
Central Valley Regional Water Quality Control Board

18 May 2018

CERTIFIED MAIL
91 7199 9991 7035 8363 3336

Tracy Bejotte
Caritas Acquisitions I, LLC
Castle City Mobile Home Park
3rd Park Plaza, Suite 1700
Irvine, CA 92614

NOTICE OF APPLICABILITY
GENERAL WASTE DISCHARGE REQUIREMENTS FOR
SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS
ORDER WQ 2014-0153-DWQ
FOR
CARITAS ACQUISITIONS I, LLC
CASTLE CITY MOBILE HOME PARK WWTF
PLACER COUNTY

Caritas Acquisitions I, LLC submitted a Report of Waste Discharge (RWD) dated 17 January 2018 describing the Castle City Mobile Home Park wastewater treatment facility (WWTF) in Placer County. The WWTF provides treatment and disposal service for domestic wastewater generated from the mobile home park. The WWTF discharge has been regulated by Waste Discharge Requirements (WDR) Order 98-049, which was adopted on 27 February 1998. Based on information provided in the RWD, the wastewater treatment system and discharge is consistent with the requirements of the State Water Resources Control Board (State Water Board) *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems*, Order WQ 2014-0153-DWQ (General Order). This Notice of Applicability (NOA) serves as formal notice that upon rescission of Order 98-049 at an upcoming Board meeting, the discharge shall be regulated pursuant to the General Order and this NOA. You are hereby assigned Order WQ 2014-0153-DWQ-R5268 for the discharge. A copy of the General Order is enclosed and also available at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf

You should familiarize yourself with the entire General Order and its attachments, which describe mandatory discharge and monitoring requirements. The General Order contains operational and reporting requirements by wastewater system type. Sampling, monitoring, and reporting requirements applicable to your treatment and disposal methods must be completed in accordance with the appropriate treatment system sections of the General Order and the attached Monitoring and Reporting Program (MRP) 2014-0153-DWQ-R5268. The Discharger is responsible for all the applicable requirements that exist in the General Order and this NOA.

EXISTING FACILITY AND DISCHARGE DESCRIPTION

The Castle City Mobile Home Park WWTF is owned and operated by Caritas Acquisitions I, LLC (hereafter “Discharger”) and is located at 1588 Lisa Drive, Newcastle in Placer County as shown on Attachment A, which is attached hereto and is made part of this NOA by reference. The mobile home park is located in an area without a regional wastewater collection system; therefore, wastewater is collected and treated on-site. The site plan is shown on Attachment B, which is attached hereto and is made part of this NOA by reference.

The mobile home park and treatment facility were built in the 1970’s. The mobile home park consists of 205 mobile home units, a club house, and the managers home. Except for one location that requires a lift station, the collection mains and lateral pipes gravity feed to the primary facultative pond (Upper Pond). Recreational vehicle (RV) wastewater is not generated onsite or allowed to be discharged into the collection system.

Treatment consists of two unlined facultative ponds with aeration. There is no primary treatment prior to the ponds. The first facultative pond (Upper Pond) receives wastewater and solids from the collection system and acts as a primary settling pond. Overflow from the Upper Pond flows into the second facultative pond (Lower Pond), which provides additional evaporation/percolation capacity. The ponds have the following estimated depth, surface area, and volume.

Pond Name	Depth (feet)	Surface Area (acres)	Volume (MG)
Upper Pond	8	3.16	8.25
Lower Pond	11	2.96	10.60

Influent flows are measured into the Upper Pond using a flow meter. In 2016, the monthly average flow peaked in November at 20,600 gpd and averaged 14,600 for the year. In 2017, the monthly average flow peaked in October at 16,500 gpd and averaged 12,100 for the year. In April 2017, the Discharger was issued a Notice of Violation for two sewage spills that occurred in February 2017. In July 2017, the Discharger submitted a *Water Balance Update and Calibration* report (Water Balance Report), which states that the precipitation in January and February 2017 were 118% and 137%, respectively, of the expected 100-year return period when distributed monthly based on average rainfall.

No groundwater monitoring wells are installed to monitor groundwater quality underlying the facility.

FACILITY CHANGES

As a result of the February 2017 spills and communication with the Central Valley Water Board staff, the Discharger sandbagged the southern portion of the Lower Pond, installed four additional pond aerator/evaporators, and constructed a spray field for additional disposal capacity. The spray field includes a collection drain that returns surface water runoff to the ponds. Based on these changes the water balance shows that the wastewater treatment facility has capacity for 22,000 gallons per day (gpd).

SITE-SPECIFIC REQUIREMENTS AND EFFLUENT LIMITS

Note that the General Order contains prohibitions and specifications that apply to all wastewater treatment systems as well as those that only apply to specific treatment and/or disposal systems. The specific requirements and effluent limits for your treatment system are summarized below.

The wastewater treatment operator must be certified and familiar with the requirements contained in the General Order, this NOA, and the MRP.

Requirements by Wastewater System Type, Section B of General Order

All Wastewater Systems (Section B.1 of General Order)

This section applies in its entirety to the Castle City Mobile Home Park WWTF with the following site-specific requirements.

1. Influent flow limits (Section B.1.a of General Order).

Treatment Unit	Flow Limit as Monthly Average
Upper Pond	22,000 gpd

2. Wastewater system setbacks (Section B.1.l of General Order).

The Discharger utilizes pond evaporators for aeration and to enhance evaporation. The pond evaporators produce a mist and pose a similar risk as spray fields having the potential to impact residents located near the ponds. Therefore, a setback was established for operation of the pond aerators as indicated below.

Equipment or Activity	Domestic Well	Flowing Stream	Ephemeral Stream Drainage	Property Line	Lake or Reservoir
Collection System ¹	150 ft.	50 ft.	50 ft.	5 ft.	50 ft.
Upper and Lower Ponds ²	150 ft.	50 ft.	50 ft.	20 ft.	100 ft.
Spray Field and Pond Evaporators	No spray irrigation or pond evaporator operation shall take place within the setback boundaries indicated in Attachment B of this NOA.				

¹ Setbacks referenced under "Septic Tank, Aerobic Treatment Unit, Treatment System, or Collection System" in Table 3 of General Order.

² Setbacks referenced under "Impoundment (undisinfected secondary recycled water)" in Table 3 of General Order. The setback for flowing stream, ephemeral stream, property line, and lake/reservoir were reduced to existing conditions.

Pond Systems (Section B.5 of General Order)

The WWTF utilizes a pond system; therefore this section applies in its entirety.

Land Application and/or Recycled Water Systems (Section B.7 of General Order)

The WWTF utilizes a spray field system; therefore this section applies in its entirety.

Effluent Limitations, Section D of General Order

This section applies in its entirety to the Castle City Mobile Home Park WWTF and shall include the following site-specific limitations.

Treatment Pond Effluent Limitations

The following limits apply to effluent from the Upper Pond.

Constituent	Units	Limit
BOD	mg/L	90

Effluent Limit Rationale

The pond treatment system is subject to technology performance effluent limits for biochemical oxygen demand (BOD) as specified in the General Order.

Staff evaluated the need for a total nitrogen effluent limit using the method contained in the General Order. Based on topo elevations, groundwater is approximately 20 feet below ground surface and not expected to be shallow. The site is not in an environment known to contain fractured bedrock. The wastewater generated at the site is of typical domestic wastewater

strength and is diluted by rainfall in the ponds. While the treatment system has a hydraulic capacity of 22,000 gpd, the monthly average flow peaked at 16,500 gpd in 2017 and there are no plans for expansion. Therefore, staff determined that a nitrogen effluent limit is not required at this time. The MRP requires the wastewater influent and effluent to be monitored for twelve months to determine if nitrogen may pose a threat to groundwater

Technical Report Preparation Requirements, Provisions Section E.1 of General Order

The following technical reports shall be submitted as described below:

1. By **6 August 2018**, the Discharger shall submit a *Spill Prevention and Emergency Response Plan* (Response Plan) consistent with the requirements of General Order Provision E.1.a.
2. By **6 August 2018**, the Discharger shall submit a *Sampling and Analysis Plan* consistent with the requirements of General Order Provision E.1.b.

MONITORING AND REPORTING PROGRAM

The Discharger shall comply with MRP 2014-0153-DWQ-R5268, which is attached hereto and made part of this NOA by reference.

ENFORCEMENT

Please review this NOA carefully to ensure that it completely and accurately reflects the discharge. Discharge of wastes other than those described in this NOA is prohibited. Prior to allowing changes to the wastewater strength or generation rate, or to the method of waste disposal, you must contact the Central Valley Regional Water Board to determine if submittal of an RWD is required.

Caritas Acquisitions I, LLC will generate the waste subject to the terms and conditions of WQ 2014-0153-DWQ-R5268 and will maintain exclusive control over the discharge. As such, Caritas Acquisitions I, LLC is primarily responsible for compliance with this NOA, MRP, and General Order, with all attachments. Failure to comply with the requirements in the General Order or this NOA could result in an enforcement action as authorized by provisions of the California Water Code.

ANNUAL FEES

Staff has determined the discharge is a threat to water quality and complexity rating of 3-C. The annual fee corresponding to a threat to water quality and complexity of 3-C is currently \$2,088. The fee is due and payable on an annual basis until coverage under the General Order is formally rescinded. Please note that the annual fees are reviewed each year and may change. You must provide written if and when the wastewater discharge ceases so that we can terminate coverage under the General Order and no longer bill you.

DOCUMENT SUBMITTAL

All monitoring reports and other correspondence should be converted to searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50 MB should be emailed to:

centralvalleysacramento@waterboards.ca.gov.

To ensure that your submittal is routed to the appropriate staff person, the following information should be included in the body of the email or any documentation submitted to the mailing address for this office:

Facility Name: Castle City Mobile Home Park, Placer County		
Program: Non-15 Compliance	Order: 2014-0153-DWQ-R5268	CIWQS Place ID: 213494

Documents that are 50 MB or larger should be copied to a CD, DVD, or flash drive and mailed to:

Central Valley Regional Water Quality Control Board
ECM Mailroom
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Now that the Notice of Applicability has been issued, the Board's Compliance and Enforcement section will take over management of your case. Guy Childs is your new point of contact for any questions about the General Order. If you find it necessary to make a change to your permitted operations, Guy will direct you to the appropriate Permitting staff. You may contact Guy at (916) 464-4648 or at gchilds@waterboards.ca.gov.

Original signed by Andrew Altevogt for

Patrick Pulupa, Incoming Executive Officer for
Pamela C. Creedon, Executive Officer

enc: Water Quality Order WQ 2014-0153-DWQ
Monitoring and Reporting Program 2014-0153-DWQ-R5268
Attachment A, Site Location Map
Attachment B, Site Plan
Attachment C, Wastewater Treatment System Schematic

cc w/out enc: Timothy O'Brien, State Water Resources Control Board, Sacramento
Laura Rath, Placer County Environmental Health Department, Auburn

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM WQ 2014-0153-DWQ-R5268

FOR

CARITAS ACQUISITIONS I, LLC
CASTLE CITY MOBILE HOME PARK WWTF
PLACER COUNTY

This Monitoring and Reporting Program (MRP) describes requirements for monitoring a wastewater treatment system at the Castle City Mobile Home Park WWTF. This MRP is issued pursuant to Water Code section 13267. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) or Executive Officer.

Water Code section 13267 states, in part:

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.”

Water Code section 13268 states, in part:

“(a) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of section 13267, or failing or refusing to furnish a statement of compliance as required by subdivision (b) of section 13399.2, or falsifying any information provided therein, is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).

(b)(1) Civil liability may be administratively imposed by a regional board in accordance with article 2.5 (commencing with section 13323) of chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars (\$1,000) for each day in which the violation occurs.”

The Castle City Mobile Home Park WWTF discharge is regulated by the Notice of Applicability (NOA) of Water Quality Order 2014-0153-DWQ-R5268 and is owned and operated by Caritas Acquisitions I, LLC. Pursuant to Water Code section 13267, the Discharger shall implement this MRP and submit the monitoring reports described herein. The reports are necessary to ensure that the Discharger complies with the NOA and General Order.

All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. The name of the sampler, sample type (grab or composite), time, date, location, bottle type, and any preservative used for each sample shall be recorded on the sample chain of custody form. The chain of custody form must also contain all custody information including date, time, and to whom samples were relinquished. If composite samples are collected, the basis for sampling (time or flow weighted) shall be approved by Central Valley Water Board staff.

Field test instruments (such as those used to test pH, dissolved oxygen, and electrical conductivity) may be used provided that they are used by a State Water Resources Control Board, Environmental Laboratory Accreditation Program certified laboratory, or:

1. The user is trained in proper use and maintenance of the instruments;
2. The instruments are field calibrated prior to monitoring events at the frequency recommended by the manufacturer;
3. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
4. Field calibration reports are maintained and available for at least three years.

INFLUENT FLOW MONITORING

Influent flow shall be monitored upstream of the treatment system at the location shown in Attachment C as specified below:

Parameter	Units	Type of Sample	Monitoring Frequency	Reporting Frequency
Average Daily Influent Flow	MGD	Meter Observation	Daily	Quarterly
Total Nitrogen ¹	mg/L	Grab	Monthly	Quarterly

¹ Monthly monitoring of total nitrogen is required for 12 consecutive months before a reduction in monitoring frequency can be considered.

EFFLUENT MONITORING

At a minimum, the Discharger shall monitor effluent as specified below. A grab sample of the Upper Pond shall be considered representative of the effluent.

Parameter	Units	Type of Sample	Monitoring Frequency	Reporting Frequency
BOD5 ¹	mg/L	Grab	Monthly	Quarterly

Parameter	Units	Type of Sample	Monitoring Frequency	Reporting Frequency
Total Nitrogen ¹	mg/L	Grab	Monthly	Quarterly

¹ 5-day Biochemical Oxygen Demand.

² Monthly monitoring of total nitrogen is required for 12 consecutive months before a reduction in monitoring frequency can be considered

POND MONITORING

The Discharger shall monitor each pond as specified below.

Parameter	Units	Type of Sample	Monitoring Frequency	Reporting Frequency
Freeboard ¹	0.1 feet	Staff Gage	Weekly	Quarterly
Levee Condition	--	Observation	Weekly	Quarterly
Seepage ²	--	Observation	Weekly	Quarterly
Odors	--	Observation	Weekly	Quarterly
Dissolved Oxygen ³	mg/L	Grab	Monthly	Quarterly

¹ Freeboard shall be measured vertically from the surface of the pond water to the lowest elevation of the surrounding berm and shall be measured to the nearest 0.1 feet.

² Pond containment berms shall be observed for signs of seepage or surfacing water along the exterior toe. If surfacing water is found, then a sample shall be collected and tested for total coliform organisms and total dissolved solids.

³ Dissolved oxygen shall be monitored at each pond that contains at least one foot of standing water. The report shall state how much water was in the pond if dissolved oxygen was not monitored. Samples shall be collected opposite the pond inlet at a depth of one foot.

SOLIDS DISPOSAL MONITORING

The Discharger shall report the handling and disposal of all solids (e.g., screenings, grit, sludge, biosolids, etc.) generated at the wastewater system. Records shall include the name/contact information for the hauling company, the type and amount of waste transported, the date removed from the wastewater system, the disposal facility name and address, and copies of analytical data required by the entity accepting the waste. These records shall be submitted as part of the annual monitoring report.

REPORTING

All monitoring reports should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to: *centralvalleysacramento@waterboards.ca.gov*.

Documents that are 50 MB or larger should be transferred to a CD, DVD, or flash drive and mailed to the following address:

Central Valley Regional Water Quality Control Board
 ECM Mailroom
 11020 Sun Center Drive, Suite 200
 Rancho Cordova, California 95670

To ensure that your submittal is routed to the appropriate staff person, the following

information should be included in the body of the email or transmittal sheet:

Attention: Compliance/Enforcement Section
Caritas Acquisitions I, LLC
Castle City Mobile Home Park WWTF
Placer County
Place ID: 213494

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, solids, etc.), and reported analytical or visual inspection results are readily discernible. The data shall be summarized to clearly illustrate compliance with the General Order and NOA as applicable. The results of any monitoring done more frequently than required at the locations specified in the MRP shall be reported in the next regularly scheduled monitoring report and shall be included in calculations as appropriate.

Monitoring information shall include the method detection limit (MDL) and the Reporting limit (RL) or practical quantitation limit (PQL). If the regulatory limit for a given constituent is less than the RL (or PQL), then any analytical results for that constituent that are below the RL (or PQL) but above the MDL shall be reported and flagged as estimated. For a Discharger conducting any of its own analyses, reports must be signed and certified by the chief of the laboratory.

A. Quarterly Monitoring Reports

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

1. Results of all required quarterly monitoring. Data shall be organized by the associated monitoring sections (e.g., Flow Monitoring, Effluent Monitoring, etc.) and presented in tabular format.
2. A comparison of monitoring data to the discharge specifications, flow limit, and effluent limits.
3. A disclosure of any violations of the NOA and/or General Order requirements and an explanation of corrective actions.
4. If requested by staff, copies of laboratory analytical report(s) and chain of custody form(s).

B. Annual Report

Annual Reports shall be submitted to the Regional Water Board by **February 1st following the monitoring year**. The Annual Report shall include the following:

1. Tabular and graphical summaries of all monitoring data collected during the year.

2. An evaluation of the performance of the wastewater treatment system, including discussion of capacity issues, nuisance conditions, system problems, and a forecast of the flows anticipated in the next year. A flow rate evaluation, as described in the General Order (Provision E.2.c), shall also be submitted if required.
3. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into compliance with the NOA and/or General Order.
4. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
5. The name and contact information for the wastewater operator responsible for operation, maintenance, and system monitoring.

A letter transmitting the monitoring reports shall accompany each report. The letter shall report violations found during the reporting period, and actions taken or planned to correct the violations and prevent future violations. The transmittal letter shall contain the following penalty of perjury statement and shall be signed by the Discharger or the Discharger's authorized agent:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of the those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

The Discharger shall implement the above monitoring program as of the date of this MRP.

Ordered by:

original signed by Andrew Altevogt for

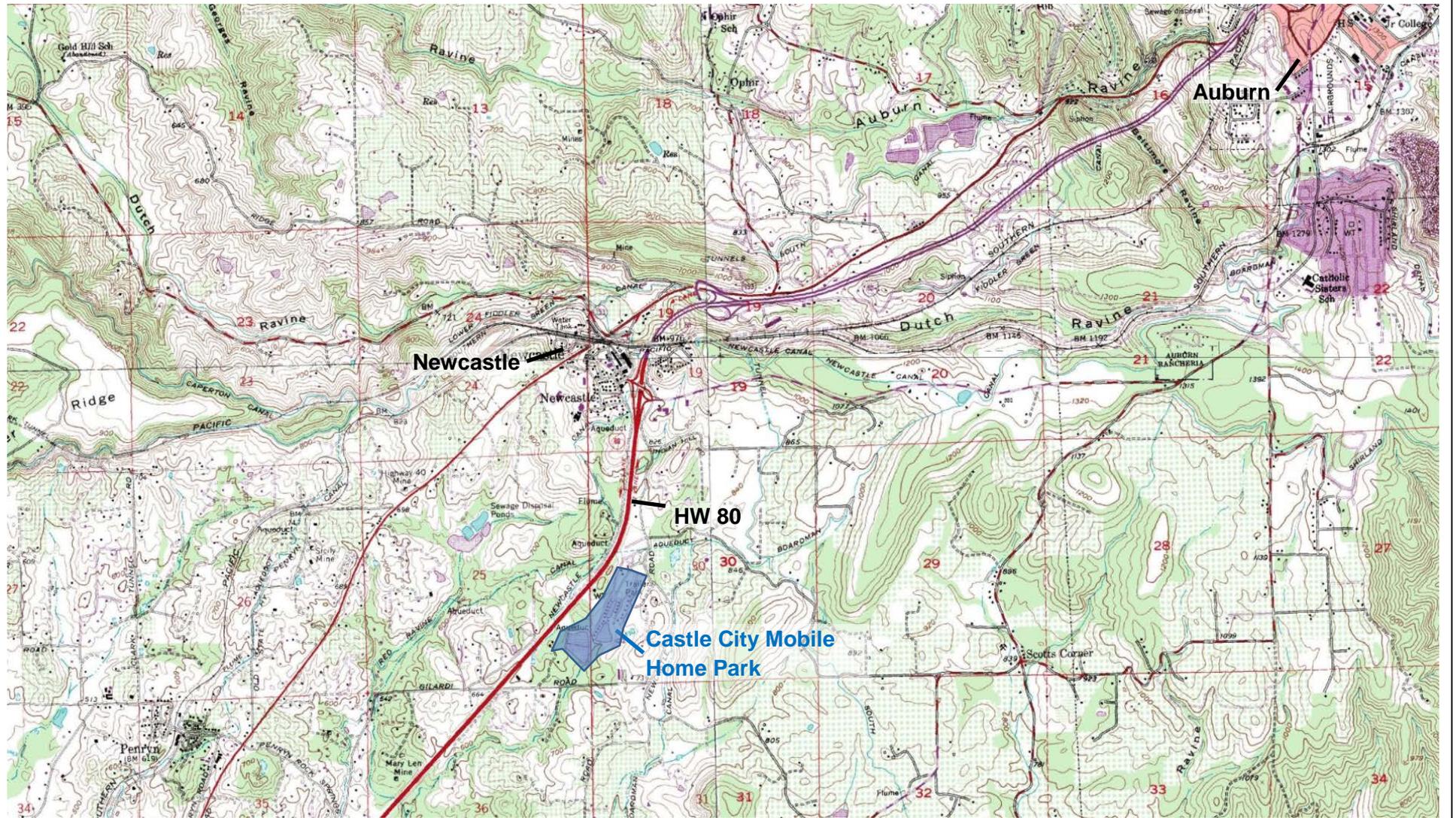
PATRICK PULUPA, Incoming Executive Officer for
PAMELA C. CREEDON, Executive Officer

18 May 2018

DATE

GLOSSARY

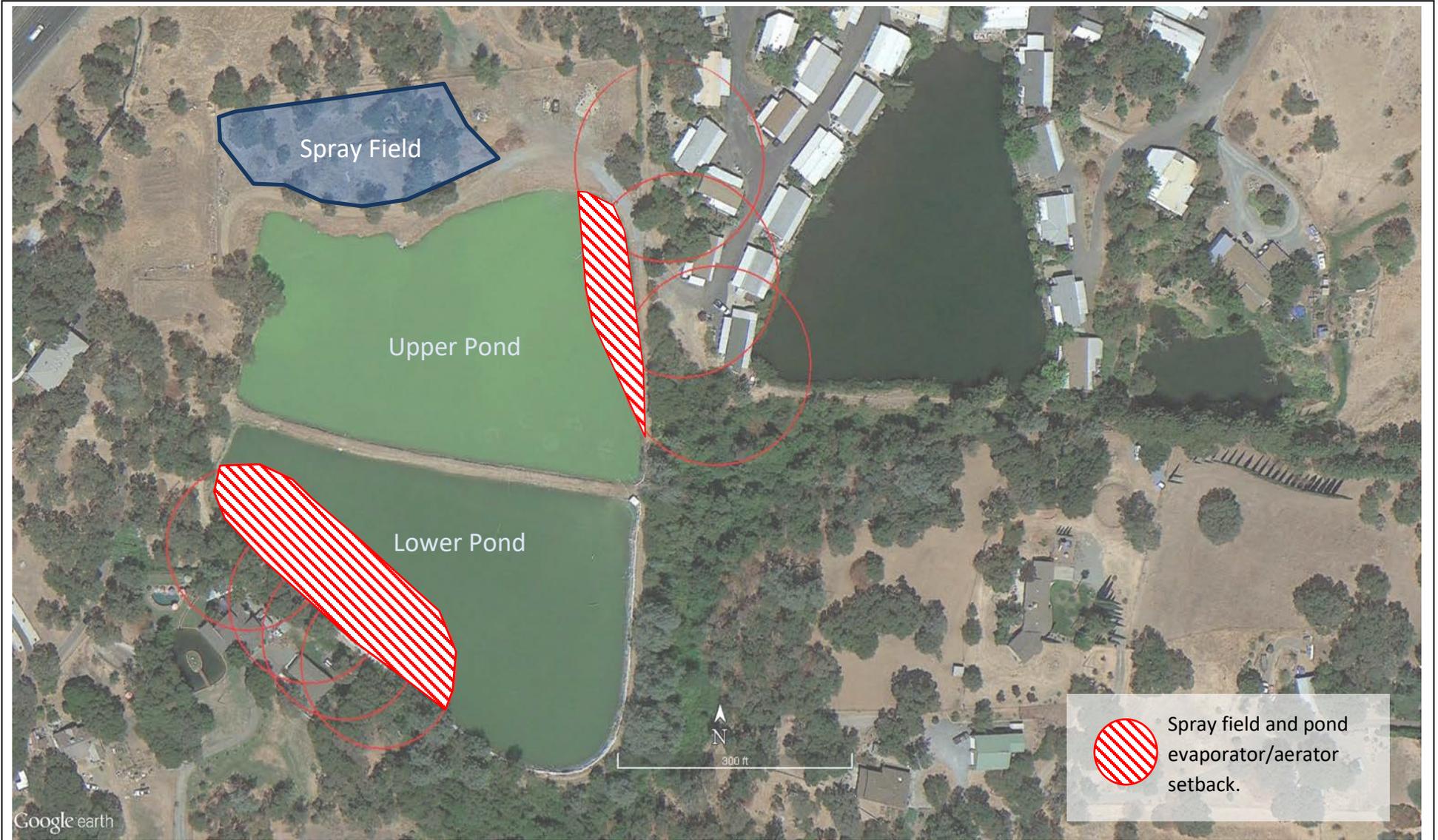
BOD ₅	Five-day biochemical oxygen demand
CaCO ₃	Calcium carbonate
DO	Dissolved oxygen
EC	Electrical conductivity at 25° C
FDS	Fixed dissolved solids
NTU	Nephelometric turbidity unit
TKN	Total Kjeldahl nitrogen
TDS	Total dissolved solids
TSS	Total suspended solids
Continuous	The specified parameter shall be measured by a meter continuously.
24-hr Composite	Samples shall be a flow-proportioned composite consisting of at least eight aliquots over a 24-hour period.
Daily	Every day except weekends or holidays.
Twice Weekly	Twice per week on non-consecutive days.
Weekly	Once per week.
Twice Monthly	Twice per month during non-consecutive weeks.
Monthly	Once per calendar month.
Bimonthly	Once every two calendar months (i.e., six times per year) during non-consecutive months.
Quarterly	Once per calendar quarter.
Semiannually	Once every six calendar months (i.e., two times per year) during non-consecutive quarters.
Annually	Once per year.
mg/L	Milligrams per liter
mL/L	Milliliters [of solids] per liter
µg/L	Micrograms per liter
µmhos/cm	Micromhos per centimeter
gpd	Gallons per day
mgd	Million gallons per day
MPN/100 mL	Most probable number [of organisms] per 100 milliliters
MTF	Multiple tube fermentation



Source
U.S.G.S. Topographic Map
7.5 Minute Quadrangle

SITE LOCATION MAP
Castle City Mobile Home Park WWTF
Placer County

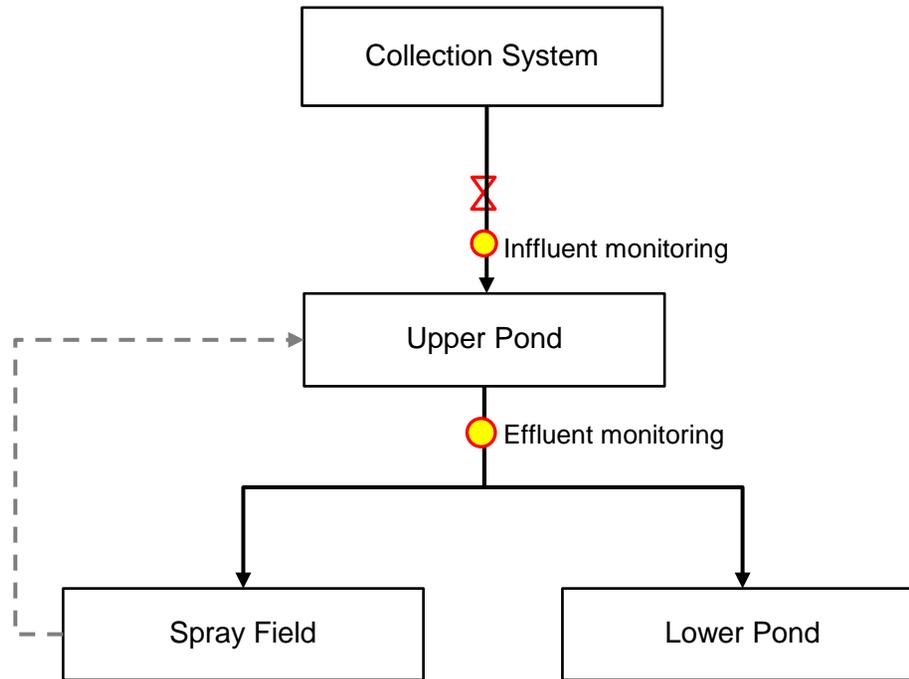
1 in ≈ 3,300 ft



Source
Report of Waste Discharge
Caritas Acquisitions I, LLC
January 2018

SITE PLAN
Castle City Mobile Home Park WWTF
Placer County

 1 in ≈ 180 ft



Source
Report of Waste Discharge
Caltrans
September 2016

FLOW SCHEMATIC
Caltrans Gold Run Rest Area
Placer County

LEGEND

-  Compliance monitoring
-  Flow limit monitoring
-  Overflow return