Plan be submitted to the Central Valley Water Board within **90 days** of the issuance of the NOA. A copy of the Spill Prevention and Emergency Response Plan and the Sampling and Analysis Plan shall be maintained onsite at the Riverland RV Resort 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-R5373, with all attachments, and MRP No. 2014-0153-DWQ-R5373 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 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.

SALT AND NITRATE CONTROL PROGRAMS

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. These Basin Plan amendments became effective on 17 January 2020. The Discharger has been assigned **CV-SALTS ID: 3598**. As the WWTF has not previously been regulated by the Central Valley Water Board, a Notice to Comply for the Nitrate Control Program and for the Salt Control Program are being issued as part of this NOA (see Attachment C and D, respectively). Pursuant to California Water Code 13260, the Discharger must submit Notices of Intent for the Salt Control Program and for the Nitrate Control Program by **18 January 2022**.

DOCUMENT SUBMITTALS

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**: 656349,
> **Facility Name:** Riverland RV Resort Wastewater Treatment Facility,
> **Order:** 2014-0153-DWQ- R5373

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 Russell.Walls@waterboards.ca.gov. Questions regarding the permitting aspects of the General Order 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 Mr. Alexander Mushegan. Mr. Mushegan can be reached at (559) 488-4397 or 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)

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).

If you have any questions regarding this matter, please contact Alexander Mushegan by email at Alexander.Mushegan@waterboards.ca.gov.

Original Signed by Clay L. Rodgers for:
Patrick Pulupa
Executive Officer

(see next page for Attachments, Enclosures, and cc's)

Attachments:

- Attachment A – Site Map
- Attachment B – Flow Schematic
- Attachment C – Nitrate Control Program Notice to Comply
- Attachment D – Salt Control Program Notice to Comply

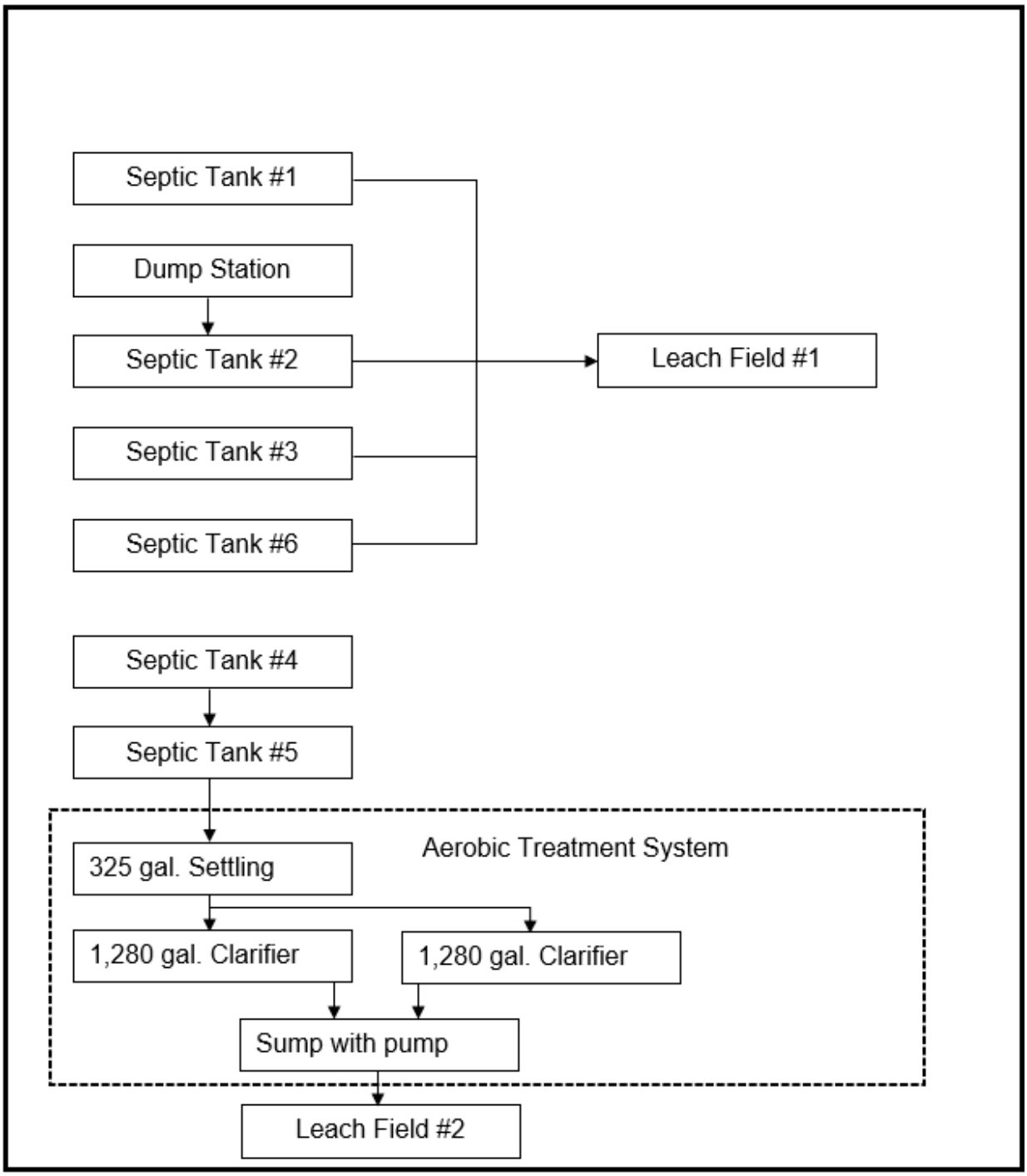
Enclosures:

- Monitoring and Reporting Program 2014-0153-DWQ-R5373
- Review Memorandum of Riverland RV Resort Wastewater Treatment Facility
- State Water Resources Control Board WQ 2014-0153-DWQ (Discharger Only)

cc:

- David Lancaster, State Water Resources Control Board, OCC, Sacramento (via email)
- Laurel Warddrip, State Water Resources Control Board, DWQ, Sacramento (via email)
- Russell Walls, Senior Engineer, Central Valley Water Board, Compliance and Enforcement Unit, Fresno (via email)
- Rb5s-cvsalts@waterboards.ca.gov
- Tricia Wathen, State Water Resources Control Board, DDW, Fresno (via email)
- Tulare County Environmental Health, Visalia.
- Debbie Webster, CVCWA (via email)
- Chrysanne Carpenter, Riverland RV Resort, Kingsburg (via email)
- Brian Shoener, QK, Inc., Clovis (via email)

ATTACHMENT A – SITE MAP
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5373
FOR
DRB RIVERLAND, LLC AND ARO RIVERLAND, LP;
RIVERLAND RV RESORT WASTEWATER TREATMENT FACILITY;
TULARE COUNTY



ATTACHMENT B – FLOW SCHEMATIC

NOTICE OF APPLICABILITY 2014-0153-DWQ- R5373

FOR

DRB RIVERLAND, LLC AND ARO RIVERLAND, LP;

RIVERLAND RV RESORT WASTEWATER TREATMENT FACILITY;

TULARE COUNTY

ATTACHMENT C -
NITRATE CONTROL PROGRAM NOTICE TO COMPLY
(CV-SALTS ID: 3598)
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5373

BACKGROUND

In May 2018, the Central Valley Water Board adopted Resolution R5-2018-0034, approving new Salt and Nitrate Control Programs. The Nitrate Control Program was developed to address widespread nitrate pollution in the Central Valley.

For the Nitrate Control Program, the Board identified areas, referred to as Priority 1 and Priority 2 basins, where nitrates in groundwater are more prevalent and therefore pose a higher risk to persons who rely on groundwater as a source of drinking water. Priority 1 and Priority 2 basins have timelines under which permittees, such as you, are required to implement Nitrate Control Program requirements. Riverland RV Resort Wastewater Treatment Facility is within Priority 1 Groundwater Basin 5-22.08 (San Joaquin Valley – Kings). Notices to Comply for existing dischargers in Priority 1 Basins were initially mailed out on 29 May 2020. Since your facility was not yet permitted, **you are receiving a Notice to Comply as part of this NOA.** Therefore, you are required to select a pathway to comply with the new Nitrate Control Program either individually (Pathway A) or collectively as part of a Management Zone Group (Pathway B) and submit a Notice of Intent by **18 January 2022**.

Details on the two compliance pathways for the Nitrate Control Program (Pathway A and Pathway B) and information to be used when selecting a pathway are discussed in greater detail below:

Pathway A: New individual permitting options. The Board will set more stringent nitrate requirements in your permit to ensure that nitrate impacts will not cause a problem for drinking water users.

Pathway B: Form or Join a Local Management Zone with other Permittees. A Management Zone is an association of permittees that work together to reduce nitrate loading and to provide replacement water to communities and individuals whose wells are impacted by nitrates.

Pathway A offers several individual permitting options, all of which set stringent nitrate requirements on all dischargers that have nitrates in their wastewater. The Board expects that, for many permittees, Pathway A will require significant upgrades, extensive monitoring, and a rigorous technical justification that wastewater will not result in any exceedances of the nitrate standard over a 20-year planning horizon. Pathway B is a new permitting approach that allows multiple permittees to form or join in a Management Zone in order to comply with the Nitrate Control Program. Pathway B provides a collaborative, locally managed, cost-effective and flexible approach to program compliance.

In order to make an informed decision and meet critical program deadlines, it is important that you take action now.

Step 1 – Before You Decide on a Pathway

Before you decide on a permitting pathway, the Board recommends that you visit the website cvsalts.info (https://www.waterboards.ca.gov/centralvalley/water_issues/salinity) for more information on the Nitrate Control Program, including:

1. Nitrate Control Program requirements and timelines
2. Conducting an initial assessment (individually or collectively with other permittees) of your discharges and nearby groundwater conditions
3. Forming or participating in a Management Zone in your area
4. Requirements and templates for deliverables (e.g. Early Action Plans, Management Zone Proposals and Alternative Compliance Project proposals)
5. Answers to Frequently Asked Questions

The cvsalts.info website will be updated regularly, so be sure to check back frequently for the latest information. You can also check the website for upcoming webinars that will provide guidance information. Questions and information requests can also be made by sending an email to: cvsalts@waterboards.ca.gov.

A full copy of the Salt and Nitrate Control Program Basin Plan language (Attachment 1 of Resolution R5-2018-0034), can be found at: https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/resolutions/r5-2018-0034_res.pdf.

Step 2 – Make a Pathway Choice and Begin Meeting Program Requirements

A. *If you choose Pathway A*

General Requirements for Pathway A (Individual Approach) are as follows:

1. Assess your nitrate impacts to shallow groundwater.
2. Prepare a Nitrate Assessment Report that categorizes the impact of your discharge over a 20-year horizon. There are five categories for permittees choosing to comply under Pathway A.
3. Complete the Notice of Intent (NOI) that indicates your election of Pathway A.

An electronic fillable PDF version of the NOI is available at the link below. A hardcopy can be sent to you by sending a request to cvsalts@waterboards.ca.gov.

(http://www.waterboards.ca.gov/centralvalley/water_issues/salinity/forms_temps_guide/#notice_of_intent)

4. Prepare an Early Action Plan (EAP) that will provide affected residents interim drinking water solutions where drinking water exceeds nitrate water quality objectives.

5. If you are in Category 4 or 5, develop a proposed Alternative Compliance Project (ACP) as an additional condition. Any proposed Alternative Compliance Project must be in addition to activities that a permittee would implement to achieve their individual discharges full compliance with the nitrate water quality objective.

6. Submit your NOI and Nitrate Assessment Report to the Central Valley Water Board no later than **18 January 2022**. Permittees that are required to complete an EAP and/or ACP proposal must also submit these documents with the NOI.

7. Obtain Central Valley Water Board evaluation and approval.

8. Initiate EAP (if applicable) within **60 days** following submittal of the plan, unless otherwise directed by the Central Valley Water Board.

B. *If you choose Pathway B*

General Requirements for Pathway B (Management Zones) are as follows:

1. Submit an individual NOI that indicates your selection of Pathway B to the Central Valley Water Board no later than **18 January 2022.**

   An electronic fillable PDF version of the NOI is available at: http://www.waterboards.ca.gov/centralvalley/water_issues/salinity/forms_temps_guide/#notice_of_intent. A hardcopy can be sent to you by sending a request to cvsalts@waterboards.ca.gov.

2. Permittees working together as a Management Zone develop and submit a Final Management Zone Proposal, **180 days** after Central Valley Water Board's review of the preliminary proposal.

3. Permittees working together as a Management Zone develop and submit a Management Zone Implementation Plan, **6 months** after the Final Management Zone Proposal is accepted by the Executive Officer of the Central Valley Water Board.

An electronic fillable PDF version of the NOI is available at: (https://www.waterboards.ca.gov/cvsalts/forms_temps_guide/nitrate_p1_noi_form.pdf). A hardcopy can be sent to you by sending a request by email to cvsalts@waterboards.ca.gov. The NOI shall be sent via email to cvsalts@waterboards.ca.gov or mailed to the address below by **18 January 2022**. Documents too large to be sent in one email may be sent in multiple emails.

Central Valley Water Board
CV-SALTS Program
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

The Central Valley Water Board recommends that the documentation be submitted in electronic format to the email or as a CD mailed to the address above. If you choose to submit documentation as a CD or hardcopy, USPS Certified Mail is the preferred mailing method to ensure receipt of delivery by the Central Valley Water Board.

ENFORCEMENT

This NTC requires your response under Water Code section 13260. If you do not respond to this request with the materials specified above by the due date, you may be subject to enforcement actions, including actions under Water Code section 13261, which authorizes the Board to impose liability of up to $1,000 per day for failure to submit a report. Under the new regulations, the Board will regulate permittees who do not elect a pathway under the Conservative Approach. **After 18 January 2022, discharges of nitrate are prohibited unless the permittee is implementing the Nitrate Control Program through either Pathway A (Individual Approach) or Pathway B (Management Zone Approach).**

For general information about the Central Valley Water Board's Salt and Nitrate Control Program, please visit our website (https://www.waterboards.ca.gov/cvsalts).

If you have any further questions about what is required of you, please email cvsalts@waterboards.ca.gov or call (916) 464-4675.

ATTACHMENT D -
SALT CONTROL PROGRAM NOTICE TO COMPLY
(CV-SALTS ID: 3598)
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5373

BACKGROUND

In May 2018, the Central Valley Water Board adopted Resolution R5-2018-0034, approving new Salt and Nitrate Control Programs. The Salt Control Program was developed to address salt accumulation issues in surface water and groundwater throughout the Central Valley Region.

Under the new Salt Control Program, the Central Valley Water Board will impose new permit requirements to protect surface waters and groundwater from salts in wastewater. This Notice to Comply (NTC) requires you to choose between new salinity permitting options established under the new Salt Control Program. Please note that NTCs such as this one are being issued to all permittees that discharge salt to surface water and/or groundwater in the Sacramento-San Joaquin River Basins and in the Tulare Lake Basin.

SALT CONTROL PROGRAM

The Salt Control Program covers the entire Central Valley region and is broken into three phases, each of which will last from 10-15 years. The Board is currently beginning to implement Phase I. During Phase I, all permittees whose discharges exceed certain salinity thresholds set in the Salt Control Program will be required to participate in and help fund a comprehensive study to assess salinity problems and potential salinity solutions in the valley. This study has been named the Prioritization and Optimization Study, or P&O Study.

This NTC requires that you let the Board know whether you qualify for permit coverage under the “conservative” permitting approach, which is reserved for dischargers that fall under the salinity thresholds set by the Salt Control Program, or whether you will instead need permit coverage under the “alternative” salinity permitting approach. These two permitting options are described in more detail below:

A. Conservative Salinity Permitting Approach

The Conservative Salinity Permitting Approach (Conservative Approach) utilizes the existing regulatory structure and focuses on source control, use of conservative permit limits, and limited use of assimilative capacity and/or compliance time schedules.

B. Alternative Salinity Permitting Approach

The Alternative Salinity Permitting Approach (Alternative Approach) provides a compliance option to permittees who participate in and provide a minimum level of financial support for the Prioritization and Optimization Study (P&O Study), led by the Central Valley Salinity Coalition, during Phase I of the Salt Control Program.

Permittees in the Alternative Approach are not required to meet the more stringent limitations of the Conservative Approach, however, they must continue to implement efforts to control salt discharges through salinity management practices and/or performance-based measures as determined by the Central Valley Water Board.

RESPONDING TO THIS NTC

1. Visit the website, cvsalts.info website (https://www.cvsalinity.org/public-info) for more information on the Salt Control Program, including:
    - Salt Control Program requirements and timelines for both permitting pathways
    - Characterizing your salinity impacts to surface and/or groundwater
    - Participation requirements and fees for the P&O Study
    - Answers to Frequently Asked Questions

    The cvsalts.info website will be updated regularly, so be sure to check back frequently for the latest information. You can also check the website for upcoming webinars that will provide guidance information.

    A full copy of the Salt and Nitrate Control Program Basin Plan language, can be found at:

    https://www.waterboards.ca.gov/cvsalts/salt_nitrate_bpa/sncp_accepted_bp_lang_official.pdf.

2. Choose between the Conservative or Alternative Approach, submit the Notice of Intent (NOI) to the Central Valley Water Board, and begin meeting program requirements. The general NOI requirements for each approach are as follows:

    A. Conservative Approach

    i. Conduct a comprehensive assessment of your salinity impacts to surface and/or groundwater.

    ii. Prepare a Salinity Characterization Report that demonstrates how your discharge will comply with the Conservative Approach requirements.

    iii. Submit your Salinity Characterization Report along with your NOI indicating your choice of the Conservative Approach Pathway to the Central Valley Water Board.

    iv. Obtain Central Valley Water Board staff approval.

    B. Alternative Approach

    i. Contact the lead entity of the P&O Study to determine your required level of financial support. Submit your NOI indicating your choice of the Alternative Approach Pathway to the Central Valley Water Board along with

documentation from the lead entity confirming your compliance with the required level of support.

ii. Maintain the minimum required level of participation and financial support for the P&O Study and implement salinity source control measures and meet performance-based salinity effluent limits or targets to ensure effluent salinity levels are maintained.

An electronic fillable PDF version of the NOI is available at: (https://www.waterboards.ca.gov/cvsalts/forms_temps_guide/salt_noi_form.pdf). A hardcopy can be sent to you by sending a request by email to cvsalts@waterboards.ca.gov. The NOI shall be sent via email to cvsalts@waterboards.ca.gov or mailed to the address below by **18 January 2022**. Documents too large to be sent in one email may be sent in multiple emails.

Central Valley Water Board
CV-SALTS Program
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

The Central Valley Water Board recommends that the documentation be submitted in electronic format to the email or as a CD mailed to the address above. If you choose to submit documentation as a CD or hardcopy, USPS Certified Mail is the preferred mailing method to ensure receipt of delivery by the Central Valley Water Board.

ENFORCEMENT

This NTC requires your response under Water Code section 13260. If you do not respond to this request with the materials specified above by the due date, you may be subject to enforcement actions, including actions under Water Code section 13261, which authorizes the Board to impose liability of up to $1,000 per day for failure to submit a report. Under the new regulations, the Board will regulate permittees who do not elect a pathway under the Conservative Approach. **After 18 January 2022, discharges of salts at concentrations that exceed the conservative salinity limits identified in the Conservative Approach are prohibited unless the permittee is implementing the Phase 1 requirements of the Salt Control Program through either the Conservative Approach or the Alternative Approach.**

For general information about the Central Valley Water Board's Salt and Nitrate Control Program, please visit our website (https://www.waterboards.ca.gov/cvsalts).

If you have any further questions about what is required of you, please email cvsalts@waterboards.ca.gov or call (916) 464-4675.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM NO. 2014-0153-DWQ-R5373
FOR
DRB RIVERLAND, LLC AND ARO RIVERLAND, LP
RIVERLAND WASTEWATER TREATMENT FACILITY
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, DRB Riverland, LLC and ARO Riverland, LP (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 the Riverland RV Resort Wastewater Facility (WWTF or Facility) that is subject to the Notice of Applicability (NOA) of 2014-0153-DWQ-R5373 enrolling

the Facility 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). 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.

SEPTIC TANK MONITORING

Septic tanks 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 Tank Monitoring

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

AEROBIC TREATMENT UNIT MONITORING

Samples of effluent shall be taken at an area that represents the effluent quality distributed to Leach Field #2. Effluent monitoring shall consist of the following:

Table 2. Aerobic Treatment Unit Monitoring

Parameter	Units	Sample Type	Sample Frequency	Reporting Frequency
BOD	mg/L	Grab	Monthly	Quarterly
EC	µmhos/cm	Grab	Monthly	Quarterly
Total Nitrogen	mg/L	Grab	Monthly	Quarterly

The Aerobic Treatment Unit 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 3. Aerobic Treatment Unit Inspection

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

The aerobic treatment unit 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 final settling tank or interferes with the operation of the system (mixed liquor aerator solids shall not exceed the manufacturer's recommendation).
2. The scum layer is within 3 inches of the outlet device.
3. The scum layer is within 8 inches of the outlet device.

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.

RECREATION VEHICLE DISCHARGE MONITORING

If the Facility accepts recreational vehicle, portable toilet, or similar waste in the previous 12 months, the discharge to Leach Fields #1 and #2 (after aerobic treatment) shall each separately be sampled, at a minimum, for the constituents in Table 4.

Table 4. Recreational Vehicle Discharge Monitoring

Constituent	Units	Sample Type	Monitoring Frequency	Reporting Frequency
Zinc	mg/L	Grab	Quarterly	Quarterly
Phenol	mg/L	Grab	Quarterly	Quarterly
Formaldehyde	mg/L	Grab	Quarterly	Quarterly

SUBSURFACE DISPOSAL AREA

In general, subsurface disposal monitoring shall be sufficient to determine if wastewater is evenly applied, the disposal area is not saturated, burrowing animals and/or deep-rooted plants are not present, and odors are not present. Inspection of dosing pump controllers, automatic distribution valves, etc. is required to maintain optimum treatment in the disposal area. Monitoring of Leach Fields #1 and #2, shall include, at a minimum, the following:

Table 5. Subsurface Disposal Area Monitoring Requirements

Constituent	Inspection/Sampling Frequency	Reporting Frequency
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
Flow Rate (see 5 below)	Continuous	Annually
BOD (see 6 below)	Monthly	Quarterly
EC (see 6 below)	Monthly	Quarterly
Total Nitrogen (see 6 below)	Monthly	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.
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.
5. Flow Rate shall be metered or estimated (based off water use from the source water wells).

6. The Discharger shall sample effluent to Leach Field #1 for BOD, EC, and total nitrogen (effluent to Leach Field #2 shall be sampled in accordance with the Aerobic Treatment Unit Monitoring specified above). The samples shall be collected after the septic tanks prior to Leach Field #1.

SLUDGE/BIOSOLIDS DISPOSAL 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.

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

Program: Non-15,
Place ID: 656349,
Facility Name: Riverland RV Resort
Order: 2014-0153-DWQ-R5373

Quarterly Monitoring Reports

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

1. Results of all required monitoring.

2. A comparison of monitoring data to the requirements (including the flow limitation), disclosure of any violations of the NOA and/or General Order, and an explanation of any violation of those requirements. Data shall be presented in tabular format.

3. Copies of laboratory analytical report(s) and chain of custody form(s).

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 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 **starting 1 December 2021**.

Ordered by:

Original Signed by Clay L. Rodgers for:
PATRICK PALUPA, Executive Officer

11/19/2021
(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 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

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

Daniel B. Benas
Water Resource Control Engineer

DATE: 19 November 2021

APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER DISCHARGE SYSTEMS; DRB RIVERLAND, LLC AND ARO RIVERLAND, LP; RIVERLAND RV RESORT WASTEWATER TREATMENT FACILITY; TULARE COUNTY

On 12 October 2018, Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff received a Report of Waste Discharge (RWD) consisting of a Form 200 and a technical report for the DRB Riverland, LLC and ARO Riverland, LP Riverland RV Resort Wastewater Treatment System (WWTF or Facility) in Tulare County. The RWD Technical Report was signed and stamped by Garth Pecchino (RCE 52678) with QK, Inc. DRB Riverland, LLC and ARO Riverland, LP are both owners of the Facility and collectively referred to as Discharger. The Facility is at 38743 CA 99, Kingsburg in Tulare County on Assessor's Parcel Nos. 028-200-037 and 028-200-038. The site is in Section 36, Township 16 South, Range 22 East Mount Diablo Baseline and Meridian (MDB&M).

This memorandum provides a summary of the applicability of this discharge to be covered under State Water Resources Control Board Order WQ 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order).

BACKGROUND INFORMATION

The Facility is currently not regulated by waste discharge requirements; however, a former Facility owner submitted a RWD in 2005 for installation of a package plant and subsurface drip irrigation disposal, which was determined to be incomplete. A

27 July 2010 Central Valley Water Board letter requested an updated RWD. The Discharger submitted a 27 August 2010 letter, which stated in part "*[t]here has been no expansion and we have no current plans for expansion. Since there has been no expansion, nor any planned expansion, I assume that an updated RWD is not needed*."

On 20 June 2017, the Central Valley Water Board was informed by the Tulare County Division of Environmental Health that recent flooding at the Riverland Resort resulted in an approximate 10-gallon spill of domestic wastewater from its collection system that reached the Kings River. Central Valley Water Board staff issued a Notice of Violation on 8 September 2017, which required the Discharger submit a RWD by 9 November 2017. An 8 November 2017 QK email requested a 30-day extension for the submittal of a RWD. A 13 November 2017 staff email granted an extension to 11 December 2017. As mentioned above, the RWD was submitted on 12 October 2018.

DESCRIPTION OF DISCHARGE

The Riverland RV Park is about 1.5 miles southeast of the City of Kingsburg in Fresno County. A Site Map is shown on **Attachment A** of the Notice of Applicability (NOA). According to the RWD, the Riverland RV Resort consists of eight mobile home units with sewer connection, 38 recreational vehicle sites with sewer connection, 64 recreational vehicle sites without sewer connection, 20 campsites, public restrooms and laundry facilities, a bar/restaurant, a 24-room motel, and a dump station that discharges to the wastewater system.

The WWTF flow schematic is shown on **Attachment B** of the NOA. The WWTF consists of six septic tanks. Two septic tanks (Septic Tanks 4 and 5 discharge to an aerated treatment system then to Leach Field #2. The other septic tanks discharge directly toLeach Field #1. The aerated treatment system consists of a 325-gallon settling tank and two 1,280-gallon clarifiers in operated in parallel. The septic tanks range in capacity from 1,500 – 2,000 gallons. Table 1 below shows the septic tank volumes and disposal locations.

Table 1 - Septic Tank Volume and Disposal Location

Septic Tank #	Volume (gals.)	Contributing Units	Effluent Disposal
1	2,000	MH sites 1-8	Leach Field #1
2	2,000	RV Sites 1-38, A-Section Bathrooms, and Laundry Room	Leach Field #1
3	1,500	64 units on Kings River Drive	Leach Field #1
4	1,500	20 campsites	Aerated Treatment System then Leach Field #2
5	2,000	Bar/Restaurant	Aerated Treatment System then Leach Field #2
6	1,500	24-room Motel	Leach Field #1

According to the 12 October 2018 RWD, Leach Field #1 covers an area of 14,000 square feet and has an adsorption capacity of 40,000 gallons per day (gpd). Leach Field #2 covers 8,000 square feet and has an adsorption capacity of 12,000 gpd. The leach fields appear to have adequate capacity to dispose of the peak flow rate of 19,500 gpd. The RWD states that the peak flow rate occurs from June through August. Supplemental information to the RWD provided calculations for the peak flow rate using unit flow rates from the California Plumbing Code and assuming maximum capacity. Subsequently, in a 13 January 2021 memorandum, QK provided additional information stating that Riverland RV Resort has the ability to monitor the volume of water pumped from Well #1 and Well #2 but that it is not possible to determine the flow going to each leach field.

In a 20 August 2019 email, Central Valley Water Board staff requested the Discharger conduct effluent sampling to characterize the discharge. On 24 February 2020, the Discharger submitted the results of a single grab sample collected on 24 October 2019 at Septic Tank #2. Table 2 below shows the sampling event results.

Table 2 – February 2020 Effluent Characterization

Constituent	Unit	Result
BOD	mg/L	41
Chloride	mg/L	26
EC	µmhos/cm	410
TKN	mg/L	24
Total N	mg/L	24
TSS	mg/L	46
Sodium	mg/L	22
Zinc	mg/L	0.037
Formaldehyde	mg/L	0.021

The Facility's estimated monthly average discharge flow is under 100,000 gpd and is therefore eligible for coverage under the General Order. Because the flows average less than 20,000 gallons per day, a nitrogen evaluation is not required at this time.

POTENTIAL THREAT TO WATER QUALITY

The Riverland RV Resort is located within the San Joaquin Valley – Kings Groundwater Basin (5-002.08). Based on information gathered from the California Department of Water Resources SGMA Data Viewer (https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#gwlevels) using Spring 2020 data, groundwater underlying the Riverland RV Park is approximately 60 feet below ground surface.

The RWD references a March 2018 Percolation Testing Report and a 2010 Central Valley Testing, Inc. (CVT) Report to describe groundwater depths. The March 2018

Percolation Testing Report indicates that no groundwater was encountered at the depths explored (10 feet) while the 2010 CVT Report states that groundwater was encountered at depths of approximately seven to nine feet. The RWD also states that groundwater depth has been reported at 15 feet below ground surface (bgs) in other instances but provides no specific details justifying this claim.

A 19 March 2018 BSK Report, submitted as part of the RWD, provides the results of a percolation test adjacent to Leach Field #1 and describes leach field construction based on conversations with on-site maintenance personnel. The report was signed and stamped by Neva Popenoe (RCE 3024) and On Man Lau (RCE 2644). The BSK Report states that Leach Field #1 consists of two parallel leach lines in gravel beds. One line has a gravel bed to a depth of seven feet bgs and the other line has a gravel bed to a depth of about nine feet bgs. The BSK Report states that gravel beds are three to four feet wide and approximately 250 feet long. Table #3 below provides a summary of the percolation tests and shows percolation rates ranging from 1.6 to 25.8 minutes per inch. Leach Field #2 is approximately 590 feet northwest of Leach Field #1, but neither the RWD nor the 2018 BSK Report provided information on Leach Field #2.

Table 3 –Leach Field #1 Soil Characteristics

Test Location	Depth (feet)	Soil Description	Percolation Rate (minutes/inch)
PT-1	5	Silty Sand	8.0
PT-2	6	Poorly Graded Sand	3.2
PT-3	5	Poorly Graded Sand	1.6
PT-4	6	Clayey Sand	25.8

Table 3 of the General Order (*Summary of Wastewater System Setbacks*) prescribes setback distances for septic tanks, aerobic treatment units, collection systems, and leach fields. There are two potable water wells onsite that serve the Riverland RV Resort Facility. Table 4 below shows the approximate setback distances (in feet) from the leach fields, septic tanks, aerobic treatment system, and lift stations to the two potable wells and the Kings River.

Table 4 – Approximate Setback Distances (in feet)

Equipment	Kings River	Well #1	Well #2
Leach Field #1	860	520	190
Leach Field #2	220	125	610
Septic Tank #1	1,000	575	170
Septic Tank #2	740	370	190
Septic Tank #3	365	**100**	550
Septic Tank #4	155	335	725
Septic Tank #5	125	260	750
Septic Tank #6	130	415	855

Equipment	Kings River	Well #1	Well #2
Aerobic Treatment System	335	**90**	560
Lift Station #1	750	365	200
Lift Station #2	360	**120**	560
Lift Station #3	345	**80**	560
Lift Station #4	275	150	580
Lift Station #5	130	310	730
Lift Station #6	125	260	755
Lift Station #7	175	355	800

Table 3 of the General Order includes a setback distance of 150 feet for both septic tanks and aerobic treatment systems (located below ground) to a domestic well (based on Onsite Wastewater Treatment Policy, section 7.5.6). Septic Tank #3, Lift Station #2, and Lift Station #3 do not meet the required setback distance of 150 feet from Well #1 (noted in bold in Table 4 above). However, the General Order, Requirement B.1.l. states the following:

> *The Discharger shall comply with the setbacks described in Table 3 (of the General Order). However, some existing sites may not comply with the setbacks provided herein. Such noncomplying sites may be permitted under this General Order if nuisance conditions do not result from the noncompliance.*

Since this is an existing system, it is appropriate to relax the setback requirements for Septic Tank #3, Lift Station #2, and Lift Station #3. In the event the wastewater system is expanded, the setback requirements should be revisited. For the Facility's existing aerobic treatment system, the 150-foot setback does not apply because the aerobic treatment system is located above grade (see footnote e of Table 3 of the 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 Monitoring;
- Aerobic Treatment Unit Monitoring;
- Recreational Vehicle Discharge Monitoring;
- Subsurface Disposal Area; and
- Solids Disposal Monitoring.

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 Resource 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).

For the Nitrate Control Program, the WWTF falls in Groundwater Basin 5-022.08 (San Joaquin Valley - Kings), a priority 1 basin. Notices to Comply for existing dischargers in Priority 1 Basins were initially mailed out on 29 May 2020. For the Salt Control Program, dischargers unable to comply with stringent salinity requirements (e.g., 700 µmhos/cm) are required to meet performance-based requirements and participate in a basin-wide planning effort to develop a long-term salinity strategy for the Central Valley. Notices to Comply with the Salt Control Program were originally sent out on 5 January 2021. Since Riverland RV Resort has not previously been issued WDRs, the Discharger did not receive Notices to Comply for either the Nitrate or Salt Control Programs. Therefore, Notices to Comply for both the Salt and Nitrate Control Program should be included as part of the NOA.

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

RECOMMENDATION

Staff proposes to enroll the Facility under the General Order and issue a Notice to Comply for the Nitrate and Salt Control Programs giving the Discharger two months to comply.