Central Valley Regional Water Quality Control Board 16 February 2024 Board Meeting

Response to Written Comments on Tentative Waste Discharge Requirements for American Valley Community Services District American Valley Wastewater Treatment Plant Plumas County

At a public hearing scheduled for 16 February 2024, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements (NPDES No. CA0078981) for the American Valley Community Services District, American Valley Wastewater Treatment Plant. This document contains responses to written comments received from interested persons and parties in response to the tentative Order. Written comments from interested persons and parties were required to be received by the Central Valley Water Board by 13 November 2023 in order to receive full consideration. Comments were received prior to the deadline from:

- 1. American Valley Community Services District (Discharger) (received 13 November 2023)
- 2. Jo Anne Kipps (received 13 November 2023)

Written comments from the above interested person and Discharger are summarized below, followed by the response of Central Valley Water Board staff.

DISCHARGER (AMERICAN VALLEY COMMUNITY SERVICES DISTRICT) COMMENTS

DISCHARGER COMMENTS – The Discharger submitted minor comments on the tentative Order, including editorial changes, cross-references, and typographical corrections.

RESPONSE: Central Valley Water Board staff concur and have revised the proposed Order accordingly, except for comment 4.b. The latitude and longitude coordinates for monitoring locations EFF-001 and LND-001 have been clarified and retained in the proposed Order.

JO ANNE KIPPS COMMENTS

JO ANNE KIPPS COMMENT #1 – Discharge Point 002 for Irrigation Pond Discharges to Groundwater

To recognize the potential of the irrigation pond seepage discharge to adversely affect groundwater, please revise the Tentative Order's Table 2 to include Discharge Point 002 and present the latitude and longitude coordinates for the irrigation pond inlet.

RESPONSE:

Staff concur and have revised the proposed Order accordingly.

JO ANNE KIPPS COMMENT #2 – Sludge Drying Bed and Pond Containment

Please revise the Tentative Order to include a description of the type of containment provided to unit operations that are potential concentrated sources of waste constituents, namely the sludge lagoon and sludge drying bed. Also include a description of the construction and use of the irrigation pond and emergency equalization basin. At a minimum, identify for each: area, maximum water depth, elevations of dike top and pond invert, vertical distance from pond invert to highest anticipated groundwater, and proximity to FEMA flood zones.

RESPONSE:

Staff concur on adding more detail about the upgraded Facility containment units and the proposed Order has been revised accordingly. The following describes the general uses and specifications for the Facility ponds/pond areas:

- 1. <u>Emergency Pond ("E-Pond"):</u> Existing unused pond that was originally used for emergency storage of treated effluent and as a passthrough wetland for effluent discharge to Spanish Creek. This pond use has been discontinued, and effluent is now either (1) directly discharged through conveyance via pipeline between the disinfection facilities and the outfall diffuser in Spanish Creek (D-001) or (2) to the Irrigation Pond (D-002) for conveyance to the land application site. The specifications on the E-Pond have not been added to the proposed Order since it is no longer in use.
- 2. <u>Irrigation Pond</u>: Stores treated effluent prior to discharge to the land application site. The Irrigation Pond elevations are as follows:

- a) Top of pond elevation varies between ~3414.3 and 3414.4 ft (Spanish Creek side), ~3414.5 ft on the Clear Stream side and north end of the pond, and ~3417 ft on the south end of the pond.
- b) Bottom of pond elevation is approximately 3405.4 ft.
- c) Water is stored to a minimum 2 ft freeboard level (in accordance with NPDES permit order), so maximum water level would be approximately 6.6 ft (max).

Vertical distance from pond invert to highest anticipated groundwater: Groundwater was encountered at a depth of 13 to 16 feet (elevation 3,404 to 3,401 ft) during the most recent subsurface exploration. This would give a vertical distance of 1.4 ft from pond invert to highest anticipated GW. Groundwater elevations on the order of 8 to 10 feet were (elevation 3,409 to 3,407) encountered during the 2017 exploration by KC Engineering Company.

<u>Proximity to FEMA Flood Zone:</u> A FEMA Flood Map was included in the ROWD. As noted in the ROWD, the Irrigation Pond is technically located within the 100-year floodplain (Zone AE as defined by FEMA's Flood Insurance Rate Map) but is protected against related inundation by the levee that borders the south side of pond.

- 3. <u>Emergency Equalization Basin</u>: A new pond facility, constructed with compacted native soil sides and bottom, was designed to store peak influent flow that exceeds the Facility's peak design capacity for pumped return to the facility headworks. The Emergency Equalization Basin elevations are as follows:
 - a) Top of pond: 3417.0 ft
 - b) Bottom of pond: varies between 3409.5 and 3408 ft
 - c) Anticipated max water surface elevation of 3415 ft (to maintain a minimum freeboard of 2 ft), so maximum water depth of 7 ft.
- 4. <u>Sludge Lagoon</u>: A new pond facility, constructed with reinforced concrete bottom and ramps with shotcrete sides, was designed to store digested sludge when the sludge dewatering facilities are not operational. Contents of this pond can be pumped back to the solids dewatering facility or back to the front of the plant for full treatment. The Sludge Lagoon elevations are as follows:
 - a) Top of pond: 3417.0 ft
 - b) Bottom of pond: varies between 3410 and 3407.5 ft
 - c) Anticipated max water surface elevation of 3415 ft (to maintain a minimum freeboard of 2 ft), so maximum water depth of 7.5 ft.
- 5. <u>Sludge Drying Area</u>: A new facility, constructed with asphalt bottom with native soil sides, was designed to store digested and dried sludge prior to off-haul for disposal. The Sludge Drying Area elevations are as follows:
 - a) Top of pond: 3417.0 ft

- b) Bottom of pond: 3408.5 ft
- c) Not designed for liquid storage. Any rainfall into the sludge drying bed area will be returned to the front of the plant via the plant drain pump station.

JO ANNE KIPPS COMMENT #3 – Site Maps

To document the Facility's physical layout, as well as for staff's use during facility inspections, please include in Tentative Order two Facility Site Maps. One should depict the Facility's current physical layout showing unit operations depicted in the Facility's wastewater flow schematic (Attachment C) (e.g., headworks, grit and screenings handling areas, secondary treatment works, chlorination basin, sludge lagoon, and sludge drying bed). The other should depict the location of the treatment works in relation to nearby surface waters (Spanish Creek, Clearstream Creek) and to associated wastewater discharge areas (irrigation pond, emergency equalization basin). It should also identify the location of the Spanish Creek outfall (DIS-001), the irrigation pond inlet (DIS-002), and upstream and downstream surface monitoring stations.

RESPONSE:

Staff concur and have revised the proposed Order accordingly.

JO ANNE KIPPS COMMENT #4 – Land Discharge Monitoring

Please include a new Land Discharge Specification for Total Nitrogen of 10 mg/L (monthly average), monitored at LND-001, and explain in the Fact Sheet that it is based to protect the beneficial use of groundwater for municipal and domestic supply. Revise the MRP for LND-001 to include weekly monitoring of total nitrogen and monthly monitoring for total ammonia nitrogen (as N) and Total Kjeldahl Nitrogen (TKN). And, because iron is also a constituent of concern, include monthly monitoring of LND-001 for iron.

The decrease in detention time provided by the upgraded Facility warrants the sample type for both BOD and TSS to be 24-hour composite, as in Table E-3.

Also, to better characterize the discharge to the irrigation pond, Table E-4 should also include weekly 24-hour composite sampling for ammonia (as N), nitrate (as N), and Total Kjeldahl Nitrogen (TKN). It should also be monitored monthly for salinity (EC and TDS) and for major salinity constituents (chloride, sodium, alkalinity, and hardness).

Because of the use of chlorine for disinfection, the land discharge should also be monitored at least quarterly for disinfection by-products.

Because of the diurnal effect of algae respiration, levels of dissolved oxygen in the irrigation pond are lowest in the morning. To monitor worst-case conditions for pond dissolved oxygen, the MRP should specify samples for pond dissolved oxygen shall be collected between the hours of 8:00 a.m. and 10 a.m.

RESPONSE:

Staff partially concur. The treated wastewater going into the irrigation pond monitored at LND-001 is the same quality of wastewater monitored at EFF-001 and the treatment facility provides nitrification and de-nitrification. Therefore, a new land discharge specification for total nitrogen of 10 mg/L as a monthly average is not necessary since the permit already includes a total nitrate average monthly effluent limit (AMEL) of 10 mg/L and ammonia nitrogen effluent limits, which staff feel are adequately protective of groundwater beneficial uses for municipal supply. Staff concur on adding additional monitoring to Table E-3 (Effluent Monitoring) and Table E-4 (Land Discharge Monitoring) as follows:

Table E-3 (Effluent Monitoring) – total Kjeldahl nitrogen (TKN) (1/month), and total nitrogen (1/week), total trihalomethanes (THMs) (1/quarter), iron (1/year)

Table E-4 (Land Discharge Monitoring) – TKN (1/month), total nitrogen (1/week), total ammonia nitrogen (1/week), nitrate plus nitrite (1/month), electrical conductivity (1/month), standard minerals (1/year), total THMs (1/quarter), iron (1/year)

Staff concur on changing sample types for BOD and TSS to 24-hour composite at LND-001. Staff do not concur with specifying time of day for sampling dissolved oxygen at LND-001 as this puts onerous requirements on the Discharger.

JO ANNE KIPPS COMMENT #5 – Irrigation Pond Usage

Please characterize the Discharger's anticipated use of the irrigation pond. Will it be dedicated to storing effluent that is reclaimed on the Leonhardt Ranch? Is it expected to be drawn down and possibly empty each year prior to the onset of the pasture irrigation season? Or will the Discharger rely on the pond during the non-irrigation season for effluent disposal by percolation and evaporation?

RESPONSE:

The Irrigation Pond is used to equalize peak effluent flows in excess of the 20:1 discharge limitation to Spanish Creek during winter months and all effluent discharge for land application during summer months. The Irrigation Pond is generally not drawn down/emptied at any point in the year.

The Discharger is not seasonally limited by discharges to Spanish Creek or to the irrigation pond for land application. The Discharger does not rely on the irrigation pond for disposal by percolation since it is a temporary storage pond for irrigation water. The Discharger confirmed that they have not noted significant changes in pond freeboard indicating significant percolation to groundwater. However, the proposed Order will include an annual operations report requirement to report total volumes of influent and effluent to both land and surface water to better characterize percolation from the Irrigation Pond. The proposed Order has been modified accordingly.

JO ANNE KIPPS COMMENT #6 – Effluent Storage Pond Usage

Did the Discharger ever use the effluent storage pond as described? If it did not, what is the correct description of monitoring location EFF-002?

RESPONSE:

The effluent storage pond (also referred to as the Emergency Storage Pond in Order R5-2016-0049) was previously used by the Discharger under the old Facility treatment process as a polishing pond and wetland, after the irrigation pond and prior to discharging to Spanish Creek. The effluent storage pond, and therefore monitoring location EFF-002, are no longer in use with the upgraded Facility. Previous monitoring location EFF-002 description and parameters previously monitored at EFF-002 can be found in current Order R5-2016-0049.

The proposed Order has not been modified.

JO ANNE KIPPS COMMENT #7 – Groundwater Monitoring Well Network and Antidegradation Analysis of Groundwater

Please revise the Tentative Order to characterize the seepage discharge and summarize the results of an antidegradation analysis for the groundwater discharge that is comparable in scope and detail as that contained in recently-adopted WDR orders for land discharges. At a minimum, estimate the hydraulic loading of effluent seepage to groundwater in feet/year and MG/year, identify constituents of concern (COCs) in the

seepage that may impair groundwater's beneficial uses, evaluate the potential for each COC to unreasonably degrade and possibly pollute groundwater, and identify best practicable treatment or control measures implemented to minimize the degradation to maintain the highest quality of groundwater, as required by the State Antidegradation Policy.

Please revise the Tentative Order to require the Discharger to install and operate a groundwater monitoring well network consisting of at least three wells situated to provide data representative of upgradient or background groundwater and groundwater downgradient from the discharge. To this end, include Special Provisions requiring the Discharger to submit a technical report describing (1) a proposed groundwater monitoring well network and (2) a characterization of background groundwater quality based on at least eight quarters of monitoring data results. Consider requiring groundwater technical reports to satisfy the information needs identified in the WDR Program boilerplate Attachment, STANDARD REQUIREMENTS FOR MONITORING WELL INSTALLATION WORK PLANS AND MONITORING WELL INSTALLATION REPORTS.

Revise the MRP to include groundwater monitoring and require quarterly monitoring of groundwater depth and elevation, and parameters including EC, TDS, chloride, nitrogen compounds, total organic carbon, general minerals, and, if deemed appropriate, total coliform organisms and disinfection by-products.

RESPONSE:

Staff do not concur with the commenter's suggestion to include a requirement to install and operate a groundwater monitoring well network at this time. The previous Order required the Discharger to conduct a Background Groundwater Quality Study, which would include a schedule for installation of groundwater monitoring wells and a groundwater monitoring plan. However, this requirement was dependent on continued future use of unlined ponds for wastewater treatment/storage—principally, a 35-acre emergency storage pond used for additional treatment. This Study was not completed because while the Facility will continue to use the unlined irrigation pond to temporarily hold treated effluent during peak flows and prior to land application, the upgraded facility will not use the emergency storage pond for wastewater treatment/storage. Requiring the Discharger to install a groundwater monitoring well network around the irrigation pond at this time is not feasible or justifiable until the disinfected secondary treated wastewater entering this pond is characterized. Staff will re-evaluate in five years at the next permit renewal once the Discharger has more data from the inlet of the irrigation pond to evaluate concentrations of nitrate, total nitrogen, and other constituents of

concern potentially entering the pond, and potentially percolating to groundwater. Additionally, Regional Board staff evaluated the State's Geotracker and Groundwater Ambient Monitoring and Assessment (GAMA) Program's municipal and domestic well information and found that the nearest drinking water well is approximately 0.5 miles away and that well's data shows nitrate trends are decreasing, with an average nitrate concentration of less than 0.4 mg/L.

Staff concur that additional antidegradation findings are appropriate. Section IV.D.4 of the Fact Sheet has been modified to include additional discussion of potential discharges from the irrigation pond and compliance with the State Antidegradation Policy, as follows:

Groundwater. The Facility utilizes an unlined irrigation pond to hold treated effluent for land application. Domestic wastewater contains constituents such as total dissolved solids (TDS), electrical conductivity, pathogens, nitrates, organics, metals and oxygen demanding substances (BOD). Percolation from the irrigation pond may result in an increase in the concentration of these constituents in groundwater. The State Anti-Degradation Policy generally prohibits the Central Valley Water Board from authorizing activities that will result in the degradation of high-quality waters unless it has been shown that:

- i. The degradation will not result in water quality less than that prescribed in state and regional policies, including violation of one or more water quality objectives;
- ii. The degradation will not unreasonably affect present and anticipated future beneficial uses;
- iii. The discharger will employ Best Practicable Treatment or Control (BPTC) to minimize degradation; and
- iv. The degradation is consistent with the maximum benefit to the people of the state.

Some degradation of groundwater from use of the irrigation pond may be consistent with the State Anti-Degradation Policy provided that the Discharger is implementing best practicable treatment or control (BPTC) measures and such degradation is consistent with the maximum benefit to the people of the state. The Facility is designed and constructed to provide secondary treatment and disinfection prior to using the irrigation pond to hold recycled water for land application. Additionally, this Order continues land discharge specifications for

BOD5, TSS, and total coliform organisms consistent with treatment capabilities at the Facility for the protection of designated and anticipated beneficial uses of groundwater. This Order also includes operation and maintenance specifications for the irrigation pond. Finally, this Order requires monitoring to characterize the seepage discharge and help evaluate the potential need for additional controls. This level of treatment may result in limited groundwater degradation not exceeding water quality objectives and constitutes best practicable treatment or control. Providing wastewater treatment to the community and use of the irrigation pond and land application areas during dry weather is in the best interest of the people of the state.

JO ANNE KIPPS COMMENT #8 - Name Change for WRR Order 96-180

Did the Regional Water Board adopt a name change order to record the change from Quincy CSD to American Valley CSD in WRR Order 96-180? If so, when? If not, in what year did this change occur?

RESPONSE:

The Central Valley Regional Water Board adopted an ownership and name change for Quincy CSD and Quincy WWTP to American Valley CSD and American Valley WWTP on 6 April 2018 (Order R5-2018-0032), which was effective for NPDES Permit Order R5-2016-0049 and Time Schedule Order R5-2016-0050. The name and ownership change were not adopted for Water Reclamation Requirements (WRR) Order 96-180. However, the Discharger may submit a Notice of Intent for enrollment under the State Board Recycled Water General Order. If and when the Discharger is enrolled under this General Order, WRR Order 96-180 will be rescinded, and the new owner and Facility name will be reflected in the Notice of Applicability. If the Discharger does not elect to enroll under the State Board Recycled Water General Order, Regional Water Board staff will work with the Discharger on updating the WRRs.

The proposed Order has not been modified.

JO ANNE KIPPS COMMENT #9 – Potentially Unauthorized Waste Discharges

Please confirm if the Discharger repurposed Field 2 to the Current Order's effluent storage pond and the Tentative Order's emergency stabilization basin. And revise the Tentative Order to describe the manner in which influent discharged to this basin is routed back to the treatment works.

Please characterize what appears to be waste discharges to areas within Fields 2 and 3. Are these waste discharges related to the Discharger's decommissioning of the

Facility's four former treatment ponds? If the waste is pond sludge and sediment, please disclose whether the Discharger notified the Regional Water Board prior to initiating this discharge (e.g., by submitting written technical proposal, at a minimum, or a Form 200 / Report of Waste Discharge pursuant to California Water Code section 13260)?

RESPONSE:

It appears that references to "Field 2" and "Field 3" pertain to the Facility's existing Emergency Pond ("E-Pond"), which has been discontinued from use. The new Emergency Equalization Basin (engineered structure at the upgraded Facility) will be used to capture peak flows in excess of the Facility's peak design capacity. Flows collected in this basin will be passively drained to the Plant Drain Pump Station, where they will be redirected to the influent side of the Grit and Screenings Facility via Plant Drain Pumps. Please refer to the updated Process Flow Diagram in Attachment C of the proposed Order for Facility operations on routing flows from the new Emergency Equalization Basin back to the headworks.

Regarding waste discharge to areas within "Fields 2 and 3," this was temporary storage for construction spoils which have since been removed by the Contractor. Nearby pastures are also numbered which may be a source of confusion; however, the Discharger confirmed that no construction spoils were disposed of in these pastures.

The proposed Order has not been modified.

JO ANNE KIPPS COMMENT #10 - Irrigation Pond Operating Requirement 4.a.iii

Because the Discharger is authorized to discharge effluent to Spanish Creek during the non-irrigation season, Irrigation Pond Operating Requirement 4.a.iii appears to not apply to this discharge situation. If so, consider deleting it.

RESPONSE:

Staff do not concur. Since discharges to the Irrigation Pond may still occur during the non-irrigation season, Pond Operating Requirement 4.a.iii may still apply to ensure there is adequate capacity.

The proposed Order has not been modified.

JO ANNE KIPPS COMMENT #11 – Irrigation Pond Flow

From 9/21/22 through 10/4/22, the Discharger's eSMRs report unusually high flow readings for LND-001 (up to 4.604 mgd) that cannot be explained by comparable

increases in influent flow (INF-001). Please request the Discharger to confirm this data and, if accurate, provide an explanation for the unusually high discharge flow.

RESPONSE:

The data reported in the eSMRs is erroneous. The Discharger looked back through monitoring logs and determined that the discrepancies were due to effluent flow from the Parshall Flume to the Irrigation Pond being bypassed due to construction activity. The high readings recorded in the eSMRs were transcribed from SCADA readings. The manual readings in the monitoring sheets in Attachment A to this Response to Comments document are correct Facility flows for the dates in question.

The proposed Order has not been modified.

JO ANNE KIPPS COMMENT #12 – Irrigation Pond Dike Seepage

Did the Discharger notify the Regional Water Board of the apparent July 2022 dike seepage event described above?

RESPONSE:

This is liquid that would have escaped the irrigation pond discharge piping when the pipe tee was installed as part of the WWTP Improvements Project. The installation of this pipe tee was necessary to enable direction of effluent flow to either (1) the irrigation pond or (2) the new effluent pipeline to the Spanish Creek discharge location (D-001) once new facilities were constructed. The Contractor took necessary precautions to minimize the volume of liquid escape during this construction activity.

The proposed Order has not been modified.

JO ANNE KIPPS COMMENT #13 – Discharge Point Coordinates

Please revise the Tentative Order to present accurate latitude and longitude coordinates of all discharge points and monitoring stations, and present all coordinates in degrees, minutes, and seconds.

RESPONSE:

Staff concur and have revised the proposed Order accordingly.

JO ANNE KIPPS COMMENT #14 - Discharger's 80 Acres

Both the current and tentative orders state "The Discharger has purchased 80 out of 200 acres that is currently irrigated by Leonhardt Ranch, which provides the Discharger with greater long-term security for dry weather irrigation use, and space for potential future expansions and improvements." Please explain how the Discharger's purchase of 80 acres provides "greater long-term security for dry weather irrigation use." Does this mean that the Discharger has changed or intends to change the manner in which it had historically discharged effluent to this land?

Since the information in WRR Order 96-180 regarding parcel land use and ownership is not accurate, please identify in the Response to Comments:

- the current owners of the eight parcels identified in WRR Order 96-180 Finding 5,
- the year(s) in which the Discharger acquired ownership of parcels comprising the 80 acres cited in the Current and Tentative Orders,
- the current and/or proposed use of each parcel (e.g., effluent reclamation, storage, disposal)

RESPONSE:

The Discharger believes that the language referenced in the comment above has been carried over from evaluations that were conducted when the Discharger was evaluating 100 percent land application and eliminating the discharge to Spanish Creek to avoid costly Facility improvements/upgrades. The Discharger ultimately made the investment in the Facility and has not changed nor intends to change effluent reclamation practices at this time.

Information regarding parcel land use and ownership is described as follows, and in Attachment B to this Response to Comments document:

- Field 1: Richard K. Leonhardt (Parcel 1 per WRR Order 96-180)
- Field 2: American Valley Community Services District (AVCSD) (Part of Parcels 2* and 8 per WRR Order 96-180)

*Parcel 2 per WRR Order 96-180 also includes the Emergency Storage Pond (not in use) owned by AVCSD.

- o Field 3: AVCSD (Parcel 4 per WRR Order 96-180)
- Field 4: AVCSD (Parcel 3 per WRR Order 96-180)
- Field 5: Feather River Land Trust (Part of Parcel 8 per WRR Order 96-180)
- Field 6: Richard D. Leonhardt (Part of Parcels 5 and 6 per WRR Order 96-180)

 WRR Order 96-180 also included Parcel 7 which is no longer a part of the reclamation area. The current Owner is unknown.

The Discharger acquired ownership of parcels comprising the 80 acres cited in the Current and Tentative Orders in 2009.

The current use of Fields 1-3 and 5-6 is effluent reclamation. Field 4 was used as a contractor staging area during the Wastewater Treatment Plant Improvements Project. The Discharger does not plan to restore use of Field 4 for effluent reclamation at this time.

The proposed Order has not been modified.

JO ANNE KIPPS COMMENT #15 – Equalization Basin Usage

If the Tentative Order authorizes the discharge of influent to the emergency equalization basin, please revise its Construction, Operation, and Maintenance Specifications to apply also to this basin and include requirements specific to its operation. These include discharge only when Facility influent flow exceeds 4.9 mgd, timely return of impounded influent for treatment and disposal, monitoring and reporting of emergency discharges (i.e., discharge dates, daily discharge volumes, drawdown date, etc.)

RESPONSE:

Staff do not concur on adding requirements for when discharges to the Emergency Equalization Basin may or may not occur, and do not concur on adding routine monitoring and reporting of emergency discharges. Staff concur on adding the below specification to Section VI.C.4.a.viii:

viii. The Emergency Equalization Basin shall be operated in manner such that there is timely return of impounded influent for treatment and disposal.

Staff also added the following to Attachment E, Section X.D.2, Annual Operations Report:

g. If discharges to the Emergency Equalization Basin occur, the Discharger shall report discharge dates, estimated discharge volumes, and drawdown dates in the Annual Operations Report.

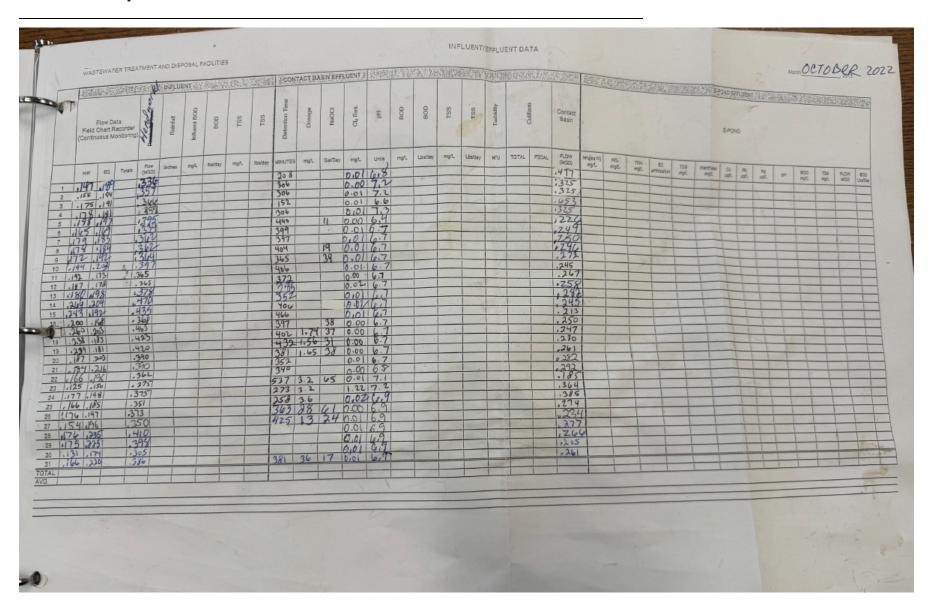
STAFF REVISIONS

Attachment E, Section X.D.2, has been modified as follows to add reporting requirement 2.f in order to evaluate percolation to groundwater:

- 2. **Annual Operations Report.** The Discharger shall submit a written report to the Central Valley Water Board, electronically via CIWQS submittal, containing the following by the due date in the Technical Reports Table E-11:
 - a. The names, certificate grades, and general responsibilities of all persons employed at the Facility.
 - b. The names and telephone numbers of persons to contact regarding the plant for emergency and routine situations.
 - c. A statement certifying when the flow meter(s) and other monitoring instruments and devices were last calibrated, including identification of who performed the calibration.
 - d. A statement certifying whether the current operation and maintenance manual, and contingency plan, reflect the wastewater treatment plant as currently constructed and operated, and the dates when these documents were last revised and last reviewed for adequacy.
 - e. The Discharger may also be requested to submit an annual report to the Central Valley Water Board with both tabular and graphical summaries of the monitoring data obtained during the previous year. Any such request shall be made in writing. The report shall discuss the compliance record. If violations have occurred, the report shall also discuss the corrective actions taken and planned to bring the discharge into full compliance with the waste discharge requirements.
 - f. Summary of annual influent flow volume, annual effluent flow volume discharged to surface water, and annual effluent flow volume discharged to the irrigation pond.

ATTACHMENT A - SEPTEMBER AND OCTOBER 2022 FIELD LOGS

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ATTACHMENT B - MAP OF NEARBY FIELDS

