Central Valley Regional Water Quality Control Board

28 October 2026

Daniel Ramirez
Facilities Management Administrator
County of San Joaquin
44 N. San Joaquin St.
Stockton, CA. 95202

VIA EMAIL
DIRAMIREZ@SJGOV.ORG

AMENDED NOTICE OF APPLICABILITY (NOA); GENERAL WASTE DISCHARGE REQUIREMENTS ORDER R5-2022-0006-03 FOR LIMITED THREAT DISCHARGES TO SURFACE WATER; COUNTY OF SAN JOAQUIN, 400 EAST MAIN STREET PROJECT, SAN JOAQUIN COUNTY

Our office received a Notice of Intent (NOI) on 11 April 2024 from CBRE, INC with Chris Neilson, as court appointed Receiver, for discharge of treated groundwater to surface water. Based on the application packet and subsequent information submitted by the CBRE, INC., staff determined that the project meets the required conditions for approval under the *General Order for Limited Threat Discharges to Surface Water* (Limited Threat General Order), as a groundwater source project. In a letter dated 14 November 2025, the County of San Joaquin requested an amendment to the current NOA for a change of ownership for the Project from CBRE INC. to the County of San Joaquin (hereinafter Discharger). This project is hereby assigned Limited Threat General Order Notice of Applicability (NOA) R5-2022-0006-040 and National Pollutant Discharge Elimination System (NPDES) Permit No. CAG995002. Please reference your Limited Threat General Order NOA number, **R5-2022-0006-040**, in your correspondence and submitted documents.

The project activities shall be operated in accordance with the requirements contained in the Limited Threat General Order and as specified in this NOA. You are urged to familiarize yourself with the entire contents of the enclosed Limited Threat General Order (https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2022-0006-03_amended.pdf)

CALIFORNIA TOXICS RULE / STATE IMPLEMENTATION POLICY MONITORING
The Limited Threat General Order incorporates the requirements of the California Toxics Rule (CTR) and the State Water Resources Control Board's (State Water Board), *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California*, 2005, also known as the State Implementation Policy (SIP). Screening levels for CTR constituents and other

constituents of concern are found in Attachment I of the Limited Threat General Order. Review of your water quality data in comparison to the screening values, showed reasonable potential for the discharge to cause or contribute to an exceedance of Total Suspended Solids (TSS), Selenium, Tetrachloroethylene, Trichloroethylene, Total Petroleum Hydrocarbons (Gasoline Range), Nitrate and Nitrite water quality objectives in the Delta Waterways (Stockton Ship Channel), which is a water of the United States. However, the proposed treatment system addresses the water quality concern by reducing Total Suspended Solids (TSS), Selenium, Tetrachloroethylene, Trichloroethylene, Total Petroleum Hydrocarbons (Gasoline Range), Nitrate and Nitrite concentrations below water quality objectives; therefore, the Project qualifies for the Limited Threat General Order.

PROJECT DESCRIPTION

American Savings Plaza or the Washington Mutual Building is an existing commercial office building, located at 400 East Main Street in Stockton, California. The building has two below-ground parking levels. The floor elevation of the lower-level parking garage (P2) is approximately 22 feet below ground level, approximately 5.5 feet below mean seal level (MSL). The building was designed and constructed in the late 1980s when groundwater was approximately 30 feet below the level of the lower parking garage floor. Groundwater levels in Stockton have risen since the construction of the building and are now approximately 4 feet below MSL and several feet above the floor elevation of P2. Groundwater has been seeping into the lower-level garage since approximately 2017, through hydrostatic relief vents or floor cracks.

To reduce flooding in P2, a permanent dewatering well system is being designed, constructed, and tested. Test wells and monitoring wells will be installed on the lower-level parking floor. Electric submersible pumps will be installed in select wells; individual wells and the wellfield as a whole will then be tested for capacity. Finally, select test wells will be converted to permanent dewatering wells.

Drilling and construction water, water generated through individual well and wellfield testing, and subsequent dewatering system operations will be treated using a 240 GPM on-site water treatment system (WTS) consisting of bag filtration, ion exchange vessels and liquid-phase granular activated carbon (GAC).

The treatment system was installed in 2 phases. Phase 1 was complete as of the original date of this NOA and consists of bag filtration and liquid-phase granular activated carbon (GAC). Phase 2 added ion exchange vessels to the treatment system and was completed by 20 October 2025. The Discharger certified completion of the treatment system, Phase 2, as required by a special provision in the original NOA.

Treated water from the WTS will be discharged to the City of Stockton Storm Drain System. The Discharger has an agreement with the City of Stockton to accept up to 240 gpm of non-stormwater discharge to the City’s Municipal Separate Storm Sewer System (MS4) from dewatering activities at the site.

FEBRUARY 2026 AMENDMENT (2025 Ownership Change):

CBRE, INC. with Chris Nielson as Court Appointed Receiver was originally identified as the Discharger in the permit application materials and Notice of Applicability R5-2022-0006-040. CBRE INC., with Chris Nielson as Court Appointed receiver have sold the building including governance of discharge activities to the County of San Joaquin (hereinafter Discharger), and ownership was transferred to County of San Joaquin on 23 October 2025.

OCTOBER 2026 AMENDMENT

This NOA was amended in October 2026 to reduce the frequency of effluent selenium monitoring to once per month since this frequency is sufficient to determine compliance with selenium effluent limitations. The discharger is assessing alternative discharge options or alternate selenium treatment methods and the selenium monitoring frequency may be changed again pending the results of this assessment.

DISCHARGE PROHIBITIONS

Discharge prohibitions are specified in Section IV, Discharge Prohibitions, of the Limited Threat General Order. Based on the information provided in the NOI, the following discharge prohibitions are applicable to this discharge:

- Prohibition IV.A
- Prohibition IV.B
- Prohibition IV.C
- Prohibition IV.D. The flow rate shall not exceed 0.35 MGD (or 240 gpm).

EFFLUENT LIMITATIONS

Effluent limitations are specified in Section V, Effluent Limitations and Discharge Specifications, of the Limited Threat General Order. Based on the information provided in the NOI, effluent limitations are only required for the parameter identified in items 1-5, below:

1. **pH (Section V.A.1.b.i).** The pH of all limited threat discharges within the Sacramento and San Joaquin River Basins (except Goose Lake in Modoc County) shall at all times be within the range of 6.5 and 8.5.

2. **Whole Effluent Toxicity, Chronic (Section V.A.2.a).** There shall be no chronic toxicity in the discharge.

3. **Temperature.** For discharges within the legal boundaries of the Sacramento-San Joaquin Delta, the maximum temperature of the discharge shall not exceed the natural receiving water temperature by more than 20°Fahrenheit (°F).

4. **Diazinon and Chlorpyrifos.** For water bodies as specified in Table 3-4 of the Basin Plan for the Sacramento and San Joaquin River Basin, effluent diazinon and chlorpyrifos concentrations shall not exceed the sum of one (1.0) as identified below:

i. Average Monthly Effluent Limitation (AMEL)
SAMEL = CD M-avg/0.079 + CC M-avg/0.012 ≤ 1.0
CD M-AVG = average monthly diazinon effluent concentration in µg/L
CC M-AVG = average monthly chlorpyrifos effluent concentration in µg/L

ii. Maximum Daily Effluent Limitation (MDEL)
SAWEL = CD W-avg/0.16 + CC W-avg/0.025 ≤ 1.0
CD W-AVG = average weekly diazinon effluent concentration in µg/L
CC W-AVG = average weekly chlorpyrifos effluent concentration in µg/L

5. **Constituents and Parameters of Concern (Section V.A.1.e).** The following constituents and parameters in Table 1 below have been identified as having reasonable potential to cause or contribute to an in-stream excursion from water quality objectives and shall not exceed the effluent limitations as listed.

Table 1. Effluent Limitations for Constituents and Parameters of Concern

Parameter	Units	Average Monthly Effluent Limitations	Maximum Daily Effluent Limitations	Section Reference
Total Suspended Solids (TSS)	mg/L	10	20	V.B.1
Selenium, Total	µg/L	4.1	8.2	V.A.1.f
Tetrachloroethylene	µg/L	0.8	1.6	V.A.1.f
Trichloroethylene	µg/L	2.7	5.4	V.A.1.f
Total Petroleum Hydrocarbons (Gasoline Range)	µg/L	--	50	V.B.4
Nitrate as N, Total	mg/L	10	20	V.A.1.e
Nitrite as N, Nitrite	mg/L	1	2	V.A.1.e

Delta Waterways (Stockton Deep Water Ship Channel) is listed for Chlorpyrifos, DDT (Dichlorodiphenyltrichloroethane), Diazinon, Dichlorobromomethane, Dibromochloromethane, Dieldrin, Dioxin, Endosulfan, Furan Compounds, Group A Pesticides, Invasive Species, Lindane/gamma Hexachlorocyclohexane (gamma-HCH), Mercury, PCBs (Polychlorinated biphenyls), Temperature, Tetrachloroethylene/PCE, Toxicity on the Clean Water Act 303(d) List of impaired water bodies. Total Maximum Daily Loads (TMDLs) have not yet been established for the Receiving Water. Therefore, no additional 303(d) based effluent limitations or monitoring requirements are included in this NOA (R5-2022-0006-040).

RECEIVING WATER LIMITATIONS

The Limited Threat General Order includes receiving surface water limitations in Section VIII.A. Based on the information provided in the NOI, only the following receiving surface water limitations are applicable to this discharge:

- Bacteria (VIII.A.2);
- Biostimulatory substances (VIII.A.3);
- Chemical constituents (VIII.A.4);
- Color (VIII.A.5);
- Dissolved oxygen (VIII.A.6.b.iii);
- Floating material (VIII.A.7);
- Oil and grease (VIII.A.8);
- pH (VIII.A.9.a);
- Pesticides ((VIII.A.10);
- Radioactivity (VIII.A.11);
- Suspended sediments (VIII.A.12);
- Settleable substances (VIII.A.13);
- Suspended material (VIII.A.14);
- Taste and odors (VIII.A.15);
- Temperature (VIII.A.16.b);
- Toxicity (VIII.A.17); and
- Turbidity (VIII.A.18.a).

SPECIAL PROVISIONS

The Limited Threat General Order contains Provisions in Section IX.C. Based on information provided in the NOI the following site-specific special provisions are applicable to the Project.

Salinity Evaluation and Minimization Plan – The Limited Threat General Order in Section IX.C.3.c requires Dischargers with projects greater than or equal to 180 days in duration to submit and implement a Salinity Evaluation and Minimization Plan to identify and address sources of salinity discharged from the Facility. Therefore, best management practices through implementation of a Salinity Evaluation and Minimization Plan are necessary to manage salinity levels. A Salinity Evaluation and Minimization Plan shall be submitted by **1 April 2026**.

For enrollees under the Salt Control Program's Alternative Salinity Permitting Approach, Table 15 of the Limited Threat General Order includes performance-based electrical conductivity (EC) triggers to be included in the NOA to ensure the Salinity Evaluation and Minimization Plan is effective. The Discharge submitted a Notice of Intent (NOI) for the Salt Control Program in May 2024 indicating its intent to comply with the Alternative Salinity Permitting Approach and participate in the CV-SALTS Prioritization and Optimization (P&O) Study. Based on effluent EC data from March and April 2024, the maximum effluent concentration for EC was 1,400 µmhos/cm, which results in an annual average **EC effluent trigger of 2,000 µmhos/cm** per Table 16 of the Limited Threat General Order. If the calendar annual average effluent EC exceeds 2,000 µmhos/cm, the Salinity Evaluation and Minimization Plan shall be reviewed and updated. The updated Salinity Evaluation and Minimization Plan shall be submitted by 1 April following the calendar year in which the electrical conductivity concentration exceeded the trigger.

The Discharger must pay the annual P&O Study fee through the Payment Portal (https://www.cvsalinity.org/po-fee-form/). If the portal cannot be accessed or there are questions on how the fee was calculated, please contact info@cvsalinity.org. Once payment has been accepted, the Discharger will receive a Certificate of Participation. Please submit both the Certificate of Participation and the Salt Control Program NOI to the Central Valley Water Board at cvsalts@waterboards.ca.gov.

MONITORING AND REPORTING

Monitoring and reporting requirements are contained in Attachment C of the Limited Threat General Order. The Discharger is required to comply with the following specific monitoring and reporting requirements for the effluent and receiving water in accordance with Attachment C of the Limited Threat General Order.

Monitoring Locations – The Discharger shall monitor the effluent and receiving water at the specified location as follows:

Table 2. Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
001	EFF-001	A location where a representative sample of the effluent can be collected prior to discharging to the City of Stockton Storm MS4 System.

Effluent Monitoring – When discharging to surface water, the Discharger shall monitor the effluent at EFF-001 in accordance with Table C-3 of the Limited Threat General Order and this NOA. The applicable monitoring requirements are as follows in Table 3 and subsequent Table 3 Notes:

Table 3. Effluent Monitoring Requirements

Parameter	Units	Sample Type	Minimum Sampling Frequency
Discharge Flow Rate	MGD & gpm	Calculated	1/Day
Electrical Conductivity @ 25 ºC	µmhos/cm	Grab	1/Month
pH	standard units	Grab	1/Month
Turbidity	NTU	Grab	1/Month
Temperature	°F	Grab	1/Month
Dissolved Oxygen (DO)	mg/L	Grab	1/Month
Total Suspended Solids (TSS)	mg/L	Grab	2/Month
Selenium, Total	µg/L	Grab	1/Month
Tetrachloroethylene	µg/L	Grab	2/Month
Trichloroethylene	µg/L	Grab	2/Month

Parameter	Units	Sample Type	Minimum Sampling Frequency
Total Petroleum Hydrocarbons (Gasoline Range)	µg/L	Grab	2/Month
Nitrate as N, Total	mg/L	Grab	2/Month
Nitrite as N, Total	mg/L	Grab	2/Month
Chronic Toxicity	--	Grab	1/Year

Table 3 Notes

1. **Electrical conductivity, pH, turbidity, temperature, and DO.** A hand-held field meter may be used, provided the meter utilizes a U.S. EPA-approved algorithm/method and is calibrated and maintained in accordance with the manufacturer's instructions. A calibration and maintenance log for each meter used for monitoring required by this Monitoring and Reporting Program shall be maintained at the Facility.
2. **All parameters, except flow.** Pollutants shall be analyzed using the analytical methods described in 40 C.F.R. part 136 or by methods approved by the Central Valley Water Board or the State Water Board.
3. **For hardness and copper.** Monitoring for hardness shall be performed concurrently with effluent sampling for cadmium, chromium (III), copper, lead, nickel, silver, and/or zinc if effluent sampling for any of these pollutants is required.
4. **Chronic toxicity.** Projects over 120 days in duration must perform annual toxicity sampling. See the Monitoring and Reporting Program (Attachment C, Section V of the Limited Threat General Order) for toxicity monitoring requirements.

Section II.B.2 of the Limitations and Discharge Requirements section of the Limited Threat General Order requires that dischargers submit new analytical results every 5 years for pollutants specified in Table I-1 of Attachment I. The Project is considered a groundwater source discharge. Therefore, the Discharger shall submit monitoring results by **01 July 2030** for the following constituents shown in Table 4 and subsequent Table 4 Notes, below:

Table 4. Effluent Characterization Monitoring

Parameter	Units	Sample Type
Biochemical Oxygen Demand (BOD)	mg/L	Grab
Total Suspended Solids (TSS)	mg/L	Grab
Dissolved Oxygen (DO)	mg/L	Grab
Hardness	mg/l	Grab
pH	standard units	Grab
Temperature	°F	Grab
Electrical Conductivity @ 25 ºC	µmhos/cm	Grab
Total Dissolved Solids (TDS)	mg/L	Grab

Parameter	Units	Sample Type
Total Petroleum Hydrocarbons (Gasoline Range)	µg/L	Grab
Turbidity	NTU	Grab
Chlorine, Total Residual	mg/L	Grab
CTR Priority Pollutants	See Attachment I, Table I-3 of the Limited Threat General Order	See Attachment I, Table I-3 of the Limited Threat General Order

Table 4 Notes

1. **For all parameters.** The Discharger is not required to conduct effluent monitoring for constituents that have already been sampled in a given month, as required in Table E-3, except for hardness, pH, and temperature, which shall be conducted concurrently with the effluent sampling.
2. **For all parameters.** Pollutants shall be analyzed using the analytical methods described in 40 C.F.R. part 136 or by methods approved by the Central Valley Water Board or the State Water Board.
3. **For DO, pH, temperature, electrical conductivity, TDS, and turbidity.** A hand-held field meter may be used, provided the meter utilizes a U.S. EPA-approved algorithm/method and is calibrated and maintained in accordance with the manufacturer's instructions. A calibration and maintenance log for each meter used for monitoring required by this Monitoring and Reporting Program shall be maintained at the Facility.
4. **For CTR Priority Pollutants.** See Attachment I, Table I-1, and Table I-3 of the Limited Threat General Order.

Receiving Water Monitoring - *Not required.* The Project discharges directly to the storm drain system which has multiple inputs before reaching the Stockton Deep Water Ship Channel. Therefore, receiving water monitoring in the Stockton Deep Water Ship Channel would not provide sufficient information to evaluate compliance with the receiving water limitations. Where feasible, compliance with the receiving water limitations will be evaluated through monitoring of the effluent.

Monitoring Report Submittals - Monitoring in accordance with the Limited Threat General Order shall begin upon initiation of discharge. Monitoring Reports shall be submitted to the Central Valley Water Board on a quarterly basis, beginning with the **Third Quarter 2025**. This report shall be submitted on **01 November 2025**. All Monitoring Reports shall specify the dates during the monitoring period that the discharge did or did not occur. If monitoring samples were not obtained within 24 hours of initiation of the discharge, the Discharger must document the reasons in the corresponding Monitoring Report. If treatment and discharge has not begun there is no need to monitor. However, a certified Monitoring Report must be submitted stating that there has been no discharge. The Monitoring Reports will clearly state if construction of Phase 2 of the treatment system is complete and operable and, when applicable, the date of completion. Table 5, below, summarizes the Monitoring Report due dates

required under the Limited Threat General Order. Quarterly Monitoring Reports must be submitted until your coverage is formally terminated in accordance with the Limited Threat General Order, even if there is no discharge during the reporting quarter.

Table 5. Monitoring Periods and Reporting Schedule

Monitoring Period for All Sampling Frequencies	Quarterly Report Due Date
First Quarter (1 January through 31 March)	1 May
Second Quarter (1 April through 30 June)	1 August
Third Quarter (1 July through 30 September)	1 November
Fourth Quarter (1 October through 31 December)	1 February of the following year

GENERAL INFORMATION AND REQUIREMENTS

The Discharger must notify Central Valley Water Board staff within 24 hours of having knowledge of 1) the start of each new discharge, 2) noncompliance, and 3) when the discharge ceases. The Central Valley Water Board shall be notified immediately if any effluent limit violation is observed during implementation of the project.

Discharge of material other than what is described in the application is prohibited. The required annual fee (as specified in the annual invoice you will receive from the State Water Resources Control Board) shall be submitted until this NOA is officially terminated. You must notify this office in writing when the discharge regulated by the Limited Threat General Order is no longer necessary by submitting the Request for Termination of Coverage (Attachment E). If a timely written request is not received, the Discharger will be required to pay additional annual fees as determined by the State Water Resources Control Board.

ENFORCEMENT

Failure to comply with the Limited Threat General Order may result in enforcement actions, which could include civil liability. Effluent limitation violations are subject to a Mandatory Minimum Penalty (MMP) of $3,000 per violation. In addition, late Monitoring Reports may be subject to MMPs or discretionary penalties of up to $1,000 per day late. When discharges do not occur during a quarterly monitoring period, the Discharger must still submit a quarterly certified Monitoring Report indicating that no discharge occurred to avoid being subject to enforcement actions.

COMMUNICATION

We have transitioned to a paperless office; therefore, please convert all documents to a searchable Portable Document Format (pdf). All documents, including Monitoring Reports, written notifications, and documents submitted to comply with this NOA and the Limited Threat General Order, should be submitted to the NPDES Compliance and Enforcement Unit, Attention: Jon Rohrbough at centralvalleysacramento@waterboards.ca.gov and Jon.Rohrbough@waterboards.ca.gov. Mr. Rohrbough may also be reached by phone at

(916) 464-4822. Questions about this NOA can be submitted to Central Valley Water Board permitting staff, Matt Richter, at matthew.richter@waterboards.ca.gov.

Please include the following information in the body of the email:

- Attention: NPDES Compliance Unit
- Discharger: Chris Neilson, as court appointed Receiver
- Facility: 400 East Main Street
- County: Sacramento County
- CIWQS place ID: 902775
- CV-SALTs ID: 3665

Documents that are 50 megabytes or larger must be transferred to a DVD, or flash drive and mailed to our office, attention “ECM Mailroom-NPDES".

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 California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water 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 Board by 5:00 p.m. on the next business day. Links to the law and regulations applicable to filing petitions may be found on the Petitions Home Page (http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

Ann Marie Ore

Digitally signed by Ann Marie Ore
Date: 2026.10.29 14:52:16 -07'00'

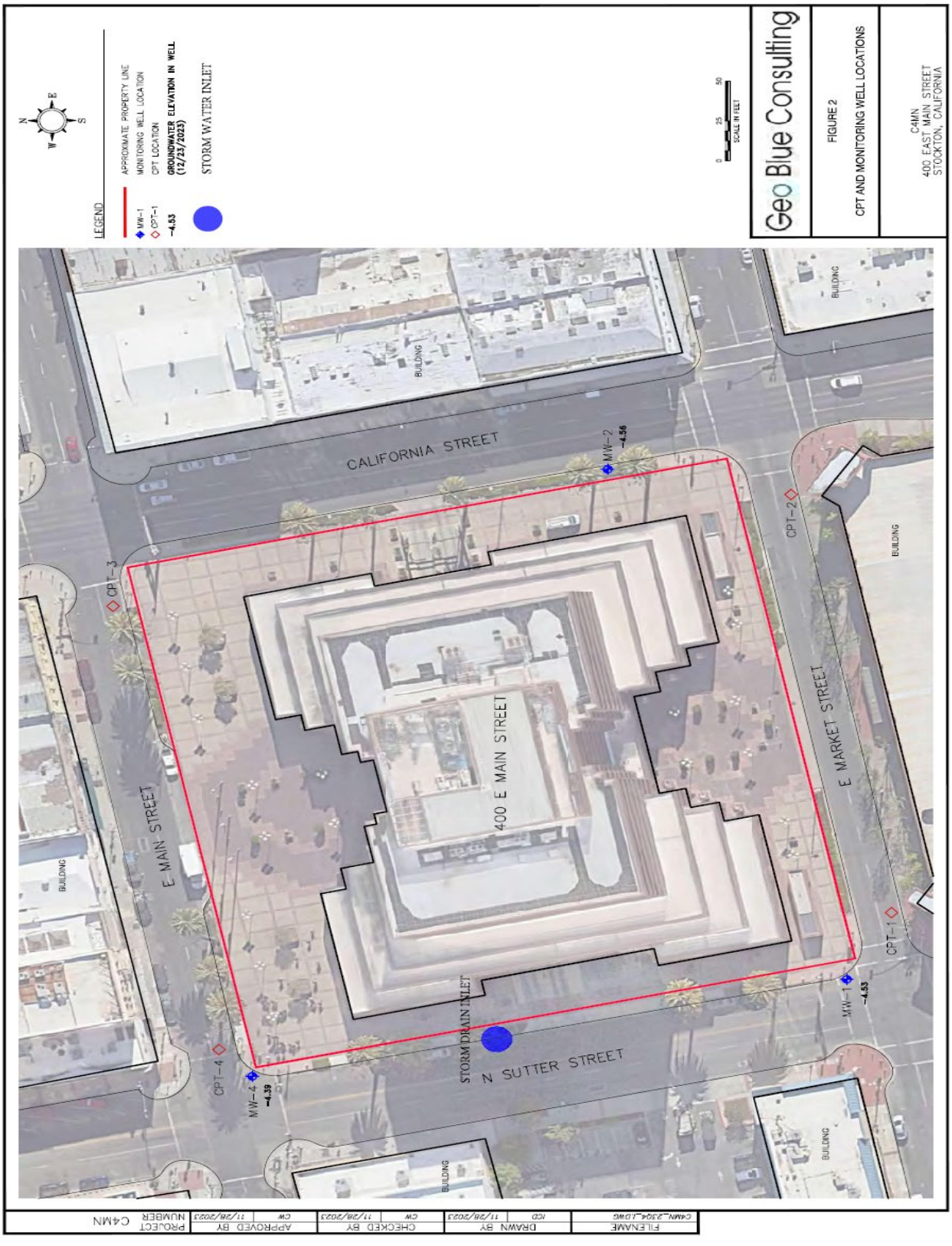
Water Boards

Patrick Pulupa, Executive Officer

Enclosures (2): Attachment A - Project Location Map
Monitoring Report Transmittal Form (Discharger only)

cc: Peter Kozelka, U.S. EPA, Region IX, San Francisco (email only)
Prasad Gullapalli, U.S. EPA Region IX, San Francisco (email only)
Division of Water Quality, State Water Board, Sacramento (email only)

ATTACHMENT A-1 – PROJECT LOCATION MAP



ATTACHMENT A-2 – PROJECT LAYOUT MAP

