

INFORMATION SHEET

ORDER R5-2018-XXXX

U.S. DEPARTMENT OF AGRICULTURE, FOREST SERVICE
& PELORIA MARINAS, LLC, DBA - BRIDGE BAY MARINA
SHASTA COUNTY

Background

Peloria Marinas, LLC, dba Bridge Bay Marina, (facility operator), and the US Department of Agriculture, Forest Service (USFS) (land owner); hereafter "Discharger(s)" are jointly responsible for compliance with the Waste Discharge Requirements (WDRs) for Bridge Bay Marina and Resort (Facility). On 1 September 2017 the Discharger submitted a Report of Waste Discharge (RWD) to apply for renewal of WDRs for an existing privately owned wastewater treatment facility. Additional information was submitted 27 November 2017, 20 December 2017 and 8 January 2018. The RWD was deemed complete 9 January 2018.

This Facility was initially permitted in 1986 under WDR Order 86-064 and updated in 1987 order 87-179, 1994 WDR Order 94-076, and under current WDR Order 5-01-227. In addition efforts to reduce and eliminate graywater discharges within Shasta Lake from this and other similar facilities around Lake Shasta the Central Valley Water Board also adopted Resolution 5-01-211 *Authorizing the Executive Officer to enter into a Memorandum of Understanding with the U.S. Department of Agriculture, Forest Service to Eliminate Graywater Discharges from houseboats to Shasta Lake*, adopted 6 September 2001.

In June 2013 the Facility was purchased by Peloria Marinas, LLC. The Facility is a full-service marina and resort with 739 moorage slips; convenience store, and fuel sales for privately owned houseboats, smaller fishing and leisure boats. Bridge Bay Marina has an assortment of houseboats and a large variety of smaller watercraft rentals. The Facility also has a full service restaurant and 40 room hotel.

EXISTING FACILITY

Peloria Resorts, Inc., has operated the Facility since June 2013. Today, operations at the site include a full-service marina with moorage for houseboats and small boats, rental services for houseboats and small boats, hotel, restaurant, store, and fuel sales. The marina has a total of 532 small boat moorage slips and 207 houseboat slips. The Facility currently maintains 110 rental houseboats and 43 smaller watercraft. Facility services include a landside fueling station for vehicles; two dockside fueling sites for boats; two floating restrooms; landside restrooms in the shop, restaurant, and hotel; boat sewage and gray water pumpouts; and boat storage and repair. Services are provided for boats owned by the marina and the general public. A sheriff's office is maintained at the main dock. Two courtesy docks are operated for public use. Several permanent structures have been constructed at the Facility including a 40 room hotel, a restaurant, landside and waterside stores, administration building, indoor boat repair shop, and a convenience store and houseboat maintenance areas. Two mobile homes are located at the north end of the property, one of which serves as an employee residence. The second mobile home is currently not in use.

A primary access road, seven primary parking areas, and two launch ramps have been constructed onsite. The access road and parking areas are paved and the launch ramp is constructed of concrete. Paved access has been added below the concrete launch ramp for access to the marina during low-water conditions. A houseboat maintenance area is used to maintain and refurbish houseboats.

The on shore boat shop area is used year-round. The on water boat shop is used during the high season, generally from May through October. Boat maintenance in the on shore boat shop occurs in an enclosed building and industrial activities are not exposed to stormwater. Only minor repairs occur at the on water boat shop, with more significant repairs performed under cover.

The general maintenance yard area is located at the south end of the property. The area has an aggregate base covering and is used to service facility vehicles and store excess parts. Incidental vessel maintenance and repair occasionally occur in this area of the Facility; however, the primary activity in this area is storage.

FACILITY DISCHARGE

The original septic system was likely installed when the marina first opened in the 1950s. Based on existing septic system drawings, expansions took place in 1970 and 1974 when additional leachfields were installed under what is now the restaurant parking area. No formal engineered drawings of the septic system have been located in the facility records maintained onsite.

The septic system onsite is operated as three separate units serving three areas: Marina #3, the restaurant, and the hotel. Together, the three systems include ten septic tanks and three leachfields. The southern septic area encompasses the floating restrooms, houseboat pump out stations, and the septic systems of associated service buildings of Marina #3. The northern septic area includes the septic systems for the restaurant and 40 room hotel.

Area 1

Leachfield #3 receives waste from houseboat pumpouts and floating restrooms on the dock, and waste from the on shore store and boat repair shop. The floating restrooms have a 500-gallon holding tank. The on water store has a 250-gallon holding tank. Both holding tanks are pumped to the Marina #3 septic tank at the on shore store (Figure 3). Based on existing drawings, the landside store septic tank has a 25,000-gallon capacity (Appendix A). The septic tank is served by leachfield #3. The septic tank is pumped for offsite disposal on a daily basis during peak season (May- Oct) and less frequently during off-season months. The volume of effluent pumped to leachfield #3 is recorded at a metering station downstream of the septic tank. Two 1,500-gallon surge tanks regulate flow to the leachfield. In 2016, approximately 430,000 gallons of sewage was pumped from the septic tank for offsite disposal and leachfield #3 received approximately 900,000 gallons of effluent.

Area 2

The restaurant septic system includes one septic tank, a grease trap, and two leachfields. The system used to serve the floating restrooms on Marina #1, which were taken out of service in 2014, the restaurant, and the public restrooms (Figure 4). The public restrooms are served by a septic tank of undocumented size. The tank connects to the restaurant septic tank and leachfield #1 via a distribution box and lift pump. The septic tanks and grease trap sizes are undocumented and these features require pumping a few times a year.

Area 3

The hotel septic system serves the 40-room hotel. The hotel utilizes four septic tanks, all of undocumented size, which require pumping a few times a year. The hotel septic system connects to a leachfield #2 under the nearby parking area. A swimming pool was formerly located beside the Hotel leachfield. The pool was permanently closed and filled with gravel in 2017. The two mobile homes on the property are served by a single septic tank (Figure 4). Facility personnel believe the mobile home septic tank connects to the hotel system leachfield, although the location of piping is undocumented and only approximately known (Appendix A). The hotel and restaurant septic systems are pumped occasionally for offsite disposal. The combined tonnage is recorded. No record of individual tank pumping is available.

Constituents of concern that have the potential to degrade groundwater include salts (primarily total dissolved solids (TDS), sodium, and chloride), and nutrients as summarized below:

Constituent	Concentrations (mg/L)		
	Effluent ¹	Water supply ²	Potential Water Quality Objective
TDS	436	200	450 ³ to 1,500 ⁶
FDS	320	--	--
Nitrate Nitrogen	0.50	0.41	10 ⁴
Total Nitrogen	90	--	--
Sulfate	13	22.8	250 ⁵
Sodium	69	6	69 ³
Chloride	68	4.3	106 ³ to 600 ⁶

¹ Combined average of sample results collected from the 3 separate onsite systems 12/13/17.
² Water supply well sampled 5/17/16, Mt. Gate CSD, provider.
³ Lowest agricultural water quality goal.
⁴ Primary Maximum Contaminant Level.
⁵ Secondary Maximum Contaminant Level.
⁶ Secondary Maximum Contaminant Level range

GROUNDWATER CONDITIONS

Depth to groundwater in the vicinity of the Facility has been measured from 11 ft. to 40 ft. below ground surface. Groundwater level is variable and lake level dependent. However, these measurements were taken approximately 20 ft. lower in elevation than the leachfield itself. Direction of groundwater flow is predominantly north towards Lake Shasta. No shallow background/baseline wells have been installed around the leachfields. The Facility had 3

groundwater monitoring wells for a Underground Storage Tanks (UST) case at the Facility that were monitored from 1996 to 2002 and abandoned in 2003; currently the site has no monitoring wells. Some groundwater samples were collected for the UST case but those samples were not in the vicinity of the leachfield, and samples were collected primarily for petroleum related COCs.

BASIN PLAN, BENEFICIAL USES, AND REGULATORY CONSIDERATIONS

The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins, Fourth Edition, revised July 2016 (hereafter Basin Plan) designates beneficial uses, establishes water quality objectives, contains implementation plans and policies for protecting waters of the basin, and incorporates by reference plans and policies adopted by the State Water Board. The beneficial uses of underlying groundwater as set forth in the Basin Plan are Municipal and Domestic Supply (MUN), Agricultural Supply (AGR), Industrial Service Supply (IND), Industrial Process Supply (PRO).

ANTIDEGRADATION

Three monitoring wells were installed at the Facility in 1996 in relation to an underground storage tank case (UST) at the facility. Based on the data available, it is not possible to determine pre-1968 groundwater quality. Therefore, determination of compliance with Resolution 68-16 for this Facility must be based on existing background groundwater quality.

The discharge and the potential for groundwater degradation allowed in this Order is consistent with the Antidegradation Policy since; (a) The degradation is consistent with the maximum benefit to the people of the state, (b) The degradation will not unreasonably affect present and anticipated future beneficial uses, (c) The degradation does not result in water quality less than that prescribed in state and regional policies, including violation of one or more water quality objectives, and (d) The discharger employs best practicable treatment or control (BPTC) to minimize degradation.

CEQA

The adoption of this Order for an existing domestic wastewater treatment and disposal system is categorically exempt from the provisions of California Environmental Quality Act (CEQA) in accordance with California Code of Regulations, title 14, section 15301, which exempts the "operation, repair, maintenance, [and] permitting ... of existing public or private structures, facilities, mechanical equipment, or topographical features" from environmental review.

TITLE 27

Title 27 of the California Code of Regulations (hereafter Title 27) contains regulatory requirements for the treatment, storage, processing, and disposal of solid waste. However, Title 27 exempts certain activities from its provisions. Discharges regulated by this Order are exempt from Title 27 pursuant to provisions that exempt domestic sewage, wastewater, and reuse. Title 27, section 20090 states in part:

- a. Sewage - Discharges of domestic sewage or treated effluent which are regulated by WDRs issued pursuant to Chapter 9, Division 3, Title 23 of this code, or for which WDRs have been waived, and which are consistent with applicable water quality objectives, and treatment or storage facilities associated with municipal wastewater treatment plants, provided that residual sludge or solid waste from wastewater treatment facilities shall be discharged only in accordance with the applicable State Water Resources Control Board (SWRCB) promulgated provisions of this division.
- b. Wastewater - Discharges of wastewater to land, including but not limited to evaporation ponds, percolation ponds, or subsurface leach fields if the following conditions are met:
 - 1) The applicable RWQCB has issued WDRs, reclamation requirements, or waived such issuance;
 - 2) The discharge is in compliance with the applicable water quality control plan; and
 - 3) The wastewater does not need to be managed according to Chapter 11, Division 4.5, Title 22 of this code as a hazardous waste . . .

Proposed Order Terms and Conditions

DISCHARGE PROHIBITIONS, SPECIFICATIONS AND PROVISIONS

1. Discharge of wastes to surface waters or surface water drainage courses is prohibited.
2. Discharge of waste classified as 'hazardous', as defined in the California Code of Regulations, title 22, section 66261.1 et seq., is prohibited.
3. Discharge of waste classified as 'designated', as defined in California Water Code (CWC) Section 13173, in a manner that causes violation of groundwater limitations, is prohibited.
4. Treatment system bypass of untreated or partially treated waste is prohibited, except as allowed by Standard Provision E.2 of the *Standard Provisions and Reporting Requirements for Waste Discharge Requirements*.
5. Discharge of waste at a location or in a manner different from that described in the Findings is prohibited.
6. Discharge of toxic substances into the wastewater treatment system or land application areas such that biological treatment mechanisms are disrupted is prohibited.
7. Discharge of restaurant and grease trap waste, and other commercial or industrial waste into the septic system is prohibited.
8. Surfacing of waste within or downgradient of the leach fields is prohibited.
9. Surfacing of wastewater from the septic system is prohibited.
10. Presence of leachate within one foot of ground surface elevation of the lowest leach field is prohibited.

11. Discharge of sewage, including gray water, to surface waters is prohibited.
12. Discharge of solid or liquid waste or pollutants, including solvents, oil, grease, or other petroleum products, to surface water, or surface water drainage courses is prohibited.
13. By **1 December 2018** the Discharger shall develop and submit a maintenance and monitoring program for its wastewater collection system. The program shall include clear procedures for operation, maintenance of all collection lines; including but not limited to the movement of lines during facility relocation or dock reconfigurations during high and low water events. It shall include procedures for safely connecting and disconnecting lines to avoid releases of any residual wastewater. This program will also include procedures for the pumping and transportation of wastewater offsite to avoid potential releases, and ensure proper disposal of wastewater from the Facility.
14. By **1 July 2019** the Discharger shall submit a leachfield capacity study report. The report shall evaluate the capacity of existing leachfields, establish maximum daily flow volumes for the existing onsite leachfields, and determine how those flows will be measured as not to be exceeded. The Report shall also evaluate options and propose a plan for long term solutions to the facility's capacity issues. This report shall be prepared and signed by a registered professional.
15. By **1 November 2020** (after 8 quarters of effluent sampling from the Marina #3 Septic tank) the discharger shall submit a wastewater assessment report. The report shall evaluate concentration trends of all sampled constituents and provide analysis of potential impacts to ground or surface waters based on the analysis. The Board will use the report to make modifications to the MRP as appropriate.

MONITORING REQUIREMENTS

Section 13267 of the California Water Code authorizes the Central Valley Water Board to require the Discharger to submit monitoring and technical reports as necessary to investigate the impact of a waste discharge on waters of the State.

The proposed Order includes effluent, septic tank, leachfield and surface water, monitoring. This monitoring is necessary to monitor the discharge, evaluate compliance with limitations prescribed by this Order.

REOPENER

The conditions of discharge in the proposed Order were developed based on currently available technical information and applicable water quality laws, regulations, policies, and plans, and are intended to assure conformance with them. The proposed Order would set limitations based on the information provided thus far. If applicable laws and regulations change, or once new information is obtained that will change the overall discharge and its potential to impact groundwater, it may be appropriate to reopen the order.

LEGAL EFFECT OF RESCISSION OF PRIOR WDRS OR ORDERS ON EXISTING VIOLATIONS

The Board's rescission of prior waste discharge requirements and/or monitoring and reporting orders does not extinguish any violations that may have occurred during the time those waste discharge requirements or orders were in effect. The Central Valley Water Board reserves the right to take enforcement actions to address violations of prior prohibitions, limitations, specifications, requirements, or provisions of rescinded waste discharge requirements or orders as allowed by law.

TENTATIVE