13 April 2026

Jessika Preston
Director of Asset Management
Sonora Estates Manufactured Housing Community 1, LLC
22880 Savi Ranch Pkwy
Yorba Linda, CA 92887

CERTIFIED MAIL
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NOTICE OF APPLICABILITY, STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ, GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; SONORA ESTATES MANUFACTURED HOUSING COMMUNITY 1, LLC; SONORA ESTATES MOBILE HOME PARK WASTEWATER TREATMENT SYSTEM; TUOLUMNE COUNTY

On 21 May 2025, Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff (Staff) received a Report of Waste Discharge (RWD) submitted on behalf of the Sonora Estates Manufactured Housing Community 1, LLC (SEMHC or Discharger). The RWD was submitted to reflect upgrades to the Sonora Estates Mobile Home Park Wastewater Treatment System (Facility) completed in 2003, and update waste discharge requirements (WDRs) for the Facility. The Facility is currently regulated by WDRs Order R5-2002-0069 and discharge monitoring requirements are prescribed in Monitoring and Reporting Program (MRP) Order R5-2002-0069, both of which were adopted on 26 April 2002. Additionally, the Facility was issued Cease and Desist Order (CDO) R5-2002-0183 in October 2002, which required the Discharger to address WDRs violations.

The RWD was prepared pursuant to State Water Resources Control Board (State Water Board) Water Quality Order 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (hereafter General Order). The RWD included a completed and signed Form 200, and a technical report prepared by Dale H. O'Bryan, a California registered civil engineer (RCE 81955). Staff reviewed the May 2025 RWD and requested additional information, and the Discharger submitted an updated RWD on 4 June 2025 addressing Staff's request.

Based on Staff's review of the available information, the Facility treats and disposes less than 100,000 gallons of domestic wastewater per day and is eligible for coverage under the General Order. This letter serves as formal notice that the General Order is applicable to your system and the wastewater discharge described below. The Facility's coverage

under the General Order is hereby assigned enrollee number **2014-0153-DWQ-R5435**. Please note that coverage under General Order 2014-0153-DWQ will become effective upon rescission of WDRs Order R5-2002-0069 and CDO R5-2002-0183 (tentatively scheduled for the April 2026 Board Meeting).

You should familiarize yourself with the entire General Order and its attachments enclosed with this letter, which describe mandatory discharge and monitoring requirements. Sampling, monitoring, and reporting requirements applicable to your treatment and disposal methods must be completed in accordance with the appropriate treatment system sections of the General Order and the attached **Monitoring and Reporting Program No. 2014-0153-DWQ-R5435**. The MRP was developed after consideration of the waste characterization and site conditions described in the RWD.

PROJECT LOCATION

The Facility is located at 22466 South Airport Road, Sonora, CA, about 3.7 miles northwest of Sonora in Tuolumne County (Section 15, Township 2 North, Range 14 East, Mount Diablo Base and Meridian) as shown in **Attachment A** (38.028° N, 120.419° W). The property consists of three parcels comprising a total of 54.5 acres (Assessor Parcel Numbers 032-170-011, 032-580-011, and 03-150-170). The Facility is located within the San Joaquin Hydrologic Basin Planning Area; however, the Facility does not lie within a designated groundwater basin, the nearest of which is the Eastern San Joaquin Subbasin (5-022.01), which is approximately 12 miles to the southwest.

The operative Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (hereafter Basin Plan) designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve water quality objectives for all waters of the basin.

DISCHARGE DESCRIPTION

SEMCH owns the Facility and land, while Mountain Oasis operates the Facility. Domestic wastewater treated at the Facility is generated from approximately 87 service connections comprised of 70 mobile home units, 14 recreational-vehicle (RV) spaces, and 3 separate onsite services, including an office, laundry, and service building. According to the RWD, RV spaces are non-transient, and the RVs are connected directly to the Facility collection system. As such, no RV septic chemicals are utilized at the Facility.

Domestic wastewater flows via gravity to a sewer collection system where a lift station pumps wastewater to a package treatment plant. The May RWD estimates an average daily flow of 18,500 gallons per day (gpd) is sent to the treatment plant from the existing connections. The package treatment plant is an extended activated sludge plant that features a 5,000-gallon equalization tank, a 20,000-gallon extended aeration chamber, an 8,000-gallon aerobic sludge digester, clarifier, tablet chlorinator for disinfection, and a filtration system. Treated effluent from the package plant is discharged to a leach field

system featuring a subsurface drip irrigation system consisting of four fields labeled Field A through Field D. According to as-built diagrams provided by the Discharger, each field consists of six zones, labeled Zone 1 through Zone 6. Each zone is dosed at a rate of 833 gpd, resulting in an overall total discharge of approximately 20,000 gpd. The total area of the subsurface drip irrigation system is approximately 2.4 acres, with each disposal field occupying around 0.6 acres. Native grass cover is irrigated at each field. According to the United States Department of Agriculture's Natural Resources Conservation Service, depth to fractured bedrock at the site is shallow and is encountered at a depth of around 1.5 to greater than 6.5 feet below ground surface.

FACILITY-SPECIFIC REQUIREMENTS

The Discharger shall maintain exclusive control over the discharge and shall comply with the terms and conditions of this NOA, General Order 2014-0153-DWQ, with all attachments, and MRP No. 2014-0153-DWQ-R5435.

In accordance with section B.1 of the General Order, wastewater discharged from the Facility to the subsurface drip irrigation system shall not exceed a **monthly average discharge of 20,000 gpd**. In accordance with the requirements of the General Order, this NOA does not specify a nitrogen effluent limitation since the Facility flow rate is less than 20,000 gpd.

As discussed in the attached memorandum, the Discharger shall comply with the effluent limitations specified in Table 1 below when discharging to the onsite subsurface drip irrigation system. Compliance with the effluent limitations specified in the General Order for activated sludge, membrane bioreactor, or similar treatment technology is appropriate. Compliance with the effluent limitations specified in Table 1 shall be determined at a point after the disinfection system and prior to discharge to the subsurface drip irrigation system.

Table 1 – Effluent Limitations

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

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

property lines where applicable. The Discharger shall comply with the applicable setback requirements, as summarized in Table 2 below.

Table 2 – Site-Specific Applicable Setback Requirements

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

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

1. Section B.4 – Activated Sludge Systems
2. Section B.6 – Subsurface Disposal Systems
3. Section B.8 – Sludge/Solids/Biosolids Disposal
4. Section C.1 – Groundwater and Surface Water Limitations

Provision E.1 of the General Order requires dischargers enrolled under the General Order to prepare and implement the following reports within **90 days** of the issuance of the NOA (**by 13 July 2026**):

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

A copy of the Spill Prevention and Emergency Response Plan, the Sampling and Analysis Plan, and the Sludge Management Plan shall be maintained at the treatment facility and shall be presented to the Regional Water Board Staff upon request. The Sludge Management Plan shall be submitted to the Central Valley Water Board **within 90 days** (**by 13 July 2026**) of issuance of the NOA.

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

Failure to comply with the requirements in this NOA, General Order 2014-0153-DWQ, with all attachments, and MRP No. 2014-0153-DWQ-R5435 could result in an enforcement action, as authorized by provisions of the California Water Code. Discharge of wastes other than those described in this NOA is prohibited. If the method of waste disposal changes from that described in this NOA, you must submit a new Report of Waste Discharge describing the new operation.

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

On 31 May 2018, the Central Valley Water Board adopted Basin Plan amendments incorporating new strategies for addressing ongoing salt and nitrate accumulation in the Central Valley as part of the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) initiative. Further details of these strategies are discussed in the enclosed memorandum. As these strategies are implemented, the Central Valley Water Board may find it necessary to modify the requirements of this NOA to ensure the goals of the Salt and Nitrate Control Program are met.

DOCUMENT SUBMITTALS

All regulatory documents, submissions, materials, data, monitoring reports, and correspondence should be converted to a searchable Portable Document Format (PDF) and submitted electronically via the State Water Resources Control Board's GeoTracker database. GeoTracker is an Internet-accessible database system used by the State Water Board, regional boards, and local agencies to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. This system consists of a relational database, online compliance reporting features, a geographical information system (GIS) interface, and other features that are utilized by regulatory agencies, regulated industries, and the public to input, manage, or access compliance and regulatory tracking data. Guidance for creating an account and submitting reports to the GeoTracker database is provided in the attached MRP.

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Resources Control Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Resources Control Board must receive the petition by 5:00 p.m., 30 days after the date of this NOA, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Resources Control Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the

internet or will be provided upon request. (http://www.waterboards.ca.gov/public_notices/petitions/water_quality).

In order to conserve paper and reduce mailing costs, a paper copy of General Order WQ 2014-0153-DWQ has been sent only to the Discharger. Others are advised that the General Order is available on the State Water Board's website (http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf).

If you have any questions regarding this matter, please contact Cruz Romero by phone at (559) 445-5036 or by email at cruz.romero@waterboards.ca.gov.

Original signed by Alex S. Mushegan
For Patrick Pulupa
Executive Officer

Attachments:

- Attachment A – Site Map
- Attachment B – Flow Schematic

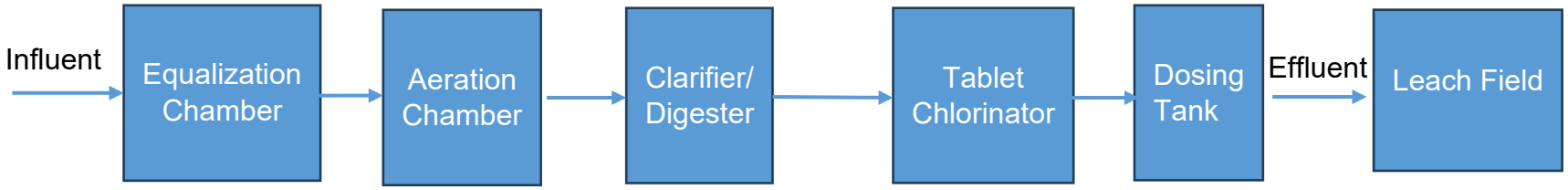
Enclosures:

- Monitoring and Reporting Program 2014-0153-DWQ-R5435
- Staff 14 April 2026 Memorandum
- State Water Resources Control Board WQ 2014-0153-DWQ

cc w/ attachments and enclosures.:

- Christopher Moskal, State Water Resources Control Board, OCC, Sacramento (via email)
- Ofelia Romero-Maraccini, State Water Resources Control Board, DDW, Fresno (via email)
- Stephanie Torres, State Water Resources Control Board, DWQ, Sacramento (via email)
- Rb5s-cvsalts@waterboards.ca.gov
- Omar Mostafa, Central Valley Water Board, Fresno (via email)
- Tuolumne County Environmental Health Department (via email)
- Jessika Preston, SEMHC1, LLC (via email)
- Debbie Webster, CVCWA (via email)
- Dale H. O'Bryan, CEI (via email)

ATTACHMENT A – SITE MAP
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5435
FOR
SEMHC1, LLC
SONORA ESTATES MHP WASTEWATER TREATMENT SYSTEM
TUOLUMNE COUNTY



ATTACHMENT B – FLOW SCHEMATIC
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5435
FOR
SEMHC1, LLC
SONORA ESTATES MHP WASTEWATER TREATMENT SYSTEM
TUOLUMNE COUNTY

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM 2014-0153-DWQ-R5435
FOR
SONORA ESTATES MANUFACTURED HOUSING COMMUNITY 1, LLC
SONORA ESTATES MOBILE HOME PARK WASTEWATER TREATMENT SYSTEM
TUOLUMNE COUNTY

This Monitoring and Reporting Program (MRP) describes requirements for monitoring a wastewater treatment system. This MRP is issued pursuant to Water Code section 13267. The Sonora Estates Manufactured Housing Community 1, LLC (hereafter Discharger) shall not implement any changes to this MRP unless and until a revised MRP is issued by the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) or Executive Officer.

Section 13267, subsection (b)(1) of the California Water Code states:

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

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

> *"(a) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of Section 13267, or failing or refusing to furnish a statement of compliance as required by subdivision (b) of Section 13399.2, or falsifying and information provided therein, is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b). (b)(1) Civil liability may be administratively imposed by a regional board in accordance with Article 2.5 (commencing with section 13323) of Chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars ($1,000) for each day in which the violation occurs."*

The Discharger owns the Sonora Estates Mobile Home Park Wastewater Treatment System (Facility) that is subject to Notice of Applicability (NOA) 2014-0153-DWQ-R5435. The NOA enrolls the WWTF under State Water Resources Control Board Order WQ 2014-0153-DWQ, *General Waste Discharge Requirements for*

Small Domestic Wastewater Treatment Systems (General Order). The reports required in this MRP are necessary to ensure that the Discharger complies with the NOA and General Order. Pursuant to Water Code section 13267, the Discharger shall implement this MRP and shall submit the monitoring reports described herein. The Facility is currently regulated by Waste Discharge Requirements (WDRs) Order R5-2002-0069, and discharge monitoring requirements are prescribed by MRP R5-2002-0069. NOA 2014-0153-DWQ-R435 will become effective upon rescission WDRs Order R5-2002-0069, at which point, this MRP will supersede and terminate MRP R5-2002-0069, previously issued to the Facility.

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

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

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

A glossary of terms used in this MRP is included on the last page.

TREATMENT SYSTEM MONITORING

A. INFLUENT MONITORING

Influent samples shall be collected from a location prior to treatment. At a minimum, influent monitoring shall include the monitoring specified in Table 1.

Table 1 - Influent Monitoring Requirements

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
EC	µmhos/cm	Grab	Weekly	Quarterly
Total Nitrogen	mg/L	Grab	Monthly	Quarterly

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

B. EFFLUENT MONITORING

Effluent samples shall be collected from a location after the dosing tank but prior to disposal at the subsurface irrigation system. At a minimum, effluent monitoring shall include the monitoring specified in Table 2.

Table 2 - Effluent Monitoring Requirements

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Flow	gpd	Meter	Continuous (see 1 below)	Quarterly
pH	Std. Units	Grab	Monthly	Quarterly
EC	µmhos/cm	Grab	Monthly	Quarterly
BOD	mg/L	Grab	Monthly	Quarterly
TSS	mg/L	Grab	Monthly	Quarterly
Total Nitrogen	mg/L	Grab	Monthly	Quarterly

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

C. DISINFECTION SYSTEM MONITORING

Disinfection system monitoring shall be collected immediately downstream of the disinfection system. At a minimum, disinfection system monitoring shall include the monitoring specified in Table 3.

Table 3 – Disinfection Monitoring Requirements

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Total Coliform Organisms	MPN/100 mL	Grab	Monthly	Quarterly

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

D. SUBSURFACE DISPOSAL SYSTEM MONITORING

In general, monitoring shall be sufficient to determine if wastewater is evenly applied, the disposal area is not saturated, burrowing animals and/or deep-rooted

plants are not present, and odors are not present. Inspection of dosing pump controllers, automatic distribution valves, etc. is required to maintain optimum treatment in the disposal area. Monitoring of the subsurface disposal area shall, at a minimum, include the monitoring specified in Table 4.

Table 4 – Subsurface Disposal Area Monitoring Requirements

Parameter	Inspection Frequency	Reporting Frequency
Pump Controllers, Automatic Valves, etc. (see 1 below)	Quarterly	Quarterly
Nuisance Odor Condition	Quarterly	Quarterly
Saturated Soils Conditions (see 2 below)	Quarterly	Quarterly
Plant Growth (see 3 below)	Quarterly	Quarterly
Vectors or Animals Burrowing (see 4 below)	Quarterly	Quarterly

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

E. SLUDGE/BIOSOLIDS DISPOSAL

The Discharger shall report the handling and disposal of all solids (e.g., screenings, grit, sludge, biosolids, etc.) generated at the wastewater system. Records shall include the name/contact information for the hauling company, the type and amount of waste transported, the date removed from the wastewater system, the disposal facility names and address, and copies of analytical data required by the entity accepting the waste. These records shall be submitted as part of the annual monitoring report.

REPORTING REQUIREMENTS

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

GeoTracker Electronic Reporting Requirements: All monitoring reports and monitoring results shall be submitted to GeoTracker in accordance with the timeframes specified below and in searchable Portable Document Format (PDF). The Discharger shall follow the applicable Electronic Submittal of Information (ESI) requirements under the Facility-specific **Global Identification Number WDR100031815** at the GeoTracker database (https://geotracker.waterboards.ca.gov/esi/login.asp)

In order to submit reports electronically, the Discharger shall create a secure GeoTracker Electronic Submittal of Information (ESI) account and log in credentials, claim their facility by requesting access in GeoTracker, and finally uploading PDF copies of the required reports via the ESI portal as outlined in the GeoTracker ESI Beginner's Guide for Responsible Parties (Beginner's Guide) linked below.
The Discharger may complete the above tasks by accessing the 'Getting Started' section on the GeoTracker ESI webpage (https://www.waterboards.ca.gov/ust/electronic_submittal/index.html).

Additional GeoTracker support information can be found at the following:

a. 'Guides/Resources' document link in the "Tools" on the Discharger's GeoTracker ESI account.

b. Resources on the GeoTracker ESI website, such as the Beginner's Guide (https://www.waterboards.ca.gov/ust/electronic_submittal/docs/geotracker_esi_rp_beginners_guide_revisedoct2019.pdf)

c. General GeoTracker Help Desk contact information:

   Phone: 1-866-480-1028, Email: geotracker@waterboards.ca.gov

A transmittal letter shall accompany each monitoring report. The letter shall include a discussion of all violations of this MRP during the reporting period and actions taken or planned for correcting each violation. If the Discharger has previously submitted a report describing corrective actions taken and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. The transmittal letter shall contain a statement by the Discharger or the Discharger's authorized agent certifying under penalty of perjury that the report is true, accurate and complete to the best of the signer's knowledge.

Laboratory analysis reports shall be included in the monitoring reports. All laboratory reports must also be retained for a minimum of three years. For a discharger conducting any of its own analyses, reports must also be signed and certified by the chief of the laboratory.

Monitoring information shall include the method detection limit (MDL) and the Reporting limit (RL) or practical quantitation limit (PQL). If the regulatory limit for a given

constituent is less than the RL (or PQL), then any analytical results for that constituent that are below the RL (or PQL) but above the MDL shall be reported and flagged as estimated.

All monitoring reports that involve planning, investigation, evaluation or design, or other work requiring interpretation and proper application of engineering or geologic sciences, shall be prepared by or under the direction of persons registered to practice in California pursuant to California Business and Professions Code sections 6735, 7835, and 7835.1.

A. QUARTERLY MONITORING REPORTS

Quarterly reports shall be submitted to the Regional Water Board on the **first day of the second month after the quarter ends** (e.g. the January-March Quarterly Report is due by May 1st). The reports shall bear the certification and signature of the Discharger's authorized representative. At the minimum, the quarterly reports shall include:

1. Results of all required monitoring.
2. A comparison of monitoring data to the requirements (including the flow limitation), disclosure of any violations of the NOA and/or General Order, and an explanation of any violation of those requirements. (Data shall be presented in tabular format).
3. Copies of laboratory analytical reports(s) and chain of custody form(s).

B. ANNUAL REPORT

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

1. Tabular and graphical summaries of all monitoring data collected during the year.
2. An evaluation of the performance of the wastewater treatment system, including discussion of the capacity issues, nuisance conditions, system problems, and a forecast of the flows anticipated in the next year. A flow rate evaluation, as described in the General Order (Provision E.2.c), shall also be submitted.
3. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into compliance with the NOA and/or General Order.
4. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
5. The name and contact information for the wastewater operator responsible for operation, maintenance, and system monitoring.

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

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

The Discharger shall implement the above monitoring program beginning 1 May 2026.

Ordered by: *Original signed by Alex S. Mushegan*

For PATRICK PULUPA, Executive Officer

13 April 2026
Date

GLOSSARY

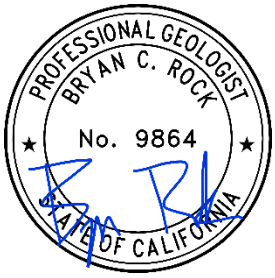
BOD_5	Five-day biochemical oxygen demand
EC	Electrical conductivity at 25° C
TSS	Total suspended solids
NTU	Nephelometric Turbidity Unit
MPN/100 mL	Most Probable Number [of organisms] per 100 milliliters
Continuous	The specified parameter shall be measured by a meter continuously.
24-hr Composite	Samples shall be a flow-proportioned composite consisting of at least eight aliquots over a 24-hour period.
Daily	Every day
Monthly	Once per calendar month
Quarterly	Once per calendar quarter (i.e., January – March).
Annually	Once per year.
mg/L	Milligrams per liter
mg/kg	Milligrams per kilogram
µg/L	Micrograms per liter
µmhos/cm	Micromhos per centimeter
gpd	Gallons per day

Central Valley Regional Water Quality Control Board

TO: Alexander Mushegan
Supervising Water Resource Control Engineer *(original initialed)*

FROM: Bryan Rock
Senior Engineering Geologist
PG 9864

Cruz Romero
Water Resource Control Engineer



DATE: 14 April 2026

APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; SONORA ESTATES MANUFACTURED HOUSING COMMUNITY 1, LLC; SONORA ESTATES MOBILE HOME PARK WASTEWATER TREATMENT SYSTEM; TUOLUMNE COUNTY

On 21 May 2025, Central Valley Regional Water Quality Control Board staff (Staff) received a Report of Waste Discharge (RWD) from Dale H. O'Bryan (RCE 81955), a California registered civil engineer, on behalf of Sonora Estates Manufactured Housing Community 1, LLC (SEMHC or Discharger). The RWD was submitted to reflect upgrades to the Sonora Estates Mobile Home Park Wastewater Treatment System (Facility) that were completed around 2003. The Discharger requests coverage under State Water Resources Control Board's Water Quality Order 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order). The RWD includes a Form 200 signed by Jessika Preston with SEMHC.

This memorandum provides a summary of the Central Valley Water Board staff's review of the RWD, and the applicability of the discharge to be covered under the General Order.

BACKGROUND INFORMATION

The Discharger owns the Facility and will subcontract the operation to a licensed operator. The Form 200 lists the operator as Mountain Oasis. The Facility is north of CA

Highway 49 and about 12 miles northwest of Sonora in Tuolumne County (38.028° N, 120.419° W) and consists of three parcels (Assessor Parcel Numbers 032-170-011, 032-580-011, and 03-150-170) comprising a total of 54.5 acres. The RWD states that the existing mobile home park has a total of 87 service connections including 70 mobile home spaces, 14 recreational vehicle spaces, and three services that include an office, laundry, and service building. The existing wastewater treatment system treats typical domestic wastewater from the mobile home park with an estimated population of approximately 235 persons. The Facility is currently regulated by Waste Discharge Requirements (WDRs) Order R5-2002-0069, which was issued to the Discharger on 26 April 2002 and authorizes a maximum flow of up to 20,000 gallons per day (gpd), which was historically discharged to a pond system and disposed via evaporation and percolation. A site map is shown in **Attachment A** of the Notice of Applicability (NOA).

On 29 August 2002, the Executive Officer issued a $10,000 Administrative Civil Liability Complaint (Order No. R5-2002-0517) to O.C. Critchfield and Harry Critchfield (Critchfield's), the previous Facility owners, for failure to submit reports pursuant to Section 13267 of the California Water Code. On 18 October 2002, the Central Valley Water Board issued Cease and Desist Order R5-2002-0183 (CDO) to the Critchfield's that required short-term measures to eliminate nuisance odor conditions, and long-term measures to connect the Facility's wastewater treatment system to a community sewer system.

On 17 March 2005, the Central Valley Water Board adopted Change of Name and/or Change of Ownership of Facilities Having Waste Discharge Requirements (NCO) Order R5-2005-0043 which recognized Sonora Estates, LLC as the new owner of the Facility. On 14 December 2023, the Central Valley Water Board adopted NCO R5-2023-0060 recognizing Sonora Estates Manufactured Housing Community, LLC and Tiki Lagun Partners, LLC as the new owners of the Facility.

DESCRIPTION OF DISCHARGE

Following adoption of the WDRs Order and in response to the CDO, treatment system upgrades have occurred at the Facility. The current wastewater treatment system at the Facility consists of a GEMCO© model GEM-20-5F extended aeration activated sludge package plant that features a 5,000-gallon equalization tank, a 20,000-gallon extended aeration chamber, an 8,000-gallon aerobic sludge digester, clarifier, tablet chlorinator, and a filtration system. The RWD estimates that at full occupancy, the mobile home park generates approximately 18,500 gpd of domestic wastewater. According to the May 2025 RWD, the treatment capacity of the package plant is 20,000 gpd.

The existing wastewater treatment system includes a facility sewer line collection system in which all wastewater flows by gravity to a sewage lift station. The lift station pumps the wastewater to the package treatment, which has the option to chlorinate effluent. Treated wastewater is subsequently pumped to a 2.4 acre pressure-dosed drip irrigation disposal field (i.e., leach field) consisting of 24 sequentially dosed zones, each receiving approximately 833 gallons per day.

POTENTIAL THREAT TO WATER QUALITY

The Discharger measures the Facility's wastewater flows to the disposal field using effluent flow meters. Average flows from January 2021 to December 2025 are summarized in Table 1 below. Flow data was not reported for August 2024 through May 2025. The design capacity of the wastewater treatment system is 20,000 gpd.

Table 1 – Monthly Average Wastewater Flows

Month	Units	2021	2022	2023	2024	2025
January	gpd	6,000	6,800	12,000	11,000	---
February	gpd	5,800	5,800	8,000	8,100	---
March	gpd	5,900	6,200	10,000	7,200	---
April	gpd	6,000	6,100	7,500	6,500	---
May	gpd	8,000	5,700	8,100	7,100	---
June	gpd	7,000	6,700	9,200	7,700	6,900
July	gpd	7,300	1,100	8,500	7,500	7,100
August	gpd	8,100	9,000	7,600	---	7,400
September	gpd	7,500	7,200	8,200	---	7,900
October	gpd	7,400	6,500	7,800	---	8,400
November	gpd	5,700	7,100	8,600	---	7,300
December	gpd	6,200	8,500	10,000	---	8,100

According to the RWD, the BOD_5 and TSS influent concentrations are both estimated to be around 150-200 mg/L, and the effluent quality can be less than 30 mg/L for both BOD and TSS if the wastewater treatment system is properly operated and maintained. Table 4: Effluent Limitations for Wastewater Treatment Systems of the General Order specifies different technology performance limitations based on the treatment provided. The BOD and TSS limits for activated sludge, MBR, or similar treatment systems are applicable for the Facility's discharge from the extended aeration activated sludge system to the subsurface dispersal field (monthly average of 30 mg/L and 7-day average of 45 mg/L).

The Discharger is required per MRP No. R5-2002-0069 to monitor effluent for biochemical oxygen demand (BOD), total coliform organisms, total dissolved solids (TDS), nitrate, and total Kjeldahl nitrogen. Table 2 below summarizes monthly average effluent BOD for 2021 through 2025. The Discharge consistently exceeded the monthly average effluent BOD limit prescribed by the General Order of 30 mg/L in 2021, 2022,

and 2024. However, as shown in 2025, the effluent BOD limit has consistently been below 10 mg/L.

Table 2 - Effluent BOD Data

Month	2021	2022	2023	2024	2025
January	285	65	160	30	2.7
February	384	130	5	75	2.5
March	200	8	4	170	3.2
April	277	71	5	99	2.0
May	200	90	7	72	3.5
June	27	40	8	145	2.4
July	105	230	10	41	2.0
August	206	49	ND	182	3.0
September	130	160	4	398	2.1
October	160	92	4	95	1.6
November	170	110	3	364	2.8
December	93	160	2	104	1.3

Monthly average effluent total suspended solids (TSS) results from January 2021 through December 2025 are summarized in Table 3 below. In the past five years, effluent TSS has been below the 30 mg/L limit prescribed by the General Order, and concentrations have been generally less than 10 mg/L, with few exceptions.

Table 3 – Effluent TSS Data (mg/L)

Month	2021	2022	2023	2024	2025
January	7	10	3	44	4.0
February	7	2	5	3	13.0
March	6	4	7	5	10.5
April	16	3	6	5	6.7
May	6	4	8	7	3.0
June	10	5	ND	8	2.5

Month	2021	2022	2023	2024	2025
July	4	4	ND	4	ND
August	6	3	8	27	3.0
September	7	2	2	5	4.0
October	3	3	4	17	1.3
November	4	2	24	2.7	10
December	9.3	3	6	6.3	10

Effluent TDS results from January 2021 through December 2025 are summarized in Table 4 below. Observed effluent TDS concentrations since 2021 have exceeded the recommended lower secondary maximum contaminant level of 500 mg/L about half the time; however, TDS concentrations have not exceeded the recommended upper secondary maximum contaminant level of 1,000 mg/L.

Table 4 - Effluent TDS Data (mg/L)

Month	2021	2022	2023	2024	2025
January	390	710	421	480	570
February	450	640	375	360	640
March	505	430	390	450	470
April	700	620	520	500	460
May	650	560	460	480	560
June	667	430	450	540	490
July	560	675	510	530	560
August	440	640	450	---	500
September	590	575	500	---	490
October	460	650	480	---	490
November	650	444	300	58	500
December	590	520	380	150	540

A summary of reported nitrogen data for 2021 through 2025 is shown in Table 5 below. Effluent nitrate (as N) is generally above the water quality objective of 10 mg/L.

Table 5 - Effluent Nitrate (as N) Data (mg/L)

Month	2021	2022	2023	2024	2025
January	32.3	28.6	19	35	25.3
February	23.4	27.5	39	33	24.2
March	38.4	36	28	32	13.7
April	17.9	29	26	32	8.5
May	29.7	20	27	21	25.0
June	20.4	19	ND	36	15.0
July	32	34	26	14	12.6
August	27.2	28	24	18	21.5
September	18.3	39	27	20	26.9
October	27.6	44	25	23.5	26.9
November	28.5	40	36	37.2	26.3
December	38	19	35	29.1	28.6

Total coliform in the effluent is generally above the 7-day average limit of 2.2 MPN/100 mL, specified in the Basin Plan for MUN designated receiving water. The Facility has not disinfected their effluent from 2021 to 2025 and effluent coliform samples indicate the effluent total coliform concentrations are greater than 1,600 MPN/100 mL. According to the operator, disinfection operations ceased at the Facility to save costs, and it was not required as part of the previous WDRs. Due to the shallow fractured bedrock environment, discussed more below, and the elevated levels of total coliform in the effluent, it would be appropriate for the Discharger to implement the Facility's disinfection capability to reduce potential impacts to underlying groundwater with regard to coliform. With implementation of disinfection, the Discharger should be able comply with the 7-day average limit for total coliform specified in the General Order.

The RWD did not provide a summary/review of the source water quality; however, the Facility's water system includes two groundwater wells that provide source water to residents of the mobile home park. Groundwater quality data from the two supply wells were obtained using the Environmental Protection Agency's State Drinking Water Information System (SDWIS). A Systems Analysis Report dated 1 November 2024 that was included as an Attachment to the RWD indicates that Well 1 (CA5500086_001_001) was drilled in 1966 to a depth of 135 feet below ground surface (bgs), with an 8-inch diameter steel casing set to a total depth of 70 feet bgs, and a 35 feet bgs sanitary seal. Well 2 (CA5500086_002_002) was drilled to depth of 98 feet bgs,

with an 8-inch diameter steel casing set to a total depth of 44 feet bgs. Details regarding the date Well 2 was drilled and information regarding the sanitary seal are unknown.

These wells draw groundwater from fractures within the underlying schist and granite bedrock formations. Well 2 has a reported depth of approximately 98 feet below bgs. The combined average source capacity of both wells is approximately 55 gallons per minute (gpm). Staff's review of State Water Resources Control Board's Groundwater Ambient Monitoring Assessment Program (GAMA) for monitoring or supply wells within a one-mile radius of the Facility did not yield any results. Therefore, only the Facility's supply wells were used to summarize local groundwater quality. Groundwater quality data collected from these wells on 13 December 2022 is summarized in Table 6 below.

Table 6 - Groundwater Quality

Constituent/Parameter	Unit	Well No. 1 (CA55500086-001-001) 13 December 2022	Well No. 2 (CA5500086-002-002) 13 December 2022
Alkalinity, Total	mg/L	331	341
Arsenic	µg/L	<2	<2
Calcium	mg/L	76.5	75.6
Chloride	mg/L	7.3	7.5
Chromium	µg/L	11.5	<10
EC	µmhos/cm	615	618
Fluoride	mg/L	0.11	<0.1
Hardness, Total (as $CaCO_3$)	mg/L	314	310
Iron	µg/L	<100	<100
Manganese	µg/L	<20	<20
Nitrate as N	mg/L	2.1	2.1
pH	Std. Units	7.6	7.5
Potassium	mg/L	2.1	2.1
Sodium	mg/L	3.6	3.5
Sulfate	mg/L	5.6	5.5
TDS	mg/L	360	360

Monitoring is necessary to confirm the system provides the level of treatment required and to characterize the Facility's discharge.

Staff's review of available soils information for the Facility area, from the United States Department of Agriculture's Natural Resources Conservation Service, indicate the occurrence of shallow soils. The depth to fractured bedrock at the site ranges from around 1.5 to greater than 6.5 feet below ground surface, limiting the potential for soil attenuation of constituents of concern, specifically pathogens. However, as noted above, the Facility is equipped to disinfect its effluent prior to discharge to the leach field, which should mitigate the potential for pathogen impacts to underlying groundwater.

Additionally, Finding 6 of the General Order states dischargers enrolled under the General Order must comply with the applicable Basin Plan requirements, and that between the requirements of the General Order and the Basin Plan, the more stringent requirements prevail. The Sacramento River and San Joaquin Rivers Basin Plan, Section 3.2.1 contains a water quality objective for bacteria requiring groundwater designated as municipal and domestic supply (MUN) have total coliform of less than 2.2 MPN/100 mL over any 7-day period. Because of the MUN designation and site-specific conditions, it is appropriate for the NOA to specify a total coliform limit of 2.2 MPN/100 mL over any 7-day period as specified in the Basin Plan.

NITROGEN LIMIT EVALUATION

The General Order requires that wastewater systems with a flow rate greater than 20,000 gallons per day to be evaluated to determine if nitrogen limits are required, as described in Attachment 1 of the General Order. As discussed above, the design capacity of the wastewater treatment system is 20,000 gallons per day (gpd). Therefore, a Nitrogen Effluent Limit evaluation is not required for the Facility. Additionally, although nitrate concentrations in the effluent exceed the water quality objective, local groundwater conditions do not appear to be impacted from the discharge. This is supported by low observed nitrate concentrations in source water wells that draw from fractured bedrock underlying the Facility.

MONITORING REQUIREMENTS

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

- Activated Sludge Monitoring
- Subsurface Disposal System Monitoring
- Disinfection System Monitoring
- Solids Disposal Monitoring

SALT AND NITRATE CONTROL PROGRAMS

At its 31 May 2018 Board Meeting, the Central Valley Water Board adopted Basin Plan amendments incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley (Resolution R5-2018-0034). The Basin Plan amendments became effective on 17 January 2020 and were revised by the Central Valley Water Board in 2020 with Resolution R5-2020-0057 (https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/resolutions/r5-2020-0057_res.pdf). The revisions to the Basin Plan amendments became effective on 10 November 2021.

Pursuant to the Basin Plan amendments, the previous owner was sent a Notice to Comply on 5 January 2021 (**CV-SALTS ID: 2450**) with instructions and obligations for the Salt Control Program within one year of the effective date of the amendments. The previous owner submitted a Notice of Intent on 30 November 2021 and selected Option 2, (Alternative Option for Salt Permitting) electing to participate in the Prioritization and Optimization Study (P&O Study).

For the Nitrate Control Program, the Facility and disposal area are not within a prioritized basin on the valley floor. Implementation within unprioritized basins/sub-basins that are outside the valley floor will occur at the direction of the Executive Officer. A Notice to Comply with the Nitrate Control Program may be issued at a later date if the Executive Officer determines it is necessary to protect water quality. Under these circumstances, it may be necessary to modify this NOA to incorporate applicable Nitrate Control Program findings and requirements.

More information on the Salt and Nitrate Control Program may be found on the internet (https:cvsalinity.or/public-info).