

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

**STAFF REPORT FOR REGULAR MEETING OF DECEMBER 1, 2011
Prepared on November 1, 2011**

ITEM NUMBER: 12

SUBJECT: Waste Discharge Requirements for Thousand Trails Recreational Vehicle Resort and Campground, San Benito, San Benito County, Order No. R3-2011-0214

KEY INFORMATION

Discharger: MHC TT, Inc.
Facility Name: Thousand Trails – San Benito
Facility Address: 16225 Cienega Road
San Benito County
Type of Waste: Domestic wastewater – RV Holding Tank wastes
Treatment: Septic tank/leach field system
Disposal: Leach field
Facility Design Capacity: 20,000 gallons per day
Facility Discharge Volume: Average 4,800 gallons per day
Existing Order: Unpermitted - Existing Site
Recycling Requirements: None
This Action: Adopt Waste Discharge Requirements Order No. R3-2011-0214

SUMMARY

MHC TT, Inc. (Discharger) owns and operates a campground and recreational vehicle park (RV facility) located at 16225 Cienega Road in San Benito County. The RV facility has been in operation for approximately 20 years and is open year round. The Discharger disposes of their sewage into a 20,000 gallon septic tank and then into a leach field. Sewage from the park includes domestic wastewater and the contents of RV holding tanks. Due to the large variety of RV holding tank cleaning chemicals, it is possible the RV facility's sewage can contain chemicals that are carcinogenic and have the potential to impact groundwater beneficial uses. Therefore, Water Board staff recommends regulating the discharge via individual Waste Discharge Requirements (WDR) Order No. R3 -2011-0214.

DISCUSSION

Water Board staff received the Discharger's Report of Waste Discharge on April 27, 2009. The Discharger's RV facility is located in San Benito County. It consists of 25 long-term occupancy trailers, 510 RV sites, two swimming pools, and a conventional septic tank/leach field system.

Domestic wastewater from the park is pumped by five lift stations, located around the park, into a 20,000 gallon septic tank. The sewage is then pumped by a sixth lift station into ten distribution boxes, and finally flows into a leach field consisting of 60 perforated pipes of 100 feet each. The Discharger regularly removes and disposes of solid sludge material at an off-site facility.

Due to the variety of cleaning chemicals available to clean and prevent odors in RV holding tanks, it is possible the RV facility's sewage can contain chemicals. These chemicals can include formaldehyde, para-formaldehyde, glutaraldehyde, ammonia, para-dichlorobenzene, methanol, bronopol, bleach (sodium perchlorate, sodium hypochlorite), and acetic acid.

The facility is located in the San Juan Sub-basin of the Gilroy-Hollister Groundwater Basin. Soils directly beneath the leach field consist of sandy alluvium from ground surface to 12 feet below grade. Depth to first encountered groundwater around the Facility is unknown. There exists two water supply wells (A and B) located within the Facility property lines, but are more than 400 feet away from the wastewater disposal fields. The two water supply wells are screened at a depth of 339 and 335 feet below ground surface. The Pescadero Creek (ephemeral) flows along the southern property line of the Facility. The Threat to Water Quality and Complexity rating for this type of discharge is considered moderate (2C).

COMPLIANCE HISTORY

The RV Facility has been in existence for approximately 20 years and has never acquired a waste discharge permit from the Central Coast Water Board, therefore historical compliance is not available. An inspection performed on March 11, 2009, by the San Benito County Environmental Health Department observed lift stations pumping solids to the leachfield, leach lines plugged with sludge, and the manhole receiving effluent from lift stations was corroded and had a fair amount of sludge in it as well. The San Benito County Environmental Health inspector issued a repair permit and a new leach field was installed in 2009.

POTENTIAL PROBLEMS

If the Discharger exceeds the design specifications of the existing leach field, there is potential for the surfacing of raw sewage. However, there are no surface water bodies in close proximity of the leach field. The proposed Monitoring and Reporting Program will require the Discharger to perform regular visual inspections of the existing leach field. Another problem associated with the leach field is the potential discharge of chemicals that are carcinogenic and harmful to groundwater beneficial uses. This could potentially be difficult to manage due to the large variety of RV cleaning chemicals available to consumers. These waste discharge requirements include a requirement to install groundwater monitoring wells and conduct sampling to evaluate impacts, if any, to groundwater from this discharge. Water Board staff will assess the need for further regulatory action following review of initial monitoring reports.

ENVIRONMENTAL SUMMARY

The proposed waste discharge requirements are for an existing facility and their adoption is exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et. seq.) in accordance with Section 15301, Chapter 3, Title 14, of the California Code of Regulations (Existing Facilities Exemption).

COMMENTS AND RESPONSES

On September 20, 2011, the Water Board notified the Discharger and interested parties of its intent to issue waste discharge requirements for the discharge and has provided them with a copy of the proposed Order and an opportunity to submit written views and comments. Water Board staff received comments from the Discharger on October 21, 2011. No other comments were received by the Water Board from other interested parties. Following is a table of the applicant's comments and staff responses.

Section	Questions/Recommendations for Consideration	Response to Comment
Cover letter	Suggest change to Caitlin McAuliffe, Permits & License Coordinator	Staff appreciates the clarification. The change has been made to the MHC TT contact list.
WDRs Order No. R3-2011-0214 B.1. Discharge Specifications	<p>The septic tank effluent discharge limits of the following three constituents are too low for primary wastewater treatment septic system. In drinking water regulations:</p> <ul style="list-style-type: none"> • Formaldehyde limit listed in the DRAFT WDO (0.1 mg/L) is the California Department of Public Health "notification level" for drinking water systems. • The 1,4-DCB limit listed in the DRAFT WDO (0.075 mg/L) is the USEPA MCL (maximum contaminant level) for drinking water, which is higher than the California Preliminary Health Goal of 0.006 mg/L. • Daily maximum for methanol is too low at 0.012 mg/L when USEPA Preliminary Remediation Goal for tap water is 18 mg/L. <p>Subsurface disposal with soil aquifer treatment can substantially remove these RV holding tank additives and byproducts. Suggest revise the daily maximum limits and move these requirements to Section C. Groundwater Limitations.</p>	<p>Staff assessed the Discharger's comments and agrees that contaminant limits are more appropriately located in Section C – Groundwater Limitations. Staff will continue to use the most stringent drinking water guideline concentration set by the California Department of Public Health or the U.S. Environmental Protection Agency for the constituent of concern. Water Board staff has eliminated Section B.1 and B.2 of the proposed Order and adds Section C.7 and C.8. Sections C.7 and C.8 state the maximum underlying groundwater concentrations for formaldehyde (0.10 mg/L, California Notification Level [Action Level] for chemicals with no set maximum contamination level), 1,4-dichlorobenzene (0.005 mg/L, California MCL), and methanol (0.12 mg/L, USEPA Integrated Risk System One in a Million Cancer Risk Estimate for Drinking Water).</p>
WDRs Order No. R3-2011-0214 C. 3. Groundwater Limitations	Coliform organisms is not an appropriate constituent for monitoring because coliform organisms are naturally occurring in soil, and would therefore be anticipated to be present.	Water Board staff corrected the groundwater limitation by further defining the limitation as fecal coliform. The Pajaro River Total Maximum Daily Load (TMDL) for fecal coliform assigns a zero load allocation for fecal coliform to Pescadero Creek. Pescadero Creek borders the Discharger's facility. This groundwater limitation is required per the Pajaro River fecal coliform TMDL.

<p>WDRs Order No. R3-2011-0214 C. 3. Groundwater Limitations</p>	<p>What is the definition of statistically significant? In general, the acceptable laboratory quality control allows variations in some laboratory results of 65-150%. Also, increase in mineral or organic constituents may not pose a threat to water quality/beneficial use, and increase in organic constituents would be anticipated in any wastewater discharge.</p>	<p>The Water Board's website defines the word <i>Significant</i> as, "A statistically significant difference in the means of two distributions of sampling results at the 95 percent confidence level." An increase in organic constituents or mineral content due to a Discharger's effluent disposal may not pose a threat to water quality or beneficial uses but it may violate State Water Board Resolution No. 68-16, Statement of Policy with Respect to Maintaining High Quality of Waters in California (Antidegradation). Therefore, the Discharger must adhere to not affecting groundwater quality in a statistically significant manner.</p>
<p>WDRs Order No. R3-2011-0214 Provisions, Section D.2.</p>	<p>Change of deadline for monitor well installation to July 31, 2012 to accommodate potentially wet winter which could make access by drilling rigs difficult.</p>	<p>Water Board agrees that inclement winter weather may delay the installation of groundwater monitoring wells and has changed the install date from April 30, 2012, to July 31, 2012, as requested by the Discharger.</p>

RECOMMENDATION

Adopt WDR Order No. R3-2011-0214.

ATTACHMENTS

1. WDR Order No. R3-2011-0214, with Attachment A
2. MRP Order No. R3-2011-0214
3. Comment Letter

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