CLEANUP AND ABATEMENT ORDER
FOR
ARBUCKLE PUBLIC UTILITIES DISTRICT
NO R5-2026-0704
FOR
ARBUCKLE WASTEWATER TREATMENT FACILITY
COLUSA, COUNTY

This Cleanup and Abatement Order (Order) is issued to Arbuckle Public Utility District (Discharger) based on provisions of California's Porter-Cologne Water Quality Control Act, specifically Water Code section 13304, which authorizes the Central Valley Regional Water Quality Control Board (Central Valley Water Board or Regional Board) to issue an order requiring the cleanup and abatement of wastes, and Water Code section 13267, which authorizes the Central Valley Water Board to require the preparation and submittal of technical reports.

The Executive Officer of the Central Valley Water Board finds the following:

PURPOSE OF THE ORDER

This Order is intended to mitigate threatened or actual impacts to beneficial uses in Salt Creek due to ongoing, unpermitted discharges of wastewater from the Arbuckle Wastewater Treatment Facility (WWTF). The Discharger has proposed to temporarily discharge excess wastewater to a proposed 91-acre Land Application Area (LAA) comprising APNs 018-270-027 and 018-270-028, for percolation and evaporation while it conducts emergency repairs and upgrades at the WWTF to prevent future discharges to Salt Creek.

Background

1. The Discharger owns and operates the WWTF, which is located just north of Bailey Road outside of Arbuckle, an unincorporated community and census-designated place. The Central Valley Water Board issued WDRs Order 93-208 that authorizes a maximum monthly average dry weather discharge of 0.5 million gallons per day and includes a revised Monitoring and Reporting Program, issued by the Executive Officer on 2 April 2007, that requires groundwater monitoring. The WDRs and MRP are still active.

2. Arbuckle is a census designated place located at the southern end of Colusa County, surrounded by agricultural fields, and had a 2024 population of 2,776, down from a 2022 population of 3,072.

3. On 29 October 1993, the Central Valley Water Board adopted Waste Discharge Requirements (WDRs) Order 93-208, which prescribes requirements for WWTF's treatment and disposal of domestic wastewater. According to the findings in WDRs Order 93-208, the WWTF consists of an influent pump station, primary clarifier, sludge digester, sludge drying bed, seven unlined wastewater evaporation/percolation ponds, and an unlined emergency wastewater storage

pond. WDRs Order 93-208 allows disposal of the stored wastewater only through percolation.

4. From 19 September 2023 to 5 October 2026, the Discharger reported 178 wastewater spills to the California Office of Emergency Services (CalOES), totaling approximately 2,447,600 gallons. These repeated uncontrolled releases of wastewater are considered violations of waste discharge requirement(s) or other order or prohibition issued by a regional board. All but one of the spills are attributed by the Regional Board to capacity limitations at the WWTF. The dates and volumes of the spills are summarized in Attachment A, Table A.1.

5. On 7 October 2024, the Executive Officer of the Central Valley Water Board issued CAO R5-2024-0703, requiring the Discharger to address deficiencies at the WWTF resulting from inadequate routine maintenance. These deficiencies included reduced percolation rates, excessive sludge accumulation in the percolation ponds, and zero measurable freeboard. CAO R5-2024-0703 required the Discharger to repair the digester, remove accumulated pond sludge, and comply with WDRs Order 93-208.

6. On 16 January 2025, 13 April 2026, and 14 August 2026, the Discharger was issued separate Notices of Violation for noncompliance with both WDRs Order 93-208 and CAO R5-2024-0703, which include the following recurring violations:

   - Discharge Prohibition A.1 of the WDRs states: “Discharge of wastes to surface waters or surface water drainage courses is prohibited.”
   - Discharge Prohibition A.2 of the WDRs states: “By-pass or overflow of untreated or partially treated waste is prohibited.”
   - Discharge Specification B.4 of the WDRs states: “The treatment and disposal facilities shall be designed, constructed, operated, and maintained to prevent inundation or washout due to floods with a 100-year return frequency.”
   - Requirement 6 of CAO R5-2024-0703 states: “No later than 15 December 2024, the freeboard levels in all seven wastewater ponds at the facility shall not be less than one foot. If freeboard levels are less than one foot in any one of the seven ponds, the Discharger shall immediately notify Central Valley Water Board staff and implement the ‘Spill Prevention and Response Plan.’”

7. According to the Discharger’s September 2026 monthly status report, submitted pursuant to Cleanup and Abatement Order (CAO) R5-2024-0703, the average influent flow to the WWTF was 268,000 gallons per day, which is within WDRs flow limit. However, pond freeboard was near or at zero, leaving no available capacity. Per the Discharger, based on an estimated 8.3-acre pond surface area, approximately 2.7 million gallons must be removed to achieve a minimum 1-foot freeboard under current conditions.

8. The Discharger is proposing to land apply wastewater to a 91-acre land application area (LAA) approximately less than a mile to the southeast of the WWTF.

9. Six groundwater monitoring wells installed for compliance with the WDRs are located approximately 0.5 to 1 mile northwest of the proposed LAA. Based on the Second Quarter 2026 Groundwater Report, current groundwater depths range from approximately 77 to 57 feet below ground surface (bgs). Regional groundwater flow is generally towards the southeast. One irrigation well (390275N1220417W001) on the proposed parcel has a recorded historically high groundwater of 47 feet bgs in the late 1980s. No groundwater monitoring wells are currently installed around the proposed LAA.

10. As of the date of this Order, the unauthorized discharges to Salt Creek have not ceased. According to the State Water Resources Control Board's (State Water Board) Enforcement Policy, these uncontrolled releases qualify as "Class A" violations of WDRs Order 93-208 due to the threat to beneficial uses.

Community Dynamics

11. The Office of Environmental Health Hazard Assessment (OEHHA) California Communities Environmental Health Screening Tool (CalEnviroScreen 5.0) is a methodology that can be used to help identify California communities disproportionately burdened by multiple sources of pollution. The CalEnviroScreen 5.0 Percentile Score for Arbuckle is 66.8 out of 100.

DISCHARGER'S PROPOSED CORRECTIVE ACTIONS

12. In response to the unauthorized discharge at a minimum greater than 2 million gallons of wastewater directly into the Salt Creek drainage, the Discharger submitted a Final Emergency Disposal and Reclamation Plan (Plan) on 8 October 2026. The Plan proposed three different phases:

    - **Phase 1** includes updating the CAO R5-2024-0703 Spill Prevention and Response Plan; acquiring land for application of wastewater; constructing the infrastructure to convey and apply wastewater to the newly acquired land; and working with the Central Valley Water Board on an Order that will provide enforcement deadlines for these proposed actions.
    - **Phase 2** includes installing interim treatment upgrades to provide secondary treatment and disinfection and working with the Central Valley Water Board to enroll the facility in Order R5-2026-0023, the WDRs General Order for Domestic Wastewater Treatment Systems with Flows Greater Than 0.1 Million Gallons Per Day (Large Domestic General Order) for regulation of its long-term land application of wastewater, as well as potentially a permit authorizing discharge into Salt Creek pursuant to the National Pollutant Discharge Elimination System (NPDES) program.
    - **Phase 3** is looking for alternative disposal options, which may include a complete upgrade or replacement of the existing WWTF to activated sludge with expanded reclamation as well as portions of Phase 2.

13. This Order only addresses Phase 1 and parts of Phase 2 of the Discharger's Plan.

14. Section 6.0 of the Discharger's plan states: "Given the emergency nature of the immediate needs and following consultation with RWQCB enforcement and permitting group representatives, the District is requesting appropriate orders (Cleanup and Abatement and/or Cease-and-Desist Order) to allow the discharge of undisinfected primary effluent on the proposed land disposal site. The Order would presumably contain the timelines for compliance with other critical milestones as needed to support new WDRs and reclamation at the LAA under Phase 2 of the project."

15. The Plan proposes installing a 10-inch-diameter pipeline along Bailey Road to convey wastewater to two parcels totaling 91-acres (APNs 018-270-027 and 018-270-028). The parcels are currently planted with almond orchards with trees spaced 16 to 18 feet apart and rows approximately 22 feet apart to accommodate machinery. The soil between trees is bare, and the site lacks tailwater control berms, irrigation piping, and onsite wastewater storage. FEMA flood maps indicate that portions of the parcels lie within the 100-year flood zone.

16. The Plan describes that the discharge will be drawn from one of the eight WWTF settling pond(s) by drawing the wastewater fitted with a screened suction pump before allowing the water to enter the transfer piping that will be used for distribution through the flood irrigation system at the LAA.

17. Wastewater will be applied by flood irrigation to the bare soil between orchard rows. The Plan proposes to retain the almond trees through the 2026-2027 wet season, after which the trees will be removed and replaced with a food crop that will enhance nitrogen uptake.

18. The Plan describes tailwater and stormwater management, including berms and ditches to "preclude outside waters running on to the site and containment of all reclamation irrigation waters on the site."

19. The Central Valley Water Board agrees that the Discharger's proposed corrective actions are appropriate for the immediate emergency resolution of the WWTF's capacity issues.

BENEFICIAL USES AND WATER QUALITY OBJECTIVES

20. The Water Quality Control Plan for the Sacramento River Basin and San Joaquin River Basin (Basin Plan) designates beneficial uses, establishes water quality objectives, and contains implementation plans and policies for achieving objectives in all waters of the Basin. The Basin Plan also incorporates by reference plans and policies adopted by the State Water Board.

21. Local drainage is to Salt Creek, which is a tributary to the Colusa Basin Drain Canal. According to the Basin Plan, the beneficial uses of the Colusa Basin Drain Canal are agricultural supply; water contact recreation; noncontact water recreation; commercial and sport fishing; aquaculture; warm freshwater habitat; migration of aquatic organisms; spawning, reproduction, and/or early development; and wildlife habitat.

22. The beneficial uses of groundwater, as specified in the Basin Plan, are municipal and domestic supply, agricultural supply, industrial service supply and industrial process supply.

LEGAL BASIS OF THE ORDER

23. Water Code section 13304, subdivision (a), states, in relevant part:

> *A person who has discharged or discharges waste into the waters of this state in violation of any waste discharge requirement or other order or prohibition issued by a regional board or the state board, or who has caused or permitted, causes or permits, or threatens to cause or permit any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall, upon the order of the regional board, clean up the waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action, including, but not limited to, overseeing cleanup and abatement efforts.*

24. The Discharger is named as a responsible party in this Order because the owner and operator of the WWTF, Arbuckle had, or should have had, knowledge of the activities that resulted in the unauthorized discharges and threatened discharges of waste and has the ability and legal responsibility to prevent the discharges from occurring and remediate conditions at the WWTF.

25. This Order is necessary to abate recurring discharges of waste to waters of the state from the WWTF that are threatening beneficial uses of Salt Creek.

26. Issuance of this Order is an enforcement action taken by a regulatory agency to enforce the regulatory provision of the Basin Plan and is therefore exempt from provisions of the California Environmental Quality Act (CEQA) (Pub. Res. Code, § 21000 et seq.) in accordance with California Code of Regulations, title 14, sections 15321 (enforcement action taken by a regulatory agency to enforce the regulatory provision of the Basin Plan), 15307 (action by a regulatory agency for the protection of natural resources), and 15308 (action by a regulatory agency for the protection of the environment).

27. The Central Valley Water Board reserves the right to amend this Order to add additional responsible parties if/when those parties are identified.

28. The Central Valley Water Board, by adopting this Order, is not making any determination as to apportionment of liability among or between responsible parties, and nothing in this Order is intended to limit, or shall be interpreted as limiting, a responsible party's ability to seek reimbursement or indemnity from all other responsible parties.

TECHNICAL REPORTS REQUIRED

29. Water Code section 13267, subdivision (a), provides that the Central Valley Water Board may investigate the quality of any water of the state within its

region “in establishing or reviewing any water quality control plan or waste discharge requirements, or in connection with any action relating to any plan or requirement authorized” by the Water Code.

30. Water Code section 13267, subdivision (b)(1) states:

> *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 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.*

31. Water Code section 13268, subdivisions (a)(1) and (b)(1), states:

> *Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of Section 13267, failing or refusing to furnish information as required by subdivision (a) or (b) of Section 13267.5, 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).*

32. Civil liability may be administratively imposed by a regional board in accordance with Water Code section 13323) 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.

33. Central Valley Water Board staff estimate the cost of the requested reports to cost between $60,000 and $80,000. The technical reports required by this Order are necessary to ensure compliance with this Order and to ensure the protection of water quality.

Requirement to Submit Report of Waste Discharge

34. Water Code section 13260 requires that any person discharging waste or proposing to discharge waste that may affect the quality of the waters of the state must submit a report of waste discharge (RWD). Section 13264 further provides that no person shall initiate a new discharge of waste or make material changes in any discharge prior to submission of a RWD. Pursuant to sections 13260 and 13264, this Order requires timely submission of a RWD describing the WWTF’s material changes to its discharge location and methods, which are necessary to abate future discharges to Salt Creek.

REQUIRED ACTIONS

IT IS HEREBY ORDERED that, pursuant to Water Code sections 13267 and 13304, the Discharger shall mitigate the ongoing violations occurring as a result of waste discharges from the WWTF. Compliance with this Order must be achieved in accordance with the following conditions.

To mitigate the threat to water quality posed by the reoccurring discharges that have been creating, or threatening to create, conditions of pollution or nuisance, this Order establishes temporary obligations for only Phase 1 and parts of Phase 2 of the Discharger's proposed project, including a schedule and conditions for this limited-term discharge. This Order will remain in effect until **31 October 2027.** Further evaluation of the long-term strategy for regulating the WWTF and its discharges to ensure protection of beneficial uses of Salt Creek and local groundwater will occur during the evaluation of permit modifications associated with updating WDRs Order 93-208. This evaluation will address potential impacts from the utilization of existing percolation ponds, operation of the wastewater treatment plants, and long-term effects of the application of wastewater to the proposed field.

The directives specified below are organized sequentially into three categories: (A) pre-application obligations, including documentation, pre-application sampling, and infrastructure improvements; (B) wastewater application specifications; and (C) post-application monitoring to demonstrate compliance with this Order.

A) PRE-APPLICATION DATA COLLECTION AND REPORT SUBMITTAL

The Discharger shall collect information and data prior to application and submit to the Central Valley Water Board the following documentation by the prescribed schedule:

The following items must be submitted prior to discharge:

1. Copies of the application to, and approval from, Colusa County for the installation of the pipeline.
2. Detailed information on pipeline construction and capacity.
3. The Discharger shall photographs and documentation that a flow meter has been installed at a point at the LAAs prior to discharger that will quantify the volume of wastewater applied to the LAA.
4. Proof that all CEQA documents associated with the project, including the Phase 1 Statutory Exemption Determination Letter, for this project have been uploaded to the Arbuckle Public Utility District's website.
5. Photographs demonstrating that all exposed piping is appropriately labeled "non-potable wastewater - do not drink or touch," in both English and Spanish.
6. A form 200 that legally identifies the owner and operator of the two LAA parcels (Colusa County APNs 018-270-027 and 018-270-028).
7. Notification to the Central Valley Water Board 72 hours prior to initiating land application.

The Discharger shall submit the following items within 30 days after application of wastewater begins:

1. A certification statement confirming that the LAA has been constructed follows the appropriate grade of the LAA presented on Figure 7.5 of the Discharger's Technical Report titled "Land Application Plan" (Attachment B). The certification shall confirm that the field checks are installed to ensure even wastewater distribution throughout the entire 91-acre LAA and that the tailwater pond is located as shown in the proposed Plan, in the lowest point of the parcel.
2. An *Operations and Maintenance Plan* (O&M Plan) that provides description on how wastewater will be applied to the LAA in a way to comply with this Order. The O&M plan should include explanations and photographs to guide field staff, emergency contact information for key personnel for Discharger, and emergency procedures that will be followed in case of a spill from the LAA or from the wastewater transfer pipeline itself.

The following items must be submitted by the respective deadlines specified below:

1. **Within 72 hours of initiating land application** to the LAA parcels, the Discharger shall submit written notification, signed by an authorized representative, confirming that all pre-application obligations have been successfully completed. The notification shall be provided to the Central Valley Water Board, the California Department of Fish and Wildlife, and the Colusa County Environmental Health Department, and posted on Discharger's website.
2. **Perimeter Berm Installation Report and Maintenance Plan due no later than 30 days following issuance of this Order**. The report shall provide evidence that the perimeter run on/runoff berm surrounding the LAA meets the following specifications.
    - The elevation of the berm shall be sufficient to protect the LAA from inundation during the projected 100-year flood event as well as prevent run on/runoff from the LAA. The berm shall be at a minimum 1.5 feet high.
    - The run on/runoff berm shall be compacted to limit percolation into the berm as well as washout.
    - A plan and description of items to be inspected for integrity after a storm event greater than ½-inch of rainfall occurs.
    - The run on/runoff berm shall be stabilized with appropriate Best Management Practices.
    - Tailwater collection and stormwater diversion ditches shall be constructed along the interior and exterior of the berm, respectively.

3. For the protection of the public, the Discharger shall demonstrate that a fence surrounds the entire field precluding access due **no later than 30 days**

following issuance of this Order. Attached to the fence, or equivalent, the Discharger shall install signs notifying the public of the hazard associated with entering the field. Signs must conform to Title 22, indicate “no drinking” and “no contact,” and contain both English and Spanish due **no later than 30 days following issuance of this Order**.

Pre-Wastewater Application Area data collection effort. Before beginning discharge to the LAA, the Discharger shall perform percolation testing to establish the soil infiltration rate and collect soil samples to determine pre-discharge background soil composition in accordance with the guidelines below. The soil shall be collected prior to discharge, as well as the percolation test. The analytical results and calculations from the sampling and testing shall be included in the required Report of Waste Discharge, which is due by **1 July 2027** (see below) to support continued application on the Land Application Area.

- The collection of soil infiltration rates shall be conducted using ASTM D 3385-18 Standard Test Method for Infiltration Rate of Soils in Field Using Double-Ring Infiltrometer, or equivalent.
- The collection of background soil sampling shall be conducted using ASTM D6311 Standard Guide for Generation of Environmental Data Related to Waste Management Activities: Selection and Optimization of Sampling Design as the methodology for developing the sampling plan.
- No less than 16 samples evenly distributed across the 91-acres. The soil samples shall be collected between 6 and 12 inches below ground surface. The samples shall be analyzed for total and soluble concentrations listed in the following table (Table 1):

TABLE 1. ANALYTICAL PARAMETERS

Analytes	Units	EPA Method (or equivalent)
Soil pH – field observation	Standard Units	EPA Method 9045D
Moisture content	Percent Moisture	EPA Method 160.3
Cation exchange capacity	meg/100 grams	EPA Method 9081
Electrical Conductivity	µmhos/cm	EPA Method 9050A
TDS	mg/kg and mg/L	EPA Method 160.1
Total Kjeldahl Nitrogen	mg/kg and mg/L	EPA Method 351.2
Total potassium	mg/kg and mg/L	EPA Method 6010D
Total Nitrogen as N	mg/kg and mg/L	EPA Method 351.2/351.4
Nitrate as N	mg/kg and mg/L	EPA Method 300.0 or 300.1
Iron	mg/kg and mg/L	EPA Method 6010D
Manganese	mg/kg and mg/L	EPA Method 6010D
Ammonia	mg/kg and mg/L	EPA Method 350.1
Total Organic Carbon	mg/kg and mg/L	EPA Method 9060A

B) APPLICATION SPECIFICATIONS

The Discharger shall comply with the following conditions for wastewater application to the LAA l. Wastewater application is authorized for a limited duration not to exceed **beyond 31 October 2027**, unless otherwise authorized under applicable WDRs.

- Wastewater shall not be discharged to surface waters or surface water drainage courses (including irrigation ditches outside of Discharger's control).
- Discharge of "hazardous waste," as defined per California Code of Regulations, title 22, section 66261.1 et seq., is prohibited.
- Discharge of waste at a location or in a manner different from that described in this order is prohibited.
- Wastewater applications shall not cause pollution or a nuisance, as defined by Water Code section 13050.
- Wastewater shall be applied at a rate such that the monthly average dry weather application flow does not exceed **0.5 million gallons per day**. If ponding occurs, the application must cease.
- Wastewater must not be applied to the LAA within 24 hours of forecasted measurable precipitation with a greater than 50 percent probability of occurring, during precipitation events, or when the land disposal area surface soil is saturated.
- At all times, discharged waste shall remain within the LAA.
- The Discharger shall manage the LAA to prevent breeding of mosquitoes by implementing, at a minimum, the following procedures:
    - An erosion control program shall be implemented to ensure that small coves and irregularities are not created around the perimeter of the bermed flood area(s) and ponds. If the trees are removed prior to the end of the wet season, the LAA must be stabilized in compliance with the SWRCB Construction Stormwater Permit Post Construction Stabilization Requirements.
    - Weeds shall be minimized through control of water depth, harvesting, herbicides, or other suitable measures in ponds and open containment structures.
    - Vegetation and debris shall not accumulate on the water surface in such a way as to create stagnant water conditions and/or promote the breeding of mosquitoes.
    - Prevention of standing water 48 hours after the application of wastewater to land disposal areas.
    - Low-pressure and unpressurized pipelines and ditches accessible to mosquitoes must not be used to store wastewater or recycled water.

  - The Discharger must coordinate with the local mosquito abatement or vector control district to supplement the measures described above."

- Objectionable odors shall not be perceivable beyond the limits of the property where the waste is generated, treated, and/or discharged at an intensity that creates or threatens to create nuisance conditions. Discharge onto the field is prohibited if the dissolved oxygen level of the discharged wastewater is below 1 mg/L.
- The tailwater pond and run-on and runoff ditches shall have sufficient capacity to accommodate allowable wastewater flow, design seasonal precipitation, and ancillary inflow and infiltration during the winter while ensuring continuous compliance with this order. Design seasonal precipitation shall be based on total annual precipitation using a return period of 100 years.
- All ponds, the individual checks, and open run-on and runoff structures shall be managed to prevent breeding of mosquitoes.
- No sludge or other solid waste may be applied or stored on the LAA.
- The Discharger shall ensure that all wastewater is applied and distributed evenly across each the LAA. The Discharger shall implement changes to the irrigation system and/or operational practices as needed.
- The Discharger shall not plant crops until permitting is in place and they obtain approval of a Title 22 Engineering Report.
- Dead algae, vegetation, and debris shall not accumulate on the water surface of the pond and/or ditches.
- The Discharger shall maximize the use of available LAA checks to minimize waste constituent loading.
- The Discharger shall screen the wastewater pumped from the WWTF such that no solids are transferred to the LAA.
- LAAs shall be designed, maintained, and operated to comply with the following setbacks from the LAA and tailwater return/stormwater pond:
  - Domestic well: 150 feet
  - Surface drainage: 100 feet
  - Property line: 100 feet
- LAAs shall be inspected to determine compliance with this order. If an inspection reveals noncompliance or threat of noncompliance with this order, the Discharger shall temporarily stop the discharge immediately and implement corrective actions to ensure compliance with this order.

4. Stormwater runoff from authorized land disposal areas that have received treated wastewater is prohibited, unless all applied wastewater meets disinfection requirements at a level equivalent to at least disinfected secondary-23 recycled water (Title 22, § 60301.225).

5. Constructed flood disposal areas must be graded to prevent the accumulation of stormwater runoff into the disposal area.

- Public contact with wastewater shall be prevented using fences and adequate signage outlining the threat of dermal contact or drinking of the applied wastewater.
- Groundwater Limitations. Discharge of waste from any portion of the Facility shall not cause or contribute to groundwater containing constituent concentrations in excess of the concentrations specified below or natural background groundwater quality, whichever is greater:
- Constituents in concentrations that exceed either the Primary or Secondary MCLs established in California Code of Regulations, Title 22, sections 64431, 64444, and 64449.

6. Taste or odor-producing constituents, toxic substances, or any other constituents in concentrations that cause nuisance or adversely affect beneficial uses.

C) ADDITIONAL REQUESTED TECHNICAL REPORTS AND MONITORING

The Discharger shall submit to the Central Valley Water Board the following documentation on the dates specified below:

1. **Groundwater Monitoring:**

   The Discharger shall follow the monitoring and reporting frequency and sample for constituents and make observations required by the Revised Monitoring and Reporting Program No. 93-208 (2007).

   No later than 60 days following issuance of this Order, the Discharger shall submit a *Groundwater Monitoring Well Installation and Sampling Plan* proposing a plan to monitor groundwater upgradient and downgradient of the LAA. The Plan shall include a sensitive receptor survey of the nearby agricultural, municipal and domestic wells, and a sampling and analysis plan that will be followed when sampling the individual wells. Because of the proximity to the WWTF's monitoring network, the Discharger shall follow the groundwater monitoring well sampling and reporting requirements outlined in Revised MRP 93-208 (2007).

2. **Land Application Area Monitoring:**

   Prior to Discharge into the conveyance pipeline and then following the schedule in the table, the Discharger shall monitor the wastewater for the following and submit the reports as specified in the following table (Table 2):

TABLE 2: LAND APPLICATION AREA MONITORING

Analyte	Units	EPA Methodology (or equivalent)	Sample	Sample Frequency	Report Frequency
BOD	mg/L	EPA Method 405.1	Grab	Monthly	Monthly
Electrical conductivity	µmhos/cm	EPA Method 120.1	Grab	Monthly	Monthly
Total dissolved solids	mg/L	EPA Method 160.1	Grab	Monthly	Monthly
Total suspended solids	mg/L	EPA Method 160.2	Grab	Monthly	Monthly
Total nitrogen	mg/L as N	Calculated	Grab	Monthly	Monthly
Nitrate as N	mg/L as N	EPA Method 300.0 or 300.1	Grab	Monthly	Monthly
Total Kjeldahl Nitrogen	mg/L as N	EPA Method 351.2	Grab	Monthly	Monthly
Ammonia	mg/L as N	EPA Method 350.1	Grab	Monthly	Monthly
pH	pH units	EPA Method 150.1	Grab	Monthly	Monthly
Standard minerals	mg/L	Multiple methods	Grab	Quarterly	Quarterly

   Additionally, the Discharger shall report daily flow volumes of wastewater, using a calibrated flow meter installed at a point directly prior to application to the LAA. Flow volumes shall be reported in the monthly reports. However, flow volumes shall be reported on a weekly basis through April 2026.

   If a deviation occurs, Discharger shall immediately notify the Central Valley Water Board by phone and then Discharger shall follow up in writing stating when a deviation of this Order occurred, and when compliance was achieved.

3. **Nitrogen, TDS and Total Nitrogen Loading Reporting:**

   The Discharger shall calculate the loading impact for BOD, TDS and Total Nitrogen applied on the LAA on a monthly frequency and include the results in the Report of Waste Discharge.

D) REQUIREMENTS FOR OBTAINING LONG-TERM WDRS

No later than **1 July 2027**, the Discharger shall submit a complete Report of Waste Discharge (RWD) to obtain WDRs for continued use of the LAA beyond the expiration of this Order on **31 October 2027**. The Discharger must characterize soil conditions throughout the application area and prepare a groundwater monitoring plan that includes upgradient and downgradient monitoring prior to discharge:

- *Pre-Application Soil Investigation Results Report*. The report shall include laboratory results from a California-certified laboratory, a description of the sampling methods used, a table summarizing the analytical results, and a map showing the sampling locations.
- *Tailwater Control System Installation Report*. The report shall demonstrate that the installed ditches, sumps, and pumps have the capacity to contain and manage wastewater and stormwater generated by the 100-year, 24-hour storm event for the area.
- *Groundwater* Monitoring Plan. The report shall include details of monitoring wells both upgradient and downgradient the LAA and mitigation measures if groundwater quality is affected by the discharge.

E) COMPLIANCE WITH OTHER REGULATORY REQUIREMENTS

The Discharger shall obtain all applicable local, state, and federal permits necessary to fulfill the requirements of this Order prior to beginning work.

Use of Qualified Professionals

All technical reports required by this Order that involve planning, investigation, evaluation, or design, or other work requiring interpretation and proper application of engineering or geological sciences shall be prepared by or under the direction of persons registered to practice in California pursuant to California Business and Professions Code sections 6735, 7835, and 7835.1. As required by these laws, completed technical reports must bear the signature(s) and seal(s) of the registered professional(s) in a manner such that all work can be clearly attributed to the professional responsible for the work.

Signatory Requirements

All technical reports submitted by the Discharger shall include a cover letter signed by the Discharger, or a duly authorized representative, certifying under penalty of law that the signer has examined and is familiar with the report and that to their knowledge, the report is true, complete, and accurate. The Discharger shall also state if it agrees with any recommendations/proposals and whether it approves implementation of said proposals. Any person signing a document submitted under this Order shall make the following certification: “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 knowledge and 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."

Cost Recovery

Pursuant to Water Code section 13304, subdivision (c), the Central Valley Water Board is entitled to, and may seek reimbursement for, all reasonable costs it incurs investigating and abating the effects of the unlawful discharges of waste and to oversee/supervise the cleanup of such waste, or other remedial action, required by this Order. If requested by the Central Valley Water Board, the Discharger shall enroll in the State Water Board's Cost Recovery Program and shall reimburse the State of California for all reasonable costs actually incurred by the Central Valley Water Board.

Submissions

Requested documentation must be converted to a searchable Portable Document Format (PDF) and submitted to **centralvalleysacramento@waterboards.ca.gov**. The e-mail's "subject" line shall include a reference to "Arbuckle PUD Report Submittal" and the body of the e-mail shall state that it contains a submittal from Arbuckle Public Utilities District regarding the Arbuckle PUD WWTP (CIWQS Place ID No. CW-206149) and shall state the title and date of the submitted report. If Discharger seeks to submit documents that are 50 MB or larger, or if the Discharger receives a notification that the Central Valley Water Board did not receive the e-mail, the submittal should be transferred to a CD, DVD, or flash drive and mailed to our office, attention "ECM Mailroom."

Enforcement Authority

For purposes of enforcement, the conditions within the WDRs, 93-208, Revised MRP, and CAO R5-2024-0703 are unchanged. If the Discharger fails to comply with this Order, the Central Valley Water Board or its delegated officer may refer this matter to the Attorney General for judicial enforcement, may issue a complaint for administrative civil liability, or may take other enforcement actions. Failure to comply with this Order may result in the assessment of administrative civil liability up to $5,000 per violation per day, depending on the violation, pursuant to Water Code sections 13268 and/or 13350. The Central Valley Water Board reserves the right to take any enforcement actions authorized by law.

Administrative Review

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 et seq. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, 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 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 at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.

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Patrick Pulupa
Executive Officer

Attachment A:
Table A.1: Summarized Spill Volumes

Attachment B:
Arbuckle Public Utility District *Technical Report Initial Draft*, 2026

Table A.1 - Summarized Spill Volumes

a. Update Received	b. Agency (Update)	Updated Situation, Cause, and Known Impact	Confidential (Update)	Updated Quantities (Substance/QTY/Measure/Rate/Type	Name(Update)	c. Phone / Page/ Cell	d. Received by
9/19/2023 14:01	Arbuckle Public Works	Caller states due to animals in the area causing the release of approx less then 100 gallons of pond water onto a dry creek bed. The release is stopped and contained. The release will naturally dissipate.	No Value	100 Gal(s)	No Value	No Value	No Value
12/2/2024 11:52	Arbuckle Public Utilities District	Per Reporting Party: Due to heavy rains, holding pond number 1 overflowed releasing 3000 gallons of waste water. The waste water impacted Salt Creek. The spill has been stopped and contained. Clean up is underway.	No Value	3000 Gal(s)	No Value	No Value	No Value
10/16/2024 16:03	Arubuckle Public Utilities District	Per reporting party, a perimeter breach from pond #1 caused 20,000 gallons of waste water to impact a dry creek. Release has been stopped by reporting party at 1600 hours but deemed unrecoverable. No further hazards or impacts reported at this time.	No Value	20000 Gal(s)	No Value	No Value	No Value
10/3/2024 14:08	Arbuckle Public Utilities District	Per reporting party: Untreated sewage water has been leaving a neighboring property and spreading onto the caller's land (see confidential) and the surrounding area. This issue has been ongoing for over a year, affecting more than 2 to 3 acres, with no action taken. The County and State are aware, but nothing has been done. There is a notice with the name Howard Hold from the Central Valley Regional Water Board, but he is unresponsive. The reporting party is concerned about the health of their employees and the impact on their agricultural trees.	No Value	1000 Gal(s)	Arwill Famrs	No Value	No Value
10/3/2024 9:28	Arbuckle Public Utilities District	Per reporting party, a breach in the perimeter caused a release from a pond on the property into a neighboring field. Release has been stopped and contained as of 0900 hours. No waterways impacted due to this incident. Release has been deemed unrecoverable.	No Value	17000 Gal(s)	No Value	No Value	No Value
9/6/2024 16:05	Arbuckle Public Utilities District	Per reporting party: The sewage pond is filled up to the edge of the high water mark and is spilling out and into the Salt Creek. This is a dry creek that doesn't lead to any other waterways. Most of the release has evaporated, gone into the soil and the nearby agriculture or just drying up.	No Value	3000 Gal(s)	CA Dept of Fish and Wildlife	No Value	No Value
9/5/2024 18:13	Arbuckle Public Utility District	Per the Reporting Party : A perimeter break on an earthen berm occurred on a retention pond due to possible overfill. The release has been stopped and berm repaired. The released material impacted soil behind the waste water treatment plant and also a dry creek bed (Salt Creek) that runs behind the waste water treatment plant. No waterways affected other than the dry creek bed. The material is unrecoverable and has seeped into the ground.	No Value	8500 Gal(s)	No Value	No Value	No Value

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8/17/2024 10:46	Arbuckle Utility District	The reporting party states that a perimeter break occurred at a wastewater pond, causing the release of 8,000 gallons of wastewater onto the soil at the given location. The release has been stopped and contained, and no waterways were impacted. The reporting party also states that the release will dry up on its own, and repairs have been made.	No Value	8000 Gal(s)	No Value	No Value	No Value
7/14/2024 12:22	Arbuckle Utility District	Per the reporting party: A perimeter break along the road resulted in 2000 gallons of waste water to release onto the neighboring properties soil. This release has been stopped and contained and no waterways were impacted. The reporting party will perform the clean up..	No Value	2000 Gal(s)	No Value	No Value	No Value
7/11/2024 7:53	Arbuckle Public Utility District	An effluent pond at a wastewater treatment plant overflowed for unknown reasons, causing 400 gallons of sewage to spill onto the soil of the plant and the adjacent property. Technicians redirected the flow to an alternate pond, stopping the overflow. There was no damage to either property. Cleanup of the spill is pending.	No Value	400 Gal(s)	No Value	No Value	No Value
6/20/2024 13:18	Arbuckle Public Utilities District (PUD)	Per the reporting party, the Arbuckle Public Utilities District's sewer pond experienced a levee failure which caused a sanitary sewage overflow. The overflow began at 0830 in the morning, and it was controlled at 1200 in the afternoon. Arbuckle PUD personnel used excavating equipment and road base (sand, gravel and dirt) to rebuild the levee and clean up the spill. The sewage was unrecoverable and spilled out into an almond orchard.	No Value	2000 Gal(s)	No Value	No Value	No Value
6/11/2024 11:25	Arbuckle Public Utility District	Per Reporting Party: Due to erosion led to the release of approximately 1,500 gallons of untreated water only onto soil. The time of release was at approximately 0930 hours on 06/11/24 and the time of control was at approximately 1015 hours on 06/11/24. The release was stopped, contained within the soil, no waterways impacted, and unrecoverable. Personnel from Arbuckle Public Utility District made repairs to stop the erosion.	No Value	1500 Gal(s)	No Value	No Value	No Value
6/8/2024 10:03	Arbuckle Public Utilities	Per the reporting party: A Arbuckle Public Utilities pond over flowed and released 2000 gallons of sewage onto a neighboring properties soil. This release has been stopped and contained and no waterways were impacted. The reporting party performed the clean-up.	No Value	2000 Gal(s)	No Value	No Value	No Value
6/2/2024 12:05	Public Utility District	Per reporting party: One of the districts pond leaked and over flowed out onto the neighboring property. No other waterways were impacted.	No Value	900 Gal(s)	No Value	No Value	No Value

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5/29/2024 11:05	Arbuckle Public Utility District	Per the Reporting Party : There was a break in the perimeter berm of a waste water sewage pond causing the release. The material went into an adjacent property impacting soil/farmland. No waterways were affected. The release has been stopped and repairs to the perimeter berm completed. The material is unrecoverable.	No Value	500 Gal(s)	No Value	No Value	No Value
5/15/2024 10:46	Arbuckle Public Utility District	Per reporting party: The east side berm of one of their ponds overflowed onto the neighboring property into vegetation and soil. No waterways impacted. Cleanup complete but water has soaked into ground.	No Value	900 Gal(s)	No Value	No Value	No Value
5/10/2024 18:14	Arbuckle Public Utility District	A recent overflow incident of a percolation pond at a local utility district site resulted from a high capacity event, causing 2,500 gallons of wastewater to spill onto the facility grounds and into a nearby dry creek bed. On-site personnel are assessing the situation. No damage occurred to the facility, and operations continue as usual. Technicians are cleaning up the affected area within the facility. The release into the dry creek bed is expected to evaporate naturally, eliminating the need for further cleanup.	No Value	2500 Gal(s)	No Value	No Value	No Value
5/5/2024 11:24	Arbuckle Public Utilities	Per reporting party, a berm between the ponds failed at the wastewater treatment facility. As a result, approximately 1,000 gallons of wastewater were released from one of the ponds on the east side of the facility. The overfilling occurred throughout the night and began leaking this morning. The wastewater flow was successfully stopped at approximately 1030 hours, and a pump was immediately installed to redirect the water into a different pond to mitigate the situation. No waterways were affected by this release. The reporting party is overseeing the cleanup process for this incident.	No Value	1000 Gal(s)	No Value	No Value	No Value
4/21/2024 10:56	Arbuckle Public Utility	Per reporting party, at 0915 hours an on site crew noticed an erosion from one of the pond rows on site. This caused the release of 900 gallons of sewage into neighboring orchards that are adjacent to the pond. The release was stopped and contained at 1000 hours. Clean up will be conducted by reporting party with no waterways impacted.	No Value	900 Gal(s)	No Value	No Value	No Value

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4/7/2024 11:26	Arbuckle Public Utility District	Per reporting party, the release occurred due to drums becoming dirty, resulting in blockage and subsequent spillage of approximately 800 gallons of wastewater into a dry creek bed. The material is deemed unrecoverable, and it will seep into the soil. The release was detected around 1000 hours and was promptly stopped and contained within 20 minutes.	No Value	800 Gal(s)	No Value	No Value	No Value
3/25/2024 10:10	Arbuckle Public Utilities	Caller stated the release occurred due to a PG&E power outage, resulting in the pumps malfunctioning and causing the material to impact soil and vegetation of a nearby property. No waterways were affected. The release has been stopped and contained, requiring no cleanup as the material has evaporated.	No Value	200 Gal(s)	No Value	No Value	No Value
3/25/2024 10:04	Arbuckle Public Utilities	The caller stated that the release was due to a Wastewater pond being overfilled, resulting in the material impacting Salt Creek (Dry). The caller also stated that the release was stopped and that the released material was unrecoverable.	No Value	500 Gal(s)	No Value	No Value	No Value
June 16, 2025, 8:11:00 AM PDT	Arbuckle Public Utilities	Per reporting party, at 0630 hours a pond overflowed due to a breach in a berm resulting in a release of 30,000 gallons of partially treated sewage. No impact to waterways at this times, but an almond orchard (Arkan Farms) has been impacted. The release has been stopped and contained. No cleanup due to the nature of the substance being absorbed into the ground and the access issues of the orchard. No other information was available.	No Value	Partially Treated Waste Water = 30000 Gallon(s) N/A Sewage	No Value	No Value	No Value
March 6, 2026, 6:17:00 PM PDT	Arbuckle Public Utilities District	Per the reporting party, wastewater is over topping the utility companies' containment pond. The substance is flowing down into farmers orchard adjacent to the utility property. The farmer has made a containment area keeping it from flowing into a dry creek (Salt Creek). No waterways are impacted at this time. RP states they are currently attempting to control the overflow, but high winds are making it difficult. The estimated release at the time of this report is approximately 5,000 gallons.	No Value	Partially Treated Waste Water = 5000 Gallon(s) N/A Sewage	No Value	No Value	No Value
March 9, 2026, 9:09:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, Arbuckle Public Utilities District personnel or private landowners built earthen berms to contain the release, and the waste water has now entered Salt Creek. It is unknown what time the waste water breached the containment berms. The amount of waste water that entered Salt Creek is estimated to be 5000 gallons.	No Value	Partially Treated Waste Water = 5000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	James Parker

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March 10, 2026, 8:32:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party: Pond number one, (1) is overtopping 5000 gallons of Partially Treated Wastewater , and pond number four (4) is overtopping 5000 gallons of Partially Treated Wastewater.	No Value	No Value	Gary	+1 530-476-2054	Mike Reineman
March 16, 2026, 8:41:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, sometime yesterday morning (03/15/26), the pond began releasing partially treated wastewater due to possible wind conditions, resulting in an estimated release of 50,000 gallons. The release is ongoing. Crews are actively attempting to contain the release; however, there are limited mitigation options as the pond is filled. The release is flowing into Sand Creek.	No Value	Partially treated wastewater. = 50000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Cindy Aguilar
March 23, 2026, 8:55:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, over the weekend approximately 5000 gallons of partially treated wastewater were release due to all ponds being full. The release is still ongoing at rate of 10 gallons per minute. The release is going into the Salt Creek, but water is soaking into the gravel.	No Value	Partially Treated Wastewater = 50000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Cindy Aguilar
March 24, 2026, 9:13:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party: 30,000 gallons of sewage is over topping from pond number one.	No Value	No Value	Jerry Felkins	+1 530-476-2054	Mike Reineman
March 25, 2026, 8:43:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party - The release has not been stopped or contained, approximately 50,000 gallons has been spilled.	No Value	No Value	Gary Felkins	+1 530-476-2054	Mike Reineman
March 25, 2026, 9:17:00 AM PDT	Arbuckle Public Utilities District	*** Resending as reporting thresholds have escalated *** Per the reporting party - The release has not been stopped or contained, approximately 50,000 gallons has been spilled.	No Value	No Value	Gary Felkins	+1 530-476-2054	Mike Reineman
March 26, 2026, 8:44:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party: An additional 30,000 gallons of sewage has released.	No Value	No Value	Gary Felkins	+1 530-476-2054	Mike Reineman
March 29, 2026, 9:34:00 AM PDT	Arbuckle Public Utilities District	The Reporting Party called back to provide the following update: An additional 20,000 gallons (approximate) of partially treated wastewater has released into Salt Creek. This update is an estimate by the Reporting Party from a picture sent to him of a 24-inch pipe releasing the material. The release was noticed at 0800 hours this morning but may have started last night. The release is on-going at an unknown rate. The Reporting Party will call back with further update when available and to update on the total release amount for this incident. Salt Creek is an ephemeral creek which is currently dry.	No Value	No Value	Gary Felkins	+1 530-476-2054	Dave Hetland

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March 30, 2026, 9:34:00 AM PDT	Arbuckle Utilities District	The Reporting Party called back with the following update: The total release amount of the partially treated wastewater up to this point is approximately 285,000 gallons. The release continues intermittently from a 24inch pipe, fluctuating between 10 to 50 gallons per minute. The release continues into Salt Creek, which is an ephemeral waterway that currently contains no water. Crews are currently on scene conducting repairs and creating new berms.	No Value	Partially Treated Wastewater = 285000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Dave Hetland
March 31, 2026, 9:54:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party: Another 30-40,000 gallons released.	No Value	No Value	530-476-2054	+1 530-476-2054	Mike Reineman
April 1, 2026, 8:36:00 AM PDT	Arbuckle Public Utilites District	Per the Reporting Party: The caller stated that the Partially Treated Wastewater is currently releasing at 10 gallons per minute, which equates to approximately 11,400 gallons for the past 24 hours.	No Value	Partially Treated Wastewater < 15000 Gallon(s) N/A	Gary Felkins	+1 530-476-2054	Marvin Yuson
April 2, 2026, 8:32:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party: Less than 14,000 gallons of sewage released.	No Value	No Value	Garry Felkins	+1 530-476-2054	Mike Reineman
April 3, 2026, 9:34:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, approximately 25,000 gallons of partially treated sewage is the current estimate for this incident.	No Value	Partially treated sewage = 25000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	James Parker
April 4, 2026, 9:15:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, an additional 15,000 gallons of partially treated water has been released. The release is flowing into an adjacent farmer's ditch and into Salt Creek.	No Value	Partially treated water = 15000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Cindy Aguilar
April 5, 2026, 9:48:00 AM PDT	Arbuckle Public Utilities District	No Value	No Value	Per reporting party, over the last 24 hours approxiamtely 7,000 gallons has been released.	Gary Falcons	+1 530-476-2054	Edward Nelson
April 6, 2026, 8:26:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, currently approximately 10,000 gallons is overflowing into the containment ditch then into Salt Creek. End of update.	No Value	Partially treated waste water = 10000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	James Parker
April 7, 2026, 8:52:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, approximately 15,000 gallons have spilled within the last 24 hours.	No Value	Partially treated waste water = 15000 Gallon(s) N/A	Gary Felkins	+1 530-476-2054	Benito Soto
April 8, 2026, 8:49:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, spill about 30,000 additional gallons in the last 24 hours.	No Value	Partially treated waste water = 30000 Gallon(s) N/A Other	Jerry Felkins	+1 530-476-2054	Benito Soto
April 9, 2026, 9:51:00 AM PDT	Arbuckle Public Utilities District	Per reporting party approximately 30,000 gallons more in the last 24 hours.	No Value	Partially treated wastewater = 30000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Benito Soto
April 10, 2026, 8:44:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, an additional 40,000 gallons has released.	No Value	No Value	Jerry Felkins	+1 530-476-2054	Mike Reineman
April 11, 2026, 9:21:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, in the last 24 hours, approximately 30,000 gallons of partially treated waste water spilled into the neighboring property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Partially treated waste water = 30000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-330-0702	James Parker
April 12, 2026, 9:26:00 AM PDT	Arbuckle Public Utilities District	The Reporting Party called back with the following update; Within the last 24 hours an additional 15,000 gallons of partially treated wastewater has overtopped pond #1 into a containment ditch that drains into Salt Creek.	No Value	No Value	Gary Felkins	+1 530-330-0702	Dave Hetland

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April 15, 2026, 8:16:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, in the last 24 hours, approximately 20,000 gallons of partially treated waste water spilled into the neighboring property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Partially treated waste water = 20000 N/A	Jerry Felkins	+1 530-476-2054	Benito Soto
April 16, 2026, 10:45:00 AM PDT	Arbuckle Public Utilites	Per the reporting party, in the last 24 hours, approximately 12,000 gallons of partially treated waste water spilled into the neighboring property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Partially treated waste water = 12000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Benito Soto
April 17, 2026, 9:29:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, in the last 24 hours, 20,000 gallons of partially treated waste water spilled into the adjacent property owner's drainage ditch and then into Salt Creek. End of update.	No Value	Partially treated waste water = 20000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	James Parker
April 18, 2026, 9:52:00 AM PDT	Arbuckle Public Utilities District	The Reporting Party called back with the following update: Since the last update, an additional 12,000 gallons of partially treated wastewater overflowed from the retention pond, entered an orchard and ran into Salt Creek.	No Value	No Value	Fabian Gomez	+1 530-476-2054	Dave Hetland
April 19, 2026, 9:39:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, over the last 24 hours, approximately 15,000 gallons of partially treated wastewater was released onto an adjacent property, flowing into a ditch that led to a drain, which ultimately discharged into Salt Creek.	No Value	No Value	Gary Felkins	+1 530-330-0702	John Sanchez
April 20, 2026, 12:31:00 PM PDT	Arbuckle Public Utilities District	Per reporting party, In the last 24 hours 15,000 gallons went adjacent to landowners drain and then from there Salt Creek.	No Value	No Value	Jerry Felkins	+1 530-476-2054	Edward Nelson
April 21, 2026, 10:40:00 AM PDT	Arbuckle Public Utilities District	Per the reporting: In the past 24 hours, 40,000 gallons of partially treated waste water was released.	No Value	Treated Waste Water = 40000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Marvin Yuson
April 22, 2026, 9:07:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, in the last 24 hours, approximately 21,000 gallons of partially treated waste water spilled into the neighboring property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Partially treated waste water = 21000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Benito Soto
April 23, 2026, 8:41:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, in the last 24 hours, approximately 15,000 gallons of partially treated waste water spilled into the neighboring property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Waste Water = 15000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Benito Soto
April 24, 2026, 8:24:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, in the last 24 hours, approximately 12,000 gallons of partially treated waste water spilled into the neighboring property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Waste Water = 12000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Benito Soto

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April 26, 2026, 8:55:00 AM PDT	Arbuckle Public Utility District	Reporting party states that the sewage retention ponds are overflowing, causing partially treated wastewater to spill onto surrounding dirt. The overflow is then flowing into a nearby orchard before entering Salt Creek. The reporting party indicates that the partially treated wastewater cannot be recovered. The release is still on going. This spill is related to spill 26-1131	No Value	Partially Treated Wastewater = 12000 N/A Sewage	Fabian Gomez	+1 530-476-2054	Diego Navarro
April 27, 2026, 8:30:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, in the last 24 hours, 12000 gallons of partially treated wastewater released into the neighboring property owner's containment ditch which drains into Salt Creek. End of update.	No Value	Partially treated wastewater = 12000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	James Parker
April 28, 2026, 8:50:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, in the last 24 hours, approximately 12,000 gallons of partially treated waste water spilled into the neighboring property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Partially treated waste water = 12000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Diego Navarro
April 29, 2026, 8:43:00 AM PDT	Arbuckle Public Utilities District	The reporting party states that Pond #1 is still releasing. In the last 24 hours, approximately 12,000 gallons of partially treated waste water spilled into Arwill Farm property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Partially treated waste water = 12000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Fuchinh Xiong
April 30, 2026, 10:07:00 AM PDT	Arbuckle Public Utilities District	The reporting party states that Pond #1 is still releasing. In the last 24 hours, approximately 12,000 gallons of partially treated waste water spilled into Arwill Farm property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Partially treated waste water = 12000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Benito Soto
May 1, 2026, 9:12:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, an additional 12,000 gallons of partially treated wastewater were released within the last 24 hours into a containment ditch and into Salt Creek.	No Value	Partially Treated Wastewater = 12000 Gallon(s) N/A Sewage	Garry Felkins	+1 530-476-2054	Cindy Aguilar
May 2, 2026, 9:25:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, within the last 24hrs an estimated 12,000 gallons have leaked out from Pond 1 into the adjacent lands' containment ditch and then into the Salt Creek.	No Value	No Value	Jerry Felkins	+1 530-476-2054	Gustavo Vega
May 3, 2026, 10:55:00 AM PDT	Arbuckle Public Utility District	Over the past 24 hours, an additional 12,000 gallons of partially treated wastewater has overflowed from the facility's stabilization ponds. The situation is ongoing, and potential corrective actions are currently being discussed with local and state officials.	■ None	Wastewater, Partially treated = 12000 Gallon(s) N/A Other	Gary Felkins	+1 530-476-2054	Randall Perez
May 4, 2026, 10:38:00 AM PDT	Arbuckle Public Utility District	Over the past 24 hours, an additional 12,000 gallons of partially treated wastewater has overflowed from the facility's stabilization ponds. The situation is ongoing, and potential corrective actions are currently being discussed with local and state officials.	■ None	Wastewater, Partially treated = 12000 Gallon(s) N/A Other	Gary Felkins	+1 530-476-2054	Randall Perez

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May 5, 2026, 10:54:00 AM PDT	Arbuckle Public Utilities District	The reporting party states that Pond #1 is still releasing. In the last 24 hours, approximately 20,000 gallons of partially treated waste water spilled into Arwill Farm property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Wastewater, Partially treated = 20000 Gallon(s) N/A Other	Gary Felkins	+1 530-476-2054	Benito Soto
May 6, 2026, 11:31:00 AM PDT	Arbuckle Public Utilities District	The reporting party states that Pond #1 is still releasing. In the last 24 hours, approximately 20,000 gallons of partially treated waste water spilled into Arwill Farm property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Partially Treated Wastewater = 20000 Gallon(s) N/A	Gary Felkins	+1 530-476-2054	Benito Soto
May 7, 2026, 8:32:00 AM PDT	No Value	Per the reporting party: Approximately 15,000 gallons of the material over topped into the neighboring All Well Farms containment ditch. This ditch has a drainage pipe that empties into the Salt Creek.	No Value	No Value	No Value	No Value	Nicholas Womack
May 8, 2026, 10:31:00 AM PDT	Arbuckle Public Utility District	As per caller: Due to Overtopping from pond 1, 12,000 gallons of partial treated wastewater released into an Arwill Farm's containment ditch then drained into Salt Creek. The 12,000 gallons of partially treated wastewater was released between 1000 hrs on May 7, 2026 and 1000 hrs on May 8, 2026.	No Value	Partially Treated Wastewater = 12000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Benjamin Ajax
May 9, 2026, 9:08:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, an additional 12,000 gallons of partially treated wastewater were released within the last 24 hours and are flowing into Salt Creek.	No Value	Partially Treated Wastewater = 12000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Cindy Aguilar
May 10, 2026, 9:24:00 AM PDT	Arbuckle Utilities District	Per the reporting party's update: An additional 12,000 gallons of partially treated wastewater have released onto an orchard and into Salt Creek. There are no remedial actions planned.	No Value	Partially Treated Wastewater = 12000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Ethan Ellis
May 11, 2026, 10:38:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, an additional 12,000 gallons of partially treated water continues to overtop from pond# 1 into Salt Creek over the 24 hours.	No Value	Partially Treated Wastewater = 12000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Cindy Aguilar
May 12, 2026, 10:16:00 AM PDT	Arbuckle Public Utilities District	As per caller: Due to Overtopping from pond 1, 15,000 gallons of partial treated wastewater released into Arwill Farm's containment ditch then drained into Salt Creek. The 15,000 gallons of partially treated wastewater was released between 1000 hrs on May 11, 2026 and 1000 hrs on May 12, 2026.	No Value	Partially Treated Waste Water = 15000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Benjamin Ajax
May 13, 2026, 10:05:00 AM PDT	Arbuckle Public Utilities District	As per caller: Due to Overtopping from pond 1, 15,000 gallons of partial treated wastewater released into Arwill Farm's containment ditch then drained into Salt Creek. The 15,000 gallons of partially treated wastewater was released between 1000 hrs on May 12, 2026 and 1000 hrs on May 13, 2026.	No Value	Partially Treated Wastewater = 15000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Benjamin Ajax
May 14, 2026, 10:20:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, an additional 15,000 gallons of partially treated water continues to overtop from pond# 1 into Salt Creek over the 24 hours.	No Value	Waste Water = 15000 Gallon(s) N/A Other	Gary Felkins	+1 530-476-2054	Benito Soto

Table A.1 - Summarized Spill Volumes

a. Update Received	b. Agency (Update)	Updated Situation, Cause, and Known Impact	Confidential (Update)	Updated Quantities (Substance/QTY/Measure/Rate/Type	Name(Update)	c. Phone / Page/ Cell	d. Received by
May 15, 2026, 10:01:00 AM PDT	Arbuckle Public Utility District	Over the past 24 hours, an additional 20,000 gallons of partially treated wastewater has overflowed from the facility's stabilization ponds. The situation is ongoing, and potential corrective actions are currently being discussed with local and state officials.	■ None	Wastewater, Partially treated = 20000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Randall Perez
May 16, 2026, 10:31:00 AM PDT	Arbuckle Public Utility District	Over the past 24 hours, an additional 12,000 gallons of partially treated wastewater has overflowed from the facility's stabilization ponds. The situation is ongoing, and potential corrective actions are currently being discussed with local and state officials.	■ None	Wastewater, Partially treated = 12000 Gallon(s) N/A Other	Gary Felkins	+1 530-476-2054	Randall Perez
May 17, 2026, 10:02:00 AM PDT	Arbuckle Utility District	Per reporting party, an additional 15,000 gallons of material were released in the last 24 hours.	No Value	Sewage = 15000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Gustavo Vega
May 18, 2026, 10:23:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, an additional 20,000 gallons of partially treated water from Pond 1 continues to overtop into the farm containment ditch, flowing into the drain and into Salt Creek.	No Value	Partially Treated Wastewater = 20000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Cindy Aguilar
May 19, 2026, 10:06:00 AM PDT	Arbuckle Public Utilities District	As per caller: Due to Overtopping from pond 1, 20,000 gallons of partial treated wastewater released into Arwill Farm's containment ditch then drained into Salt Creek. The 20,000 gallons of partially treated wastewater was released between 1000 hrs on May 18, 2026 and 1000 hrs on May 19, 2026.	No Value	Partially Treated Waste Water = 20000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Benjamin Ajax
May 20, 2026, 11:23:00 AM PDT	Arbuckle Public Utilities District	As per caller: Due to Overtopping from pond 1, 15,000 gallons of partial treated wastewater released into Arwill Farm's containment ditch then drained into Salt Creek. The 15,000 gallons of partially treated wastewater was released between 1000 hrs on May 19, 2026 and 1000 hrs on May 20, 2026.	No Value	Partially Treated Waste Water = 15000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Benjamin Ajax
May 21, 2026, 10:44:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, per reporting party, an additional 15,000 gallons of partially treated water continues to overtop from pond# 1 into Salt Creek over the 24 hours.	No Value	Partially Treated Waste Water = 15000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Benito Soto
May 22, 2026, 10:34:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, per reporting party, an additional 15,000 gallons of partially treated water continues to overtop from pond# 1 into Salt Creek over the 24 hours.	No Value	Partially Treated Waste Water = 15000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Benito Soto
May 23, 2026, 9:15:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party's update: Approximately 15,000 gallons of partially treated wastewater has been released in the past 24 hours.	No Value	Partially Treated Wastewater = 15000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Ethan Ellis
May 24, 2026, 9:29:00 AM PDT	Arbuckle Public Utilities District	Per Reporting Party: Approximately 15,000 gallons of partially treated wastewater has been released in the past 24 hours.	No Value	Partially Treated Wastewater = 15000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Cecil Luera

Table A.1 - Summarized Spill Volumes

a. Update Received	b. Agency (Update)	Updated Situation, Cause, and Known Impact	Confidential (Update)	Updated Quantities (Substance/QTY/Measure/Rate/Type	Name(Update)	c. Phone / Page/ Cell	d. Received by
May 25, 2026, 9:51:00 AM PDT	Arbuckle Public Utility District	Over the past 24 hours, an additional 15,000 gallons of partially treated wastewater has overflowed from the facility's stabilization ponds. The situation is ongoing, and potential corrective actions are currently being discussed with local and state officials.	■ None	Wastewater, Partially treated = 15000 Gallon(s) N/A Other	Fabian Gomez	+1 530-476-2054	Randall Perez
May 26, 2026, 11:01:00 AM PDT	Arbuckle Public Utilities District	Per reporting party: Pond 1 is still over topping into the farms containment ditch and into Salt Creek through the famer drain pipes. In the last 24 hours there has been a release of 15,000 gallons	No Value	No Value	Gary Felkins	+1 530-476-2054	Rosa Pulido
May 27, 2026, 10:17:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party: 15,000 gallons of partially treated waste water has overtopped into Arwill Farms containment ditch then into Salt Creek in the past 24 hours.	No Value	No Value	Jerry Felkins	+1 530-476-2054	Nicholas Womack
May 28, 2026, 11:43:00 AM PDT	Arbuckle Public Utility District	Over the past 24 hours, an additional 15,000 gallons of partially treated wastewater has overflowed from the facility's stabilization ponds. The situation is ongoing, and potential corrective actions are currently being discussed with local and state officials.	■ None	Wastewater, Partially treated = 15000 Gallon(s) N/A Other	Gary Felkins	+1 530-476-2054	Randall Perez
May 29, 2026, 10:10:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party: Pond #1 is overtopping and releasing into the containment ditch on Arwill Farms property. The drainage ditch has diverted the substance to drain into Salt Creek. From 1000 to 1000 hours, 15,000 gallons released.	No Value	Partially Treated Wastewater = 15000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Ethan Ellis
May 30, 2026, 10:05:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, the total released in the last 24 hours is 15,000 gallons. No further information was provided.	No Value	Partially treated wastewater = 15000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-330-0702	Gustavo Vega
May 31, 2026, 10:11:00 AM PDT	Arbuckle Public Utility District	Over the past 24 hours, an additional 15,000 gallons of partially treated wastewater has overflowed from the facility's stabilization ponds. The situation is ongoing, and potential corrective actions are currently being discussed with local and state officials.	■ None	Wastewater, Partially treated = 15000 Gallon(s) N/A Other	Gary Felkins	+1 530-476-2054	Randall Perez
June 1, 2026, 10:18:00 AM PDT	Arbuckle Public Utility District	Per reporting party, an additional 15,000 gallons of partially treated water continue to overtop Pond 1, flowing into a containment ditch and into Salt Creek.	No Value	Partially Treated Wastewater = 15000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Cindy Aguilar
June 2, 2026, 10:19:00 AM PDT	Arbuckle Public Utilities District	Per Reporting Party: Pond number 1 is topping over into the Arwill Farms containment ditch, and then into Salt Creek via the Arwill Farms drainpipe.	No Value	Partially Treated Wastewater = 15000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Douglas Price
June 3, 2026, 10:58:00 AM PDT	Arbuckle Public Utilities District	As per caller: Due to Overtopping from pond 1, 15,000 gallons of partial treated wastewater released into Arwill Farm's containment ditch then drained into Salt Creek. The 15,000 gallons of partially treated wastewater was released between 1000 hrs on June 2, 2026, 2026 and 1000 hrs on June 3, 2026.	No Value	Partially Treated Waste Water = 15000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Benjamin Ajax
June 4, 2026, 10:10:00 AM PDT	Arbuckle Utilities District	Per reporting party, an additional 15,000 gallons of partially treated water continue to overtop Pond 1, flowing into a containment ditch and into Salt Creek.	No Value	Partially Treated Waste Water = 15000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Benito Soto

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a. Update Received	b. Agency (Update)	Updated Situation, Cause, and Known Impact	Confidential (Update)	Updated Quantities (Substance/QTY/Measure/Rate/Type	Name(Update)	c. Phone / Page/ Cell	d. Received by
June 5, 2026, 11:42:00 AM PDT	Arbuckle Utility	As per caller: Due to Overtopping from pond 1, 25,000 gallons of partial treated wastewater released into Arwill Farm's containment ditch then drained into Salt Creek. The 25,000 gallons of partially treated wastewater was released between 1000 hrs on June 4, 2026, 2026 and 1000 hrs on June 5, 2026.	No Value	Partially Treated Waste Water = 25000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Benjamin Ajax
June 6, 2026, 9:44:00 AM PDT	Arbuckle Public Utlities District	Per reporting party, 15,000 gallons have been released in the last 24 hours.	No Value	Partially Treated Wastewater = 15000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Gustavo Vega
June 7, 2026, 9:59:00 AM PDT	Arbuckle Public Utilities	Per reporting party, approximately 15,000 gallons were released in the last 24 hours.	No Value	Partially treated wastewater = 15000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Gustavo Vega
June 8, 2026, 10:59:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, within the last 24 hours, Pond 1 has continued overtopping into a containment ditch and flowing into Salt Creek. An additional 25,000 gallons of Partially Treated Wastewater were released during this period.	No Value	Partially Treated Wastewater = 25000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Cindy Aguilar
June 10, 2026, 10:09:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, within the last 24 hours, Pond 1 has continued overtopping into a containment ditch and flowing into Salt Creek. An additional 20,000 gallons of Partially Treated Wastewater were released during this period.	No Value	Partially Treated Wastewater = 20000 Gallon(s) N/A Sewage	Jacy Anderson	+1 530-476-2054	Benito Soto
June 12, 2026, 9:24:00 AM PDT	Arbuckle Public Utilities	Per reporting party, Pond 1 has continued overtopping into a containment ditch and flowing into Salt Creek. Approximately 15,000 gallons were released in the last 24 hours	No Value	Sewage = 15000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Gustavo Vega
June 16, 2026, 11:07:00 AM PDT	Arbuckle Public Utilities District	Per reporting party: Pond 1 over topping into the Arwell Farms containment ditch and into Salt Creek thru a drain pipe. Quantity in the last 24 hours is 20,000 gallons, this is from 1000 hours to 1000 hours.	No Value	No Value	Gary Felkins	+1 530-476-2054	Rosa Pulido
June 17, 2026, 12:43:00 PM PDT	Arbuckle Public Utility District	Per the Reporting Party: In the last 24 hours, approximately 25,000 gallons of partially treated waste water was released from Pond 1.	No Value	Partially Treated Wastewater = 25000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Marvin Yuson
June 18, 2026, 1:12:00 PM PDT	Arbuckle Public Utilities District	The reporting party states that Pond #1 is still releasing. In the last 24 hours, approximately 20,000 gallons of partially treated waste water spilled into Arwill Farm property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Partially Treated Waste Water = 20000 Gallon(s) N/A Sewage	Gary Felkins	+1 530-476-2054	Benito Soto
June 19, 2026, 10:13:00 AM PDT	Arbuckle Public Utility District	Over the past 24 hours, an additional 25,000 gallons of partially treated wastewater has overflowed from the facility's stabilization ponds. The situation is ongoing, and potential corrective actions are currently being discussed with local and state officials.	■ None	Wastewater, Partially treated = 25000 Gallon(s) N/A Other	Fabian Gomez	+1 530-476-2054	Randall Perez
June 20, 2026, 9:56:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, 20,000 gallons of wastewater were released in the last 24 hours.	No Value	Wastewater = 20000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Gustavo Vega

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a. Update Received	b. Agency (Update)	Updated Situation, Cause, and Known Impact	Confidential (Update)	Updated Quantities (Substance/QTY/Measure/Rate/Type	Name(Update)	c. Phone / Page/ Cell	d. Received by
June 21, 2026, 9:22:00 AM PDT	Arbuckle Public Utility District	Over the past 24 hours, an additional 20,000 gallons of partially treated wastewater has overflowed from the facility's stabilization ponds. The situation is ongoing, and potential corrective actions are currently being discussed with local and state officials.	■ None	Wastewater, Partially treated = 20000 Gallon(s) N/A Other	Fabian Gomez	+1 530-476-2054	Randall Perez
June 22, 2026, 11:51:00 AM PDT	Arbuckle Public Utilities	Per reporting party, approximately 20,000 gallons have been released in the last 24 hours from Pond 1 into Salt Creek.	No Value	Wastewater = 20000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Gustavo Vega
June 23, 2026, 10:07:00 AM PDT	Arbuckle Public Utilities District	As per caller: Due to Overtopping from pond 1, 10,000 gallons of partial treated wastewater released into Arwill Farm's containment ditch then drained into Salt Creek. The 10,000 gallons of partially treated wastewater was released between 1000 hrs on June 22, 2026, 2026 and 1000 hrs on June 23, 2026.	No Value	Partially Treated Wastewater = 10000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Benjamin Ajax
June 24, 2026, 11:22:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, Arbuckle Public Utilities District personnel, approximately 5000 gal of material has released in the last 24 hours.	No Value	Partially treated waste water = 5000 Gallon(s) N/A	Jacy Anderson	+1 619-852-8455	Gerald Osuna
June 25, 2026, 10:15:00 AM PDT	Arbuckle Utility District	Per reporting party, Pond #1 Is overtopping into Arwill Farms Drainage Ditch flowing into Salt Creek approx. 1000 gallons in the last 24 hours	No Value	No Value	Jacy Anderson	+1 619-852-8455	Edward Nelson
June 30, 2026, 10:34:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party: Approximately 1,000 gallons of the material over topped into the neighboring All Well Farms containment ditch overnight. This ditch has a drainage pipe that empties into the Salt Creek.	No Value	Partially Treated Wastewater = 1000 Gallon(s) N/A Sewage	Jerry Felkins	+1 530-476-2054	Nicholas Womack
July 11, 2026, 9:38:00 AM PDT	Arbuckle Public Utility District	The Reporting Party called back with the following update: Approximately 5,000 additional gallons of partially treated wastewater has released from 0900 hours on 7/10/26 to 0900 hours on 7/11/26. The released material went into the Arwill Farms containment ditch and then into Salt Creek; which is currently dry.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Dave Hetland
July 12, 2026, 8:59:00 AM PDT	Arbuckle Utility District	Per the reporting party's update: In the last 24 hours, approximately 5000 gallons of partially treated wastewater released into a containment ditch and then into the Salt Creek.	No Value	Partially Treated Wastewater = 5000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Ethan Ellis
July 13, 2026, 10:42:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party's update: In the last 24 hours, approximately 5000 gallons of partially treated wastewater released into a containment ditch and then into the Salt Creek.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Benito Soto
July 14, 2026, 1:21:00 PM PDT	530-713-5013	Per reporting party approximately 10,000 gallons were released in the last 24 hours.	No Value	No Value	Jacy Anderson	No Value	Michael Nishikawa
July 15, 2026, 11:03:00 AM PDT	Arbuckle Utilities District	Per the reporting party, 10000 gallons of sewage has flown into Pond Number 1 and is still flowing into Arwill Farms Drainage Ditch and then into Salt Creek.	No Value	Sewage = 10000 Gallon(s) N/A Sewage	Jacy Andersohn	+1 619-852-8455	James Parker

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July 16, 2026, 10:26:00 AM PDT	Arbuckle Utility	Per reporting party : The no 1 pond is spilling into the Arwill Farms drainage ditch and flowing into the Salt creek. It has been 12,000 gallons in the last 24 hours.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Rosa Pulido
July 17, 2026, 11:25:00 AM PDT	Arbuckle Utilities District	Per the reporting party, approximately 5000 gallons of partially treated wastewater released into Salt Creek in the last 24 hours.	No Value	Partially treated wastewater = 5000 Gallon(s) N/A Other	Fabian Gomez	+1 530-476-2054	James Parker
July 20, 2026, 3:42:00 PM PDT	Arbuckle Utility District	The Reporting Party called back with the following update: Approximately 20,000 gallons of partially treated wastewater has released in the past 24 hours. It released into Salt Creek which is currently dry.	No Value	No Value	Fabian Gomez	+1 530-476-2054	Dave Hetland
July 22, 2026, 10:09:00 AM PDT	Arbuckle Public Utilities District	Per reporting party approximately 20,000 gallons in the last 24 hours.	No Value	No Value	Jerry Felkins	+1 530-476-2054	Michael Nishikawa
July 23, 2026, 10:30:00 AM PDT	Arbuckle Public Utilities District	Per reporting party approximately 5,000 gallons in the last 24 hours.	No Value	No Value	Jerry Felkins	+1 530-713-0513	Michael Nishikawa
July 24, 2026, 2:13:00 PM PDT	Arbuckle Public Utility District	Per the reporting party's update: In the last 24 hours, 20,000 gallons of partially treated wastewater has released into a dry creek.	No Value	Partially Treated Wastewater = 20000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Ethan Ellis
July 25, 2026, 9:41:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party's update: In the last 24 hours, 12,000 gallons have released into the Salt Creek.	No Value	Partially Treated Wastewater = 12000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Ethan Ellis
July 26, 2026, 9:01:00 AM PDT	Arbuckle Utility District	The Reporting Party called back with the following update: In the past 24 hours an additional 12,000 gallons of treated wastewater has released into Salt Dry (Salt Creek is currently dry).	No Value	No Value	Jacy Anderson	+1 619-852-8455	Dave Hetland
July 27, 2026, 1:25:00 PM PDT	Arbuckle Public Utilities District	Per the reporting party's update: In the last 24 hours, 20,000 gallons of partially treated wastewater has released into a dry creek.	No Value	No Value	Fabian Gomez	+1 530-476-2054	Benito Soto
July 28, 2026, 9:40:00 AM PDT	Arbuckle Public Utility District	Per reporting party approximately 15,000 gallons spilled Arwill Farms into their containment ditch and then flowed into salt creek (dry creek). occurred in last 24 hours.	No Value	No Value	Jacey Anderson	+1 619-852-8455	Michael Nishikawa
July 29, 2026, 10:57:00 AM PDT	Arbuckle Utilities District	Per the reporting party, in the last 24 hours, there was 15000 gallons of partially treated wastewater spilling from Arwill Farms into the dry creek bed of Salt Creek.	No Value	Partially Treated Wastewater = 15000 Gallon(s) N/A Other	Jacy Anderson	+1 619-852-8455	James Parker
July 30, 2026, 10:27:00 AM PDT	Arbuckle Utilities District	Per the reporting party, in the last 24 hours, approximately 15000 gallons of partially treated wastewater released from Pond Number 1 then flowed into the Arwill Farms drainage ditch then thru a drainpipe into Salt Creek.	No Value	Partially treated wastewater = 15000 Gallon(s) N/A Other	Jacy Anderson	+1 619-852-8455	James Parker
July 31, 2026, 10:23:00 AM PDT	Arbuckle Public Utility District	Per reporting party approximately 6,000 gallons in the last 24 hours spilled out from pond number 1 into an Arwill farms ditch that went into a drain pipe that then went into Salt Creek.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Michael Nishikawa

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August 2, 2026, 9:24:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party's update: Approximately 20,000 gallons of partially treated wastewater has released in the last 24 hours into the creek. There are no estimates on when the release will be placed under control.	No Value	Partially Treated Wastewater = 20000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Ethan Ellis
August 3, 2026, 10:11:00 AM PDT	Arbuckle Public Utilities District	The Reporting Party called back with the following update: Within the past 24 hours approximately 12, 000 gallons of partially treated wastewater released into Salt Creek (Salt Creek is currently dry).	No Value	No Value	Jacy Anderson	+1 619-852-8445	Dave Hetland
August 4, 2026, 10:49:00 AM PDT	Arbuckle Public Utilities District	Per reporting party: In the past 24 hours 1,000 gallons of treated wastewater has released into the Salt Creek.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Rosa Pulido
August 8, 2026, 9:54:00 AM PDT	Arbuckle Public Utilities District	The Reporting Party called in with the following update: Within the past 24 hours approximately 6,000 gallons of partially treated wastewater from pond #1 has flowed into Arwill Farms drain ditch, into a drainpipe and then into Salt Creek (Salt Creek is currently dry). The material is overflowing due to the pond's capacity having been exceeded. The current flow rate is unknown.	No Value	No Value	Jaycee Anderson	+1 619-852-8455	Dave Hetland
August 9, 2026, 9:39:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party: In the last 24 hours, an additional 12,000 gallons of partially treated waste water released into the Salt Creek. It is unknown when the release will be placed under control.	No Value	Partially Treated Waste Water = 12000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8445	Ethan Ellis
August 10, 2026, 9:59:00 AM PDT	Arbuckle Utility District	Per the reporting party: Within the past 24 hours approximately 15,000 gallons of partially treated wastewater from pond #1 has flowed into Arwill Farms drain ditch, into a drainpipe and then into the Salt Creek (dry).	No Value	No Value	Jaycee Anderson	+1 619-852-8455	Nicholas Womack
August 11, 2026, 11:37:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, within the last 24 hours, an additional 5,000 gallons of partially treated wastewater were released and entered Salt Creek, which is currently a dry creek.	No Value	Partially Treated Wastewater = 5000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Cindy Aguilar
August 16, 2026, 9:00:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, within the last 24 hours, an additional 10,000 gallons of partially treated wastewater were released and entered Salt Creek, which is currently a dry creek.	No Value	Partially Treated Wastewater = 10000 N/A Sewage	Fabian Gomez	+1 530-476-2054	Benito Soto
August 17, 2026, 10:29:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, within the last 24 hours, an additional 12,000 gallons of partially treated wastewater were released and entered Salt Creek, which is currently a dry creek.	No Value	Partially Treated Wastewater = 12000 Gallon(s) N/A Sewage	Jacy Anderson	+1 530-476-2054	Benito Soto
August 18, 2026, 10:25:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, within the last 24 hours, 6,000 gallons of partially treated wastewater flowed thru the Arwill Farms drainage into Salt Creek which is a dry creek.	No Value	Partially treated wastewater = 6000 Gallon(s) N/A Other	Jace Anderson	+1 619-852-8455	James Parker
August 22, 2026, 9:17:00 AM PDT	Arbuckle Public Utilities District	The Reporting Party called in with the following update: In the past 24 hours 12,000 gallons of treated wastewater has released into Salt Creek (Salt Creek is currently dry).	No Value	No Value	Jaycee Anderson	+1 619-852-8455	Dave Hetland

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a. Update Received	b. Agency (Update)	Updated Situation, Cause, and Known Impact	Confidential (Update)	Updated Quantities (Substance/QTY/Measure/Rate/Type	Name(Update)	c. Phone / Page/ Cell	d. Received by
August 23, 2026, 9:50:00 AM PDT	Arbuckle Utility District	Per the reporting party: Within the past 24 hours approximately 12,000 gallons of partially treated wastewater from pond #1 has flowed into Arwill Farms drain ditch, into a drainpipe and then into the Salt Creek (dry).	No Value	No Value	Jacy Anderson	+1 619-852-8455	Nicholas Womack
August 24, 2026, 10:32:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party's update: In the last 24 hours, 12,000 gallons of partially treated wastewater has released into Salt Creek. There is no estimated time of stoppage.	No Value	Partially Treated Wastewater = 12000 Gallon(s) N/A Sewage	Jayce Anderson	+1 619-852-8455	Ethan Ellis
August 25, 2026, 9:46:00 AM PDT	Arbuckle Public Utilities District	Per reporting party: In the past 24 hours 6,000 gallons of treated water have gone into Salt Creek. Nothing else to report.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Rosa Pulido
August 27, 2026, 9:56:00 AM PDT	Arbuckle Utility	Per reporting party: In the past 24 hours, there has been a release of 12,000 gallon of partially treated water into the Salt Creek. Nothing else to report.	No Value	No Value	Andy Anderson	+1 619-852-8455	Rosa Pulido
August 28, 2026, 10:16:00 AM PDT	Arbuckle Public Utilities District	Per reporting party: in the last 24 hours there has been a release of 12,000 gallons of waste water into the Salt Creek. Nothing else to report.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Rosa Pulido
August 30, 2026, 9:43:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party's update: 12,000 gallons of partially treated wastewater have released in the past 24 hours. It is unknown when the release will be placed under control.	No Value	Partially Treated Wastewater = 12000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-476-2054	Ethan Ellis
August 31, 2026, 3:33:00 PM PDT	Arbuckle Utility District	Per the reporting party: In the past 24 hours 20,000 gallons of treated wastewater has released into Salt Creek (Salt Creek is currently dry).	No Value	No Value	Fabian Gomez	+1 530-476-2054	Nicholas Womack
September 1, 2026, 12:48:00 PM PDT	Arbuckle Utilities District	Per reporting party, within the last 24 hours, an additional 6,000 gallons of partially treated wastewater were released and entered Salt Creek, which is currently a dry creek.	No Value	Partially treated wastewater = 6000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Benito Soto
September 3, 2026, 10:36:00 AM PDT	CUPA	Per reporting party: There has been a release of 6,000 gallon of waste water from Pond 1 to Salt Creek within the last 24 hours. Nothing else to report.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Rosa Pulido
September 4, 2026, 1:10:00 PM PDT	Arbuckle Utility	Per RP: Approximately 12000 gallons flowed into Salt Creek from pond one.	No Value	Sewage = 12000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Anthony Archuleta
September 5, 2026, 1:50:00 PM PDT	Arbuckle Utility	Per RP: Update for today, 12000 gallons in the last 24 hours from pond number one to salt creek.	No Value	Sewage = 12000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Anthony Archuleta
September 6, 2026, 9:58:00 AM PDT	Arbuckle Utility District	Per the reporting party: In the past 24 hours 12,000 gallons of treated wastewater has released into Salt Creek (Salt Creek is currently dry).	No Value	No Value	Jacy Anderson	+1 619-852-8455	Nicholas Womack
September 7, 2026, 10:19:00 AM PDT	Arbuckle Utility	Per RP: 12,000 gallons of sewage into Salt Creek from Pond 1.	No Value	12000 = 12000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Anthony Archuleta
September 9, 2026, 11:54:00 AM PDT	Arbuckle Utility District	Per reporting party, 12,000 - gallons of sewage went into Salt Creek	No Value	No Value	Jacy Anderson	+1 619-852-8455	Edward Nelson
September 9, 2026, 12:09:00 PM PDT	No Value	No Value	No Value	No Value	No Value	No Value	Edward Nelson
September 10, 2026, 10:11:00 AM PDT	Arbuckle Utilities District.	Per reporting party, per reporting party: in the last 24 hours there has been a release of 12,000 gallons of waste water into the Salt Creek. Nothing else to report	No Value	No Value	Jacy Anderson	+1 619-852-8455	Benito Soto
September 11, 2026, 10:06:00 AM PDT	Arbuckle Utilities District	Per reporting party, 6,500 gallons of sewage went into the salt creek	No Value	Sewage	Jacy Anderson	+1 530-476-2054	Edward Nelson

Table A.1 - Summarized Spill Volumes

a. Update Received	b. Agency (Update)	Updated Situation, Cause, and Known Impact	Confidential (Update)	Updated Quantities (Substance/QTY/Measure/Rate/Type	Name(Update)	c. Phone / Page/ Cell	d. Received by
September 13, 2026, 9:16:00 AM PDT	Arbuckle Utility	Per RP: Approximately 20,000 gallons of partially treated sewage drained from Pond 1 to Salt Creek.	No Value	Partially treated sewage = 20000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-713-5013	Anthony Archuleta
September 14, 2026, 10:56:00 AM PDT	Arbuckle Public Utility District	Per reporting party approximately 12,000 galloons went into Salt Creek in the last 24 hours.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Michael Nishikawa
September 15, 2026, 10:12:00 AM PDT	Arbuckle Utility District	Per the reporting party, approximately 12,000 gallons of partially treated wastewater overflowed into Salt Creek within the past 24 hours.	No Value	Sewage = 12000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Diego Navarro
September 19, 2026, 9:33:00 AM PDT	Arbuckle Utilities	Per RP: Approximately 12,000 gallons of sewage from Pond 1 into Salt Creek.	No Value	Sewage = 12000 Gallon(s) N/A Sewage	Jacey Anderson	+1 619-852-8455	Anthony Archuleta
September 20, 2026, 9:35:00 AM PDT	Arbuckle Utility	Per RP: The reporting party states that Pond #1 is still releasing. In the last 24 hours, approximately 12,000 gallons of partially treated wastewater spilled into Arwill Farm property's drainage ditch which then flows into Salt Creek. End of update.	No Value	Sewage = 12000 Gallon(s) N/A Sewage	Jacey Anderson	+1 619-852-8455	Anthony Archuleta
September 21, 2026, 10:01:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party's update: In the past 24 hours, 12,000 gallons of partially treated waste water has released into Salt Creek.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Ethan Ellis
September 22, 2026, 9:56:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, an ongoing release within the last 24 hours resulted in approximately 12,000 gallons of sewage being released from Pond One into Salt Creek.	No Value	Sewage	Jacy	+1 619-852-8455	John Sanchez
September 23, 2026, 1:43:00 PM PDT	Arbuckle Public Utilities District	Per reporting party, in the last 24 hours there has been a release of 12,000 gallons of wastewater into the Salt Creek. Nothing else to report	No Value	Wastewater = 12000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Benito Soto
September 24, 2026, 10:05:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, over the last 24 hours an additional 12,000 gallons were released from Pond #1 into Salt Creek.	No Value	Partially Treated Wastewater = 12000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Cindy Aguilar
September 25, 2026, 10:16:00 AM PDT	Arbuckle Utility	Per reporting party: In the past 24 hours, 12,000 gallons of partially treated water has released from pond #1 to Salt Creek. Nothing else to report.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Rosa Pulido
September 26, 2026, 9:16:00 AM PDT	Arbuckle Public Utilities District	Per reporting party approximately 20,000 gallons in the last 24 hours.	No Value	No Value	Fabian Gomez	+1 530-713-5013	Michael Nishikawa
September 27, 2026, 10:26:00 AM PDT	Arbuckle Utility District	Per RP: Ongoing issues, approximately 20,000 gallons of partially treated sewage flowed from Pond 1 to Salt Creek in the last 24 hours.	No Value	Sewage = 20000 Gallon(s) N/A Sewage	Fabian Gomez	+1 530-713-5013	Anthony Archuleta
September 28, 2026, 10:35:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party's update: 12,000 gallons of partially treated wastewater has released into the Salt Creek in the last 24 hours.	No Value	Partially Treated Wastewater = 12000 Gallon(s) N/A Sewage	Jacey Anderson	+1 619-852-8455	Ethan Ellis
September 29, 2026, 9:37:00 AM PDT	Arbuckle Utility	Per reporting party: In the past 24 hours, 12,000 gallons of waste water has entered the Salt Creek from Pond #1 Nothing else to report.	No Value	No Value	Jacy Anderson	+1 619-852-8455	Rosa Pulido
September 30, 2026, 11:44:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, in the last 24 hours, approximately 12,000 gallons of treated wastewater was released into Salt Creek from Pond 1.	No Value	No Value	Jacy Anderson	+1 619-852-8455	John Sanchez
October 1, 2026, 10:52:00 AM PDT	Arbuckle Public Utilities District	On 10/1/26 caller advised update to spill report, approximately 20,000 gallons released in the last 24 hours.	No Value	Wastewater = 20000 N/A Sewage	Javier Donze	+1 530-713-5013	Patti Orozco

Table A.1 - Summarized Spill Volumes

a. Update Received	b. Agency (Update)	Updated Situation, Cause, and Known Impact	Confidential (Update)	Updated Quantities (Substance/QTY/Measure/Rate/Type	Name(Update)	c. Phone / Page/ Cell	d. Received by
October 2, 2026, 10:54:00 AM PDT	Arbuckle Utility District	Per RP: Approximately 12,000 gallons of partially treated sewage water from Pond 1 to Salt Creek.	No Value	Sewage = 12000 Gallon(s) N/A Sewage	Jacey Anderson	+1 619-852-8455	Anthony Archuleta
October 3, 2026, 8:24:00 AM PDT	Arbuckle Public Utilities District	Per the reporting party, in the last 24 hours, there was 12,000 gallons of partially treated wastewater spilling from Arwill Farms into the dry creek bed of Salt Creek.	No Value	No Value	Jayce Anderson	+1 530-476-2024	Benito Soto
October 4, 2026, 9:40:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, an additional 10,000 gallons of partially treated wastewater were released from Pond 1 into Salt Creek within the last 24 hours.	No Value	Partially Treated Wastewater = 10000 Gallon(s) N/A Sewage	Jacy Anderson	+1 619-852-8455	Cindy Aguilar
October 5, 2026, 10:04:00 AM PDT	Arbuckle Public Utilities District	Per reporting party, an additional 5,000 gallons of partially treated wastewater were released from Pond 1 into Salt Creek within the last 24 hours.	No Value	Partially Treated Waste Water = 5000 Gallon(s) N/A Sewage	Jacy Anderson	+1 530-476-2054	Benito Soto

Attachment B

Technical Report

Arbuckle Public Utility District

Emergency Disposal and Reclamation

Technical Report Initial Draft

Prepared for:
APUD

Colusa County, California
October 2026

MC Engineering, Inc.

Arbuckle Public Utility District

Emergency Disposal and Reclamation

Technical Report

Prepared By:

MC Engineering, Inc.
9294 Madison Avenue
Orangevale, California 95662

<insert stamp on final draft>

Mark A. Carey, P.E.
MC Engineering

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Exhibits

EXECUTIVE SUMMARY

The Arbuckle Public Utility District (APUD) provides wastewater service to approximately 1,064 connections in the community of Arbuckle California. The District's wastewater treatment facility was first constructed in the 1950s and relies on a primary clarifier and seven evaporation/percolation ponds for treatment and disposal. Although the facility is permitted for 0.5 million gallons per day (MGD) and currently receives approximately 0.25 to 0.30 MGD, declining pond percolation has left the facility without sufficient disposal capacity or reliable operating freeboard.

This disposal limitation has resulted in recurring pond discharges to Salt Creek despite emergency wastewater hauling, pond dredging, and an ongoing moratorium on new water and sewer connections. Between April and July 2026, an estimated 1.3 MG were discharged from the pond system to Salt Creek. The facility remains vulnerable to additional spills due to sustained pond levels and aging and unreliable infrastructure.

The Regional Water Quality Control Board previously issued Cleanup and Abatement Order R5-2024-0703 and, following a July 20, 2026 inspection, issued a Notice of Violation dated August 14, 2026 addressing the continuing spills and the need for spill-abatement planning. Because a permanent solution is expected to require at least five years to plan, finance, permit, design, and construct, APUD is requesting regional board support to implement an immediate Phase 1 emergency disposal project, followed by a Phase 2 interim treatment and reclamation project. These improvements are intended to prevent further uncontrolled discharges while the District completes planning for a permanent Phase 3 wastewater solution.

PROPOSED INTERIM PROJECT

Following evaluation of multiple regional and local treatment and disposal alternatives, APUD proposes implementation of a phased emergency reclamation project utilizing a newly acquired 91-acre land application area (LAA) and interim treatment upgrades at the existing WWTF. This approach is the only practicable alternative capable of substantially reducing spill risk within the immediate future while supporting future long-term efforts. Please refer to Figure ES-1 for an overview illustration.

Phase 1 Emergency Response

Phase 1 consists of immediate emergency measures intended to reduce wastewater levels within the existing ponds and halt ongoing uncontrolled discharges. Temporary pumping and conveyance facilities would transfer pond water to the proposed LAA for land disposal.

The primary objective of Phase 1 is emergency spill prevention while Phase 2 facilities are designed, permitted, and constructed.

Phase 2 Interim Reclamation Facilities

Phase 2 consists of the construction of permanent interim treatment and reclamation facilities, including aerated treatment ponds, permanent pumping infrastructure, reclaimed-water conveyance pipelines, and improvements to the LAA.

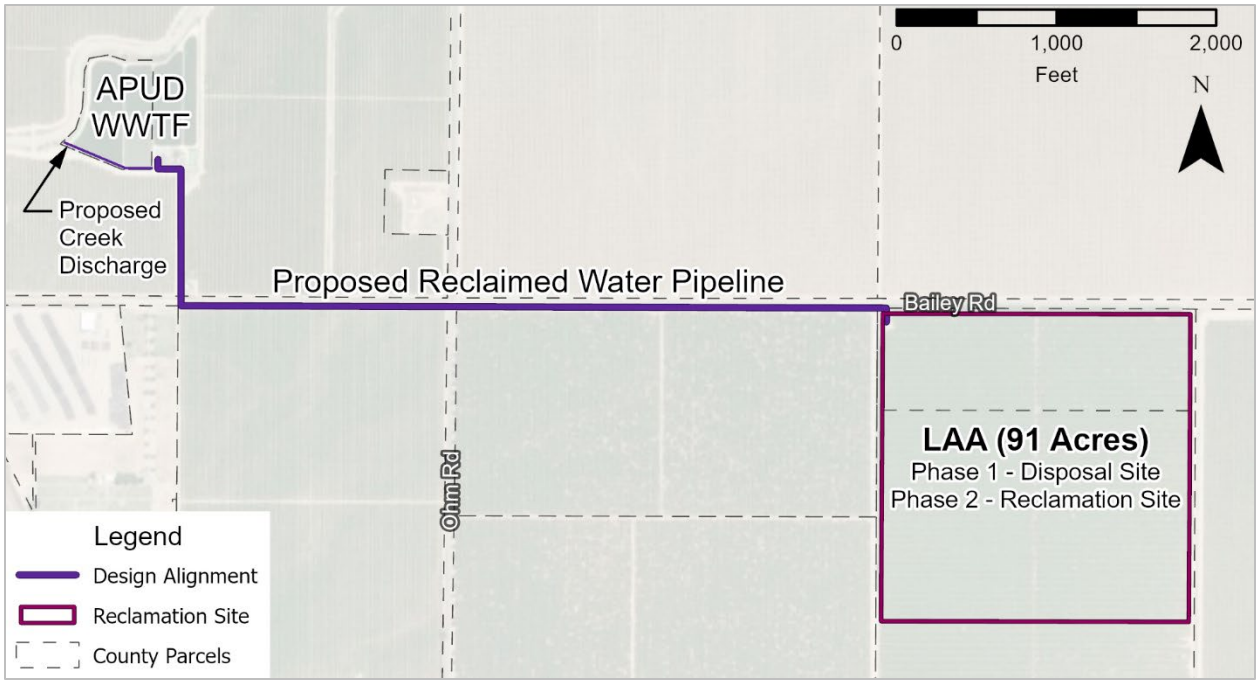


Figure ES-1, Proposed Emergency Phase 1 and 2 Project

Even with implementation of the proposed 91-acre land application area, APUD may not have sufficient storage capacity to accommodate extreme wet weather conditions. The Phase 2 project includes a seasonal discharge of disinfected secondary effluent to Salt Creek during periods when adequate receiving-water dilution is available.

These proposed Phase 2 facilities are intended to consistently produce secondary-treated effluent meeting the treatment objectives associated with the State Water Resources Control Board General Order for Land Application of Treated Wastewater and provide an interim disposal solution until a permanent facility becomes operational.

Phase 3 Long-Term Wastewater Solution

The District is currently evaluating permanent alternatives through a State-funded planning effort. Alternatives under consideration include regional conveyance to neighboring agencies, new local treatment facilities, tertiary treatment with discharge capabilities, and long-term reclamation strategies. Preliminary planning-level cost estimates range from approximately $37 million to $64 million *(2026 Dollars)* depending upon the ultimate alternative selected.

REGIONAL BOARD ACTIONS REQUESTED

To support implementation of the emergency response program and avoid continued unauthorized discharges, APUD requests Regional Board consideration of the following actions:

1. Issue a Cease-and-Desist Order (CDO) or other appropriate regulatory action necessary to allow implementation of the Phase 1 emergency response, including temporary land application of wastewater at the proposed LAA while permanent reclamation facilities are being designed and permitted.
2. Establish an enforceable compliance schedule, (supporting an operational Phase 1 project by October 2026 and a Phase 2 project in Summer 2027)
3. Provide regulatory direction regarding authorization of controlled seasonal wet-weather discharges to Salt Creek, including the appropriate permitting pathway, monitoring requirements, and performance standards should supplemental discharge capacity be required.

APUD also requests guidance regarding the preferred long-term wastewater strategy, (including potential funding pathways), to assist APUD in focusing ongoing planning efforts on the most viable long-term solution.

1.0 INTRODUCTION AND BACKGROUND

Arbuckle PUD is a publicly owned water and wastewater district that was formed in 1939, and is located south of Colusa County, approximately 40 miles northwest of Sacramento. The town of Arbuckle is a census-designated place (CDP) with a population of about 3,484 per 2020 Decennial Census. The town of Arbuckle is characterized by single-family residences, multiple-family units, some mobile homes, and commercial facilities. The land surrounding Arbuckle is mostly agricultural, including cultivated annual crops and almond orchards.

The Arbuckle PUD started providing sewer services in 1953 and currently has 1064 sewer connections. The wastewater collected from the service area through approximately 14 miles of gravity sewer piping is transported to the Wastewater Treatment Facility (WWTF) located on Bailey Road. The WWTF treatment and disposal system consists of an influent pump station, an emergency wastewater storage pond, a primary clarifier, seven wastewater evaporation/percolation ponds, a sludge digester, and a sludge drying bed. The Arbuckle WWTF has a treatment capacity of 0.5 million gallons per day (mgd) and is permitted to discharge up to this volume under Waste Discharge Requirements (WDR) Order No. 93-208. The WWTF originally included a pond discharge to Salt Creek. This discharge was later removed from operation and was not included in the 1993 waste discharge permit.

The WWTF has surpassed its useful life, has limited treatment and discharge capabilities, and will not comply with any future permit changes. The primary clarifier and sludge digester need refurbishment and are not operating efficiently. Currently, the Arbuckle WWTF treats approximately 0.27 mgd, and it exceeds its disposal capacity due to reduced percolation rates of the percolation ponds and absence of the original pond discharge to Salt Creek. The percolation rates are anticipated to continue declining, resulting in Arbuckle PUD adopting a resolution in September 2022 declaring a moratorium on all water and sewer connections to reduce the likelihood of spills and noncompliance at the wastewater treatment facility. Other emergency actions taken by APUD have included emergency trucking of wastewater to a nearby treatment plant (Figure 1B) and dredging of the existing ponds to try to improve percolation rates. The emergency wastewater trucking was cost-prohibitive and depleted APUD reserves. Pond dredging produced little improvement in pond percolation rates. Pond spills and treatment facility infrastructure failures have resulted in the issuance of a Cleanup and Abatement Order (CAO) from the Regional Water Quality Control Board (RWQCB) in 2024. (CAO R5-2024-0703)

Spills have been recurring as recently as April-October 2026 there was an estimated recent total of more than 1.3 MG spilled into Salt Creek. See Figure 1A for photos of a recent wastewater spill. On July 20, 2026, Regional Board staff inspected the WWTF and then issued a Notice of Violation (NOV) on August 14, 2026, citing the District for continuing spills and not implementing spill abatement planning. The Board also directed the District to repair a collapsed embankment in Salt Creek (Figure 2.2B) that is threatening the integrity of the disposal ponds by October 1, 2026.

As required by the C&AO, the District has been exploring alternatives to prevent spillage both with an initial short-term project and, ultimately, through construction of a long-term solution. A long-term solution will require either a completely new WWTF or a Regionalization Project, either

of which will require at least 5 years to design, finance and construct. Therefore, the District is currently focusing on temporary and short-term phased Projects that will address the spillage while a long-term project is developed. Towards that end, the District recently raised rates sufficient to fund up to $6 million to implement immediate solutions.

The purpose of this Technical Report is to support the emergency projects by documenting engineering background information, potential alternative solutions, and project details so that the Regional Board can issue the permits and orders as necessary.



Figure 1A- Pond 1 Perimeter Levee with No Freeboard and Recent Wastewater Spill Site (Into Adjacent Agricultural Drainage Course and Ultimately Into Salt Creek)



Figure 1B- Emergency Wastewater Hauling Activity to Reduce Pond Spilling

2.0 EXISTING APUD FACILITIES

The APUD maintains a wastewater collection system, wastewater treatment facility, potable drinking water wells and distribution system, and groundwater monitoring wells. A description of each of the existing APUD facilities follows with an emphasis on wastewater treatment infrastructure.

2.1 EXISTING COLLECTION SYSTEM

The Arbuckle PUD collection system is comprised of approximately 14 miles of pipelines. Approximately seventy percent (70%) of these pipelines are constructed of vitrified clay pipe (VCP), which are older, and thirty percent (30%) of the pipelines are made of Polyvinyl chloride (PVC), which are newer. The ages of the piping vary 10 to 70 years of age. There are no lift stations within the collection system with all mains flowing via gravity.

There is an I/I study in progress that is expected to define needed repairs and maintenance needs in the collection system, as well as refining future WWTF project upgrade needs.

2.2 EXISTING WASTEWATER TREATMENT FACILITY

The treatment and disposal system consists of an influent pump station, an emergency wastewater storage pond, a primary clarifier, seven unlined wastewater evaporation/percolation ponds, a sludge digester, and a sludge drying bed. The existing facilities at the WWTF are summarized in Table 2.2. A diagram of the WWTF is presented in Figure 2.2A.

Table 2.2- Arbuckle PUD Summary of Treatment Assets

Asset	Quantity	Design Capacity
Raw Sewage Influent Pumps	2	0.52 MGD
Emergency Storage	1	83,000 Gallons
Primary Clarifier	1	0.6 MGD
Percolation Ponds	7	5.67 Acres
Sludge Digester	1	12,000 CF
Sludge Pump	1	200 gpm 20 FT TDH
Sludge Drying Bed	1	22,000 Gallons (1 FT Freeboard)

Note: Treatment capacity information was originally estimated by WSC in 2022 and has not been verified by MC Engineering.

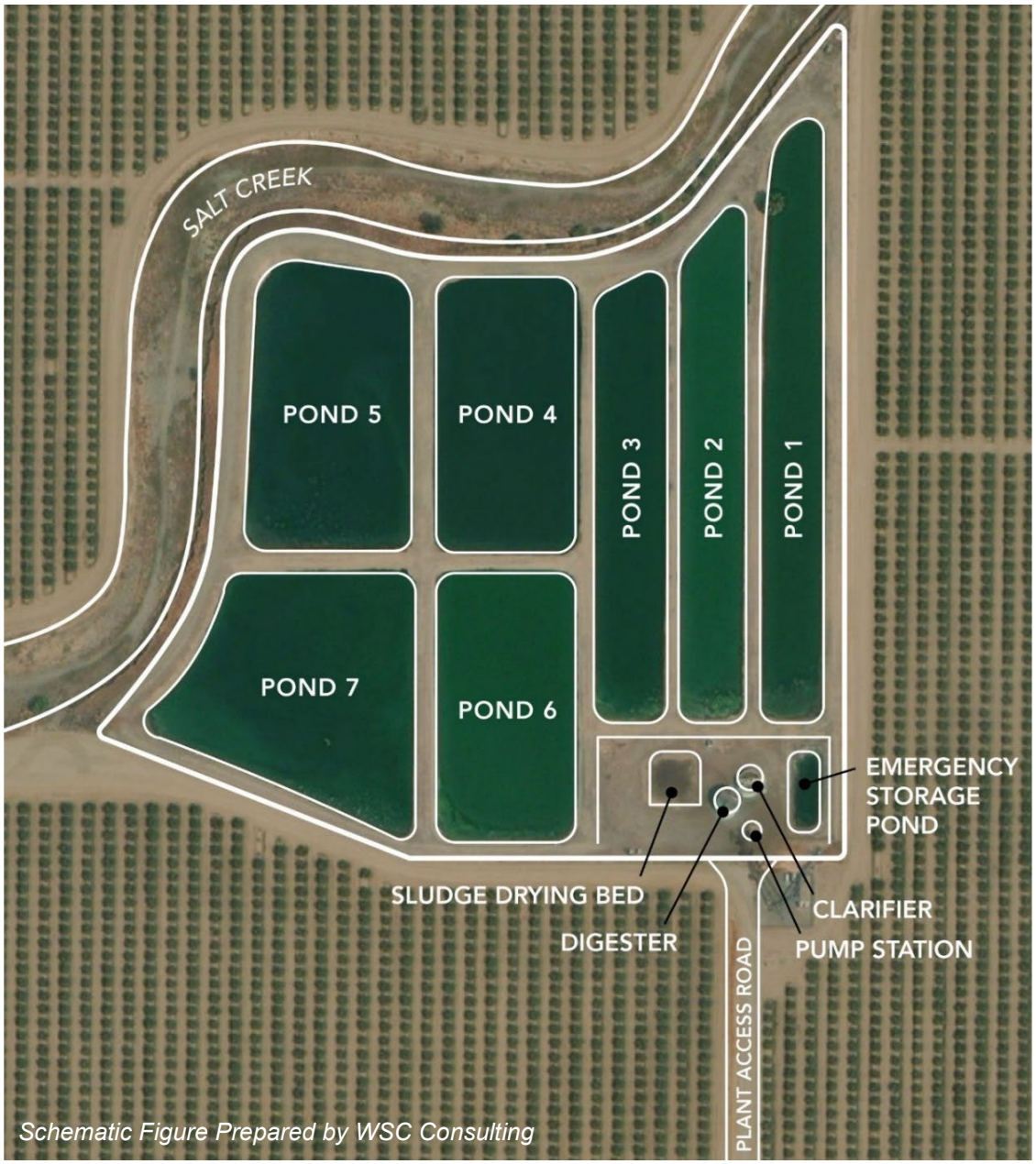


Figure 2.2A- Existing Wastewater Treatment Facility Schematic



Figure 2.2B- Salt Creek Bed and Pond Embankment Failure

2.2.1- Headworks

The existing influent pump station (Figure 2.2.1A) dates to the 1950s and does not include many of the features expected at more modern facilities. It is limited to two pumps that together, with no redundancy, meet peak hour wet weather inflows. The sludge pump is also located at this structure, it also has no redundancy.

The 1950s main electrical service switchgear (Figure 2.2.1B) is located on this structure and needs refurbishment and upgrade to service any future WWTF improvement projects. There is a cellular power failure call out device and a portable 25KW generator and transfer switch which is stationed next to the switchgear.

There is an overflow pipe to the 86,000-gallon emergency storage pond, which is located to the east of the pump station. A portable gas-powered pump is also kept on-site for emergency use.

There is no screening of debris and solids so those accumulate in the wet well and are pumped to the clarifier and downstream ponds. See Figure 2.2.1 C and D for an illustration of solids and trash in the wetwell. The sludge pump piping is currently only pumping settled primary clarifier sludge to the digester and not clarifier scum as the scum piping has been disconnected at the clarifier.



Figure 2.2.1A- WWTF Headworks
(Electrical Panel, Wetwell Pumps 1 and 2, Sludge Pump, Digester in Background)

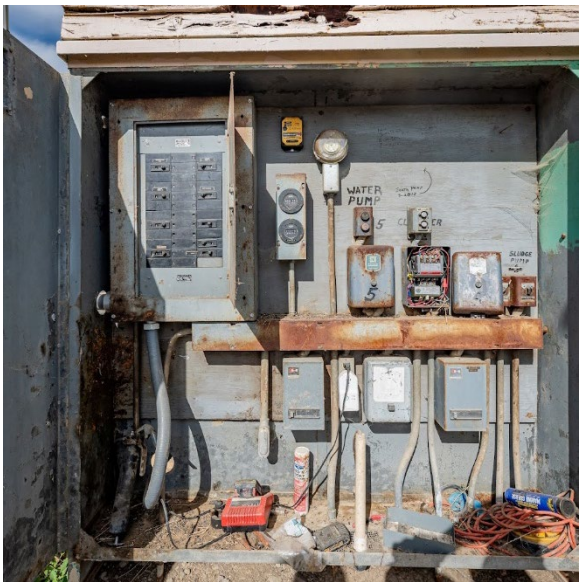


Figure 2.2.1B- Obsolete 1950's Electrical Cabinet Interior



Figure 2.2.1C- Raw Sewage Pump Station Manhole



Figure 2.2.1D- Solids and Trash Buildup Floating In Raw Sewage Sump



Figure 2.2.1E- Clogged Clarifier Due to Lack of a Scum Outlet and Digester Supernatant Return Piping in Background

2.2.2 Primary Clarifier

The primary clarifier is a center feed clarifier with inboard peripheral effluent launder, sludge scraping mechanism, and surface skimming system. See Figure 2.2.2 A for a photo of the clarifier. As noted in the headworks section the scum removal piping has been disconnected so scum accumulates along the effluent weir and is passed to the pond system. See Figure 2.2.1E for a photo of scum clogging the clarifier and Figure 2.2.2B for a photo of the disconnected scum piping location. This limits the effectiveness of the clarifier and results in trash and grease in the downstream ponds. In addition to refurbishing the clarifier any future discharges will require screening to be installed at either the effluent pumping facility and/or the headworks. See Table 2.2.2 for detailed clarifier information:

Table 2.2.2- Primary Clarifier Information

Parameter	Units	Value
Diameter	Feet	28
Side Water Depth	Feet	7
Surface Area	Sq. Feet	616
Effluent Trough Width	Inches	12
Depth from Bottom of Wier V-Notch to Bottom of Effluent Lauder	Inches	14
Number of V-Notches in Effluent Weir	-	133
Discharge Pipe Size	Inches	8

Note: Primary Clarifier information was originally estimated by WSC in 2022 and has not been verified by MC Engineering.



Figure 2.2.2A- Sludge Digester (Left) and Primary Clarifier (Right)



Figure 2.2.2B- Scum Box and Missing Clarifier Scum Outlet Location

2.2.3 Sludge Digester

The sludge digester is an unheated, unmixed, open top concrete circular tank. See table below for information on the sludge digester. Overflow (supernatant) under the current operation is to the clarifier. Additional details related to the sludge digester are outlined in Table 2.2.3.

Table 2.2.3- Sludge Digester Information

Parameter	Units	Value
Diameter	Feet	28
Side Water Depth	Feet	20
Approximate Capacity	CF	12,000

Note: Sludge Digester information was originally estimated by WSC in 2022 and has not been verified by MC Engineering.

2.2.4 Sludge Drying Bed

Historically, an approximate 2,000 sf area on the south/west side of the WWTF has been used as a sludge drying bed. Recently, sludge has been periodically discharged from the digester and placed in geobags. The geobags are then hauled to the Yolo County Landfill. See Figure 2.2.4 for a photo of the sludge drying operation.



Figure 2.2.4- Sludge Drying Operation (2025)

2.2.5 Evaporation/Percolation Ponds

There are seven (7) existing evaporation/percolation ponds. According to the 1993 Dewante and Stowell Plant Expansion Report, as of the early 90's the ponds had "excellent" percolation rates measured at roughly 250,000 gal/ac/day and only one pond was typically used at a time. This presumably allowed for "rest" between pond use for drying the ponds and disking. In May of 2025 MC Engineering roughly estimated pond percolation at only 17,300 gal/ac/day. Pond percolation rates appear to have dramatically decreased over the last thirty years. Low percolation rates have contributed to an excessive hydraulic imbalance. The percolation ponds are routinely well above the permitted freeboard levels of two feet minimum (Figure 2.2.5B) and pond spills occur when there is no freeboard available into the nearby Salt Creek. Pond spills appear to be increasingly common even with a connection moratorium.

Plant flow reaches a flow diversion structure downstream of the primary clarifier (Figure 2.2.5A) and from there is routed to either Pond 2 or Pond 4. Hard piping previously routed from the structure to other ponds, but this piping and valves has become non-operational over the years. Flow is equalized between ponds with the use of a portable transfer pump (Figure 2.2.5C). It appears that significant operations time is required to manually equalize flow between ponds, and that operations staff invest significant time and energy in manually equalizing ponds to reduce the likelihood of a spill when minimal freeboard exists.



Figure 2.2.5A- Flow Splitter Box and Pond 2 Discharge Pipe



Figure 2.2.5B- Perc Ponds 5 and 4 and Separation Levee (Minimal Freeboard)

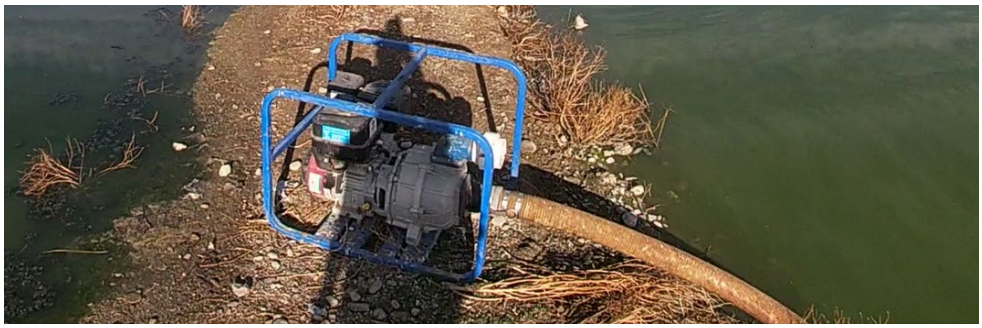


Figure 2.2.5C- Portable Equalization Pump

2.3 OTHER APUD FACILITIES

2.3.1 Potable Water System

In addition to the wastewater collection and treatment facilities, the Arbuckle PUD supplies potable water to its customers within its service area via groundwater wells. The water system consists of 4 wells and approximately 1,000 water services connections, most of which (approximately 60% are un-metered). Metering all accounts could encourage water use efficiency and decrease wastewater flows. There are 37+/- drinking water services out of the Wastewater District's official service area. Much of the mainline pipe is old and deteriorated and comprised of galvanized steel, cast iron pipe, and older asbestos cement (ACP) pipe with some of the newer pipelines being comprised of PVC C900 pipe that is mostly found within the in newer developments. Many of the house service laterals are comprised of older galvanized and copper pipe, with poly pipe within the newer areas. A map of drinking water wells is included as Exhibit B of this report.

2.3.2 Groundwater Monitoring Wells

Six groundwater wells are operated by the PUD nearby for waste discharge compliance monitoring. A map of groundwater monitoring wells as included in a 2024 groundwater monitoring report is presented in Exhibit A of this report. When the District added fill to raise portions of the pond embankments some of the monitoring wells were not raised and are now in low points subject to surface water contamination. See Figure 2.3.2 for a photo of a typical monitoring well.



Figure 2.3.2- Monitoring Well 2R

3.0 WATER QUALITY AND QUANTITY CHARACTERIZATION

3.1 WWTF INFLOW

Average daily WWTF inflow has ranged between 0.24 and 0.31 MGD over the past several decades. Please refer to Exhibit D for a plot of historic annual flows. Flows are not expected to increase until the connection moratorium is rescinded when the future long-term project is operational. Short-term projects will therefore only be designed to accommodate and prevent uncontrolled discharges under current flow.

The range of influent flows for the period of January 2025 to October 2026 are presented Figure 3.1B. It is interesting that plant inflow appears to have limited correlation with rain events, primarily only occasional/sporadic short term inflow. Longer term increases in flow, such as in the summer of 2025 may be attributed to agricultural irrigation inflow as the oldest sewer system piping transverses orchard properties, however that was not evident in the summer of 2026. In December of 2025 the District repaired a ¾" water service break that was discharging directly into the sewer system, which alone could account for 10K's gal/day of inflow. A study is currently underway to better quantify and address the apparent impacts of I/I and better correlate flows with rain events.

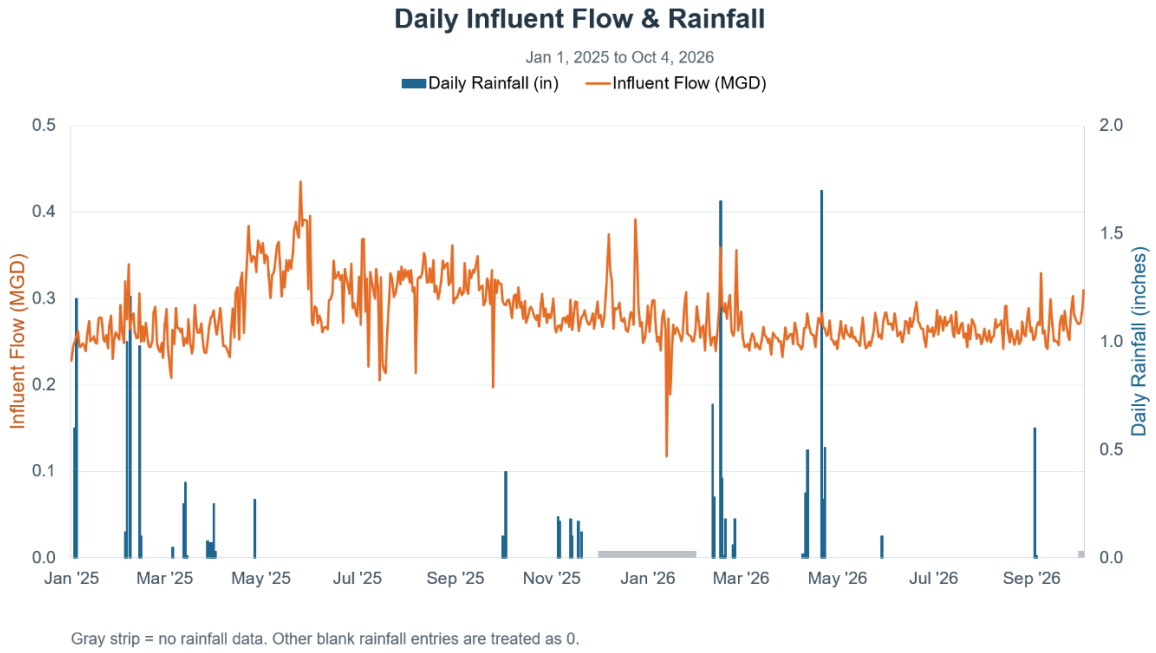


Figure 3.1B- Daily Plant Inflow January 2025-October 2026

Maximum daily flows of up to 0.44 mgd were recorded in May of 2025 however during the 25/26 water year average daily flow was 0.27 mgd, with a peak day of 0.39 mgd. For designing the future emergency project this information will be utilized in annual water balance analysis as discussed in more detail in the following section.

3.2 WATER BALANCE

A water balance was previously presented as required by the C&AO (See References). This water balance, presuming no percolation disposal at the WWTF site, was used as the basis for acquiring the 91 ac LAA for the proposed future reclamation projects. No percolation at the WWTF site was presumed as a conservative assumption and will allow the ponds to be repurposed for maximizing storage and spill prevention during the winter which is important for short term projects; and for drying out and servicing (i.e. removal of accumulated sludge) during the summer months in preparation for more long-term projects.

We note that the water balances were required by the C&AO to address future flows as part of the long-term project, however it presumes average daily flows in the 250,000 300,000 gallons per day range which is consistent with current flows indicating the need for the 91 ac LAA as a component of the immediate interim Project(s) and spill prevention. To accommodate future service connections a long-term reclamation Project will require additional LAAs and/or significant I/I reduction.

The water balance also indicates that even with the LAA there is an immediate need for additional storage of up to 60 MG more than available at the WWTF. This amount is closer to 30 MG if existing pond percolation is factored in. Therefore, to prevent uncontrolled spillage the immediate project(s) may also require a seasonal discharge to Salt Creek during a wetter than normal year. During a 1:100-year season these discharges may average up to 500,000 gallons per day during the months of Nov-Feb as shown in Table 3.2.

Table 3.2- Potential 1:100 Year Excess Flow

Month	Nov.	Dec.	Jan.	Feb.	Average
MGD	0.36	0.55	0.45	0.50	0.46

The water balances will be revisited in the ROWD and short-term facilities design efforts given current flows and the proposed project facilities. Average, 1:25, and 1:100 wet weather year scenarios will be assessed to better quantify the expected short term storage needs and likely discharge events and storage quantity needed to avoid uncontrolled discharges (spill).

3.3 WATER QUALITY SAMPLING RESULTS

The Monitoring and Reporting Program in the current District Waste Discharge Permit does not require collection of influent BOD or TSS samples. Therefore, there is no on-going or significant historical BOD or TSS data available for analysis.

From Prior Reports:

> *"The Monitoring and Reporting Program in the current District Waste Discharge Permit doesn't require collection of influent BOD or TSS samples. Therefore, there is no historical BOD or TSS data available for analysis. Four time-proportional composite BOD and TSS samples were collected in 1992. Based on this limited data set, BOD in the range 70 to 100 mg/L and TSS in the range of 120 to 170 mg/L were observed. A typical literature reported per capita BOD load ranges from 0.17 lb./day (without garbage grinders) to 0.22 lb./day (with garbage grinders). Based on the projected District per capita flow rate of 100*

gallons/person/day, the expected BOD values would be in the 204 to 264 mg/L range. The observed BOD results are significantly below this range, and the discrepancy is believed to be due to either sampling problem or significant groundwater infiltration into the older portion of the collection system."

Furthermore, what more recent data is available was generally sampled in the primary clarifier and not necessarily representative of the raw sewage characteristics. Recent grab sampling of the wastewater influent (159 mg/l) is consistent with the above historical information. In addition, the spill from Pond 1 was sampled in June 2026 and is also consistent with that range.

For planning purposes, the Phase 2 design uses more conservative BOD values of 200 mg/l for influent, and will continue to utilize the primary clarifier prior to the secondary treatment system. During design more accurate flow propositional sampling will be considered.

In the ponds the some (Facultative) treatment occurs just given the detention time and natural oxygenation from wind action and algae. Solids also settle out and are digested anaerobically. In May of 2025 the ponds were sampled, and average BOD was found to be 65 mg/L with a range of 42 to 88 mg/L. TDS averaged 631 mg/L, and the TSS average was 113 mg/L.. Recent sampling in August of 2026 indicated BOD levels as low as 20 mg/l in some ponds. Pond Sampling Data is presented in Table 3.3:

Table 3.3- Existing Pond Volumes and Water Quality Sampling Results

Sampled May 2025				Sampled Aug 2026
Pond No.	**BOD (mg/l)**	**TDS (mg/l)**	**TSS (mg/l)**	**BOD (mg/l)**
1	82	636	106	74
2	48	635	112	29
3	42	642	103	20
4	74	635	108	20
5	76	601	98	29
6	88	617	150	62
7	42	650	112	38
Pond 1 Overflow Sampled June 2026				
1	157	620	120	

Note: Pond 1 overflow sampled June 2026 157 BOD, 620 TDS, 120 TSS.



Figure 3.3- Pond 2 Algae and Limited Freeboard (August 2026)

Facultative pond BOD values are inherently variable and unpredictable, especially as configured at the WWTF. In addition, the algae itself contribute to measured BOD levels, and the photosynthetic activity of algae causes daily fluctuations in DO and pH making it difficult to distinguish the BOD attributable solely to wastewater versus algae. See Figure 3.3 for a photo of an algae bloom in Pond 2.

The Phase 2 project aerated pond option will utilize ponds 2 and 3 in series for aerated secondary treatment and pond 6 for settling, polishing, and equalization. The aerators will provide additional

mixing to discourage algae growth, and the system will be configured to eliminate potential for short circuiting. The system will be designed to reliably meet a 40 mg/LBOD, of wastewater origins, General Order reclamation effluent limit.

Based on the most recent pond sampling, if the proper ponds are chosen to pump from, it is expected the Phase 1 emergency discharge can also meet this 40 mg/l objective.

4.0 EMERGENCY RESPONSE ALTERNATIVES

Several alternatives have been evaluated as part of the SWRCB approved planning study that will ultimately be analyzed in more detail to verify the most appropriate long-term strategy. It is recognized, based on similar experiences, that the ultimate solution for APUD will require 5-7 years of effort, including identifying adequate funding sources among other things. Meanwhile, the proposed phased approach will allow for reclamation as an immediate strategy on approximately 90 acres that are currently under final negotiations for purchase and use by APUD as a land disposal site to mitigate the existing failing percolation ponds. Figure 4.7 depicts the various alternatives that were analyzed that formed the basis and need for a phased approach by considering the following alternatives. Table 4.7 outlines preliminary cost estimates for the various alternatives.

4.1 ALTERNATIVE I- REGIONAL TREATMENT AT THE CITY OF WILLIAMS PLANT

This alternative would require the construction of a new lift station and force main to convey wastewater flows to the City of Williams existing wastewater plant. The existing City of Williams plant is permitted for up to 0.5 MGD with current flows close to the permit limits and various constraints associated with wet weather and recent violations. The City would like to expand the plant to 0.75 MGD to accommodate growth. The plant, located approximately 11.4 miles to the north of the APUD facility, discharges to Salt Creek and has experienced several violations recently, the most notable of which were associated with the filters and related processes. The facility, as originally placed into service, was operating under an NPDES permit No. R5-2017-0085-008.

The preliminary alignment to convey flows to Williams is presented in the attached Figure 1. The preliminary opinion of costs for this alternative has been estimated at $43.5 million and would ultimately depend upon additional planning, design, negotiations, and agreements. The plant is not considered a full Title 22 reclamation facility, and the City has limited reclamation potential currently. Monthly wastewater bills for the City of Williams are programmed to be $120/month by 2029 for a typical residential equivalent dwelling unit (EDU) and connection fees are at $8,390 for a typical residential dwelling unit. (2026 City of Williams Rate Study) The City will need to expand the facility and adjust rates accordingly if they were to accept any appreciable flow from APUD.

4.2 ALTERNATIVE II- REGIONAL TREATMENT AT THE CITY OF COLUSA PLANT

This alternative would also require the construction of a new lift station and force main to convey flows approximately 15.1 miles east of the City of Colusa's existing wastewater treatment facility. The existing City of Colusa plant is permitted for a capacity of up to 0.7 MGD and is being expanded to up to 1.4 MGD by relying on a recently acquired $33 million SWRCB grant that

includes expansion of the biological processes along with pumping and conveyance improvements to expand reclamation potential. Current ADWF flows are approximately 0.4 MGD.

The Colusa plant currently operates under NPDES permit No. R5-2022-0020 and the plant discharges tertiary treated effluent to Powell Slough. Reclamation sites include underdrains that are designed to mitigate TDS impacts on underlying groundwater. The preliminary opinion of cost for this alternative has been estimated at $42 million and would ultimately depend on further planning, design, negotiations and agreements. The Colusa plant is programmed to include full reclamation along with options for mitigation of TDS and other impacts through a combination of irrigation and surface water discharges. Current monthly wastewater bills for the City of Colusa are $102.27/month for a typical residential equivalent dwelling unit (EDU), and connection fees are $86.20 for a typical residential dwelling unit. The monthly rate and connections fees are likely subject to change soon.

4.3 ALTERNATIVE III- LOCAL (APUD OWNED AND OPERATED) RESTRICTED LAND APPLICATION

This alternative would entail construction of a permanent secondary treatment process (i.e. oxidation ditch or equivalent) capable of reliably producing disinfected secondary effluent for use on restricted sites, typically focused on fodder crop (i.e. alfalfa) irrigation. The initial plant would be limited to an estimated ADWF of 0.5 MGD and would likely require an estimated total irrigable land of up to 150 acres and additional on-site storage. Options for reducing the storage needs could include a wet weather discharge capability by pumping to the nearby Salt Creek or Colusa Drain in peak wet weather periods. The preliminary opinion of cost for this alternative has been estimated at $36.9 million and would ultimately depend on further planning, design, negotiations and agreements. Challenges include the acquisition of additional land and the ability to minimize impacts to groundwater, particularly those associated with high TDS.

4.4 ALTERNATIVE IV- LOCAL (APUD OWNED AND OPERATED) TERTIARY DISCHARGE

A tertiary discharge option would build upon the initial secondary processes by the addition of filters to allow for discharges to surface waters with the possibility of limited land disposal. Storage would be minimal under this alternative, and the plant would primarily be designed to discharge to Salt Creek or the nearby Colusa Drain while operating under a new NPDES permit. The initial plant would be limited to an estimated ADWF of 0.5 MGD and could be expanded in the future to accommodate additional flows and, provided it includes redundancy and other requirements, be modified to accommodate full tertiary reclamation on an un-restricted basis. The preliminary opinion of cost of this alternative has been estimated at $41.8 million and would ultimately depend on further planning, design, negotiations and agreements.

4.5 ALTERNATIVE V- LOCAL TERTIARY RECLAMATION

This option would include an emphasis on reclamation as the primary disposal mechanism with the possibility of limited surface water discharges. The plant would be required to meet Title 22 redundancy requirements, including the ability to discharge to commercial areas, golf courses, high school football fields, common areas, etc. The plant would ideally be permitted to provide unrestricted Title 22 tertiary effluent with the option of an NPDES discharge, particularly during

extreme wet weather seasons and events to minimize storage requirements and provide optimum flexibility. The minimum capacity would be 0.5 MGD. The preliminary opinion of cost for this alternative is estimated at $63.9 million.

4.6 ALTERNATIVE VI- SHORT-TERM LOCAL (APUD OWNED AND OPERATED) SECONDARY TREATMENT PLANT

This alternative is proposed as an immediate solution to mitigate the ongoing health and safety impacts associated with the existing plant. The initial water balance prepared by MC Engineering indicates that APUD needs to acquire approximately 90 acres of additional land for disposal of effluent that meets the 40 mg/L BOD and 40 mg/L TSS requirements of the recently approved General Order. APUD is currently evaluating options to add aerators and/or install temporary treatment units at the site. The plant would have limited capacity over the next five years, with an emphasis on treating current flows and disposing of effluent through a combination of the existing percolation ponds and the new land disposal site approximately 1.5 miles south of the current facility. The effluent pipeline, storage, and other components would likely be permanent features, depending on the long-term strategy selected through the current planning process. The preliminary opinion of cost for this alternative is estimated at $5.2 million and would depend on further planning, design, negotiations, and agreements.

4.7 RECCOMENDED EMERGENCY PROJECT ALTERNATIVE

Alternative VI above is recommended as the emergency and interim response to the current CAO because it can be implemented in the short-term, directly reduces the risk of continued pond overflows, and preserves flexibility while APUD evaluates a permanent solution. The other options presented (Alternatives I through V) would require not only significant investments in infrastructure costs but also considerable time during which the on-going threat to public health, safety and the environment would be unmitigated and potentially disastrous. Based on similar experiences, the current discharge would likely be unavoidable for the next 5-7 years.

Those alternatives therefore cannot mitigate the immediate spill risk within the near future. Alternative VI does not select the ultimate long-term solution; it provides interim treatment, conveyance, and disposal capacity that may remain useful under either regionalization or a future local treatment alternative.

The recommended initial alternative is being referred to as “Phases 1 and 2” with the understanding that the long-term alternatives will be evaluated further as part of the grant funded planning study. The long-term solution will be designated as a “Phase 3” solution. Immediate (2026) discharge of effluent will presumably be handled by the RWQCB under a Cease-and-Desist Order as part of a “Phase 1” solution with minimal improvements needed to facilitate lowering of the ponds and avoiding further discharge into Salt Creek. Phase 2 improvements

would follow and presumably be in place up until the time that the ultimate Phase 3 improvements are designed, constructed, permitted, and operational.

More detailed analysis of the long-term solutions is warranted and will take place as part of the originally conceived planning efforts. Early analysis indicates that the proposed discharge pipeline and land can be a part of the permanent solution for Arbuckle while recognizing that some emergency facilities, including booster pumps and treatment, may ultimately be replaced with other equipment to facilitate the respective long-term strategy. A more detailed description of the proposed Phase 1 recommended improvements is presented in subsequent report sections.

Table 4.7- Project Alternative Cost Comparison

LONG-TERM	TOTAL CONSTRUCTION COST*	CONSTRUCTION CONTINGINCY (10%)	PM, ENGINEERING AND CM (25%) (rounded)	TOTAL PROJECT COST**	Reclamation	Long -Term Salinity Compliance
Williams Regional	$ 20,668,800	$ 2,066,880	$5.7 M	**$43.5 M**	no	yes
Colusa Regional	$ 23,266,920	$ 2,326,692	$6.4 M	**$42 M**	yes	yes
Local (Restricted) Land App	$ 25,017,440	$ 2,501,744	$6.8 M	**$36.9 M**	yes	no
Local Tertiary Discharge	$ 30,100,000	$ 3,010,000	$8.2 M	**$41.8 M**	no	yes
Local Tertiary Reclamation	$ 44,500,000	$ 4,450,000	$12.2 M	**$63.9 M**	yes	TBD
(more extensive reclamation)						
Short-Term (Emergency)			10% for S.T.			
40/40 Land App	$ 2,217,440	$ 221,744	$ 220,000	**$5.2 M**	yes	no

**Construction Cost includes pipelines, pump stations, and WWTP improvements*

***Total Project Costs include non-construction costs (ie; Land, Permitting and connection fees)*

Pipeline	Legnth	# Creek	# R/R	Δ Elev
Regional to Williams WWTP	11.4 mi	12	2	-29 ft
Regional to Colusa WWTP	15.1 mi	11	2	-61 ft
Regional to Morningstar WWTP	8.0 mi	7	2	-11 ft
Local to Proposed LAA	1.4 mi	0	0	-12 ft

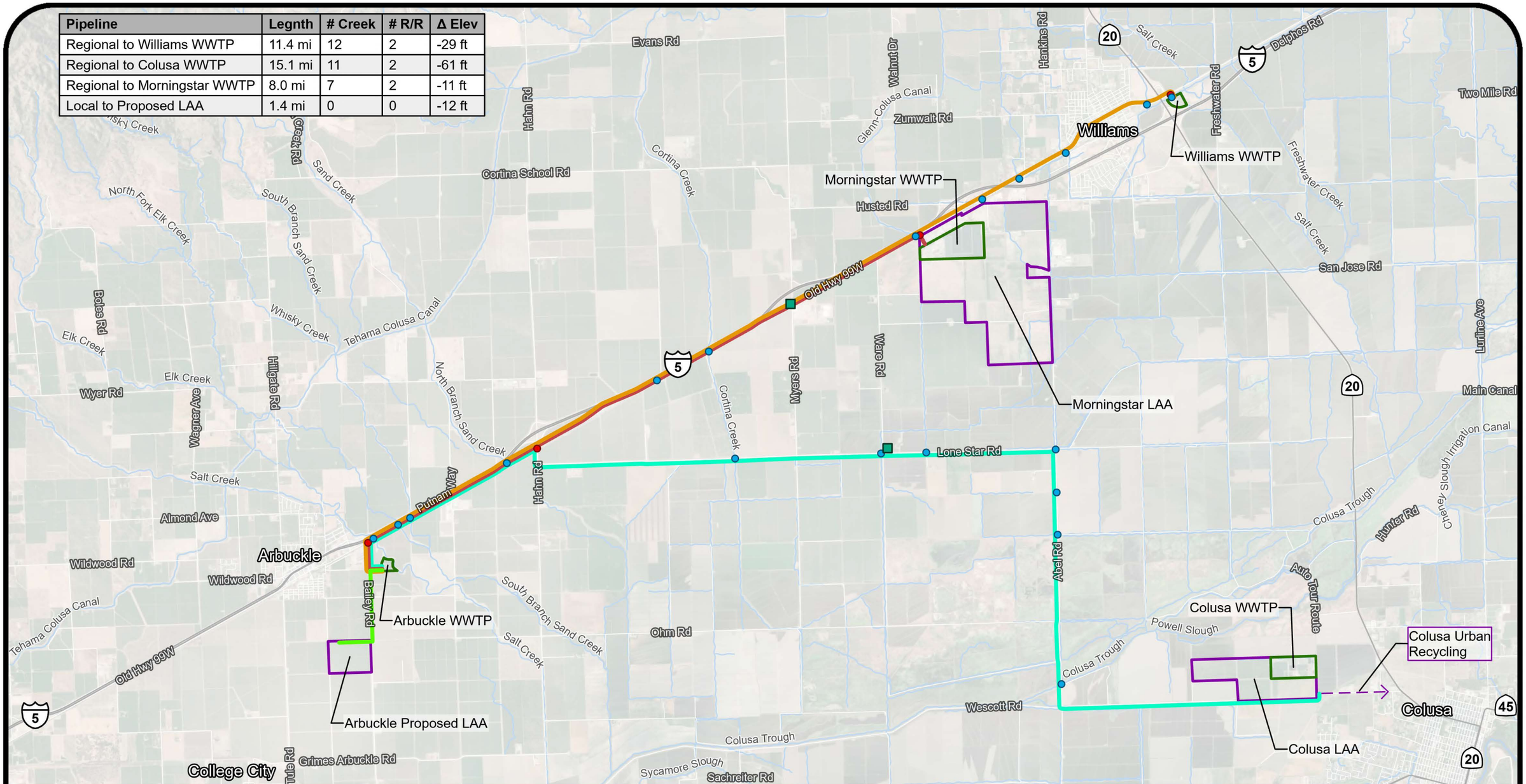


Figure 4.7 Arbuckle Regional Wastewater Alternatives

N

Feet
0 3,000 6,000
1 Inch equals 6,000 Ft

Legend

Pipeline Alignments
- Colusa
- Morningstar
- Williams
- Local

Pipeline Point of Interests
- Railroad Crossing
- Stream Crossing
- Booster Pump Station

- Streams
- Land Application Area
- Waste Water Treatment Plant

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Orangevale, CA 95662
(916) 546-7898
www.mceng.us

Revised: 6/24/2026

5.0 PROPOSED EMERGENCY RECLAMATION PROJECT

5.1 PROPOSED PHASED APPROACH

As introduced in the alternatives analysis, a phased approach is recommended for the APUD WWTF upgrades. The various phases and related intent are summarized here:

Phase 1 Emergency Wastewater Treatment and Disposal Improvements – Immediate action to avoid current water quality violations for the period beginning October 1, 2026, through December 1, 2026, with wastewater facility improvements consisting of an emergency above ground pipeline installation and temporary engine driven pump to convey flows to the newly acquired effluent disposal area.

> I**ntent**: To temporarily halt current wastewater spills due to pond overflowing, until such time a Phase 2 Emergency Wastewater Treatment and Disposal Improvements are completed (anticipated date summer of 2027). The new site will ultimately require an "Emergency Waste Discharge Requirements (WDRs)" from the CRWQCB or an amended Order from the CRWQCB with a timeline for the WDR requirements for Phase 2.

Phase 2 Emergency Wastewater Treatment and Disposal Improvements- Completion of on-going design and construction to prevent future water quality violations with wastewater facility improvements consisting of a new submersible pump station, aeration facilities, new disposal area, underground piping and pumping with miscellaneous pond improvements at the WWTF. This project will provide 40/40 secondary treated effluent for reclamation at the LAA, as well as facilities to comply with the requirements of the General Order for Land Application. It will not include sufficient storage for 1:100-year wet weather conditions, therefore it may also include a temporary disinfection system to allow a seasonal 20:1 dilution discharge to the adjacent Salt Creek drainage course.

> **Intent:** To avoid future water quality violations both at the WWTF and at the new effluent disposal site, until such time that the Phase 3 Long-term Wastewater Facility Improvement Project are completed, including planning, design, and construction. The long-term improvements would tentatively be completed by September 2032.

Phase 3 – Long-term Wastewater Facility Improvements – This long-term plan is currently being funded from 100% grant funding through the State Water Resources Control Board Dept. of Financial assistance (SWRCB DFA). The district currently has a 100% SWRCB DFA Planning Grant Award of $833,000 with a pending amendment for an additional $300,000 +/- for interim facilities planning and permitting that includes the preparation of a Project Engineering Report, environmental permitting and approvals, and other regulatory permitting requirements. The long-term solution may utilize portions of the Phase 2 project and may include a regionalization project or a new WWTF.

Intent: To plan, design, and construct new wastewater treatment and disposal facilities, along with upgrading the existing wastewater collection system. The new long-term facility will require a new Report of Waste Discharge and possibly an NPDES Permit through the CRWQCB. The permitting for the new facility is not included in the DFA funding. All planning, design and construction work would tentatively be completed by late 2032.

The proposed Phase 1 improvements will ultimately facilitate discharge of secondary effluent on a newly acquired parcel located approximately 1 mile east of the plant entrance on Bailey Road. A schematic of the proposed Phase 1 project is illustrated in Figure 5.4A. The initial (2026) planned Phase 2 immediate discharge is tentatively scheduled for late September/early October this year. The new site is currently an almond orchard which was recently harvested. Ultimately the trees will be removed, and the site will be re-graded to facilitate irrigation of a fodder crop in Phase 2. The Phase 1 and 2 improvements are presented in Figures 5.4A,B and 7.5 for the proposed WWTF site improvements, discharge pipeline, and offsite reclamation area, respectively.

5.2 EMERGENCY TREATMENT UPGRADES

The improvements at the WWTF are to be designed to meet a 40-BOD, undisinfected effluent, which is the minimum required under the newly adopted State General Order; and pump it to the proposed land reclamation site for flood irrigation of fodder crops. If time and budget permits, the effluent will be disinfected prior to discharging. Preliminary design work to date has identified a need to utilize two of the existing disposal ponds for aerated treatment, with the remaining ponds for final settling, equalization, and storage if possible. Ultimately, a pre-cast effluent pump station will be included to deliver a flow of up to 2,100 gpm to the reclamation field. In Phase 1, prior to constructing a more permanent submersible lift station, the District intends to procure a portable diesel engine driven pump for the immediate Phase 1 offsite discharge/disposal. Ponds not required for treatment and/or equalization will ideally be utilized for storage and dewatered during dry weather to allow future improvements to proceed. Please refer to Figure 5.4B for a schematic illustration of the proposed emergency treatment upgrades.

Initial calculations and design criteria for the aerated ponds are described further below:

<u>Initial (Phase 1) Discharge Water Quality:</u>

The Phase 1 discharge is considered equivalent to an expansion of the current percolation pond disposal mechanism that will likely be completed in the absence of aerated treatment and disinfection. This is since the ponds are currently inter-mixed and do not comply with the initial General Order to be classified as reclamation quality. The estimated volume of the ponds is 12.1 MG spread over approximately 8.2 acres. If the aerators can be installed prior to the Phase 1 discharge, the BOD will likely be reduced. Water Quality data for the existing ponds is summarized in Table 5.2A.

The amount discharged will be up to 12 MG initially and will likely be less due to the presence of sludge and the inability to thoroughly drain each pond. If time and if weather permits, the temporary discharge may take place over several weeks to maximize the anticipated fall dry weather window. All discharges on the new site will be closely monitored by staff, and no runoff will be permitted. Temporary berms will be constructed to help contain flows and avoid runoff in adjacent canals and farmland. All discharges will be ceased at least 48 hours prior to a forecasted rain event, and the soil must be free of standing water prior to storm-related runoff to leave the disposal area.

If necessary and permitted Phase 1 may also include temporary facilities to allow a controlled discharge of disinfected effluent directly to Salt Creek to mitigate the effects of a potential uncontrolled spill if this winter is wetter than normal. This is further described in Phase 2 below.

Anticipated Phase 2 Water Quality Projections

A simplified Kinetic model was prepared for estimating HP requirements and aerated pond effluent water quality after installation of aerators in two of the original Ponds at the WWTF. The results of the initial analysis are summarized in Tables 5.2A and 5.2B based on an influent BOD of 200 mg/L and a design flow rate of 0.25 MGD (250,000 gpd), with the two ponds (A&B) operating in series:

Table 5.2A- Pond A Kinetics

Parameter	**15° C / 59° F**	**25° C / 77° F**
Effluent BOD (mg/L)	65	42
% Reduction	68	79
BOD Load (lb./day)	417	-
Aerator (HP)	17	-

Table 5.2B- Pond B Kinetics

Parameter	**15° C / 59° F**	**25° C / 77° F**
Effluent BOD (mg/L)	22	14
% Reduction	66	78
BOD Load (lb./day)	135	-
Aerator (HP)	6	-

Pond A will require a minimum of 17 HP and achieve an estimated 68% BOD reduction in the winter months (estimated avg. temp 15 deg. C) which is the critical time due to the reduced biological activity. The above kinetic model results indicate that Pond B effluent (when acting in series with Pond A) should produce an effluent with a maximum BOD of wastewater origins of 22 mg/L, well below the required 40 mg/L minimum. It should be noted that the presence of algae will likely result in higher measured BOD values.

To meet the minimum requirements of 17 HP in Pond A and 6 HP in Pond B, three 10 HP brush aerators will be installed as presented in Figure X. Electrical and mooring capabilities should be provided to afford flexibility as to which of the 3 ponds (Ponds 1, 2, or 3) serve as Ponds A and B.

This flexibility is intended to provide plant operators with the ability to take any given pond out of service for maintenance and/or to utilize it for storage.

Phase 2 will include the addition of disinfection of the final pond effluent with sodium hypochlorite. The hypochlorite will be supplied via 55-gallon totes and placed in a temporary secondary containment feature that will be determined during the final design. Hypo-chlorite will be dosed as needed and temporary plastic tanks will be used for initial CT (estimated 30-minute detention time). Preliminary sizing indicates a need for two 12' diameter tanks with a 10' side water depth (approximately 10,000 gal each). Availability and pricing will be confirmed during final design along with appropriately sized peristaltic pumps.

The Estimated Opinion of Construction Costs for the Aerated Pond Design are summarized in the table below and are based on negotiated prices by the District, operating under an emergency order, without the need to bid or pay prevailing wage. As presented in Table 5.2C, the Opinion of Cost for Phases 1 and 2 is $1.5 million.

Table 5.2C- Initial Phase 1 WWTF Improvements Preliminary Opinion of Construction Cost

Item	Quantity	Unit	Unit Cost	Total Cost
Aerators (10 HP)	3	EA	$55,000	$165,000
Effluent PS	1	LS	$500,000	$500,000
Pond Piping/ Sumps/Screening	1	LS	$200,000	$200,000
Earthwork	1	LS	$150,000	$150,000
Elect. Service Upgrade	1	LS	$50,000	$50,000
Switch Gear/Wiring	1	LS	$300,000	$300,000
Disinfection/ Creek Outfall	1	LS	$150,000	$150,000
			Total	**$1,515,000**

5.3 CONVEYANCE PIPELINE

The proposed conveyance pipeline alignment is illustrated in Figure 5.4A. The proposed conveyance pipeline (8" or 10") for the Phase 1 project will be temporary laid along the WWTF entrance road and cross to the south side shoulder of Bailey road (Figures 5.3A and B) before turning east towards the LAA and will generally lay within the 60 foot R/W south of the existing shoulder drainage ditches.

Temporary road crossings will utilize buried casing pipes that will also serve the Phase 2 permanent pipeline. APUD will work with the County and other local agencies to install appropriate traffic control flagging and warning signage. When in use APUD staff will constantly patrol the pipeline and respond to any leakage that may occur.



Figure 5.3A- Proposed Bailey Road Pipeline crossing and Route (Right Shoulder)



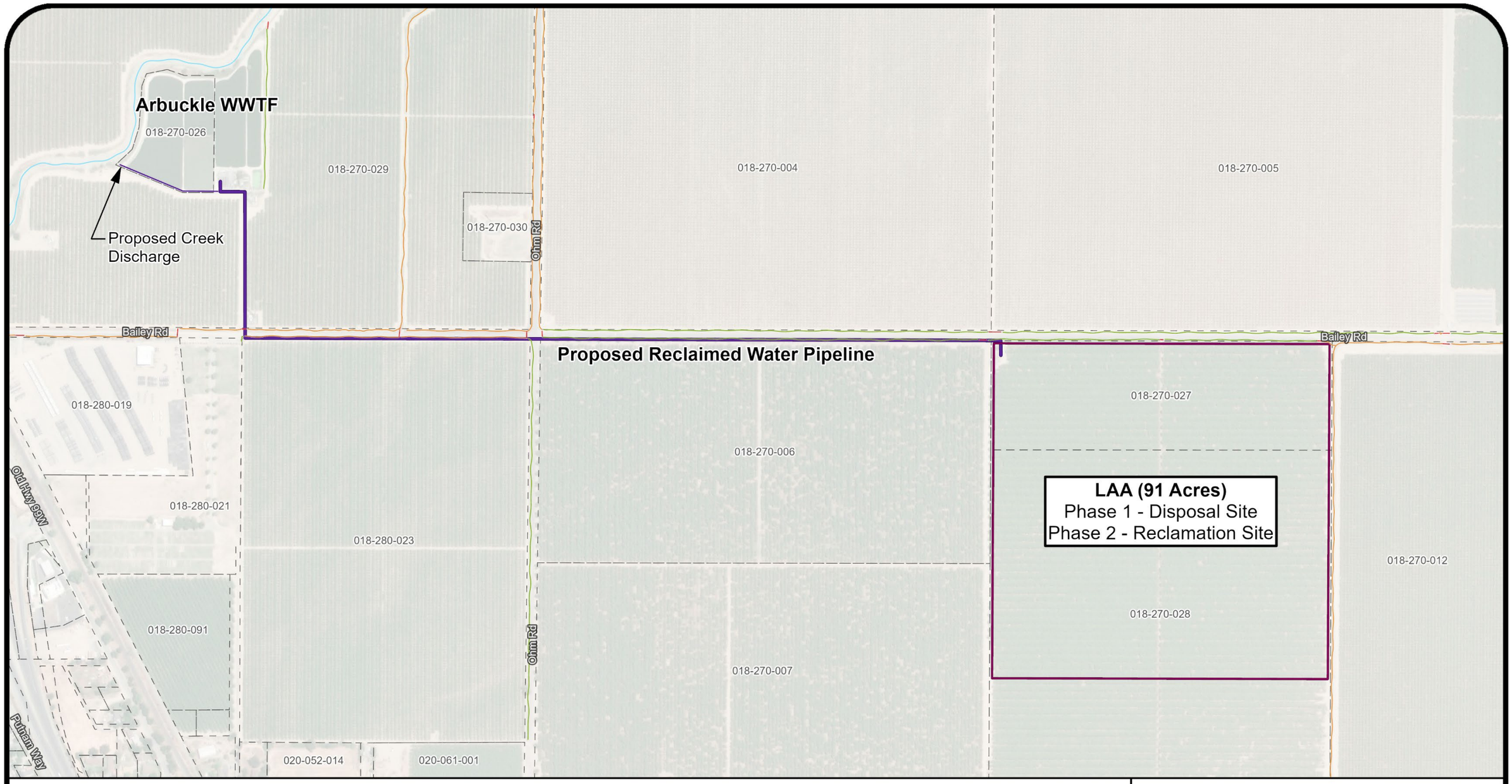
Figure 5.3B- Proposed Pipeline Ohm Rd. Street Crossing Location

The permanent Phase 2 piping is expected to be 12" and will be installed in the WWTF access road 10 feet to the east of an existing potable water line. It will cross Bailey road and likely be installed near the southerly 60-foot right of way line to avoid the cost of extensive re-pavement as well as the drainage ditches adjacent to the roadway.

5.4 EFFLUENT PUMPING REQUIREMENTS

The temporary Phase 1 effluent pumping will consist of a portable gas-powered pump capable of at least 1 mgd such that the WWTF ponds can be lowered in a matter of weeks. The flow rate will be monitored and immediately stopped if there is a pipeline leak and varied to ensure effluent is completely contained at the LAA.

For Phase 2 the effluent pumps will be two approximately 50 HP electrically driven to deliver peak flows of approximately 3 mgd to facilitate the farmer's flood irrigation operations. A third smaller pump may be included to facilitate a disinfected creek discharge of about 0.5 mgd.



APUD WWTF Phase 1 and 2 EMERGENCY Project Map
Figure 5.4A

N

Feet
0 400 800

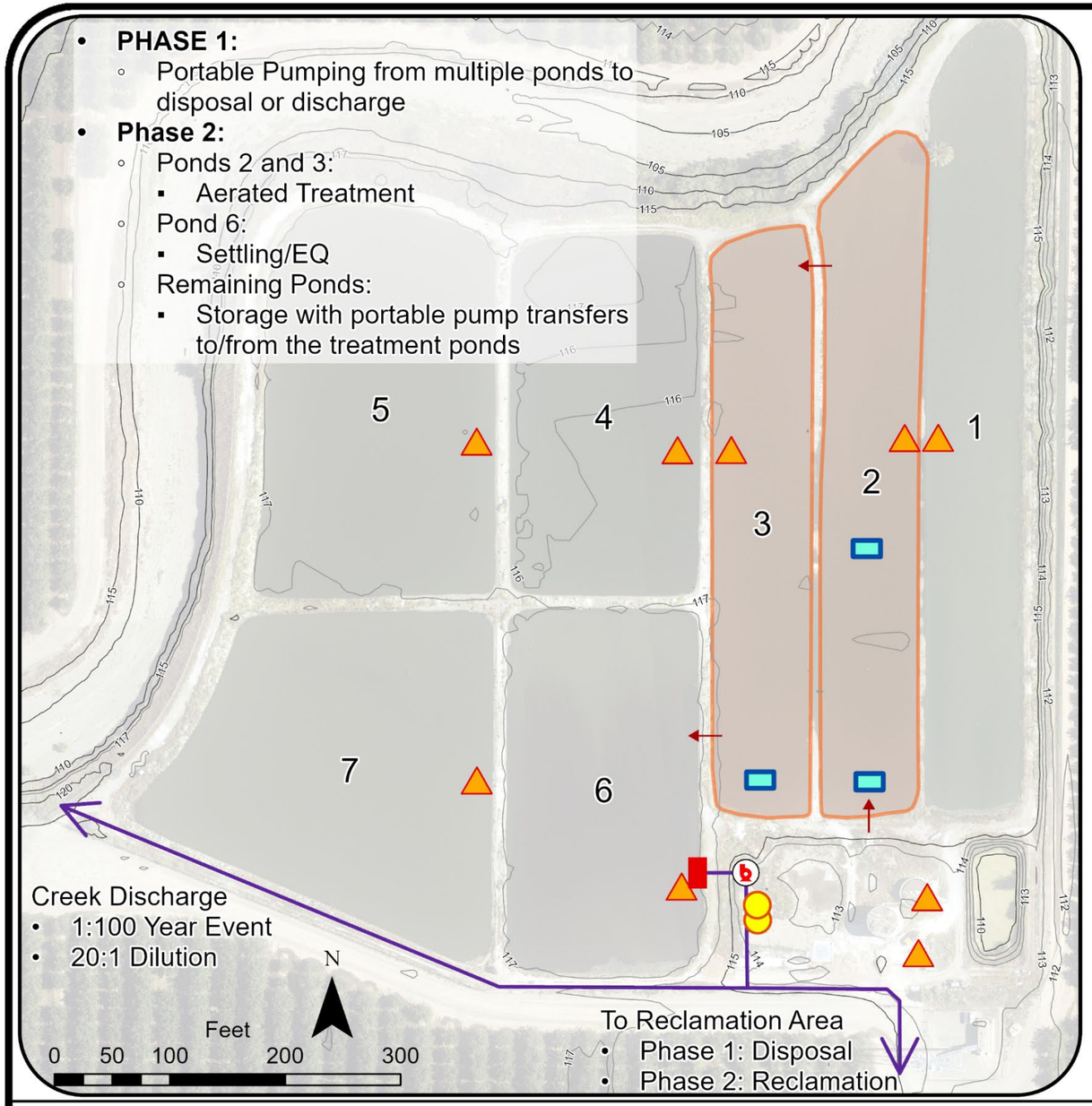
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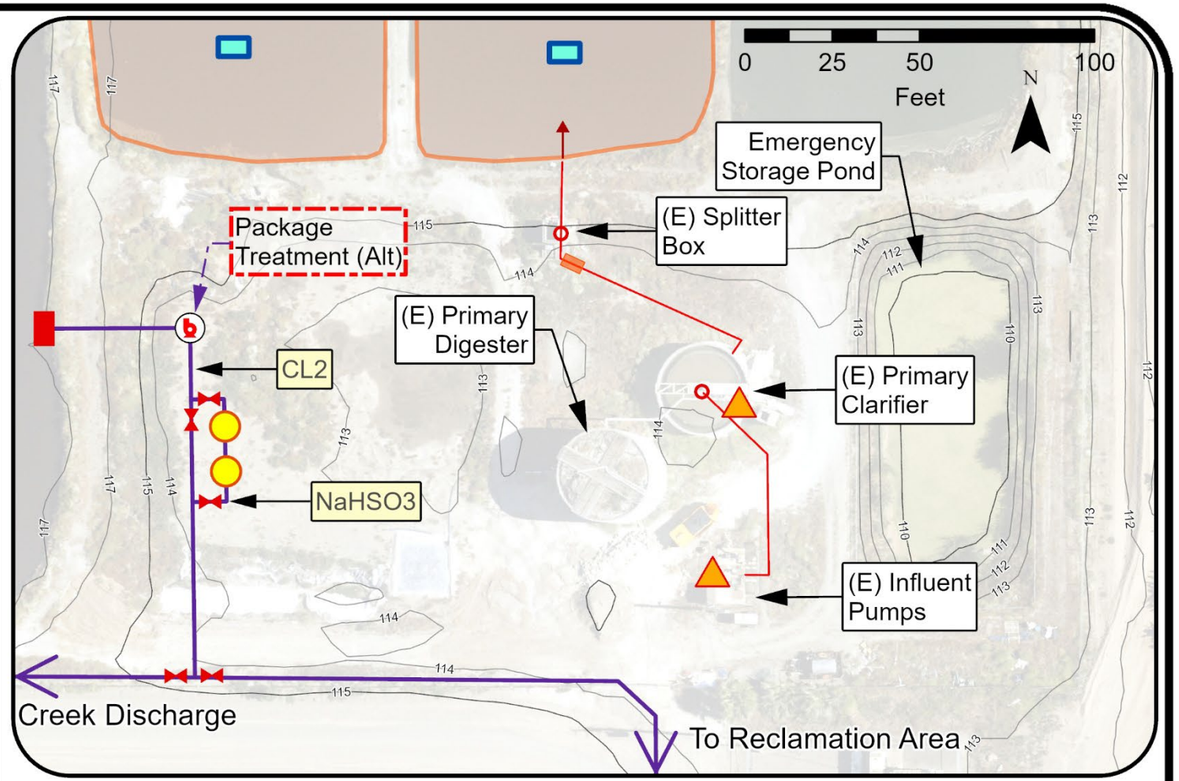
- Design Alignment
- Creek
- Ditch
- Drainage
- Culvert
- Reclamation Site
- County Parcels

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- **PHASE 1:**
  - Portable Pumping from multiple ponds to disposal or discharge
- **Phase 2:**
  - Ponds 2 and 3:
    - Aerated Treatment
  - Pond 6:
    - Settling/EQ
  - Remaining Ponds:
    - Storage with portable pump transfers to/from the treatment ponds





The figure on the left is an overview of the WWTF showing the probable layout and process flow of an aerated secondary treatment pond system as envisioned for the Phase 2 Project.

The Figure above is a closer view of the existing primary treatment train area and shows in more schematic detail the proposed Phase 2 structures that would facilitate a controlled disinfected discharge to the creek in lieu of a spill during Phase 1, or to maintain adequate freeboard during 1:100-year wet weather in Phase 2. This approach was previously utilized at the Cities of Dixon and Lincoln to mitigate uncontrolled discharges while more permanent facilities were constructed and permitted. It continues to be used at Lincoln in lieu of constructing storage and LAA sufficient for 1:100-year wet seasons.

The Phase 1 Project will utilize temporary portable pumping, and the Phase 2 Project will install permanent in- ground facilities.

Figure 5.4B Arbuckle WWTP Site

- Approximate Sampling Locations (Typ)
- 10 HP Aerators (Typ)
- Disinfection Contact Tanks (12' D x 10' H)
- Inlet Screen/Weir Structure
- Effluent Pumping Structure
- Valves
- (E) Flow Meter
- Pipe Vertical Change
- (E) Pipes
- (N) Pipes
- Aerated Treatment
- Minor Contours
- Major Contours

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Revised: 9/4/2026

5.5 POTENTIAL EMERGENCY PROJECT OPERATIONAL CHALLENGES

The immediate Phase 1 and 2 project is intended to mitigate the failure of the existing percolation ponds and to stop untreated discharge of effluent to Salt Creek, however, the plant will likely continue to have operational challenges until such time that a new facility is built. Some of these concerns were summarized under the Description of Existing Facilities section of this report. Brief descriptions of anticipated problems for supporting the initial Phase 1 improvements follow:

Unknown impacts of accumulated sludge in the existing ponds: The percolation ponds have been in operation since the plant's original construction in the 1950s. Little to no records are available related to the past maintenance and removal of accumulated solids over time and it is suspected that the accumulation of settled solids is, in part, the reason the ponds have failed to perform. Periods of poor primary removal, or lack thereof, have exacerbated this concern. The accumulated solids are presumably undergoing anaerobic digestion and experience with similar plants has shown that in fact much of the volatile components of the accumulated solids do breakdown effectively over time. The introduction of mechanical aeration and more oxygen in the ponds will likely result in increased odors and, when coupled with the mechanical mixing of the proposed aerators that will stir up undigested solids, an increase in the oxygen demand that cannot be fully determined. Proactive monitoring of the dissolved oxygen (D.O.) level in the ponds will be required, and staff should obtain at least 2 reliable DO probes with a goal of continual DO monitoring at some point in the future for optimizing aerator run times and energy consumption based on diurnal and hourly fluctuations over a given day. The proposed facility O&M manual should include recommendations for strategic sampling of DO levels and BOD removal. Corresponding operator training should be included as part of the proposed facility operations and new permit requirements.

Potential for Hydraulic Short-circuiting: Adequate contact/detention time for biological processes and settling is critical to effectively remove BOD and TSS. The ponds should not be operated in a complete mix mode as they are inevitably experiencing now due to the lack of available storage and continual pumping between ponds. The proposed Phase 1 design includes strategic placement of connecting pipes between the ponds intended to encourage a plug flow regime and increase detention time. If necessary, dye testing can be conducted to track flows and locate potential hydraulic short circuit routes. Curtains can be installed to further direct flows if necessary and avoid hydraulic short circuiting.

Lack of pre-existing "First Recoverable" groundwater quality data at the proposed reclamation site: Best practices suggest that prior to applying effluent on a given site, an initial groundwater sampling program should be implemented to analyze the ambient background water quality of the "First Recoverable" groundwater. Depths associated with the first recoverable groundwater are reportedly about 50'+/- below ground surface (bgs). APUD will need to retain an experienced hydrogeologist to inform them as to the recommended monitoring well locations both up and down gradient from the land where effluent will be applied. Critical monitoring should include known constituents of concern, including total dissolved solids (TDS), coliform, and nitrates at a minimum initially. A report should be prepared by the retained hydrogeologist with specific recommendations for

monitoring well construction, proposed depths, and sampling protocols. Initial results should be summarized and included as a submittal to APUD, the Engineer, and the RWQCB. Long-term accumulation of TDS should be mitigated through Best Practicable Treatment and Control (BPTC) in the treatment process in the future coupled with regular dosing of irrigation water from alternate sources with better water quality and capture of rainfall as needed to flush and dilute salts prior to impacting waters of the State.

Aging primary clarifier and related equipment: Due to the age and deterioration of the existing clarifier and related equipment, an independent operations review should be made to include detailed recommendations for improving the efficiency and reliability of the existing clarifier, intake wetwell, and influent pumps. A thorough cleaning program is recommended to remove previously accumulated solids. Necessary repairs to improve the weirs and removal efficiency for the clarifier should be preceded by a review of the equipment by a third-party familiar with wastewater equipment and operating requirements.

Aging sludge digester and related equipment: Similar to the clarifier, the anaerobic digester status is highly questionable, and, at best, it needs serious maintenance. Staff have identified the need to remove accumulated solids in the digester along with thick buildups near the surface. Rake arms and related equipment needed to remove the sludge for subsequent processing and dewatering should be evaluated. Consideration should be given to constructing at least a temporary aerobic digester that might include installation of aerators in a lined pond prior to dewatering to further stabilize the removed solids.

Non-existing Headworks Screening: Staff have emphasized the importance of installing screens upstream of the primary clarifier. The existing influent is currently plagued by problematic solids including tampons, paper and plastic products, and other items that can impinge on the processes, clog pipes and pumps, and wreak havoc on the daily operations. Although not part of the initial Phase 1 funding, this improvement should be evaluated soon along with corresponding increases in capital needed to place a mechanical screen in an upstream manhole at a minimum.

Aging influent pump station and related equipment: Continual, un-interrupted operation of the influent pumps is critical to avoid future spills and to maintain operations. A review of the past maintenance and repairs associated with the influent pumps should be completed and the pumps should be inspected as warranted. Standby pumps and related equipment should be readily available, as well as related emergency generators needed to power the pumps and aeration equipment at a minimum. The related emergency protocols should be documented and included in the related plant O&M manual for the Phase 1 improvements.

Inadequate storage for the 1 in 100-year design year/storm and required 20:1 Surface Discharge: The initial water balance that was submitted in response to the recent Cease and Desist Order indicated the need for at least 30 MG of additional wet weather storage to meet the 1 in 100-year storm analysis. Limited funding will likely preclude the

construction of additional storage during Phase 1, until such time that additional grants or loans supported by subsequent rate increases can be acquired. In the interim, and as a stop gap at a minimum, it is recommended that the facility improvements include the ability to discharge disinfected secondary effluent to Salt Creek if required. Similar permits have been issued by the RWQCB based on the ability to meet a 20:1 dilution in the creek to minimize water quality impacts. This ROWD is intended to support the ability to discharge under a Cease-and-Desist Order initially and ultimately as part of a new NPDES permit that should be applied for as a condition of approval. Discharging the disinfected secondary effluent will be considered an initial mitigation under the Spill Prevention program to minimize uncontrolled and un-disinfected discharge of the primary effluent as is the current situation at the plant. A separate ROWD should identify protocols for triggering a discharge, appropriate gauging stations to monitor the flow in Salt Creek, and the necessary R1 and R2 monitoring locations for verification of water quality impacts associated with the discharge. Related I/I evaluations being funded by the SWRCB DFA grant should include immediate flow monitoring at select locations in the collection system to isolate and minimize I/I related flows.

Potential offsite spills for Phase 1: The required "Spill Prevention Program" should address both spills at the WWTF as well as the at the proposed reclamation site and related effluent piping. Initial Phase discharges, in the absence of permanent piping, containment and tailwater return at the new site should be implemented under continual monitoring and control by both plant staff and the new site farmer/operator. Minimum requirements as part of the Spill Prevention Program should be documented and communicated in advance with the operations staff, along with proposed cleanup measures in the event a spill occurs. Uncontrolled discharges to Salt Creek should be further mitigated by the ability to treat (oxidize) and disinfect any necessary discharges under the proposed Cease and Desist Order and ultimately as part of the proposed new NPDES permit requirements.

Possible public exposure to un-disinfected effluent for Phase 1: The initial discharge needed to drop the pond levels will likely be made in the absence of adequate BOD and TSS removal, essentially by operating the newly acquired land as an extension of the existing percolation ponds. It is highly recommended that the proposed perimeter fencing be installed at the new site prior to the discharge of un-disinfected primary effluent. This should include appropriate signage and setbacks to preclude public contact along with appropriate protocols for farm hands and operators. Related material should be included in the proposed O&M procedures.

Inability to achieve 40/40 BOD/TSS treatment standards: Algae are alive during the day and produce oxygen via photosynthesis, but when they die or enter a dark BOD incubator bottle, they decay and consume oxygen. This raises the measured CBOD or BOD5 value. Dissolved oxygen (DO) and pH levels swing wildly in algal-heavy ponds, which can also violate other discharge permit conditions. The incorporation of a final secondary polishing can help settle solids before discharge. Low-dose coagulants or safe algaecides can drop solids to the bottom, though operators must monitor toxicity limits. Flexibility should be

included in the proposed discharge permit that recognizes the algae related loading potential by specifying specific limits related to BOD of wastewater origins.

Scour at the interface of the existing ponds with Salt Creek: A competing critical need has been identified at the WWTF related to the scour occurring at the northern end of the existing ponds where they meet Salt Creek. APUD has retained a geotechnical engineer and is in the process of embarking on appropriate permit processes to facilitate temporary repairs. The limited funding available may preclude the ability of APUD to complete the required repairs. At a minimum, sufficient repairs should be made to avoid catastrophic failure until such time that additional funding can be acquired and the long-term improvements made at the plant. This may include future reconstruction and reconfiguration of the existing ponds coupled with more extensive slope protection measures. To the extent catastrophic failure becomes eminent, efforts should be made to implement the emergency discharge of oxidized/treated and disinfected secondary effluent by emptying the ponds in advance of certain failure.

Early rainfall precluding the ability to land apply effluent: Discharging on the proposed reclamation site should be done sufficiently prior to anticipated rainfall events to limit the discharge or co-mingling of wastewater with storm water flows. At a minimum, 48 hours should be allowed to pass after the surface if fully dry and prior to the release of stormwater from the site. Protocols for monitoring weather forecasts and related operator training should be implemented in advance of the discharges.

Limited funding availability: As described above, there are several conflicting needs that will demand additional funding for plant improvements in the immediate future. The most recent rate adjustments are considered the bare minimum that will be required to support the necessary capital investments needed to effectively operate the plant over the next 5 years. APUD should continue to seek interim funding sources as required to address the various vulnerabilities and to pay for increased operating expenses and critical immediate needs.

6.0 PERMITTING REQUIREMENTS

APUD anticipates the following permitting requirements:

6.1 CAO AND C&DO (PHASE 1)

Given the emergency nature of the immediate needs and following consultation with RWQCB enforcement and permitting group representatives, the District is requesting appropriate orders (Cleanup and Abatement and/or a Cease-and-Desist Order) to allow the discharge of un-disinfected primary effluent on the proposed land disposal site. The Order would presumably contain the timelines for compliance with other critical milestones as needed to support new Waste Discharge Requirements (WDRs) and reclamation at the LAA under Phase 2 of the project.

6.2 ROWD AND WDRS (PHASE 2)

As a condition of the emergency order, the District will be completing the required ROWD and related information to support new WDRs for the newly acquired site. The new WDRs would provide the conditions and formal monitoring and reporting requirements for the discharge of disinfected secondary effluent on the proposed disposal/reclamation site. Issuance of the new WDRs will be proceeded by a completed Title 22 Engineer's Report, additional groundwater monitoring results, and related information as directed by the RWQCB permitting and compliance groups.

6.3 Potential NPDES

As noted earlier, there is a need to release a controlled seasonal discharge of disinfected secondary effluent in wetter than normal years due to lack of adequate storage. These discharges are expected to occur when the flow in salt creek allows a minimum of 20:1 dilution. Such releases will require specific Orders and/or NPDES permitting as directed by RWQCB staff.

7.0 LAND APPLICATION AREA

The proposed land application area is a 91-acre parcel on Bailey Road. This property is illustrated in Figure 5.4A and a recent aerial photograph of the property is illustrated in Figure 7. The property is currently an almond orchard, and it is the intent of APUD to ultimately convert this property for growing a fodder crop such as alfalfa with reclaimed water.

7.1 PROPOSED OPERATING STRATEGY

The following sections describe the operational strategies that are intended to meet the short-term issues of the temporary Phase 1 Project and the long-term Phase 2 project to comply with all General Order requirements.

7.2 CROPPING PLAN

Given the urgency of the immediate emergency, APUD proposes to keep the existing Almond orchard on the property during the immediate proposed Phase 1 release of effluent on the site. APUD intends to remove these trees in Spring 2027. APUD proposes replacing the almond

orchard with alfalfa or other fodder crops irrigated with reclaimed water as a part of the proposed Phase 2 project.



Figure 7- Proposed Land Application Area Aerial Flyover Photo

7.3 HYDRAULIC LOADING

For the Phase 1 Project disposal loading will be limited to about 20 MG, which is equivalent to less than 9 inches across the LAA site. With the secession of irrigation and planned application before significant rainfall it is expected this discharge will be readily absorbed by the soil and agronomic uptake. Additional dosing of up to 5MG/month may be required in the Spring of 2027, depending on weather, percolation rates and ability to discharge to the creek.

For the Phase 2 Project hydraulic loading during the irrigation season will be driven by agronomic needs with both reclamation and make up water components. The water balance estimates reclamation loading of approximately 100 MG/ year during a 1:100-year wet weather season with monthly amounts broken out in Table 7.3.

Table 7.3- Annual Agronomic Demand

MONTH	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEP	ANNUAL
IRRIGATION REQUIRED (IN)	1.83	0	0	0	0	0	2.54	4.59	6.88	8.33	7.41	4.85	
AGRONOMIC DEMAND (IN)	2.29	0	0	0	0	0	3.17	5.74	8.6	10.42	9.26	6.06	
AGRONOMIC DEMAND (MG)	5.2	0	0	0	0	0	7.2	13.03	19.51	23.65	21.03	13.75	103.36

During average and dry years, the farmer will have lesser reclamation water available and will augment with available well and surface water supplies. Make-up irrigation water will also be utilized when APUD storage capacity runs low and for mitigation of salinity impacts to groundwater.

7.4 NUTRIENT LOADING

Nutrient levels have not been ascertained for the expected short term projects effluent and robust nutrient removal processes will be necessarily limited in a pond system. However, the Groundwater Monitoring Reports show low nitrate levels in both pond effluent and first recoverable groundwater in Well 1, which is directly below the existing ponds footprint for recent samples during the last 10 years. Exhibit C illustrates that nitrate in the existing ponds is significantly lower than nitrate recorded in the monitoring wells.

For the short-term nature and limited volume of the Phase 1 Project it is expected existing crop uptake will be sufficient to ensure no detectable impacts to the underlying groundwater resource.

For the Phase 2 Project nutrient constituents in the reclamation effluent will be routinely monitored and APUD will work in conjunction with the farmer to ensure nutrients are applied at agronomic uptake rates and that the resultant fodder crops are harvested for use off-site.

7.5 TAILWATER AND STORMWATER MANAGEMENT

Figure 7.5 illustrates improvements that are required at the LAA to comply with the requirements of the General Order for Land Applications as part of the Phase 2 Project.

Notable features include berms and ditches to preclude outside waters running on to the site and containment of all reclamation irrigation waters on the site. Irrigation tailwater and stormwater will be captured by a ditch and berm on the easterly (downhill) side and directed to a sump at the northeast corner. Check dams will be placed along the LAA slope to minimize the amount of tailwater run-off.

During irrigation operations captured tailwater will be pumped back to the irrigation header and reapplied to the uphill side utilizing a portable gas-powered pump. During the wet weather season, and after all reclamation waters have dried for 48 hours, a gated discharge pipe will be opened to allow stormwater to flow to the adjacent agricultural drainage course, although some stormwater will be retained and redirected to the irrigation header and reapplied to maximize on site percolation as mitigation of reclamation related salinity concentration.

For the temporary Phase 1 Project improvements will be limited to a recapture berm and ditch to ensure no disposal tailwaters spills off site although that will be primarily controlled by careful monitoring of the application and flow throttling to preclude tailwater runoff.

APUD has negotiated for some of the improvements to be performed by the farmer (seller) as part of the land acquisition agreement. The other improvements will be performed by APUD staff or outside Contractors.

Monitoring wells for the LAA are not indicated on the figure, pending a report from a hydrogeologist as part of the Phase 2 permitting process, although it is expected to consist of 4 wells near the corners of the LAA site.

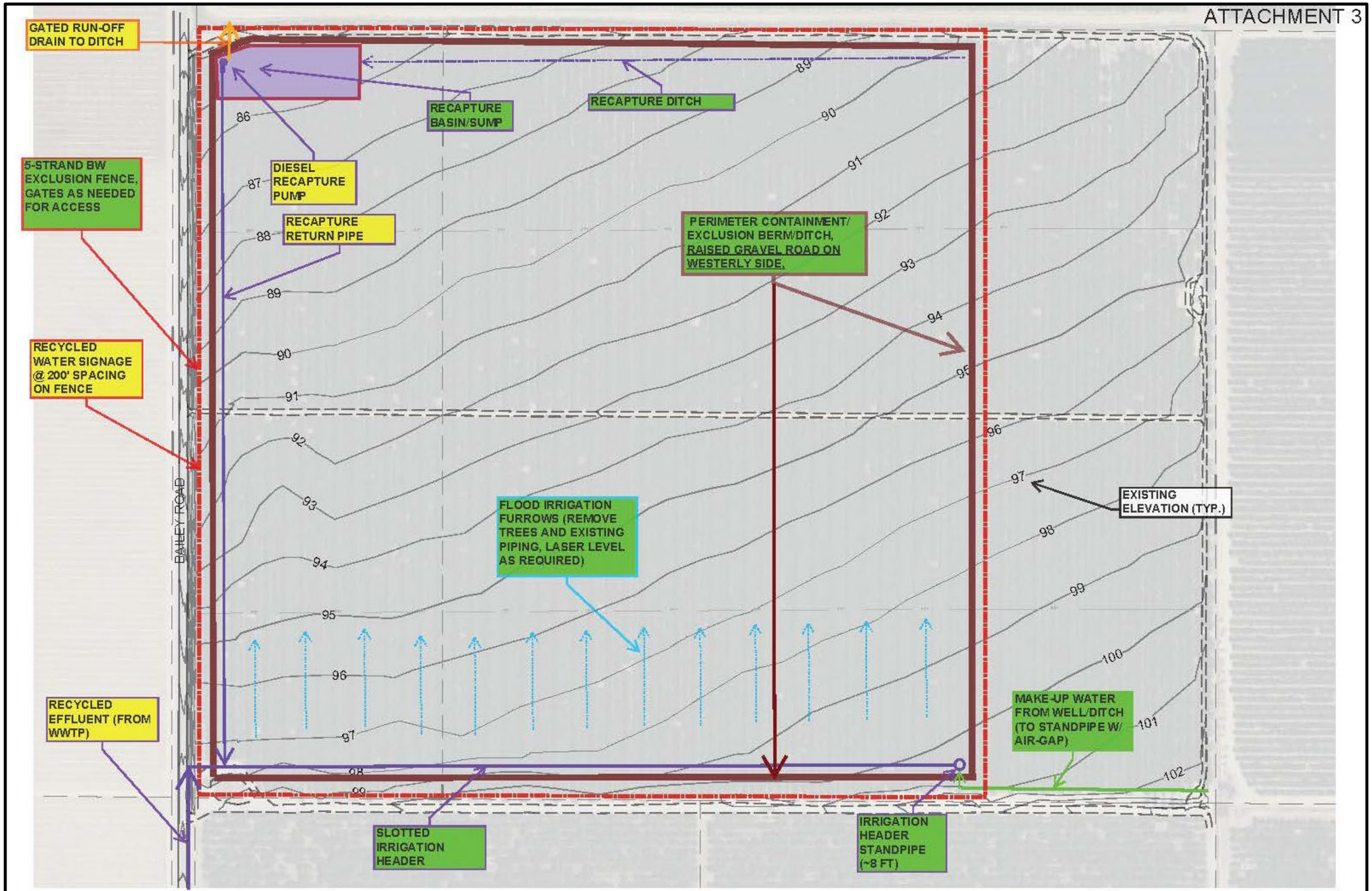


Figure 7.5- Land Application Plan

N

YELLOW ITEMS - BY APUD

GREEN ITEMS - BY FARMER

8.0 PRELIMINARY SCHEDULE

Table 8 outlines critical milestones intended to complete the Phase 1 (immediate emergency discharge) and Phase 2 (Reclamation project) improvements. There are two critical needs for compliance that may be beyond the District's control, and these include obtaining an initial Right of Entry prior to the property closing and acquiring a loan for an estimated $5.5 million that was recently approved as part of the new rate structure.

Table 8- Preliminary Schedule

Compliance Milestone	Estimated Completion Date
Submit Spill Prevention and Response Plan	9/11/26
Acquire Disposal Site Right of Entry	9/11/26
Board Issues Phase 1 Project Order(s)	9/30/26
Construct and Install Temporary Offsite Disposal Improvements	10/9/26
Submit Draft ROWD/Notice of Intent for Phase 2 Project	10/15/26
Initial Phase 1 Discharge (Tentative Date)	10/23/26
Submit LAA Monitoring Well Installation Plan	11/13/26
APUD Secures Phase 1 and 2 Bond Financing	12/31/26
Submit Monitoring Well Water Quality Data, with LAA WQOs	2/5/27
Complete Final ROWD and Engineer's Report	2/5/27
Regional Board Issues LAA WDR's	3/23/27
Complete Phase 2 Design	4/5/27
Construct Phase 2 Improvements	8/18/27
Provide an Updated O&M Manual	9/18/27

Note: The estimated completion date of the Spill Prevention and Response Plan is in compliance with the 8/14/2026 NOV deadline.

9.0 BOARD ACTION REQUEST

Existing percolation capacity is insufficient to reliably manage current wastewater flows. Recurring spills, reduced pond percolation, limited freeboard, aging treatment infrastructure, and recent SWRCB orders demonstrate that continued reliance on the existing system presents an immediate compliance and water quality risk. Because a new WWTF or regionalization project will require at least five years to plan, finance, design, permit, and construct, APUD is proposing to implement interim measures to reduce pond levels and prevent additional uncontrolled discharges while the long-term project is developed. RWQCB support is requested for this emergency interim effort.

The following immediate actions from the RWQCB are requested:

- Provide the necessary Orders to allow the initial Phase 1 disposal discharge to the LAA, or alternatively a controlled discharge to Salt Creek to proceed, before October 1. *This is a critical aspect of the District's spill prevention planning.*
- If necessary, provide a Time Schedule Compliance Order to allow completion of the permitting, design, and studies necessary for the Phase 2 reclamation Project to fully comply with the General Order, and to allow a sustained seasonal creek discharge.

APUD also requests guidance regarding the Regional Board's preferred direction and available funding for the ultimate "Phase 3" project which may consist of regionalization or local discharge. Regional Board feedback on the Phase 3 direction will allow the District to most effectively focus on the ongoing long-term planning work.

REFERENCES:

1993 Plant Expansion Evaluation Dewante and Stowell

1993 WDR Permit

2024 APUD CAO

2024 Groundwater Monitoring Report

2025 Emergency Sewer Mitigation Memo MC Engineering

2025 Groundwater Monitoring Report

2025 Preliminary Water Balance MC Engineering

2026 Arbuckle Wastewater Treatment Facility Preliminary Feasibility Analysis for Avoiding Current Water Quality Violations

2026 Salt Creek Samples

2026 Wastewater Utility Rate Study MC Engineering

Abbreviation	Definition
ACP	asbestos cement pipe
ADWF	average dry weather flow
APUD	Arbuckle Public Utility District
bgs	below ground surface
BOD	biochemical oxygen demand
BOD5	five-day biochemical oxygen demand
BPTC	Best Practicable Treatment and Control
C&AO	Cleanup and Abatement Order
CAO	Cleanup and Abatement Order
CBOD	carbonaceous biochemical oxygen demand
CDO	Cease-and-Desist Order
CDP	census-designated place
CF	cubic feet
CRWQCB	California Regional Water Quality Control Board
DFA	Division of Financial Assistance
DO	dissolved oxygen
EA	each
EDU	equivalent dwelling unit
ES	Executive Summary
FT	feet
gal/ac/day	gallons per acre per day
gpd	gallons per day
gpm	gallons per minute
HP	horsepower
I/I	infiltration and inflow
LAA	land application area
lb./day	pounds per day
LS	lump sum
MC	MC Engineering
MG	million gallons
mg/L	milligrams per liter
MGD	million gallons per day
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
O&M	operations and maintenance
PS	pump station
PUD	Public Utility District
PVC	polyvinyl chloride
ROWD	Report of Waste Discharge
RWQCB	Regional Water Quality Control Board
sf	square feet
SWRCB	State Water Resources Control Board
TDH	total dynamic head
TDS	total dissolved solids
TSS	total suspended solids
VCP	vitrified clay pipe
WDR	Waste Discharge Requirements
WDRs	Waste Discharge Requirements
WQOs	Water Quality Orders
WSC	Water Systems Consultants
WWTF	wastewater treatment facility

EXHIBITS

ARBUCKLE PUBLIC UTILITIES DISTRICT

Groundwater Monitoring
February 3, 2025

Figure 2 Fourth Quarter 2024 Groundwater Elevation Map

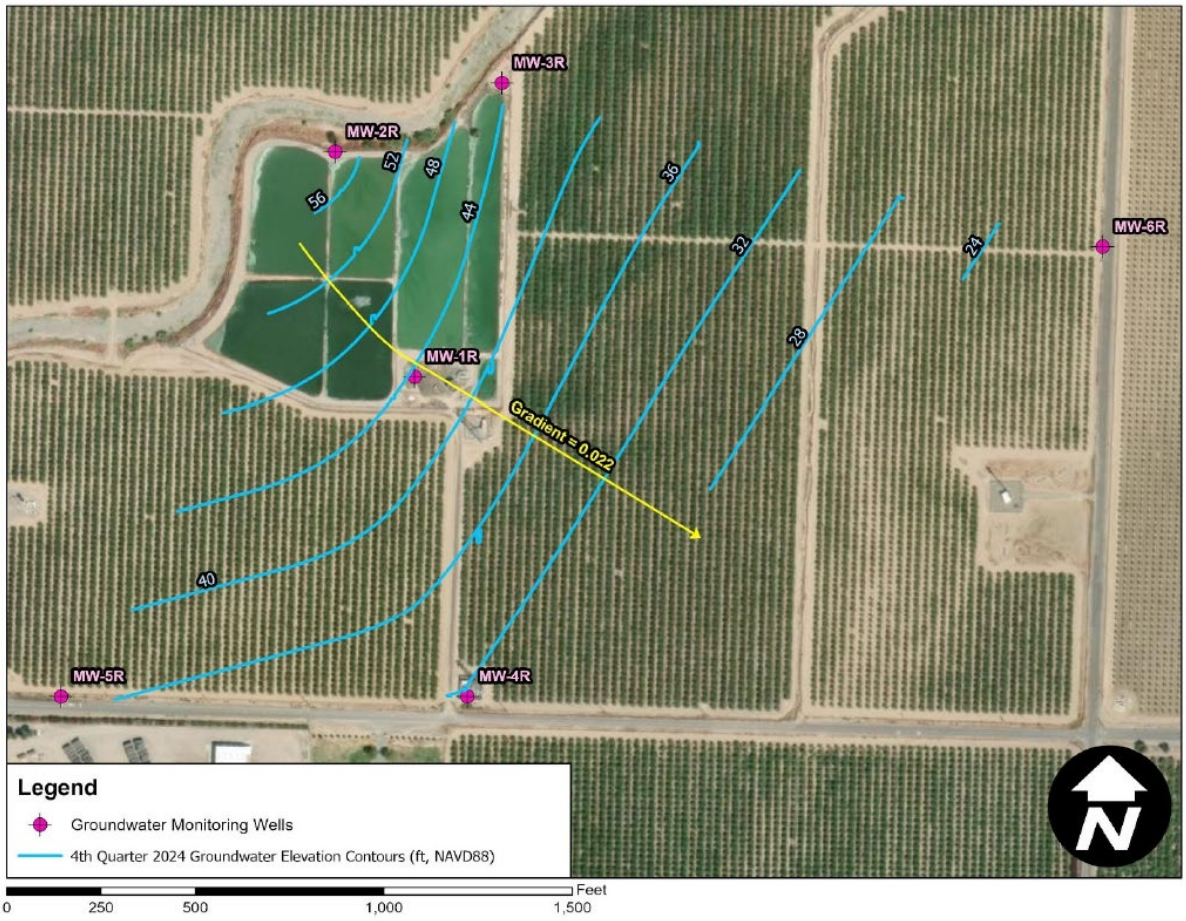


EXHIBIT A- APUD GROUNDWATER MONITORING WELLS

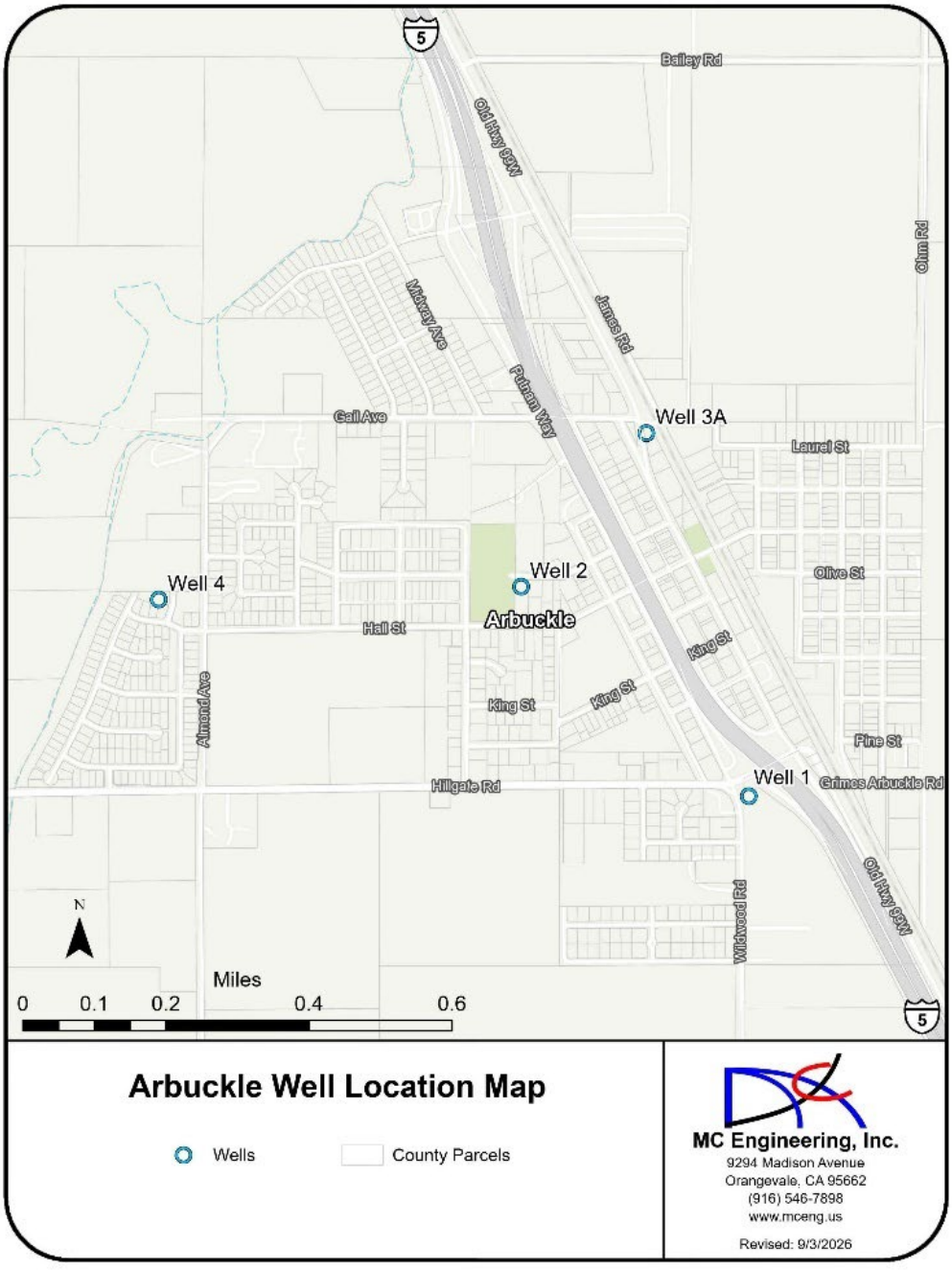


EXHIBIT B- APUD DRINKING WATER WELLS

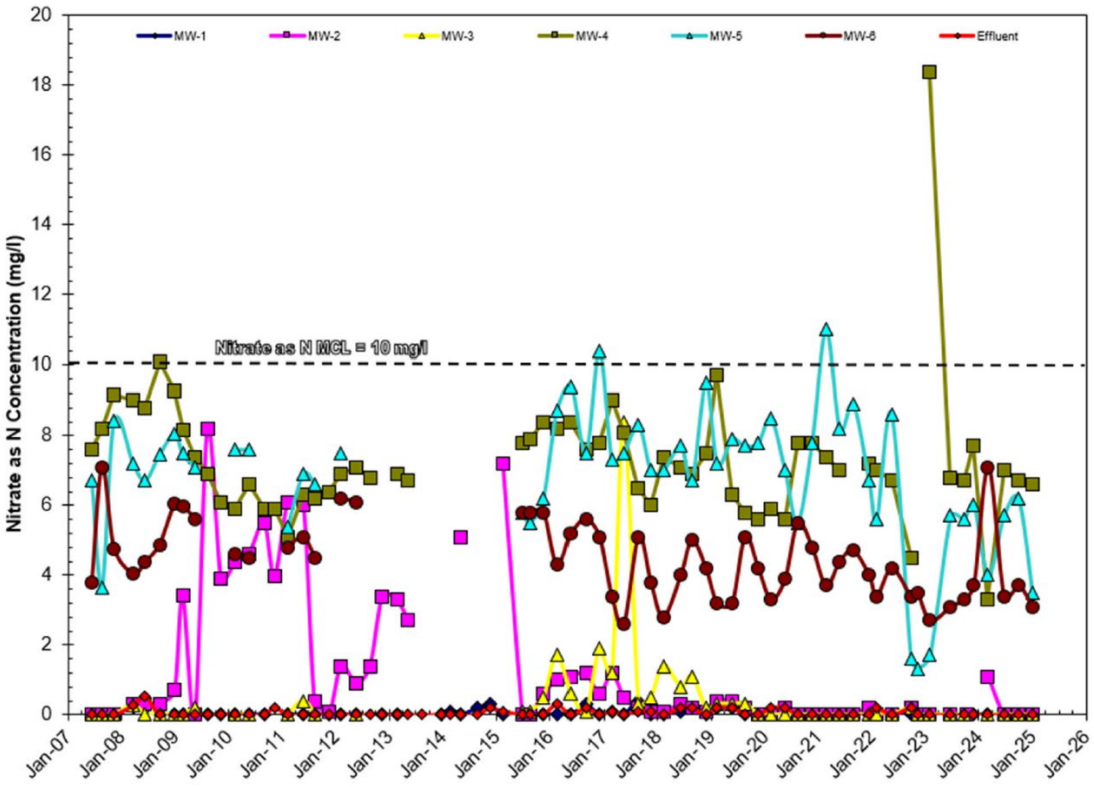


EXHIBIT C- NITRATE MONITORING RESULTS

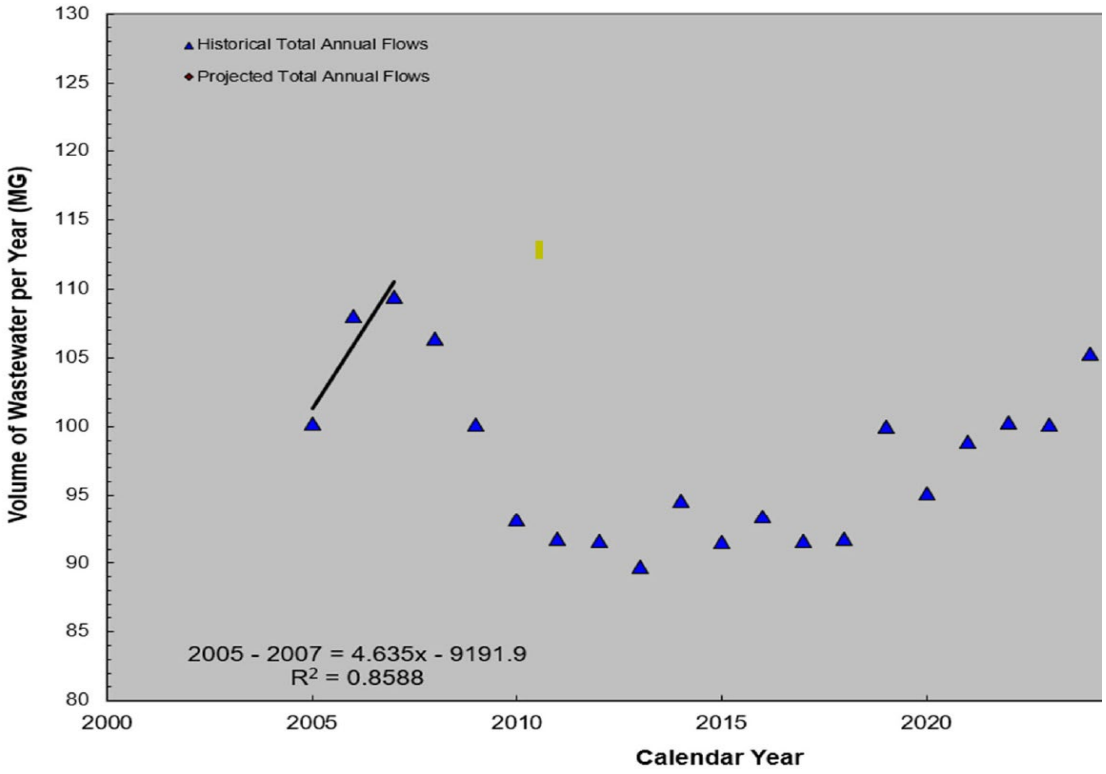


EXHIBIT D- HISTORIC WWTF INFLOW

Source Stantec 2024 Annual Groundwater Monitoring Report

Central Valley Regional Water Quality Control Board

4 November 2026

Kevin Wood
Arbuckle Public Utility District
104 5th Street
Arbuckle, CA 95912

via email:
k.wood@arbucklepud.org

CLEANUP AND ABATEMENT ORDER NO. R5-2026-0704, ARBUCKLE PUBLIC UTILITY DISTRICT, COLUSA COUNTY

Enclosed for your records is a copy of Central Valley Water Board's Cleanup and Abatement Order No. R5-2026-0704 that was issued today for the Arbuckle Public Utility District. The enclosed Order authorizes the proposed remedial application of wastewater onto the 91-acre Land Application Area (LAA) comprising APNs 018-270-027 and 018-270-028. This Order is limited in duration and sunsets **31 October 2027**.

Prior to application of wastewater, please review Item A of the Order, titled "*Pre-Application Data Collection and Report Submittal"* which outlines the information and notifications necessary to begin application. If you have any questions regarding the Order or need clarification, please contact Catherine Wesoloski at (916) 464-4708 or Catherine.Wesoloski@waterboards.ca.gov.

HOWARD HOLD, PG #7466
Senior Engineering Geologist
WDRs Compliance and Enforcement Unit

Enclosures: Cleanup and Abatement Order No. R5-2026-0704
Attachment A: Summarized Spill Volumes
Attachment B: Arbuckle Public Utility District, Emergency Disposal and Reclamation Plan

cc: list on following page:

cc: Matt Carr, Environmental Circuit Prosecutor (email)
Perry Elerts, State Water Resources Control Board, Sacramento (email)
Kennedy Knight, State Water Resources Control Board, Sacramento (email)
Chris Moskel, State Water Resources Control Board, Sacramento (email)
John Baum, Central Valley Water Board, Rancho Cordova (email)
Xuan Luo, Central Valley Water Board, Rancho Cordova (email)
Howard Hold, Central Valley Water Board, Rancho Cordova (email)
Catherine Wesoloski, Central Valley Water Board, Rancho Cordova (email)
Mary Child, Central Valley Water Board, Rancho Cordova (email)
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Lixin Fu, Central Valley Water Board, Rancho Cordova (email)
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Mark White, Lieutenant, California Department of Fish and Wildlife (email)
Craig Harris, Warden, California Department of Fish and Wildlife (email)
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RB5-Chron (email)