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## Central Valley Regional Water Quality Control Board

27 October 2021

**CERTIFIED MAIL**  
**7018 1830 0001 2774 7572**

Haren Sanghera  
Ineffable Hospitality, Inc.  
6473 E. Hatch Road  
Hughson, California 95326

**CERTIFIED MAIL**  
**7018 1830 0001 2774 7565**

Sukhjinder and Kulvinder Sanghera  
1516 Tristan Court  
Hughson, California 95326

**NOTICE OF APPLICABILITY (NOA), STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153, GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; INEFFABLE HOSPITALITY, INC. AND SUKHJINDER AND KULVINDER SANGHERA; HAMPTON INN & SUITES THREE RIVERS WASTEWATER TREATMENT FACILITY; TULARE COUNTY**

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

On 21 October 2020, Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff received a Report of Waste Discharge (RWD) prepared by ALD General Engineering, Inc., on behalf of Ineffable Hospitality, Inc. and Sukhjinder and Kulvinder Sanghera (collectively referred to as Discharger). The RWD was submitted for a proposed wastewater treatment facility (Facility or WWTF) to serve a proposed Hampton Inn & Suites (Hotel) and future commercial development in Three Rivers, Tulare County. The RWD was prepared pursuant to State Water Resources Control Board (State Water Board) Water Quality Order 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order). The October 2020 RWD was stamped and signed by Rafael D Divina (RCE 30011) and David C. Annis (P.G. 9444). A Form 200 was submitted along with the October RWD that was signed by Haren Sanghera, President of Ineffable Hospitality, Inc.

The Discharger submitted an updated RWD on 4 November 2020. Central Valley Water Board staff reviewed the October and November 2020 RWDs and responded with a 4 December 2020 review letter and memorandum requesting additional information be submitted to deem the RWD process complete. An updated RWD was submitted on

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KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

1685 E Street, Fresno, CA 93706 | [www.waterboards.ca.gov/centralvalley](http://www.waterboards.ca.gov/centralvalley)

14 December 2020 that included another completed Form 200 with the signatures of Sukhjinder and Kulvinder Sanghera (landowners) and additional information regarding the quality of the proposed disinfected tertiary-treated effluent. The December 2020 RWD was signed and stamped by Rafael D Divina and David C. Annis.

Based on the staff's review of the information provided, the Facility treats and disposes of less than 100,000 gallons of domestic wastewater per day and is eligible for coverage under the General Order. This letter serves as formal notice that the General Order is applicable to your system and the wastewater discharge described below. The Facility's coverage under the General Order is hereby assigned enrollee number **2014-0153-DWQ-R5371**.

You should familiarize yourself with the entire General Order and its attachments enclosed within this letter, which describes mandatory discharge and monitoring requirements. Sampling, monitoring and reporting requirements applicable to your treatment and disposal methods must be completed in accordance with the appropriate treatment system sections of the General Order and the attached Monitoring and Reporting Program (MRP) No. 2014-0153-DWQ-R5371. This MRP was developed after consideration of your waste characterization and site conditions described in the attached memorandum.

#### **DISCHARGE DESCRIPTION**

Ineffable Hospitality, Inc owns the Facility and Hotel and will subcontract the operation of the Facility to a licensed operator. Sukhjinder and Kulvinder Sanghera own the land that the Facility is located on. The Facility and Hotel are to be located approximately 1.2 miles south of Three Rivers on the east side of Highway 198 in Tulare County (Section 26, Township 17 South, Range 28 East, Mount Diablo Base and Meridian) as shown in Attachment A. The property consists of two parcels, Assessor Parcel Numbers 068-080-010 (2.81 acres) and 068-100-010 (1.58 acres), comprising a total of 4.39 acres, as shown in Attachment B.

The proposed hotel will be a 105-room hotel that will generate wastewater from sinks, toilets, showers, laundry, and limited food service that includes dish washing. The WWTF will be an Orenco AX-MAX media bed filtration system with an ultraviolet (UV) light disinfection system. The WWTF is proposed to be constructed in two phases, Phase I will include the Hotel and the entire WWTF except for a septic tank with an effluent pump (or STEP tank) that will be sized specifically for the individual future commercial development of the frontage area. The future commercial development and uses of the frontage lot are speculative. The actual uses described in the RWD (e.g. service station, market, restaurant) were used for calculation purposes only and to develop the available capacity for any future development of the frontage lot. The STEP tank project is Phase II of the WWTF construction.



The cumulative flow to the WWTF is estimated to be 17,145 gallons per day (gpd). The estimated monthly average flow from the Hotel is 13,725 gpd. The estimated monthly average flow from the frontage development is 3,420 gpd.

A flow schematic is included as Attachment C to this NOA. Wastewater from the Hotel (influent) will be routed to a 15,000-gallon Orenco Meander tank (septic tank), while influent from Phase II will gravity flow to a 5,000-gallon STEP tank. Both the Phase I and II developments will have pretreatment controls in the form of grease traps downstream of the sources but before the septic tanks. From the Orenco Meander septic tank, primary treated wastewater will be pumped to the Orenco AX-MAX units, then through a media bed filtration system as shown in Attachment C. The wastewater is then disinfected using an ultraviolet (UV) light treatment system prior to being discharged to a subsurface drip system. Ground cover will be planted over the drip field to provide additional treatment, prevent erosion, and increase wastewater reuse through plant evapotranspiration.

#### **FACILITY SPECIFIC REQUIREMENTS AND EFFLUENT LIMITATIONS**

The Discharger shall maintain exclusive control over the discharge and shall comply with the terms and conditions of this NOA, General Order 2014-0153-DWQ, with all attachments, and MRP No. 2014-0153-DWQ-R5371.

In accordance with section B.1 of the General Order, wastewater discharged from the WWTF to the onsite subsurface drip irrigation system shall not exceed a **monthly average discharge of 17,145 gallons per day (gpd)**. In accordance with the requirements of the General Order, this NOA does not specify a nitrogen effluent limitation since the Facility flow rate is less than 20,000 gpd. However, the RWD indicates that the site is underlain by sand and gravel deposits that have rapid percolation rates (discussed in greater detail in the attached memorandum). Therefore, MRP 2014-0153-DWQ-R5371 requires the submittal of a groundwater monitoring work plan to monitor the quality of the underlying groundwater in the area of the subsurface disposal system.

As discussed in the attached memorandum, the Discharger shall comply with the effluent limitations specified in Table 1 below when discharging to the onsite subsurface drip irrigation system. Compliance with the effluent limitations specified in Table 2 shall be determined at a point after the disinfection system prior to discharge to the subsurface drip irrigation system.

**Table 1 - Effluent Limitations**

<b>Constituent</b>	<b>Unit</b>	<b>Monthly Average Limit</b>	<b>7-day Average Limit</b>
Biochemical Oxygen Demand (BOD)	mg/L	30	45

Constituent	Unit	Monthly Average Limit	7-day Average Limit
Total Suspended Solids (TSS)	mg/L	30	45
Total Coliform Organisms	MPN/100 mL	---	2.2

The General Order states in Section B.1 that the Discharger shall comply with the setbacks as described in Table 3 of the General Order. This table summarizes different setback requirements for wastewater treatment system equipment, activities, land application areas, and storage and/or treatment ponds from sensitive receptors and property lines where applicable. The Discharger shall comply with the applicable setback requirements, as summarized in Table 2:

**Table 2 – Site-Specific Applicable Setback Requirements**

Equipment or Activity	Domestic Well	Flowing Stream	Ephemeral Stream Drainage	Property Line
Septic Tank, Treatment System, or Collection System	150 ft.	50 ft.	50 ft.	5 ft.
Subsurface Dispersal System	100 ft.	100 ft.	50 ft.	5 ft.

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

1. Septic system requirements specified in Section B.2 of the General Order;
2. Activated Sludge System requirements specified in Section B.4 of the General Order;
3. Subsurface Disposal requirements specified in Section B.6 of the General Order;
4. Sludge/Solids/Biosolids Disposal requirements specified in Section B.8 of the General Order; and
5. Groundwater and Surface Water Limitations specified in Section C.1 of the General Order.

Provision E.1 of the General Order requires dischargers enrolled under the General Order to prepare and implement the following reports within **90 days** of the issuance of the NOA (**by 25 January 2022**):

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

A copy of the Spill Prevention and Emergency Response Plan, the Sampling and Analysis Plan, and Sludge Management Plan shall be maintained at the treatment facility and shall be presented to the Regional Water Board staff upon request. The Sludge Management Plan shall be submitted to the Central Valley Water Board **within 90 days (by 25 January 2022)** of issuance of the NOA.

As stated in Section E.2.w., in the event any change in control or ownership of the Facility or wastewater disposal areas, the Discharger must notify the succeeding owner or operator of the existence of this General Order by letter, a copy of which shall be immediately forwarded to the Central Valley Water Board Executive Officer.

Failure to comply with the requirements in this NOA, General Order 2014-0153-DWQ, with all attachments, and MRP No. 2014-0153-DWQ-R5371 could result in an enforcement action as authorized by provisions of the California Water Code. Discharge of wastes other than those described in this NOA is prohibited. If the method of waste disposal changes from that described in this NOA, you must submit a new Report of Waste Discharge describing the new operation.

The required annual fee specified in the annual billing from the State Water Board shall be paid until this NOA is officially terminated. You must notify this office in writing if the discharge regulated by the General Order ceases, so that we may terminate coverage and avoid unnecessary billing.

### **SALT AND NITRATE CONTROL PROGRAMS**

On 31 May 2018, the Central Valley Water Board adopted Basin Plan amendments incorporating new strategies for addressing ongoing salt and nitrate accumulation in the Central Valley as part of the Central Valley Salinity Alternatives for Long-Term Sustainability (**CV-SALTS**) initiative. These Basin Plan amendments became effective on 17 January 2020. The Discharger has been assigned **CV-SALTS ID: 3600**. As the WWTF is not constructed yet and has not previously been regulated by the Central Valley Water Board, a Notice to Comply for the Salt Control Program is being issued as part of this NOA (see Attachment D). Pursuant to California Water Code 13260, the Discharger must submit Notice of Intent for the Salt Control Program by **29 November 2021**.

For the Nitrate Control Program, the WWTF falls outside a prioritized groundwater basin. The closest prioritized basin is Groundwater Sub-Basin 5-22.08 (San Joaquin Valley - Kings). Implementation within a non-prioritized basin/sub-basin will occur as directed by the Central Valley Water Board Executive Officer. As these programs are implemented,

the Central Valley Water Board may find it necessary to modify the requirements of this NOA to ensure the goals of the Salt and Nitrate Control Programs are met. For more information regarding the Salt and Nitrate Control Programs, you are encouraged to go to the [CV-SALTS Website](https://www.cvsalinity.org/public-info) (<https://www.cvsalinity.org/public-info>).

## **DOCUMENT SUBMITTALS**

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

**Program:** Non-15,  
**Place ID:** 870434,  
**Facility Name:** Hampton Inn and Suites Three Rivers WWTF,  
**Order:** 2014-0153-DWQ-R5371

All documents, including responses to inspections and written notifications, submitted to comply with this General Order shall be directed, via the paperless office system, to the Compliance and Enforcement Unit, attention to Russell Walls. Mr. Walls can be reached at (559) 488-4392 or [Russell.Walls@waterboards.ca.gov](mailto:Russell.Walls@waterboards.ca.gov). Questions regarding the permitting aspects of the General Order, and notification for termination of coverage under the Small Domestic General Order, shall be directed, via the paperless office system, to the WDR Permitting Unit, attention Jeffrey Pyle. Mr. Pyle can be reached at (559) 445-5145 or by email at [Jeffrey.Pyle@waterboards.ca.gov](mailto:Jeffrey.Pyle@waterboards.ca.gov).

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Resources Control Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Resources Control Board must receive the petition by 5:00 p.m., 30 days after the date of this NOA, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Resources Control Board by 5:00 p.m. on the next business day. [Copies of the law and regulations applicable to filing petitions](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) may be found on the internet ([http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality)) or will be provided upon request.

In order to conserve paper and reduce mailing costs, a paper copy of the General Order has been sent only to the Discharger. Others are advised that the [General Order](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo_2014_0153_dwq.pdf) is available on the State Water Board's website ([http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2014/wqo\\_2014\\_0153\\_dwq.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo_2014_0153_dwq.pdf)).

If you have any questions regarding this matter, please contact Jeffrey Pyle by phone at (559) 445-5145, or by email at [Jeffrey.Pyle@waterboards.ca.gov](mailto:Jeffrey.Pyle@waterboards.ca.gov).

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

Attachments:

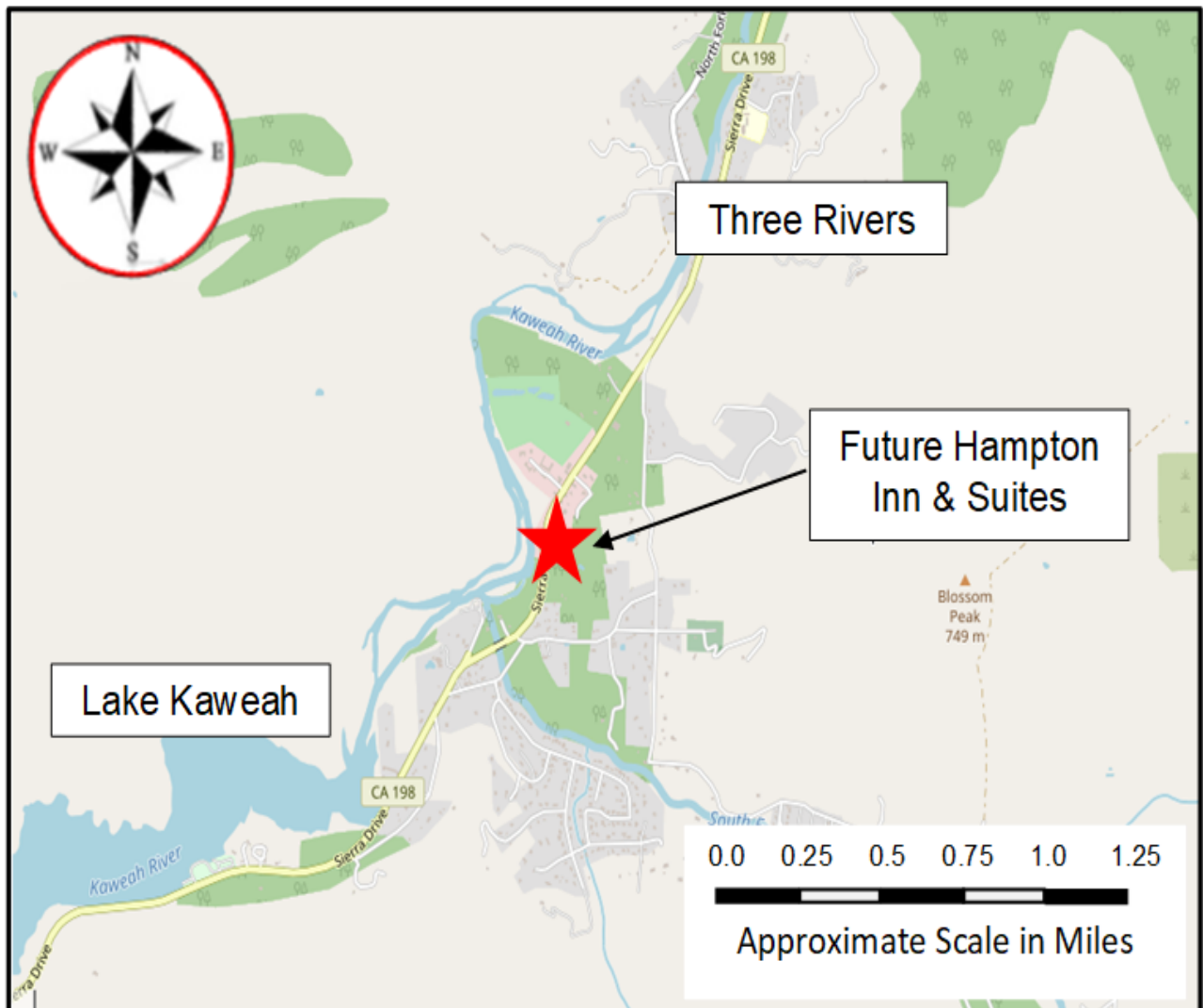
- Attachment A – Site Location Map
- Attachment B – Site Map
- Attachment C – Flow Schematic
- Attachment D - Salt Control Program Notice to Comply

Enclosures:

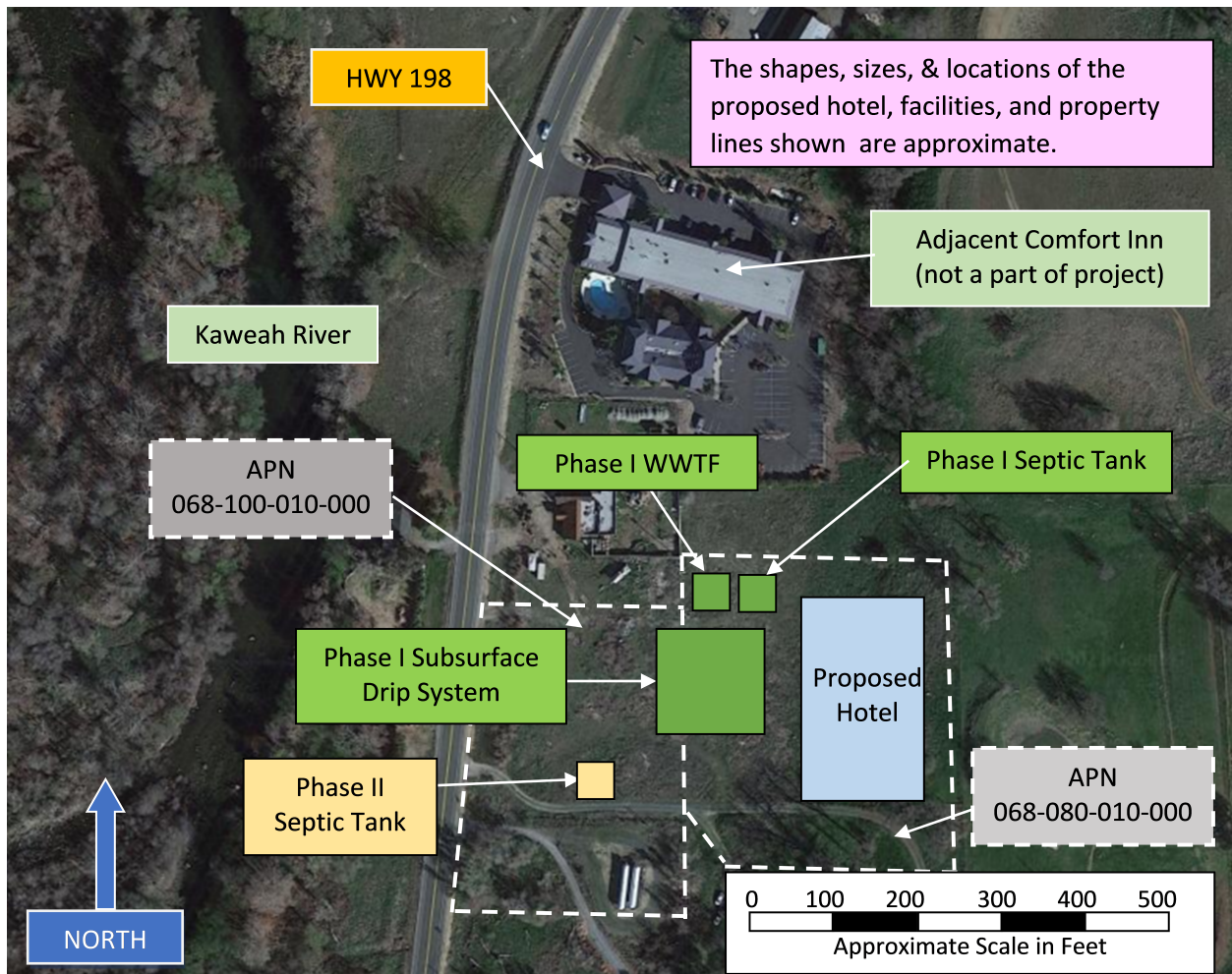
- Monitoring and Reporting Program 2014-0153-DWQ-R5371
- 27 October 2021 Review Memorandum of Hampton Inn and Suites, Three Rivers WWTF
- State Water Resources Control Board WQ 2014-0153-DWQ (Discharger Only)

cc's:

- David Lancaster, State Water Resources Control Board, OCC (via email)
- Laurel Warddrip, State Water Resources Control Board, DWQ (via email)
- Anna Mancillas, Central Valley Water Board, Fresno (via email)
- [Rb5s-cvsalts@waterboards.ca.gov](mailto:Rb5s-cvsalts@waterboards.ca.gov)
- Russell Walls, Central Valley Water Board, Compliance and Enforcement Unit, Fresno (via email)
- Tulare County Environmental Health Department (via email)
- Debbie Webster, CVCWA (via email)
- Kaweah Coalition, Three Rivers (via email)
- Kuhlinder Sanghera, Landowner (via email)
- Delores Lucero, Three Rivers Resident (via email)

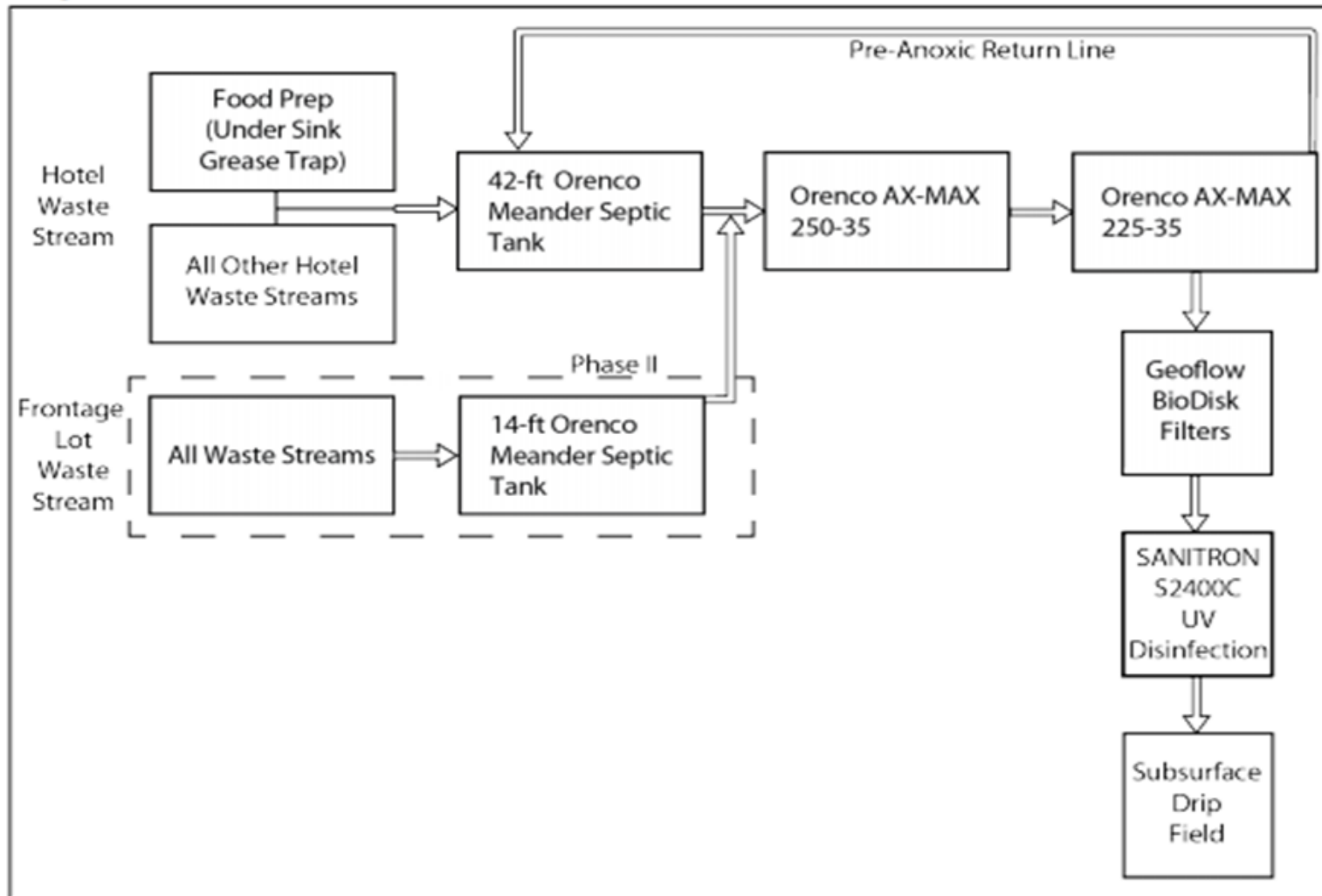


**ATTACHMENT A – SITE LOCATION MAP**  
**NOTICE OF APPLICABILITY 2014-0153-DWQ-R5371**



**ATTACHMENT B – SITE MAP**  
**NOTICE OF APPLICABILITY 2014-0153-DWQ-R5371**





**ATTACHMENT C – FLOW SCHEMATIC**  
**NOTICE OF APPLICABILITY 2014-0153-DWQ-R5371**



**ATTACHMENT D -  
SALT CONTROL PROGRAM NOTICE TO COMPLY  
(CV-SALTS ID: 3600)  
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5371**

**BACKGROUND**

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

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

**SALT CONTROL PROGRAM**

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

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

**A. Conservative Salinity Permitting Approach**

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

**B. Alternative Salinity Permitting Approach**

The Alternative Salinity Permitting Approach (Alternative Approach) provides a compliance option to permittees who participate in and provide a minimum level of financial support for the Prioritization and Optimization Study (P&O Study), led by the Central Valley Salinity Coalition, during Phase I of the Salt Control Program. Permittees in the Alternative Approach are not required to meet the more stringent limitations of the Conservative Approach, however, they must continue to implement efforts to control salt discharges through salinity

Salt Control Program  
Notice to Comply

management practices and/or performance-based measures as determined by the Central Valley Water Board.

## RESPONDING TO THIS NTC

1. Visit the website, [cvsalts.info website](https://www.cvsalinity.org/public-info) (<https://www.cvsalinity.org/public-info>) for more information on the Salt Control Program, including:

- Salt Control Program requirements and timelines for both permitting pathways
- Characterizing your salinity impacts to surface and/or groundwater
- Participation requirements and fees for the P&O Study
- Answers to Frequently Asked Questions

The [cvsalts.info](https://www.cvsalinity.org/public-info) website will be updated regularly, so be sure to check back frequently for the latest information. You can also check the website for upcoming webinars that will provide guidance information.

[A full copy of the Salt and Nitrate Control Program Basin Plan language](https://www.waterboards.ca.gov/cvsalts/salt_nitrate_bpa/sncp_accepted_bp_lang_official.pdf), can be found at:

([https://www.waterboards.ca.gov/cvsalts/salt\\_nitrate\\_bpa/sncp\\_accepted\\_bp\\_lang\\_official.pdf](https://www.waterboards.ca.gov/cvsalts/salt_nitrate_bpa/sncp_accepted_bp_lang_official.pdf)).

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

### A. Conservative Approach

- i. Conduct a comprehensive assessment of your salinity impacts to surface and/or groundwater.
- ii. Prepare a Salinity Characterization Report that demonstrates how your discharge will comply with the Conservative Approach requirements.
- iii. Submit your Salinity Characterization Report along with your NOI indicating your choice of the Conservative Approach Pathway to the Central Valley Water Board.
- iv. Obtain Central Valley Water Board staff approval.

### B. Alternative Approach

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

## Salt Control Program

## Notice to Comply

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

[An electronic fillable PDF version of the NOI](https://www.waterboards.ca.gov/cvsalts/forms_temps_guide/salt_noi_form.pdf) is available at: ([https://www.waterboards.ca.gov/cvsalts/forms\\_temps\\_guide/salt\\_noi\\_form.pdf](https://www.waterboards.ca.gov/cvsalts/forms_temps_guide/salt_noi_form.pdf)). A hardcopy can be sent to you by sending a request by email to [cvsalts@waterboards.ca.gov](mailto:cvsalts@waterboards.ca.gov). The NOI shall be sent via email to [cvsalts@waterboards.ca.gov](mailto:cvsalts@waterboards.ca.gov) or mailed to the address below by **29 November 2021**. Documents too large to be sent in one email may be sent in multiple emails.

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

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

**ENFORCEMENT**

This NTC requires your response under Water Code section 13260. If you do not respond to this request with the materials specified above by the due date, you may be subject to enforcement actions, including actions under Water Code section 13261, which authorizes the Board to impose liability of up to \$1,000 per day for failure to submit a report. Under the new regulations, the Board will regulate permittees who do not elect a pathway under the Conservative Approach. **After 29 November 2021, discharges of salts at concentrations that exceed the conservative salinity limits identified in the Conservative Approach are prohibited unless the permittee is implementing the Phase 1 requirements of the Salt Control Program through either the Conservative Approach or the Alternative Approach.**

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

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

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION**

**MONITORING AND REPORTING PROGRAM NO. 2014-0153-DWQ-R5371  
FOR  
INEFFABLE HOSPITALITY, INC. AND  
SUKHJINDER AND KULVINDER SANGHERA  
HAMPTON INN & SUITES THREE RIVERS WASTEWATER TREATMENT FACILITY  
TULARE COUNTY**

**Please note this MRP requires you to install and monitor groundwater monitoring wells (see pages 5 and 6).**

This Monitoring and Reporting Program (MRP) describes requirements for monitoring a wastewater treatment system. This MRP is issued pursuant to Water Code section 13267 to Ineffable Hospitality, Inc. and Sukhjinder and Kuhlinder Sanghera (collectively referred to as Discharger). The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) or Executive Officer.

Section 13267 of the California Water Code states, in part:

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

Section 13268 of the California Water Code states, in part:

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

*(b)(1) Civil liability may be administratively imposed by a regional board in accordance with Article 2.5 (commencing with section 13323) of Chapter 5 for*

*a violation of subdivision (a) in an amount which shall not exceed one thousand dollars (\$1,000) for each day in which the violation occurs.”*

The Discharger owns the Hampton Inn & Suites Wastewater Treatment Facility (Facility or WWTF) that is subject to the Notice of Applicability (NOA) **2014-0153-DWQ-R5371**, enrolling the Facility under State Water Resources Control Board (State Water Board) Water Quality Order 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order). The reports required in this MRP are necessary to ensure that the Discharger complies with the NOA and General Order. Pursuant to Water Code section 13267, the Discharger shall implement this MRP and shall submit the monitoring reports described herein.

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

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

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

If monitoring consistently shows no significant variation in magnitude of a constituent concentration or parameter after at least 12 months of monitoring, the Discharger may request this MRP be revised to reduce monitoring frequency. The proposal must include adequate technical justification for reduction in monitoring frequency.

### **SEPTIC TANK MONITORING**

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

**Table 1. Septic Tank Monitoring**

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

### **TREATMENT SYSTEM MONITORING**

Influent samples shall be taken from a location that provides representative samples of the wastewater and flow, prior to any treatment or return flows. At a minimum, influent monitoring shall include the monitoring specified in Table 2.

**Table 2 – Influent Monitoring Requirements**

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Total Nitrogen (as N)	mg/L	Grab	Monthly	Quarterly
Oil and Grease	mg/L	Grab	Monthly	Quarterly

Effluent samples shall be taken at an area after disinfection that represents the effluent quality distributed to the disposal area. At a minimum, effluent monitoring shall include the monitoring specified in Table 3.

**Table 3 – Effluent Monitoring Requirements**

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Flow	gpd	Metered	Continuous (see 1 below)	Quarterly
BOD <sub>5</sub>	mg/L	Grab	Monthly	Quarterly
TSS	mg/L	Grab	Monthly	Quarterly
Total Nitrogen	mg/L	Grab	Monthly	Quarterly
pH	SU	Grab	Weekly	Quarterly
EC	µmhos/cm	Grab	Weekly	Quarterly

1. For continuous analyzers, the Discharger shall report documented routine meter maintenance activities including date, time of date, and duration, in which the analyzer(s) is not in operation.

## DISINFECTION SYSTEM MONITORING

Ultraviolet light (UV) disinfection system monitoring shall be collected immediately downstream of the UV system. At a minimum, UV disinfection system monitoring shall include the monitoring specified in Table 4.

**Table 4 – UV Disinfection System Monitoring Requirements**

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Total Coliform Organisms	MPN/100 mL	Grab	Monthly	Quarterly
Turbidity (see 2 below)	NTU	Meter	Continuous (see 1 below)	Quarterly
UV Transmittance	Percent (%)	Meter	Continuous (see 1 below)	Quarterly
UV Intensity	mW/cm <sup>2</sup>	Meter	Continuous (see 1 below)	Quarterly
UV Dose (see 3 below)	mJ/cm <sup>2</sup>	Calculated	Continuous (see 1 below)	Quarterly

1. For continuous analyzers, the Discharger shall report documented routine meter maintenance activities including date, time of date, and duration, in which the analyzer(s) is not in operation.
2. The turbidity meter shall be stationed immediately after the filters, prior to the UV disinfection unit. Report daily average turbidity and maximum turbidity.
3. Report daily minimum, daily average, and weekly average UV dose.

## SUBSURFACE DISPOSAL SYSTEM MONITORING

In general, monitoring shall be sufficient to determine if wastewater is evenly applied, the disposal area is not saturated, burrowing animals and/or deep-rooted plants are not present, and odors are not present. Inspection of dosing pump controllers, automatic distribution valves, etc. is required to maintain optimum treatment in the disposal area. Monitoring of the subsurface disposal area shall, at a minimum, include the monitoring specified in Table 5.

**Table 5 – Subsurface Disposal Area Monitoring Requirements**

Constituent	Inspection Frequency	Reporting Frequency
Pump Controllers, Automatic Valves, etc. (see 1. below)	Quarterly	Quarterly
Nuisance Odor Condition	Quarterly	Quarterly
Saturated Soils Conditions (see 2. below)	Quarterly	Quarterly
Plant Growth(see 3. below)	Quarterly	Quarterly

Constituent	Inspection Frequency	Reporting Frequency
Vectors or Animals Burrowing (see 4. below)	Quarterly	Quarterly

1. All pump controllers and automatic distribution valves shall be inspected for proper operation as recommended by the manufacturer.
2. Inspect a disposal area for saturated conditions.
3. Shallow-rooted plants are generally desirable, deep-rooted plants such as trees shall be removed as necessary.
4. Evidence of animals burrowing shall be immediately investigated, and burrowing animal populations controlled as necessary.

### **SLUDGE/BIOSOLIDS DISPOSAL**

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 names 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

### **GROUNDWATER MONITORING**

**By 27 December 2021**, the Discharger shall submit a groundwater monitoring well work plan for the installation of groundwater monitoring wells to provide groundwater monitoring both upgradient and downgradient of the discharge location.

**By 27 July 2022**, the Discharger shall install the groundwater monitoring wells and submit a groundwater monitoring installation report. **Requirements for monitoring well work plans, and installation reports are included as Attachment A of this Monitoring and Reporting Program.**

Consistent with the Business and Professions Code, groundwater monitoring reports, well construction workplans, etc. shall be prepared under the supervision of a California licensed civil engineer or geologist. Prior to construction of any groundwater monitoring wells, the Discharger shall submit plans and specifications to the Regional Water Board's staff for review and approval. Once installed, all monitoring wells designated as part of the monitoring network shall be sampled and analyzed according to the schedule below.

The data from routine groundwater monitoring events shall be submitted quarterly. Analysis of the data shall be performed at least annually and shall be performed under the supervision of a California licensed professional (as described above). The Discharger may request a reduced monitoring and reporting schedule once adequate data has been collected to characterize the site. (Typically, two years of quarterly sampling is required for adequate characterization.)



Prior to sampling, groundwater elevations shall be measured, and the wells shall be purged of at least three well volumes and until pH and electrical conductivity have stabilized. No-purge, low-flow, or other sampling techniques are acceptable if they are described in an approved Sampling and Analysis Plan. Depth to groundwater shall be measured to the nearest 0.01 feet. Groundwater elevations shall be calculated. Samples shall be collected using approved USEPA methods. Groundwater monitoring shall include, at a minimum, the monitoring included in Table 6 below. The Discharger shall commence groundwater monitoring upon installation of the groundwater monitoring network (**no later than 27 July 2022**).

**Table 6 – Groundwater Monitoring Requirements**

<b>Constituent</b>	<b>Units</b>	<b>Sample Type</b>	<b>Sampling Frequency</b>
Groundwater Elevation (see 1 below)	0.01 Feet	Calculated	Quarterly
Depth to Groundwater	0.01 Feet	Measurement	Quarterly
pH	Std. Units	Grab	Quarterly
EC	µmhos/cm	Grab	Quarterly
TDS	mg/L	Grab	Quarterly
Nitrate (as N)	mg/L	Grab	Quarterly
TKN	mg/L	Grab	Quarterly
Total Nitrogen (as N)	mg/L	Grab	Quarterly
Total Coliform Organisms	MPN/100 mL	Grab	Annually

A groundwater contour map based on groundwater elevations for each quarter shall be submitted with the annual monitoring report. The maps shall show the gradient and direction of groundwater flow in the area of the facility and the effluent disposal area(s). The maps shall also include the locations of monitoring wells and the subsurface disposal area.

## **REPORTING**

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

All regulatory documents, submissions, materials, data, monitoring reports, and correspondence should be converted to a searchable Portable Document Format (PDF)

and submitted electronically. Documents that are less than 50MB should be emailed to: [centralvalleyfresno@waterboards.ca.gov](mailto:centralvalleyfresno@waterboards.ca.gov). Documents that are 50MB or larger should be transferred to a disk and mailed to the appropriate Regional Water Board office, in this case 1685 E Street, Fresno, CA 93706. To ensure that your submittals are routed to the appropriate staff, the following information block should be included in any email used to transmit documents to this office:

**Program:** Non-15,  
**Place ID:** 870434  
**Facility Name:** Hampton Inn, Three Rivers WWTF,  
**Order:** 2014-0153-DWQ-R5371

#### **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 1<sup>st</sup>). The reports shall bear the certification and signature of the Discharger's authorized representative. At the minimum, the quarterly reports shall include:

1. Results of all required monitoring.
2. A comparison of monitoring data to the requirements (including the flow limitation), disclosure of any violations of the NOA and/or General Order, and an explanation of any violation of those requirements. (Data shall be presented in tabular format).
3. Copies of laboratory analytical report(s) and chain of custody form(s).
4. For each groundwater monitoring well, a table showing the results of groundwater monitoring for the parameters/constituents listed in Table 5 for at least the last five quarters, up through the current quarter.

#### **B. Annual Report**

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

1. Tabular and graphical summaries of all monitoring data collected during the year.
2. An evaluation of the performance of the wastewater treatment system, including discussion of the capacity issues nuisances' conditions, system problems and a forecast of the flows anticipated in the next year. A flow rate evaluation, as described in the General Order (Provision E.2.c), shall also be submitted.

3. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into compliance with the NOA and/or General Order.
4. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
5. The name and contact information for the wastewater operator responsible for operation, maintenance, and system monitoring.
6. Groundwater contour maps based on groundwater elevations for each quarter of the calendar year. The maps shall show the gradient and direction of groundwater flow under/around the facility and/or effluent disposal area for each quarter. The maps shall also include the locations of monitoring wells and subsurface wastewater disposal area.
7. An evaluation of the groundwater quality beneath the site and determination of compliance or noncompliance with the Groundwater and Surface Water Limitations specified in Section C.1 of the General Order.

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

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

The Discharger shall implement the above monitoring program on 1 December 2021.

Ordered by:

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

*10/27/2021*  
(Date)

## GLOSSARY

BOD <sub>5</sub>	Five-day biochemical oxygen demand
CaCO <sub>3</sub>	Calcium carbonate
DO	Dissolved oxygen
EC	Electrical conductivity at 25° C
FDS	Fixed dissolved solids
TDS	Total dissolved solids
TKN	Total Kjeldahl nitrogen
TSS	Total suspended solids
Continuous	The specified parameter shall be measured by a meter continuously.
24-hr Composite eight aliquots	Samples shall be a flow-proportioned composite consisting of at least over a 24-hour period.
Daily	Every day except weekends or holidays.
Twice Weekly	Twice per week on non-consecutive days.
Weekly	Once per week.
Twice Monthly	Twice per month during non-consecutive weeks.
Monthly	Once per calendar month.
Quarterly	Once per calendar quarter.
Semiannually	Once every six calendar months (i.e., two times per year) during non-consecutive quarters.
Annually	Once per year.
mg/L	Milligrams per liter
mg/kg	Milligrams per kilogram
mL/L	Milliliters [of solids] per liter
µg/L	Micrograms per liter
µmhos/cm	Micromhos per centimeter
gpd	Gallons per day
mgd	Million gallons per day
MPN/100 mL	Most probable number [of organisms] per 100 milliliters
NA	Denotes not applicable

**ATTACHMENT A**  
**NOTICE OF APPLICABILITY 2014-0153-DWQ-R5371**  
**REQUIREMENTS FOR**  
**MONITORING WELL INSTALLATION WORKPLANS AND**  
**MONITORING WELL INSTALLATION REPORTS**

Prior to installation of groundwater monitoring wells, the Discharger shall submit a workplan containing, at a minimum, the information listed in Section 1, below. Wells may be installed after staff approves the workplan. Upon installation of the monitoring wells, the Discharger shall submit a well installation report which includes the information contained in Section 2 below. All workplans and reports must be prepared under the direction of, and signed by, a registered geologist or civil engineer licensed by the State of California.

**SECTION 1 -Monitoring Well Installation Workplan and Groundwater Sampling and Analysis Plan**

The monitoring well installation workplan shall contain the following minimum information:

**A. General Information:**

- Purpose of the well installation project
- Brief description of local geologic and hydrogeologic conditions
- Proposed monitoring well locations and rationale for well locations
- Topographic map showing facility location, roads, and surface water bodies
- Large-scaled site map showing all existing on-site wells, proposed wells, surface drainage courses, surface water bodies, buildings, waste handling facilities, utilities, and major physical and man-made features

**B. Drilling Details:**

- Description of the on-site supervision of drilling and well installation activities
- Description of drilling equipment and techniques
- Equipment decontamination procedures
- Soil sampling intervals (if appropriate) and logging methods

**C. Monitoring Well Design (in narrative and/or graphic form):**

- Diagram of proposed well construction details:
  - Borehole diameter
  - Casing and screen material, diameter, and centralizer spacing (if needed)

**MONITORING WELL INSTALLATION WORKPLAN  
AND MONITORING WELL INSTALLATION REPORT**

- Type of well caps (bottom cap either screw on or secured with stainless steel screws)
- Anticipated depth of well, length of well casing, and length and position of perforated interval
- Thickness, position and composition of surface seal, sanitary seal, and sand pack
- Anticipated screen slot size and filter pack

**D. Well Development (not to be performed until at least 48 hours after sanitary seal placement):**

- Method of development to be used (i.e., surge, bail, pump, etc.)
- Parameters to be monitored during development and record keeping technique
- Method of determining when development is complete
- Disposal of development water

**E. Well Survey (precision of vertical survey data shall be at least 0.01 foot):**

- Identify the Licensed Land Surveyor or Civil Engineer that will perform the survey
- Datum for survey measurements
- List well features to be surveyed (i.e. top of casing, horizontal and vertical coordinates, etc.)

**Schedule for Completion of Work****F. Appendix: Groundwater Sampling and Analysis Plan (SAP)**

The Groundwater SAP shall be included as an appendix to the workplan, and shall be utilized as a guidance document that is referred to by individuals responsible for conducting groundwater monitoring and sampling activities.

Provide a detailed written description of standard operating procedures for the following:

- Equipment to be used during sampling
- Equipment decontamination procedures
- Water level measurement procedures
- Well purging (include a discussion of procedures to follow if three casing volumes cannot be purged)
- Monitoring and record keeping during water level measurement and well purging (include copies of record keeping logs to be used)

**MONITORING WELL INSTALLATION WORKPLAN  
AND MONITORING WELL INSTALLATION REPORT**

- Purge water disposal
- Analytical methods and required reporting limits
- Sample containers and preservatives
- Sampling
  - General sampling techniques
  - Record keeping during sampling (include copies of record keeping logs to be used)
  - QA/QC samples
- Chain of Custody
- Sample handling and transport

**SECTION 2 - Monitoring Well Installation Report**

The monitoring well installation report must provide the information listed below. In addition, the report must also clearly identify, describe, and justify any deviations from the approved workplan.

**A. General Information:**

- Purpose of the well installation project
- Brief description of local geologic and hydrogeologic conditions encountered during installation of the wells
- Number of monitoring wells installed and copies of County Well Construction Permits
- Topographic map showing facility location, roads, surface water bodies
- Scaled site map showing all previously existing wells, newly installed wells, surface water bodies, buildings, waste handling facilities, utilities, and other major physical and man-made features.

**B. Drilling Details (in narrative and/or graphic form):**

- On-site supervision of drilling and well installation activities
- Drilling contractor and driller's name
- Description of drilling equipment and techniques
- Equipment decontamination procedures
- Soil sampling intervals and logging methods
- Well boring log (including the following):

**MONITORING WELL INSTALLATION WORKPLAN  
AND MONITORING WELL INSTALLATION REPORT**

- Well boring number and date drilled
- Borehole diameter and total depth
- Total depth of open hole (same as total depth drilled if no caving or back-grouting occurs)
- Depth to first encountered groundwater and stabilized groundwater depth
- Detailed description of soils encountered, using the Unified Soil Classification System

**C. Well Construction Details (in narrative and/or graphic form).**

- Well construction diagram, including:
  - Monitoring well number and date constructed
  - Casing and screen material, diameter, and centralizer spacing (if needed)
  - Length of well casing, and length and position of perforated interval
  - Thickness, position and composition of surface seal, sanitary seal, and sand pack
  - Type of well caps (bottom cap either screw on or secured with stainless steel screws)

**D. Well Development:**

- Date(s) and method of development
- How well development completion was determined
- Volume of water purged from well and method of development water disposal
- Field notes from well development should be included in report

**E. Well Survey (survey the top rim of the well casing with the cap removed):**

- Identify the coordinate system and datum for survey measurements
- Describe the measuring points (i.e. ground surface, top of casing, etc.)
- Present the well survey report data in a table

Include the Registered Engineer or Licensed Surveyor's report and field notes in appendix.



## Central Valley Regional Water Quality Control Board

**TO:** Scott J. Hatton  
Supervising Water Resource Control Engineer

**FROM:** Alexander S. Mushegan  
Senior Water Resource Control Engineer  
RCE 84208

Jeffrey S. Pyle  
Engineering Geologist  
PG 7375



**DATE:** 27 October 2021

**APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ-2014-0153; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; INEFFABLE HOSPITALITY, INC. AND SUKHJINDER AND KULVINDER SANGHERA; HAMPTON INN & SUITES THREE RIVERS WASTEWATER TREATMENT FACILITY; TULARE COUNTY**

On 21 October 2020, Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff received a Report of Waste Discharge (RWD) prepared by ALD General Engineering, Inc., on behalf of Ineffable Hospitality, Inc. and Sukhjinder and Kulvinder Sanghera (collectively referred to as Discharger), for a wastewater treatment facility (Facility or WWTF) that will serve a proposed Hampton Inn & Suites (Hotel) in Three Rivers, Tulare County. An updated RWD was submitted on 4 November 2020. Central Valley Water Board staff reviewed both the October and the updated November 2020 RWDs and provided comments in a 4 December 2020 review letter and memorandum. A second updated RWD was submitted on 14 December 2020 that included a completed Form 200 with the signatures of Sukhjinder and Kulvinder Sanghera (landowners) and additional information regarding the quality of the proposed tertiary-treated effluent. The County of Tulare certified a Final Environmental Impact Report (SCH# 2020110016) for the proposed Hotel in June 2021.

The Facility is designed to have domestic wastewater flows less than 100,000 gallons per day (gpd). Therefore, this memorandum provides a summary of the applicability of the Facility to be covered under State Water Resources Control Board's Order WQ 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order).

### **BACKGROUND INFORMATION**

Ineffable Hospitality, Inc., and Sukhvinder and Kulvinder Sanghera will collectively own the Facility and subcontract its operation to a licensed operator. The Form 200 submitted with the RWD lists the operator as HTL Hospitality Advisors of San Rafael, California. The proposed Hotel and WWTF will be on the east side of California State Highway 198 about 1.2 miles south of the community of Three Rivers in Tulare County (latitude 36.42463° and longitude -118.91450°). The property consists of two parcels (Assessor Parcel Numbers 068-080-010 [2.81 acres] and 068-100-010 [1.58 acres]) comprising a total of 4.39 acres. The RWDs indicate the proposed development will include the hotel and a future frontage development that will be served by the WWTF. The RWD states the restaurant is to be a "Subway restaurant, or equivalent" that will have limited amounts of fats, oil, and grease, and a cumulative grease and oil contribution to the "advanced treatment unit" of less than 25 mg/L. The proposed Hotel will consist of 105 rooms and will generate wastewater from sinks, toilets, showers, laundry, and limited food service that includes dish washing.

### **DESCRIPTION OF DISCHARGE**

The WWTF will be an Orenco AX-MAX media bed filtration system with an ultraviolet (UV) light disinfection system. The WWTF is proposed to be constructed in two phases. Phase I will include the hotel and the entire WWTF except for a septic tank with an effluent pump (or STEP tank) that will be sized specifically for the future frontage area commercial development. The STEP tank project is Phase II of the development. The RWD estimates the Hotel will generate a monthly average flow of 13,725 gallons per day (gpd) and the future frontage development will generate 3,420 gpd. The cumulative flow to the WWTF is estimated to be 17,145 gpd, and the RWD indicates in Section 1.2 that the system is designed with the capability to treat a maximum flow of 17,145 gpd.

Wastewater from the hotel will be routed to a 15,000-gallon Orenco Meander tank or septic tank, while wastewater from Phase II will gravity flow to a 5,000-gallon step tank. Both the Phase I and II developments will have pretreatment controls in the form of grease traps downstream of the source but before the septic tanks. From the septic tanks, wastewater will be pumped to the Orenco AX-MAX WWTF for treatment.

The original October 2020 RWD noted in Section 2.2.2.2 that the treatment system was designed to have a pre-anoxic tank to reduce nitrogen in the treated effluent, but since the General Order does not require a nitrogen evaluation for systems with flows less

than 20,000 gpd, the October 2020 RWD stated a pre-anoxic tank would not be installed. Central Valley Water Board staff had concerns with the omission of the pre-anoxic tank due to the proximity of the Kaweah River and the rapid percolation rates reported in the RWD. Central Valley Water Board staff discussed the issue with Mr. David Annis of ALD General Engineering, Inc. and the need for a pre-anoxic tank was addressed in the December 2020 RWD. Appendix D of the December 2020 RWD included a December 2020 letter from Orenco that stated, *“In this design, the 15,000-gallon meander tank had been sized to function as a pre-anoxic tank in lieu of a separate pre-anoxic tank as specified in the Commercial Design Criteria.”*

From the Orenco treatment system, treated wastewater will be discharged to a subsurface drip system. The subsurface drip system will cover an area of about 0.33 acres. The drip system was sized using an average percolation rate of 0.45 minutes per inch, a design loading rate of 1.2 gallons per foot squared per day (gal/ft<sup>2</sup>/day), and a design capacity of 17,145 gpd. The system will consist of 1.0 gallon per hour drip line with two-foot emitter spacing installed 8-inches below the ground surface. According to the Mr. David Annis, ground cover will be installed over the drip field that will provide “additional treatment, prevent erosion, and increase wastewater reuse through plant evapotranspiration.

Using published sources for influent and effluent quality (Crites and Tchobanoglous, 1998; Hantzsche and Finnemore, 1992; etc.) the RWD provided estimates of the influent and effluent quality as shown in Table 1.

**Table 11 - Estimated Influent and Effluent Quality**

Constituent	Unit	Influent	Effluent
Biochemical Oxygen Demand (BOD <sub>5</sub> )	mg/L	315 - 440	<30
Total Suspended Solids (TSS)	mg/L	100 - 350	<30
Total Nitrogen	mg/L	50 - 70	14 - 17
Total Coliform Organisms	MPN/100mL	---	<2.2
Electrical Conductivity (EC)	µmhos/cm	250 - 850	250 - 850
Total Dissolved Solids (TDS)	mg/L	900 – 1,680	900 – 1,680

### **POTENTIAL THREAT TO WATER QUALITY**

The RWDs did not provide a summary/review of the source water quality but did indicate that the EC for groundwater locally was 560 to 580 µmhos/cm. A review of State Water Resources Control Board’s Groundwater Ambient Monitoring Assessment Program (GAMA) showed three municipal supply wells north/northeast of the Hotel. Well No. 5403062-001 (Well #1), Well No. 5400887-002 (Well #2), and Well No. 5400887-001 (Well #3). Well #1 is the closest of the wells and adjacent the northeast corner of the Hotel property. Well #2, an inactive municipal well, is about 400 feet

north/northeast of Well #1. Well #3 is about 800 feet northeast of the northeast corner of the Hotel property.

Results for nitrate (as N) for the three wells are shown below in Table 2. The available nitrate data included the following: 21 results between October 2003 and May 2021 for Well #1, 1 result from December 2003 for Well #2, and 16 results from September 1999 to July 2020 for Well #3. The average result for Well # 1 and Well # 3 are shown first with the range of the detections shown below in parentheses.

**Table 2 – Groundwater – Area Nitrate as Nitrogen Results**

Well Number	Date	Units	Results
Well # 1 5403062-001	October 2003 – May 2021	mg/L	4.4 (2.0 – 6.2)
Well # 2 5400887-002	December 2003	mg/L	4.5
Well # 3 5400887-001	September 1999 – July 2020	mg/L	4.5 (2.2 – 5.9)

The results for additional constituents are shown in Table 3.

**Table 3 – Groundwater Quality**

Constituent	Units	Well #1 (Well 5403062-001) 27 September 1999	Well #3 (Well 5400887-001) 15 November 2018
Electrical Conductivity (EC))	µmhos/cm	581	560
Total Dissolved Solids (TDS)	mg/L	440	380
Chloride	mg/L	11	14
Sodium	mg/L	17	15
Sulfate	mg/L	14	15.3
Alkalinity	mg/L	280	230
Bicarbonate Alkalinity	mg/L	340	280

Seasonal high groundwater is reported to be located approximately 10 to 12 feet below the ground surface. Appendix C of the December RWD includes a November 2019 Site Evaluation Report prepared by the Dirt Guys of Bakersfield to assess soil conditions at the site. Six test pits were advanced to four feet bgs and had percolation rates ranging from 0.17 to 0.91 minutes per inch (min/in). The RWDs note that due to the shallow groundwater and the rapid percolation rates, the discharge from the WWTF requires advanced treatment and disinfection.

Due to the site conditions, the Monitoring and Reporting Program for the Facility should include groundwater monitoring, specifically to evaluate any impacts the Facility's

discharge could have on underlying groundwater nitrate concentrations. The site conditions that warrant groundwater monitoring include the rapid percolation rates, shallow groundwater, the proximity of the disposal area to the Kaweah River, and the estimated total nitrogen concentrations in effluent ranging from 14 to 17 mg/L. The groundwater monitoring network should monitor the quality of groundwater upgradient and downgradient of the Facility and the subsurface disposal system.

Finding 6 of the General Order states dischargers enrolled under the General Order must comply with the applicable Basin Plan requirements, and that between the requirements of the General Order and the Basin Plan, the more stringent requirements prevail. The Tulare Lake Basin Plan, Section 3.2.1 contains a water quality objective for bacteria requiring groundwater designated as municipal and domestic supply (MUN) have total coliform of less than 2.2 MPN/100 mL over any 7-day period. Because of the shallow depth to groundwater and its MUN designation and since the Discharger proposes to provide disinfection via UV light disinfection, it is appropriate for the NOA to specify a total coliform limit of 2.2 MPN/100 mL over any 7-day period as specified in the Basin Plan.

#### **MONITORING REQUIREMENTS**

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

- Septic Tank Monitoring
- Activated Sludge Monitoring (Treatment System Monitoring)
- Subsurface Disposal System Monitoring
- Solids Disposal Monitoring
- Disinfection System Monitoring
- Groundwater Monitoring

#### **SALT AND NITRATE CONTROL PROGRAMS**

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

the Office of Administrative Law. The Office of Administrative Law approved the Basin Plan amendments on 15 January 2020.

For the Salt Control Program, the Discharger has not yet received a Notice to Comply since the Facility is new and not previously regulated by the Central Valley Water Board. Therefore, the NOA includes a Notice to Comply for the Salt Control Program. The Discharger is issued CV-SALTS ID: 3600. To comply with the Salt Control Program Notice to Comply, the Discharger will need to choose between Path A (Conservative Option for Salt Permitting) or Path B (Alternative Option for Salt Permitting).

For the Nitrate Control Program, the WWTF falls outside a prioritized groundwater basin. The closest prioritized basin is Groundwater Sub-Basin 5-22.08 (San Joaquin Valley - Kings). Implementation within a non-prioritized basin/sub-basin will occur as directed by the Central Valley Water Board Executive Officer.

More information related to the Salt and Nitrate Control Programs can be found at the [Central Valley Coalition Website](https://www.cvsalinity.org/public-info) (<https://www.cvsalinity.org/public-info>).