CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION

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Regional Board Website (https://www.waterboards.ca.gov/coloradoriver)

WASTE DISCHARGE REQUIREMENTS ORDER R7-2023-0042

ORDER INFORMATION

Order Type(s):	Waste Discharge Requirements (WDRs) with Monitoring and Reporting Program (MRP)
Status:	ADOPTED
Program:	Non-15 Discharges to Land
Discharger(s):	Westwind Enterprises, Ltd.
Facility:	Rio Bend RV and Golf Resort, and Storm's Crossing Mobile Estates OWTS
Address:	1589 Drew Road, 1601 Drew Road
County:	Imperial County
APN(s):	051-280-057, 051-280-056
GeoTracker ID:	WDR100036265
WDID:	7A131003001
Prior Order(s):	WDRs Order R7-2021-0024

CERTIFICATION

I, Paula Rasmussen, Executive Officer, hereby certify that the following is a full, true, and correct copy of the order adopted by the California Regional Water Quality Control Board, Colorado River Basin Region, on October 10, 2023.

Original signed by
PAULA RASMUSSEN
Executive Officer

GeoTracker ID: WDR100036265
WDID: 7A131003001

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GLOSSARY

Antidegradation Policy .....Statement of Policy with Respect to Maintaining High Quality Waters in California, State Water Resources Control Board Resolution 68-16

Basin Plan.....Water Quality Control Plan for Colorado River Basin Region (inclusive of all amendments)

bgs.....Below Ground Surface

BOD5 .....Five-Day Biochemical Oxygen Demand at 20°C

BPTC .....Best Practicable Treatment and Control

CEQA.....California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.)

CEQA Guidelines.....Regulations for Implementation of CEQA (Cal. Code Regs., tit. 14, § 15000 et seq.)

DTSC .....California Department of Toxic Substances Control

DWR.....California Department of Water Resources

GPD .....Gallons per Day

MCL[s] .....Maximum Contaminant Level[s] for Drinking Water under Title 22

µg/L.....Microgram per Liter

mg/L.....Milligrams per Liter

MGD.....Millions of Gallons per Day

MRP .....Monitoring and Reporting Program

NPDES.....National Pollutant Discharge Elimination System

ROWD.....Report of Waste Discharge

GLOSSARY

SMRs .....Self-Monitoring Reports

TDS.....Total Dissolved Solids

Title 22.....California Code of Regulations, Title 22

Title 23.....California Code of Regulations, Title 23

Title 27.....California Code of Regulations, Title 27

USEPA.....United States Environmental Protection Agency

WDRs.....Waste Discharge Requirements

WQO[s].....Water Quality Objective[s]

VOCs .....Volatile Organic Compounds

(findings begin on next page)

FINDINGS

The Colorado River Basin Regional Water Quality Control Board (Colorado River Basin Water Board) hereby finds as follows:

Introduction

1. Westwind Enterprises, Ltd. (Discharger), a limited partnership, owns and operates Rio Bend RV and Golf Resort (Rio Bend), which consists of 451 Recreational Vehicle (RV) spaces and a recreation building with a laundry room. Storm's Crossing Mobile Estates (Storm's Crossing) is adjacent to Rio Bend. Storm's Crossing is also owned and operated by the Discharger and consists of 48 mobile homes, which discharge to evaporation/percolation ponds at the Rio Bend Property. The combined domestic wastewater collection and disposal systems at both properties are regulated as one Onsite Wastewater Treatment and Disposal Facility (Facility) under this Order.

2. The Rio Bend address is 1589 Drew Road, El Centro, California 92243, approximately 14.5 miles northwest of El Centro City. The RV park is registered as having an El Centro address; however, the actual location is approximately two miles south of Seeley.

3. The Storm's Crossing address is 1601 Drew Road, El Centro, California 92243.

4. The evaporation/percolation ponds are in the NE ¼ of Section 23, Township 16 South, Range 12 East, San Bernardino Base and Meridian, 2.5 miles north of Hwy 8 in Imperial County. The Latitude is 32.76641°N and the Longitude is -115.692346°W. The Facility location is shown in Attachment A – Vicinity Map, incorporated herein.

5. The Rio Bend Onsite Wastewater Treatment System (OWTS) was most recently regulated by Order R7-2021-0024, which was adopted by the Regional Water Board on June 27, 2021. Order R7-2021-0024 regulated a group of Onsite Wastewater Treatment Systems (OWTS) that serviced domestic wastewater from 451 RV spaces. Domestic wastewater from 223 of the 451 spaces was collected and discharged to two onsite ponds. The discharge from the remaining 228 RV spaces flowed north and into an existing leach field. Under Order R7-2021-0024, the Facility was assigned California Integrated Water Quality System WDID 7A131003001 and GeoTracker Global Identification WDR100036265.

6. On February 13, 2020, the Regional Water Board was notified of a spill of wastewater from the leach field servicing the group of OTWS onto the nearby

golf course leach field. The Discharger stated that the leach field disposal system was overloaded due to high occupancy, causing domestic wastewater to surface in the golf course. The Discharger proposed to install a lift station at the leach field to pump excess wastewater to the two existing evaporation/percolation ponds.

7. On March 13, 2023, staff at the Regional Water Board conducted a planned-announced inspection. Staff found that Storm's Crossing discharges into the evaporation/percolation ponds at Rio Bend RV and Golf Resort. The Discharger also confirmed the leach fields are no longer used.

8. On March 23, 2023, the Regional Water Board received an application and Report of Waste Discharge (ROWD) for Waste Discharge Requirements (WDRs) submitted by the Discharger, that reported current discharges to the OWTS and disposal system.

9. This Order updates the WDRs to reflect changes in Facility operations. Further, all wastewater treatment and disposal systems at Rio Bend and Storm's Crossing will be regulated by this Order as a single facility.

Facility and Discharge

10. The treatment and disposal systems at Rio Bend service 451 RV spaces that discharge into 80 septic tanks. Each tank can handle the wastewater generated by five to eight RV spaces. Additionally, the treatment and disposal system at Storm's Crossing service 48 mobile homes that discharge into eight septic tanks. Domestic wastewater from all 451 spaces and 48 mobile homes are collected and discharged into two unlined, onsite evaporation/percolation ponds.

11. The ponds are operated at an average wastewater depth of 2.5 and 3.5 feet to prevent aquatic vegetation growth and mosquito breeding and promote aeration via oxygen diffusion from the atmosphere. The main pond has a volume of approximately 13,580 cubic feet. The pond volume is designed to take the wastewater flow of the park at full occupation during the peak winter season of January through March, as well as September through December, when occupancy is expected to vary from 30 percent to 80 percent. However, the smaller pond is used for disposal during the offseason months of April through August, when occupancy is less than 10 percent. The smaller pond has a volume of 1,400 cubic feet, which is equivalent to 12 percent occupancy.

12. During the offseason, wastewater flow from the 451 spaces and 48 mobile homes are discharged to the small pond. During this time, any sludge which

collects on the bottom of the main pond is removed and disposed of at a properly designated location. Any vegetation growth in the pond is also removed at this time. Conversely, during the peak season months, the main pond receives all the wastewater, and the small pond is then serviced.

13. During construction, the ponds were excavated below ground surface (bgs). The silty clay material excavated from the upper layer of the soil was stockpiled and used as liner material at the bottom of the ponds to minimize percolation of wastewater. To ensure acceptable percolation rates in the ponds, the ponds were over-excavated to a depth of at least one foot; the silty clay material was then placed back in the pond bottom to give a nominal percolation rate between five and 60 minutes per inch. Onsite tests were also performed in the bottom of the pond to verify the percolation rate. The full water elevation of the ponds is designed to have a freeboard of two feet.

14. Improvements to the OWTS at Rio Bend under Order R7-2021-0024 consist of two new pumps, two 5,000 gallon holding tanks, and a 750-gallon holding tank. The pumps and holding tanks are designed for a total daily discharge rate of 22,800 gallons per day (gpd); this is equivalent to 100 gallons per space. The design improvements are as follows:

    a. Two single phase, 240-volt, 1.5 horsepower (HP) submersible effluent pumps (duplex pumps) specified with a control panel with alarm light, horn, pump run light, elapsed time meter, and event counters. The duplex pumps operate on alternate run cycles. On, off, and high-water alarm floats are used for pump controls. The two 5,000-gallon pump tanks (10,000-gallon total) have a liquid capacity of about 154 gallons per inch of liquid depth.

    b. The "on/off" float is set at 20 inches below the inlet invert with a 1.75- inch range for approximately 250-gallon individual dosings when the pump is operating at 50 gallons per minute (gpm). Approximately 92 dosings per day, 46 to the oxidation ponds and 46 to the existing leach field, occur with about a five minute pump run time per cycle when the system is operated at full capacity of 22,800 gallons per day. An eight-inch overflow outlet pipe is set at 12 inches below the inlet invert to allow for 1,232 gallons of storage above the "on" float before liquid levels overflow to the 750-gallon holding tank. The alarm (high water level) float is set two inches above the overflow outlet invert.

    c. The duplex pumps have two-inch discharge lines with two-inch diameter check valves and unions installed, just before the shut-off valve for the

pump. A two-inch flow meter and a distribution valve are located after the shut-off valve. Two transport lines extend from the distribution valve.

d. A two-inch diameter discharge (transport) line that extends from the distribution valve connects to the 750-gallon polyethylene holding tank that gravity flows to an existing eight-inch sewer pipe and cleanout that flows to the existing leach field.

e. A 2.5-inch diameter discharge (transport) line extends 1,600 linear feet from the distribution valve and connects to an existing sewer manhole from an eight-inch pipeline that gravity flows into the existing evaporation/percolation ponds.

15. Monthly Self-Monitoring Reports (SMRs) from April 2022 through May 2023 characterize the effluent as summarized in **Table 1**.

Table 1. Effluent Characterization.

Constituent 14	Units	Average	Maximum	Minimum
Flow	GPD	~1,800	~9,278	~0
pH	Std. Units	7.55	8.24	6.64
TDS	mg/L	992	1,200	600
Nitrite + Nitrate as N	mg/L	<0.20	0.77	<0.20
Total Nitrogen	mg/L	78.8	110	36

Hydrogeologic Conditions

16. Annual precipitation in the Seely area averages about 3 inches, the average temperature is 91 degrees, and the annual evapotranspiration rate approximately 70 inches.

17. The New River is adjacent to and bends around on the north, east, and south of the Facility. The RV Park is situated on an elevated plateau that is approximately 40 feet above the New River. In a soil investigation report conducted prior to construction, the depth to groundwater at the site of the evaporation/percolation ponds was found to be 22 feet bgs. The evaporation/percolation ponds are on a

lower plateau where the bottom elevation of the ponds is about 15 feet above groundwater.

18. The Discharger states that the Facility is adequately protected from a 100-year storm event.

19. No domestic wells are within 1000 feet of the onsite evaporation/percolation ponds.

20. Groundwater in the area of the Facility is generally known to be too brackish for domestic use. Prior to a change in zoning from General Agricultural to Recreational, the land at the site of the RV park and evaporation/percolation ponds was used for agricultural purposes. Tile drain systems are located throughout the Imperial Valley to dewater sediments to a depth below the root zone of crops and to prevent the accumulation of salts near the ground surface; however, below the tile drains, recharge groundwater from agricultural drainage has historically been high in salinity, with TDS concentrations greater than 5000 mg/L.

21. Water supply to the community is from the Imperial Irrigation District (IID). The Facility has an onsite water treatment system that distributes domestic water to the residents and tenants of the Facility. TDS concentrations in the water supply ranges from 720 mg/L to 880 mg/L.

22. Regional groundwater flow in the area is generally to the northwest.

23. The Discharger reports that the soil in the vicinity of the OWTS show the upper two to three feet bgs to be a silty clay. From the depth of five to eight feet bgs the soil is mostly sand.

Legal Authority

24. This Order prescribes requirements (WDRs) for the discharge of waste (i.e., wastewater) pursuant to Water Code section 13263, subdivision (a), which provides that "[t]he regional board, after any necessary hearing, shall prescribe requirements [WDRs] as to the nature of any proposed discharge, existing discharge, or material change in an existing discharge…, with relation to the conditions existing in the disposal area or receiving waters upon, or into which, the discharge is made or proposed." Subdivision (a) further requires that the WDRs "implement any relevant water quality control plans that have been adopted, and shall take into consideration the beneficial uses to be protected, the

water quality objectives reasonably required for that purpose, other waste discharges, the need to prevent nuisance, and the provisions of Section 13241."

25. As discussed below, this Order implements the *Colorado River Basin Water Board's Water Quality Control Plan for the Colorado River Basin Region* (Basin Plan), which designates beneficial uses for surface water and groundwater and establishes water quality objectives (WQOs) necessary to preserve such uses.

26. This Order is also issued pursuant to Water Code section 13267, subdivision (b)(1), which provides that "the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, … shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires," provided that "[t]he 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."

27. The technical reports required under this Order, as well as those required under the Monitoring and Reporting Program in Attachment A (including subsequent revisions thereto), are necessary to ensure compliance with prescribed WDRs; additional reasons for the submittal of reports are provided in the findings above. Additionally, the burdens associated with such reports are reasonable relative to the need for their submission.

28. **Attachment A**, incorporated herein, contains a Monitoring and Reporting Program (MRP) with monitoring and reporting requirements that are necessary to ensure compliance with the WDRs. The Executive Officer may issue a Revised MRP as a standalone order, pursuant to her delegated authority under Water Code section 13223. Upon issuance, the Revised MRP shall supersede the provisions of Attachment A.

29. Permitting coverage under this Order is not transferable to any person without written approval by the Executive Officer.

Basin Plan Implementation

30. The Basin Plan designates beneficial uses, establishes water quality objectives (WQOs), and contains implementation programs and policies to achieve those WQOs for all waters addressed through the plan. Pursuant to Water Code section 13263, subdivision (a), WDRs must implement the Basin Plan and take into consideration the beneficial uses to be protected, the WQOs reasonably

required for that purpose, other waste discharges, the need to prevent nuisance, and the provisions of Water Code section 13241.

31. The Facility is located within the Imperial Valley Hydrologic Unit. The Basin Plan designates the following beneficial uses for groundwater:

    a. Municipal Supply (MUN), and

    b. Industrial Supply (IND).

32. Although underlying groundwater is currently designated for MUN beneficial uses, the State Water Resources Control Board's Sources of Drinking Water Policy, Resolution 88-63, provides that groundwater with TDS in excess of 3,000 mg/L cannot reasonably be expected to supply a public water system. (Resolution 88-63, pp. 1-2.) Staff anticipate that underlying groundwater may exceed the TDS threshold for MUN, as the area is generally known to contain brackish groundwater. There are also no groundwater wells; all drinking water is supplied by IID. (See Findings 19-22.)

33. The Facility is situated adjacent to the New River that has the following designated beneficial uses:

    a. Freshwater Replenishment (FRSH),

    b. Water Contact Recreation (REC I),[1]

    c. Non-contact Water Recreation (REC II),

    d. Warm Freshwater Habitat (WARM),

    e. Wildlife Habitat (WILD), and

    f. Rare and endangered species (RARE).[2]

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[1] Although some fishing occurs in the downstream reaches, an advisory has been issued by the Imperial County Health Department warning against the consumption of any fish caught from the river and advisories against body contact with the water.

[2] Rare, endangered, or threatened wildlife exists in or utilizes some of these waterway(s). If the RARE beneficial use may be affected by a water quality control decision, responsibility for substantiation of the existence of rare, endangered, or

34. Adopted pursuant to Water Code section 13263, this Order prescribes WDRs for waste discharges that are not subject to regulation under Clean Water Act section 402 (33 U.S.C. § 1342).

35. These WDRs implement the Basin Plan's numeric and narrative WQOs for groundwater and surface waters established by the Basin Plan and other applicable state and federal laws and policies.

36. The Basin Plan establishes the following WQOs for MUN-designated groundwater:

    a. Tastes and Odors (Narrative): Groundwater shall not contain taste or odor-producing substances that adversely affect beneficial uses as a result of human activity (Ch. 3, § IV.A);

    b. Coliform Bacteria (Numeric): Groundwater shall not contain coliform organisms in exceedance of the limits specified in California Code of Regulations, title 22 (Title 22), section 64426.1 (Ch. 3, § IV.B); and,

    c. Chemical Constituents (Numeric): Groundwater shall not contain organic and inorganic chemical constituents in concentrations exceeding the Primary Maximum Contaminant Levels (MCLs) established for drinking water per Title 22, sections 64431, 64444 and 64678 (Ch. 3, § IV.C). Notably, the Primary MCL for the sum of Nitrate and Nitrate is 10 mg/L (Cal. Code Regs., tit. 22, § 64431.)

37. Although they are not universally incorporated into the Basin Plan as numeric WQOs for MUN-designated groundwater, the Secondary MCLs established for drinking water per Title 22, section 64449 are appropriate in most cases for use as site-specific numeric limits supporting the narrative WQO for groundwater tastes and odors.

38. The discharge authorized by this Order, except for discharges of residual sludge and solid waste, are exempt from the solid waste requirements of California Code of Regulations, title 27, section 20005 et seq. This exemption is based on section 20090, subdivision (b) of title 27 of the California Code of Regulations,

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threatened species on a case-by-case basis is upon the California Department of Fish and Wildlife on its own initiative and/or at the request of the Regional Water Board; and such substantiation must be provided within a reasonable time frame as approved by the Regional Water Board.

which provides that discharges of wastewater to land, including but not limited to evaporation ponds, percolation ponds, or subsurface leach fields are not subject to the requirements of title 27 as long as:

a. The applicable regional water board has issued WDRs, reclamation requirements, or waived such issuance;

b. The discharge is in compliance with the applicable water quality control plan; and

c. The wastewater does not need to be managed according to chapter 11, division 4.5, title 22 of the California Code of Regulations as a "hazardous waste."

39. With respect to the narrative WQO for chemical constituents, specifically the objective for TDS, the Title 22 Secondary MCL specifies a recommended limit of 500 mg/L, and an upper limit of 1,000 mg/L.[3] For the purposes of the site-specific numeric limit supporting the narrative WQO for tastes and odors in MUN-designated groundwater. Regardless of what threshold is selected, the TDS in local groundwater is likely higher than any of these thresholds, meaning that the groundwater likely does not meet the narrative objective for tastes and odors, and is not suitable for MUN beneficial uses. This will be confirmed via the Discharger's groundwater investigation required by the Special Provisions of this Order.

40. Consistent with Water Code section 13241, the Regional Water Board, in establishing the requirements contained herein, considered factors including, but not limited to, the following:

a. Past, present, and probable future beneficial uses of water;

b. Environmental characteristics of the hydrographic unit under consideration, including the quality of water available thereto;

c. Water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area;

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[3] Salinity may alternatively be expressed in terms of microsiemens per centimeter (µS/cm) of Electrical Conductivity (EC). As a Secondary MCL, Title 22 specifies a recommended limit of 900 µS/cm, and an upper limit of 1,600 µS/cm.

d. Economic considerations;

e. The need for developing housing within the region; and

f. The need to develop and use recycled water.

41. Water Code section 13267 authorizes the Regional Water Board to require technical and monitoring reports. The monitoring and reporting requirements in Monitoring and Reporting Program (MRP) R7-2023-00XX are necessary to demonstrate compliance with this Order. The State Water Resources Control Board's (State Water Board) electronic database, GeoTracker, facilitates the submittal and review of monitoring and reporting data. The burden, including costs, of the MRP bears a reasonable relationship to the need for the information and the benefits to be obtained from that information.

Antidegradation Policy Analysis

42. The Basin Plan incorporates the State Water Resources Control Board's *Statement of Policy with Respect to Maintaining High Quality Waters in California*, Resolution 68-16 (Antidegradation Policy). The Antidegradation Policy generally prohibits the Regional Water Board from authorizing discharges that will result in the degradation of "high quality" waters, unless it is demonstrated that such degradation: (a) will be consistent with maximum benefit to the people of the state; (b) will not unreasonably affect beneficial uses or otherwise result in the violation of WQOs; and (c) is minimized through the implementation of best practicable treatment or control (BPTC).

43. The baseline for determining whether waters are "high quality" under the Antidegradation Policy is the highest quality achieved since the policy was established in 1968. If the subject waters have not achieved the minimum quality necessary to meet WQOs since 1968, the waters are considered "poor quality," which means the Antidegradation Policy does not apply. This determination is made on a constituent-by-constituent basis, meaning that waters may be considered "high quality" with respect to some constituents but not others.

44. Based on the Discharger's effluent characterization, nitrogen, TDS, total coliform, and RV waste products are the primary constituents with potential to degrade underlying groundwater. The Colorado River Basin Water Board's analysis under the Antidegradation Policy is therefore limited to discussion of Nitrate/Nitrate (Nitrogen), TDS, total coliform, and RV waste products.

45. **Nitrate and Nitrite:** The Primary MCL for Nitrate and Nitrite (combined) in drinking water is 10 mg/L. (Cal. Code Regs., tit. 22, § 64431.) To account for the fate of transport for the various components of total nitrogen, as a conservative value, it is assumed that all present nitrogen converts to nitrate/nitrite. The potential degradation of groundwater is believed to be greatest under the ponds. Background groundwater total nitrogen at the site is unknown. To evaluate potential degradation to groundwater due to discharges of nitrogen, this Order adds semi-annual total nitrogen and nitrate + nitrite as nitrogen monitoring in the groundwater monitoring wells.

46. **TDS:** According to Department of Water Resources (DWR) historical records, almost all of the groundwater in the general area of the Facility (Imperial Valley) is extremely high in TDS, vastly exceeding the "upper limit" of 1,000 mg/L used as a site-specific numeric limit supporting the narrative WQO for chemical constituents in MUN-designated groundwater. Potable water supply has a TDS concentration between 720 to 880 mg/L. The typical incremental addition of dissolved salts from domestic water usage in wastewater treatment plants ranges from 150 to 380 mg/L. However, the concentration of TDS in underlying groundwater upgradient and downgradient of the Facility's subsurface disposal system is unknown. To evaluate the degradation by TDS due to the discharge, this Order adds semi-annual TDS monitoring in the groundwater monitoring wells.

47. **Total Coliform.** Typical coliform concentration in domestic raw wastewater is about 10^7 to 10^8 most probable number (MPN)/100 mL, and 10^5 to 10^6 for typical secondary treated domestic effluent wastewater. (U.S. environmental Protection Agency, Design Manual: Municipal Wastewater Disinfection, EPA/625/1-86/021, October 1986.) The depth to groundwater, is approximately 15 feet below the bottom of the disposal ponds, it is possible that pathogen-indicator bacteria will reach groundwater in excess of that prescribed in California Code of Regulations, title 22, section 64426.1. To evaluate the degradation by bacteria due to the discharge, this Order adds semi-annual E. coli monitoring in the groundwater monitoring wells.

48. **RV Waste Products.** RV holding tanks or portable toilets may contain chemicals that can pollute groundwater quality. Some commercially available products used to control holding tank/portable toilet odors may contain harmful chemicals such as formaldehyde, zinc, or phenol. The harmful chemicals can kill the bacteria in the wastewater treatment system and cause wastewater to be inadequately treated. The best and least expensive method to prevent groundwater pollution from these harmful chemicals is to educate RV owners about the pollution

hazard. To ensure degradation by RV waste products is not taking place, this Order adds annual groundwater monitoring for VOCs.

49. In the absence of groundwater quality information for TDS and Nitrate/Nitrite, it cannot be determined whether underlying groundwater is "high quality" for purposes of the Antidegradation Policy, or whether the Facility's discharges will result in water quality less than applicable WQOs. Accordingly, this Order requires the Discharger to perform a groundwater investigation to determine the concentrations of TDS, Nitrate, Nitrite, and pathogens both upgradient and downgradient from the disposal system.

50. Degradation of groundwater by some of the typical waste constituents associated with domestic waste, namely nitrogen, TDS, and total coliform, is consistent with the maximum benefit to the people of the state. The Facility provides recreation and tourism to the local area. The economic prosperity of surrounding communities and associated industries is of maximum benefit to the people of the state and provides sufficient justification for allowing any limited groundwater degradation that may occur pursuant to this Order.

Other Regulatory Considerations

51. The WDRs in this Order are currently exempt from the prescriptive requirements of California Code of Regulations, title 27 (Title 27), 20005 et seq., as the wastewater discharges authorized hereunder comply with the Basin Plan, and do not need to be managed as "hazardous waste." (Title 27, § 20090.)

52. Pursuant to Water Code section 106.3, it is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. Although section 106.3 does not directly apply to WDRs, the Basin Plan nevertheless broadly promotes that policy by requiring that MUN-designated groundwater comply with Primary MCLs. (See Finding 36.c.) Although groundwater underneath the Facility is not believed to be suitable for MUN beneficial uses (i.e., due to high salinity), this Order requires the Discharger to conduct a groundwater investigation to determine whether that is the case.

53. The discharge of waste is a privilege, not a right, and adoption of this Order does not create a vested right to continue the discharge. (Wat. Code, § 13263, subd. (g).).

54. Water Code section 13149.2, subdivision (d) requires that the Regional Water Board, "[w]hen issuing…individual waste discharge requirements…that regulate

activity or a facility that may impact a disadvantaged or tribal community, and that includes a time schedule in accordance with subdivision (c) of Section 13263 for achieving an applicable water quality objective, an alternative compliance path that allows time to come into compliance with water quality objectives, or a water quality variance…," must include finding(s) regarding "potential environmental justice, tribal impact, and racial equity considerations" that are relevant to the permitting action. (Assem. Bill No. 2018 (2021-2022 Reg. Sess.) § 3). This Order does not incorporate a time schedule for compliance with applicable WQOs, or any of the other provisions described in Water Code section 13149.2, subdivision (d). Accordingly, no additional findings are necessary.

Stormwater

55. Federal regulations for stormwater discharges were promulgated by the U.S. Environmental Protection Agency on November 16, 1990 (40 C.F.R. parts 122, 123, and 124) to implement the Clean Water Act's stormwater program set forth in Clean Water Act section 402, subdivision (p) (33 U.S.C. § 1342(p)). In relevant part, the regulations require specific categories of facilities that discharge stormwater associated with industrial activity to "waters of the United States" to obtain National Pollutant Discharge Elimination System (NPDES) permits and to require control of such pollutant discharges using Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to prevent and reduce pollutants and any more stringent controls necessary to meet water quality standards.

56. The State Water Board adopted Order 2014-0057-DWQ (NPDES No. CAS000001), *General Permit for Storm Water Discharges Associated with Industrial Activities* (Industrial General Permit) on July 1, 2015. Facilities used in the storage, treatment, recycling, and reclamation of municipal or domestic sewage with a design flow of one million gallons per day or more, or that are required to have an approved pretreatment program under 40 Code of Federal Regulations part 403, are required to enroll under the Industrial General Permit, unless there is no discharge of industrial stormwater to waters of the United States.

57. Because the Facility has a design treatment capacity of 0.088 million gallons per day (MGD) (i.e., less than 1 MGD) and is not required to have an approved pretreatment program under 40 Code of Federal Regulations part 403, the Facility is not required to enroll in the Industrial General Permit at this time. Nonetheless, this Order recommends that the Discharger implement, where

practicable, industrial stormwater best management practices to ensure nuisance conditions are prevented.

CEQA and Public Participation

58. Pursuant to California Code of Regulations, title 14, section 15301, the issuance of these WDRs, which govern the operation of an existing facility involving negligible or no expansion of use beyond that previously existing, is exempt from the provisions of the California Environmental Quality Act (CEQA), Public Resources Code section 21000 et seq.

59. The Regional Water Board has notified the Discharger and all known interested agencies and persons of its intent to issue WDRs for this discharge and has provided them with an opportunity for a public meeting and to submit comments.

60. The Regional Water Board, in a public meeting, heard and considered all comments pertaining to this discharge.

REQUIREMENTS

IT IS HEREBY ORDERED, pursuant to Water Code sections 13263 and 13267, that WDRs Order R7-2021-0024 is rescinded (except for enforcement purposes), and that the Discharger shall comply with the following requirements.

A. Prohibitions

1. Discharge of waste classified as "hazardous," as defined in California Code of Regulations, title 27, section 20164, or "designated," as defined in Water Code section 13173 and California Code of Regulations, title 27, section 20164, is prohibited.

2. The discharge of treated wastewater at a location other than the designated disposal area is prohibited.

3. The discharge of any wastewater to any surface waters or surface drainage courses is prohibited.

4. The Discharger shall not accept waste in excess of the design treatment capacity of the disposal system.

5. Surfacing or ponding of wastewater outside of the designated disposal locations is prohibited.

6. Bypass, overflow, discharge or spill of untreated or partially-treated waste is prohibited.

7. The discharge of wastewater to land not owned or controlled by the Discharger, or not authorized for such use, is prohibited.

8. There shall be no surface flow of wastewater away from the designated disposal areas.

B. Discharge Specifications

1. The storage, treatment, or disposal of wastes shall not cause contamination, pollution, or nuisance as defined in Water Code section 13050, subdivisions (k), (l), and (m).

2. The Discharger shall maintain sufficient freeboard in the evaporation/infiltration basins to accommodate seasonal precipitation and to contain a 100-year storm event, but in no case no less than two (2) feet of freeboard (measured vertically). Freeboard shall be utilized for wake and waves of fluid motion and emergency or natural disaster purposes only.

3. All treatment, storage, and disposal areas shall be designed, constructed, operated and maintained to prevent inundation or washout due to floods with a 100-year return frequency.

4. Ponds shall have sufficient capacity to accommodate allowable wastewater flow, design seasonal precipitation, ancillary inflow, and infiltration during the non-irrigation season. Design seasonal precipitation shall be based on total annual precipitation using a return period of 100 years, distributed monthly in accordance with historical rainfall patterns.

5. The evaporation/infiltration ponds shall be managed to prevent breeding of mosquitoes. In particular:

    a. An erosion control program should ensure that small coves and irregularities are not created around the perimeter of the water surface.

b. Weeds shall be minimized through control of water depth, harvesting, or herbicides.

c. Dead algae, vegetation, and debris shall not accumulate on the water surface.

6. Adequate measures shall be taken to ensure that flood or surface drainage waters do not erode or otherwise render portions of the discharge facilities inoperable.

7. Public contact with non-disinfected wastewater shall be precluded through such means as fences, signs, and other acceptable alternatives.

8. Objectionable odors originating at the Facility shall not be perceivable beyond the limits of the wastewater treatment and disposal area.

9. The septic tank system shall be maintained to remain effective in treating wastewater.

10. The subsurface wastewater disposal system shall be maintained so that at no time will sewage be permitted to surface or overflow at any location.

11. All septic tanks shall be accessible for cleaning and inspection.

12. Septic tank cleanings shall be discharged only by a duly authorized service.

13. No wastewater other than domestic wastewater shall be discharged into the sewage disposal system.

C. Effluent Limitations

1. The 30-day monthly average daily dry weather discharge from the OWTS into the evaporation/percolation basins shall not exceed 0.088 MGD.

2. The discharge to the ponds shall not contain a TDS concentration that exceeds 300 mg/L above the water supply to the Facility.

3. Effluent from the OWTS shall not have a pH below 6.0 or above 9.0.

4. The ponds shall be maintained so they will continuously operate in aerobic conditions. The dissolved oxygen content in the upper zone (one foot) of the evaporation/percolation ponds shall not be less than 1.0 mg/L.

D. Receiving Water Limitations

1. The discharge of wastewater from the Facility shall not cause groundwater to: exceed applicable WQOs; acquire taste, odor, toxicity, or color that create nuisance conditions; impair beneficial uses; or contain constituents in excess of California Maximum Contaminant Levels (MCLs), as set forth in Title 22. (See, e.g., § 64426.1 [bacteriological constituents], § 64431 [inorganics]; § 64444 [organics], § 64678 [lead and copper].)

E. Subsurface Disposal System Requirements

1. Septic Tank Pump-Out

a. Each septic tank shall be inspected as specified in the MRP, and pumped out when[4]:

i. The combined thickness of sludge and scum exceeds one-third of the tank depth of the first compartment;

ii. The scum layer is within three inches of the outlet device; or

iii. The sludge layer is within eight inched of the outlet device.

b. If a septic tank is pumped during the year, the pumping report shall be submitted with the annual report. At a minimum, the record shall include the date, nature of service, service company name, and service company license number.

2. **Septic Tank Decommissioning.** When the Discharger no longer intends to discharge wastewater to any given septic tank or other subsurface disposal system, or whenever such a system has not been used to dispose of wastewater for at least three years, the Discharger shall, at the written direction of the Executive Officer, decommission that system in accordance with any applicable state or local requirements. At a minimum, decommissioning shall be demonstrated to prevent the remaining system from operating as a conduct for waste discharges to groundwater.

[4] Alternatively, the septic tanks may be pumped out annually.

F. Special Provisions

1. **Groundwater Monitoring Network Workplan.** Board Order R7-2021-0024 required that within 90 days of adoption of the Order, the Discharger would submit a technical report in the form of a workplan with milestones, time schedule for implementation, and technical rationale for the installation of a groundwater monitoring well network in the vicinity of the evaporation/percolation ponds and leach field for approval by the Regional Water Board's Executive Officer. The groundwater monitoring well network shall include, at a minimum, one upgradient and two downgradient monitoring wells.

   The workplan was submitted on September 14, 2022. Regional Water Board Staff provided comments on the workplan with a requirement to submit a revised workplan with requested modifications by March 7, 2023. The revised workplan has not yet been received. Within **90 days** of adoption of this Order, the Discharger shall submit the revised workplan for approval by the Regional Water Board's Executive Officer.

2. **Request for Extension.** If the Discharger is unable to timely comply with any of the deadlines in the Special Provisions, the Discharger may request an extension from the Regional Water Board's Executive Officer. The extension request must be submitted in writing as soon as a delay is recognized and prior to the compliance date. The extension request should include justification for the delay. The request must be approved by the Executive Officer in writing.

G. Other Provisions

1. **Electronic Submittals.** All submittals and correspondence, including Self-Monitoring Reports (SMRs), shall be submitted electronically via the GeoTracker Database (https://geotracker.waterboards.ca.gov), and in the appropriate Microsoft Office software application format, such as Word or Excel files, or as a Portable Document Format (PDF) file. Large documents must be split into appropriately labelled, manageable file sizes and uploaded into GeoTracker. The following information shall be included in the body of the cover letter:

   Attention: Land Disposal Unit
   Report Title: [Report Title]
   WDID: 7A131003001
   Facility: Rio Bend RV and Storm's Crossing Mobile Estates

County: Imperial County
GeoTracker ID: WDR100036265

2. **Technical Reports.** The following requirements are applicable to Technical Reports[5] submitted under the Waste Discharge Requirements Order or the Morning and Reporting Program.

   a. The Technical Report shall be prepared by, or under the direct supervision of, a California-licensed civil engineer or engineering geologist that is competent and proficient in the field and subject matter of the submittal (Qualified Professional).

   b. The Technical Report shall be signed and stamped by the Qualified Professional.

   c. The Technical Report shall include a brief summary of the Qualified Professional's qualifications.

3. **Certifications.** All submittals (including non-Technical Reports) shall be accompanied by the certification language below, signed under penalty by a Senior Vice President or equivalent principal executive (Required Signatory) or their Authorized Representative of perjury.

4. To act as an Authorized Representative for a Required Signatory, an individual must be identified[6] and duly authorized in writing by the Required Signatory; this written authorization shall be provided to the Board beforehand, or concurrently with the first submittal signed by the Authorized Representative.

   I declare under the penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those

[5] Technical reports are those that contain work plans, describe the conduct of investigations and studies, or contain technical conclusions and recommendations concerning engineering and/or geology.

[6] This identification may be in reference to the Authorized Representative's title or position, provided it is one that customarily has the responsibility of supervising a facility's overall operation (e.g., facility manager, superintendent).

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 for knowing violations.

5. **Proper Operation and Maintenance.** The Discharger shall at all times properly operate and maintain all systems and components of collection, treatment, and control installed or used by the Discharger to achieve compliance with this Order.[7] All systems in service or reserved shall be inspected and maintained on a regular basis. Records of inspections and maintenance shall be retained and made available to the Regional Water Board on request.

6. **Prevention and Mitigation of Violations.** The Discharger shall take all reasonable steps to minimize or prevent any discharge in violation of this Order that has a reasonable likelihood of adversely affecting human health or the environment.

7. **Disposal Capacity.** The Discharger shall provide a report to the Regional Water Board when it determines that the Facility's average dry-weather flow rate for any month exceeds 80 percent of the design disposal capacity. The report shall indicate what steps, if any, the Discharger intends to take to provide for the expected wastewater disposal capacity necessary when the plant reaches design capacity.

8. **Onsite Materials.** The following materials shall be kept onsite at the Facility, and shall be familiar to operating personnel:

    a. This Order and all attachments thereto;

    b. The operative Monitoring and Reporting Program (including subsequent revisions);

[7] Proper operation and maintenance include the following: effective performance; adequate process controls; and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities/systems when necessary to achieve compliance with this Order.

c. All technical reports and other documents[8] submitted to the Regional Water Board within the last five years.[9]

9. **Changes in Facility Ownership or Operators.**

a. Prior to any changes in Facility ownership, or any changes in operators (including parties responsible for performing activities to comply with this Order), the Discharger shall notify (in writing) the prospective owners or operators of the existence of this Order and the operative Monitoring and Reporting Program. Copies of this written notification shall be provided to the Board.

b. At least 30 days prior to the effective date of the transfer, the Discharger shall notify the Board of the effective date, and submit a signed statement by the new parties, affirming that they will comply with this Order and the operative Monitoring and Reporting Program as of the transfer date.

c. To assume ownership or operation under regulatory coverage of this Order, the new owner or operator shall apply in writing to the Board requesting transfer of coverage within 14 days of assuming ownership or responsibility for operation. The request shall contain the applicant's full legal name; place of incorporation (if corporation); names, addresses and telephone numbers of designated contact persons, and a signed statement affirming that the new owner or operator assumes full responsibility for compliance with this Order and the operative Monitoring and Reporting Program.[10]

ENFORCEMENT

If, in the opinion of the Executive Officer, the Dischargers fail to comply with the provisions of this Order, the Executive Officer may refer this matter to the Attorney General for judicial enforcement, may issue a complaint for administrative civil liability,

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[8] This category of records may be maintained electronically.

[9] This period may be extended by the Executive Officer in writing.

[10] Failure to submit the request shall be considered a discharge without requirements, a violation of the Water Code.

or may take other enforcement actions. Failure to comply with this Order may result in the assessment of Administrative Civil Liability of up to $10,000 per violation, per day, depending on the violation, pursuant to the Water Code, including sections 13268, 13350 and 13385. The Regional Water Board reserves its right to take any enforcement actions authorized by law.

ADMINISTRATIVE REVIEW

Any person aggrieved by this Regional Water Board action may petition the State Water Board for review in accordance with Water Code section 13320 and California Code of Regulations, title 23, section 2050 et seq. To be timely, the petition must be received by the State Water Board by 5:00 pm on the 30th day after the date of this Order; if the 30th day falls on a Saturday, Sunday or state holiday, the petition must be received by the State Water Board by 5:00 pm on the next business day. The law and regulations applicable to filing petitions are available on the State Water Board website (http://www.waterboards.ca.gov/public_notices/petitions/water_quality). Copies will also be provided upon request.

ATTACHMENT A—MONITORING AND REPORTING PROGRAM

A. Sampling and Analysis General Requirements

1. **Testing and Analytical Methods.** The collection, preservation, and holding times of all samples shall be in accordance with U.S. Environmental Protection Agency (USEPA)-approved procedures. All analyses shall be conducted in accordance with the latest edition of either the USEPA's *Guidelines Establishing Test Procedures for Analysis of Pollutants Under the Clean Water Act* (40 C.F.R. part 136) or *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods Compendium* (SW-846), unless otherwise specified in the MRP or approved by the Regional Water Board's Executive Officer.

2. **Laboratory Certification.** All analyses shall be conducted by a laboratory certified by the State Water Resources Control Board (State Water Board), Division of Drinking Water's Environmental Laboratory Accreditation Program (ELAP), unless otherwise approved by the Regional Water Board's Executive Officer.

3. **Reporting Levels.** All analytical data shall be reported with method detection limits (MDLs) and with either the reporting level or limits of quantitation (LOQs) according to 40 Code of Federal Regulations part 136, Appendix B. The laboratory reporting limit for all reported monitoring data shall be no greater than the practical quantitation limit (PQL).

4. **Sampling Location(s).** Samples shall be collected at the location(s) specified in the WDRs. If no location is specified, sampling shall be conducted at the most representative sampling point available.

5. **Representative Sampling.** All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. The time, date, and location of each grab sample shall be recorded on the chain of custody form for the sample. If composite samples are collected, the basis for sampling (time or flow weighted) shall be approved by Regional Water Board staff.

6. **Instrumentation and Calibration.** All monitoring instruments and devices used by the Discharger shall be properly maintained and calibrated to ensure their continued accuracy. Any flow measurement devices shall be calibrated at least once per year to ensure continued accuracy of the devices. In the event that continuous monitoring equipment is out of

service for a period greater than 24 hours, the Discharger shall obtain representative grab samples each day the equipment is out of service. The Discharger shall correct the cause(s) of failure of the continuous monitoring equipment as soon as practicable. The Discharger shall report the period(s) during which the equipment was out of service and if the problem has not been corrected, shall identify the steps which the Discharger is taking or proposes to take to bring the equipment back into service and the schedule for these actions.

7. **Field Test Instruments.** Field test instruments (such as those used to test pH, dissolved oxygen, and electrical conductivity) may be used provided:

   a. The user is trained in proper use and maintenance of the instruments;

   b. The instruments are field calibrated prior to monitoring events at the frequency recommended by the manufacturer;

   c. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and

   d. Field calibration reports are submitted.

8. **Records Retention.** The Discharger shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, for a minimum of five (5) years from the date of the sampling or measurement. This period may be extended by request of the Executive Officer at any time. Records of monitoring information shall include:

   a. The date, exact place, and time of sampling or measurement(s);

   b. The individual(s) who performed the sampling or measurement(s);

   c. The date(s) analyses were performed;

   d. The individual(s) who performed the analyses;

   e. The analytical techniques or method used; and

   f. All sampling and analytical results, including:

i. units of measurement used;

ii. minimum reporting limit for the analyses;

iii. results less than the reporting limit but above the method detection limit (MDL);

iv. data qualifiers and a description of the qualifiers;

v. quality control test results (and a written copy of the laboratory quality assurance plan);

vi. dilution factors, if used; and

vii. sample matrix type.

9. **Inoperative Facility.** If the Facility is not in operation, or there is no discharge during a required reporting period, the Discharger shall forward a letter to the Regional Water Board indicating that there has been no activity during the required reporting period.

B. Monitoring Requirements

1. The discharge flow rate to the evaporation percolation ponds shall be calculated/estimated monthly and reported as an average daily flow. Discharge flow monitoring shall be reported quarterly.

2. **Evaporation/Percolation Pond Monitoring.** Evaporation/Percolation ponds shall be monitored per **MRP Table 1**.

3. **Groundwater Monitoring.** Once there is an approved groundwater monitoring network in place, the groundwater shall be monitored per **MRP Table 2**.

4. **Septic Tank Monitoring.** One septic tank for every 20 septic tank systems shall be sampled annually for the leach field disposal and evaporation/percolation pond systems. The samples shall be analyzed per MRP Table 3.

5. **Septic Tank Inspections.** All septic tanks shall be inspected and/or pumped at least as frequently per **MRP Table 4**. Inspections of sludge and scum depth are not required if the tanks are pumped at least annually.

6. **Source Water Monitoring.** The Discharger shall monitor the source water per **MRP Table 5**.

MRP Table 1. Evaporation/Percolation Pond Monitoring.

Constituent	Units	Sample	Monitoring Freq.	Reporting Freq.
TDS	mg/L	Grab	Monthly	Monthly
Nitrate as N	mg/L	Grab	Monthly	Monthly
Total Nitrogen	mg/L	Grab	Monthly	Monthly
pH	Std. Units	Grab	Monthly	Monthly
VOCs	µg/L	Grab	Annually	Annually
Dissolved Oxygen (DO)	mg/L	Grab	Monthly	Monthly

MRP Table 2. Groundwater Monitoring.

Constituent	Units	Type	Monitoring Freq	Reporting Freq
Depth to groundwater	Ft.	Measurement	Semi-Annually	Semi-Annually
pH	Std. Units	Grab	Semi-Annually	Semi-Annually
TDS	mg/L	Grab	Semi-Annually	Semi-Annually
Total Nitrogen	mg/L	Grab	Semi-Annually	Semi-Annually
VOCs	µg/L	Grab	Annually	Annually

MRP Table 3. Septic Tank Monitoring.

Constituent	Units	Type of Sample	Monitoring Frequency	Reporting Frequency
TDS	mg/L	Grab	Annually[11]	Annually
Discharge Flow Rate	gpd	Estimate	Annually	Annually
Nitrate as N	mg/L	Grab	Annually	Annually
Total Nitrogen	mg/L	Grab	Annually	Annually
pH	Std. Units	Grab	Annually	Annually
VOCs	µg/L	Grab	Annually	Annually

MRP Table 4. Septic Tank Inspections.

Parameter	Units	Measurement Type	Inspection/Reporting Frequency
Sludge depth and scum thickness in each compartment of each tank	ft.	Staff Guage	Annually
Distance between bottom of scum layer and bottom of outlet device	Inches	Staff Guage	Annually
Distance between top of sludge layer and bottom of outlet device	Inches	Staff Guage	Annually

[11] Annual monitoring shall be sampled during November each year.

MRP Table 5. Source Water Monitoring Schedule.

Constituent	Units	Type of Sample	Monitoring Freq	Reporting Freq
TDS	mg/L	Grab	Semi-Annually	Semi-Annually

C. Reporting Requirements

1. Monthly Self-Monitoring Reports (SMRs) shall be submitted by the 15th day of the following month following the monitoring period. Quarterly SMRs shall be submitted by **January 31st, April 30th, July 31st, and October 31st**. Semi-Annual SMRs shall be submitted by **January 31st** and **July 31st**. Annual SMRs shall be submitted by **January 31st** of the following year.

2. Monthly and quarterly SMRs shall include, at a minimum, the following:

   a. **Cover Letter.** A transmittal letter summarizing the essential points in the report.

   b. **Maps.** Maps depicting the Facility layout and the location of sampling points.

   c. **Summary of Monitoring Data.** Tables of the data collected. Each row shall be a monitoring event and each column shall be a separate parameter at a single location (or a single average, as appropriate).

   d. **Compliance Summary.** Identification of any violations found since the last report was submitted, and actions taken or planned for correcting each violation. If the Discharger previously submitted a report describing corrective actions and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. If no violations have occurred since the last submittal, this shall be stated.

3. **Annual Reporting.** Annual SMRs shall include:

a. **Cover Letter.** A transmittal letter summarizing the essential points in the report.

b. **Maps.** Maps depicting the Facility layout and the location of sampling points.

c. **Summary of Monitoring Data.** Tables of the data collected. The tables shall include all of the data collected to-date at each monitoring point, organized in chronological order, with the oldest data in the top row and progressively newer data in rows below the top row. Each row shall be a monitoring event and each column shall be a separate parameter at a single location (or a single average, as appropriate).

d. **Graphical Display.** Graphs depicting monitoring parameters through time, with the concentrations being the y-axis and time being the x-axis. Logarithmic scales can be used for values that vary by orders of magnitude. Individual graphs can combine multiple locations or multiple chemicals if that allows the data to be compared more easily.

e. **Operation and Maintenance Summary.** Information concerning operation and maintenance of the facility, including documentation showing the calibration of flow meters and equipment, modifications to the Operation and Maintenance Manual, and any modifications or updates to the Discharger's wastewater rules and/or regulations.

f. **Compliance Summary.** Identification of any violations found since the last report was submitted, and actions taken or planned for correcting each violation. If the Discharger previously submitted a report describing corrective actions and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. If no violations have occurred since the last submittal, this shall be stated.

ATTACHMENT B—MAPS AND FIGURES

Figure 1: Vicinity Map

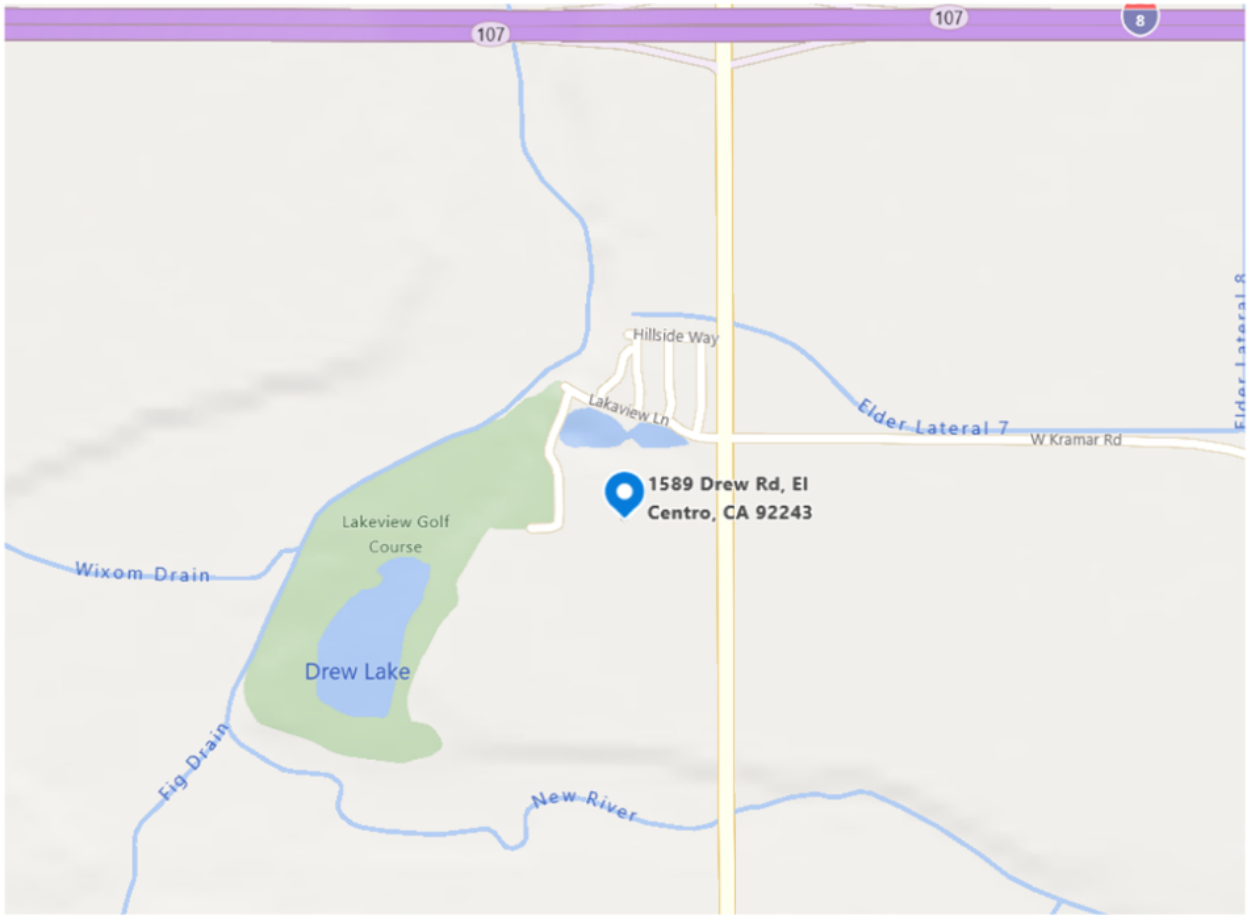

Figure 2: Site Map

ATTACHMENT B—MAPS AND FIGURES

Figure 3: OWTS Layout