16 January 2026

CERTIFIED MAIL
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Tom Dogias
Yolo County Housing Authority
Dixon Migrant Center
147 West Main Street
Woodland, CA 95695

NOTICE OF APPLICABILITY

GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS ORDER WQ 2014-0153-DWQ FOR YOLO COUNTY HOUSING AUTHORITY, CITY OF DIXON HOUSING AUTHORITYAND VOA DIXON, LLC DIXON MIGRANT CENTER WWTF SOLANO COUNTY

On September 11, 2024, the Yolo County Housing Authority submitted a Report of Waste Discharge (RWD) describing the Dixon Migrant Center Wastewater Treatment Facility (WWTF) in Solano County. Additional information was submitted on 26 September 2024, 18 April 2025, and 2 May 2025. Based on information provided in the RWD and quarterly self-monitoring reports, the wastewater treatment system and discharge are consistent with the requirements of the State Water Resources Control Board (State Water Board) *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems*, Order WQ 2014-0153-DWQ (General Order). This Notice of Applicability (NOA) serves as formal notice that the General Order is applicable to the site as described below. You are hereby assigned Order WQ 2014-0153-DWQ-R5433 for the discharge. A copy of the Waiver is enclosed and also available at the State Water Boards Adopted Orders webpage, General Order 2014-0153-DWQ (https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/wq-2014-0153-dwq.pdf

You should familiarize yourself with the entire General Order and its attachments, which describe mandatory discharge and monitoring requirements. The General Order contains operational and reporting requirements by wastewater system type. 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

(MRP) 2014-0153-DWQ-R5433. The Yolo County Housing Authority is responsible for all the applicable requirements that exist in the General Order and this NOA.

REGULATORY BACKGROUND

Wastewater discharge from the WWTF is currently regulated by Waste Discharge Requirements (WDR) Order 5-01-015, which was adopted by the Central Valley Regional Water Quality Control Board (Central Valley Water Board) on 26 January 2001, superseding previous Order 95-128, adopted on 26 May 1995. Coverage under the General Order will become effective upon rescission of WDR Order 5-01-015, which will occur at an upcoming Central Valley Regional Water Board meeting.

EXISTING FACILITY AND DISCHARGE DESCRIPTION

The Dixon Migrant Center Wastewater Treatment Facility (WWTF) is owned by the City of Dixon Housing Authority and operated through a Joint Powers Agreement by the Yolo County Housing authority. The WWTF is located at 7290 Radio Station Road, in Solano County on land owned by the City of Dixon Housing Authority. The Yolo County Housing Authority and the City of Dixon Housing Authority are hereafter referred to as “Discharger”.

The WWTF provides treatment and disposal service for domestic wastewater generated by the Dixon Migrant Center, which provides housing for approximately 370 residents during the harvest season. The Dixon Migrant Center consists of separate housing and wastewater disposal areas. The housing area occupies approximately 27 acres (Assessor’s Parcel No 0143-060-070), and the wastewater ponds occupy approximately 5 acres of a 33-acre parcel (Assessor’s Parcel No 0143-060-110). The housing area is in the northwest quarter of the northeast quarter, and the wastewater ponds are in the eastern half of the southeast quarter of Section 8, T6N, R2E, MDB&M. A site location map is shown on Attachment A, which is attached hereto and is made part of this NOA by reference.

The Dixon Migrant Center (Center) is located in an area without a regional wastewater collection system; therefore, wastewater is collected and treated on-site. The site plan map is shown on Attachment B, which is attached hereto and is made part of this NOA by reference.

The WWTF has been operating since 1984 and provides domestic wastewater service to 20 single family dwellings and 24 duplexes, a community center, day-care center laundry facility, office, storage area and maintenance shop. The Center provides housing for migrant workers and their families during the harvest season. There are approximately 370 residents and 15 teachers at the center from May through October. During the off season (November through April) maintenance staff and their families (approximately 15 residents) are housed at the center. Drinking water is supplied by two domestic wells (DW-1 and DW-2) that are operated by the Yolo County Housing Authority. Well locations are shown in Attachment B.

Wastewater generated from the housing units and community facilities is collected in a 32,000-gallon septic tank then pumped through a 4-inch PVC sewer force main to two

percolation ponds. The two ponds have a combined capacity of 7.47 acre-feet with two feet of freeboard. When wastewater volumes in the two ponds exceed capacity, wastewater can be pumped to the adjacent 15-acre parcel owned by the City of Dixon Housing Authority, or the adjacent 633-acre property (land application area) owned by VOA Dixon, LLC, for disposal through an agreement between the two parties. Native grasses are currently grown in the land application area. According to the RWD, no wastewater has been land discharged to the property owned by VOA Dixon, LLC since 2017. There have been no violations for the WWTF since 2016.

GROUNDWATER CONDITIONS

Three groundwater monitoring wells were installed in 2002, approximately 20 feet below ground surface (bgs), to monitor shallow groundwater quality up and downgradient of the ponds. A 2002 *Groundwater Characterization Report*, prepared following the installation of the monitoring wells, characterizes Monitoring well MW-1 as upgradient and MW-2 and MW-3 as downgradient, based on groundwater elevation data collected during the October 2002 monitoring event. However, quarterly reporting since that time shows variation in groundwater elevation data between the wells, and MW-1 has not consistently been upgradient of MW-2 and MW-3.

Historical groundwater monitoring data ranges are summarized in Table 1. MPN means most probable number of organisms. The water quality objectives (WQOs) in this table are primary maximum contaminant levels (MCLs) for nitrate as nitrogen and secondary MCLs for total dissolved solids (TDS) and electrical conductivity (EC).

Table 1 Average Historical Groundwater Monitoring Data March 2018 – May 2023

Parameter	MW-1	MW-2	MW-3	Potential Water Quality or WQOs
Total Dissolved Solids (mg/L)	700 - 1700	770 - 1700	760 - 2600	500
Nitrate as nitrogen (mg/L)	3.2 - 20.0	1.1 - 16	3.4 - 16	10
Total Coliform (MPN/100mL)	<1.1 - 3.2	<1.1 - 3.6	<1.1 - 40	2.2
pH	6.5 - 8.3	6.7 - 8.3	6.1 - 8.0	--
Electrical conductivity (µmhos/cm)	1110 - 2360	721 - 2430	1147 - 2440	900

Beginning in 2021, monitoring wells MW-1, MW-2 and MW-3 were routinely found to be dry, and therefore groundwater data was collected only twice between Quarter 3, 2021 and Quarter 1, 2025. In March 2025, MW-1, MW-2 and MW-3 were abandoned, and three new replacement wells (MW-4, MW-5 and MW-6 respectively) were drilled within 10 feet of each of the original monitoring wells. MW-4 and MW-5 are 35 feet deep, with a screened interval between 15 to 25 feet bgs. MW-6 is 30 feet deep with a screened interval between 10 and 30 feet bgs. Following well development, groundwater samples from MW-4, MW-5 and MW-6 were collected and analyzed for select constituents. As shown in the table below and compared with data presented in Table 1, preliminary

monitoring for the three new monitoring wells is within a comparable range of monitoring data from MW-1, MW-2, and MW-3, respectively. The results from the groundwater samples collected on 11 March 2025 are shown in Table 2 below.

Table 2 Monitoring Well Data, March 2025

Parameter	MW-4	MW-5	MW-6	Potential Water Quality or WQOs
Depth to Groundwater (feet)	15.25	14.92	13.90	--
Total Dissolved Solids (mg/L)	660	720	1200	500 -1,000 secondary MCL (recommended – upper)
Nitrate as nitrogen (mg/L)	2.9	1.4	5.5	10, Primary MCL
Total Coliform (MPN/100mL)	>23	>23	>23	2.2
pH	7.6	7.7	7.7	6-8, secondary MCL
Electrical conductivity (µmhos/cm)	1133	1189	1163	900-1600, Sec MCL (recommended – upper)

Total coliform was detected occasionally in MW-1, MW-2 and MW-3 from 2018-2023 and was detected in MW-4, MW-5 and MW-6 upon installation in March 2025. The WWTF does not provide disinfection to remove pathogens in wastewater and must rely on site conditions (climate and soil) to control the persistence and transport of pathogens into the aquifer; therefore, the MRP requires continued monitoring for total coliform.

SITE-SPECIFIC REQUIREMENTS AND EFFLUENT LIMITS

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

1. Requirements A. Prohibitions
2. Requirements B.1.a

   The Discharger shall comply with the following flow limit: The daily maximum flow entering the storage pond shall not exceed 37,000 gallons per day (gpd).
3. Requirements B.1 b

   For Section B.1.l, the Discharger shall comply with the following setback requirements listed in Table 3 of the General Order:

Equipment or Activity	Domestic Well	Flowing Stream	Ephemeral Stream Drainage	Property Line	Lake or Reservoir
Septic Tank, Treatment System, or Collection System	150 ft	50 ft	50 ft	5 ft	200 ft
Impoundment	150 ft	150 ft	150 ft	50 ft	200 ft
Land Application Area (LAA)	150 ft	100 ft	100 ft	50 ft	200 ft

4. Requirements B.2 Septic Systems

   The WWTF utilizes a septic tank; therefore Section B.2 of General Order applies in its entirety.

5. Requirements B.5 Pond Systems

   The WWTF utilizes a pond system; therefore Section B.5 of General Order applies in its entirety.

6. Requirements B.7 Land Application and/or Recycled Water Systems

   The WWTF utilizes a land application system; therefore Section B.7 of General Order applies in its entirety.

   Storm water runoff from the VOA Dixon LLC property drains to the south and eastern boundaries of the property, to an agricultural ditch and drainage laterals managed by Reclamation District No. 2068. These laterals drain into Haas Slough, Chache Slough and ultimately to the Sacramento River.

   Per General Order Section B.7.e., if storm water is allowed to runoff from an LAA during the time of year wastewater is not applied, all wastewater shall meet disinfection requirements at a level equivalent to disinfected secondary-23 recycled water. Alternatively, the Discharger may submit a technical report, for Executive Officer approval, describing how the LAA will be operated to prevent pathogens from migrating off the LAA with stormwater.

7. Requirements B.8 Sludge/Solids/Biosolids Disposal

   The WWTF utilizes a pond system that will accumulate solids; therefore Section B.8 of the General Order applies in its entirety.

8. Requirements C. Groundwater and Surface Water Limitations

9. Requirements D. Effluent Limitations

The pond treatment system is not subject to technology performance effluent limits for biochemical oxygen demand (BOD) as specified in the General Order. Wastewater has been historically treated and disposed of primarily by means of evaporation and percolation within the ponds. Treatment is performed through the soil column.

Staff evaluated the need for a total nitrogen effluent limit using the method contained in the General Order and determined that a nitrogen effluent limit is not required based on historical flows.

10. Provision E.1 Technical Report Preparation Requirements

    The following technical reports shall be submitted as described below:

    a. **Within 90 days** of issuing NOA, the Discharger shall submit a *Spill Prevention and Emergency Response Plan* (Response Plan) consistent with the requirements of General Order Provision E.1.a.

    b. **Within 90 days** of issuing NOA, the Discharger shall submit a *Sampling and Analysis Plan* consistent with the requirements of General Order Provision E.1.b.

    c. **At least 90 days prior** to any removal, drying, treatment, or disposal of sludge for pond maintenance, the Discharger shall submit a *Sludge Management Plan* consistent with the requirements of General Order Provision E.1.c.

    d. **Within 90 days** of issuing NOA the Discharger shall submit a technical report describing how the LAA will be operated to prevent pathogens from mitigating off the LAA with stormwater.

SALT AND NITRATE CONTROL PROGRAMS

The Central Valley Water Board adopted Basin Plan amendments incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting (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).

1. For nitrate, dischargers that are unable to comply with stringent nitrate requirements will be required to take on alternate compliance approaches that involve providing replacement drinking water to persons whose drinking water is affected by nitrates. Dischargers may comply with the new nitrate program either individually or collectively with other dischargers. For the Nitrate Control Program, the WWTF currently falls outside of any prioritized Groundwater Basin.

2. For salinity, dischargers that are unable to comply with stringent salinity requirements will instead need to meet performance-based requirements and participate in a basin-wide effort to develop a long-term salinity strategy for the Central Valley. The Discharger, with **CV-SALTS ID 1967**, has opted to participate in the Prioritization and Optimization (P&O) Study.

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 Programs are met. More information regarding this regulatory planning process can be found on the Central Valley Water Board CV-SALTS website (https://www.waterboards.ca.gov/centralvalley/water_issues/salinity).

MONITORING AND REPORTING

The Discharger shall comply with MRP 2014-0153-DWQ-R5433, which is attached hereto and made part of this NOA by reference. Effective upon the first day of the month following recission of Order 5-01-015, the Discharger shall comply with MRP WQ 2014-0153-DWQ-R5433.

ENFORCEMENT

Please review this NOA carefully to ensure that it completely and accurately reflects the discharge. Discharge of wastes other than those described in this NOA is prohibited.

Prior to allowing changes to the wastewater strength or generation rate, or to the method of waste disposal, you must contact the Central Valley Regional Water Board to determine if submittal of a RWD is required.

The Discharger will generate the waste subject to the terms and conditions of WQ 2014-0153-DWQ-R5433 and will maintain exclusive control over the discharge. As such, the Yolo County Housing Authority and VOA Dixon LLC are primarily responsible for compliance with this NOA, MRP, and General Order, with all attachments. Failure to comply with the requirements in the General Order or this NOA could result in an enforcement action as authorized by provisions of the California Water Code.

DOCUMENT SUBMITTAL

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 are available to the public on the internet at the Water Boards Water Quality Petitions webpage (https://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

Now that the Notice of Applicability has been issued, the Board's Compliance and Enforcement section will take over management of your case. Howard Hold is your new point of contact for any questions about the Waiver. If you find it necessary to make a change to your permitted operations, Howard will direct you to the appropriate Permitting staff. You may contact Howard at (916) 464-4679 or at howard.hold@waterboards.ca.gov.

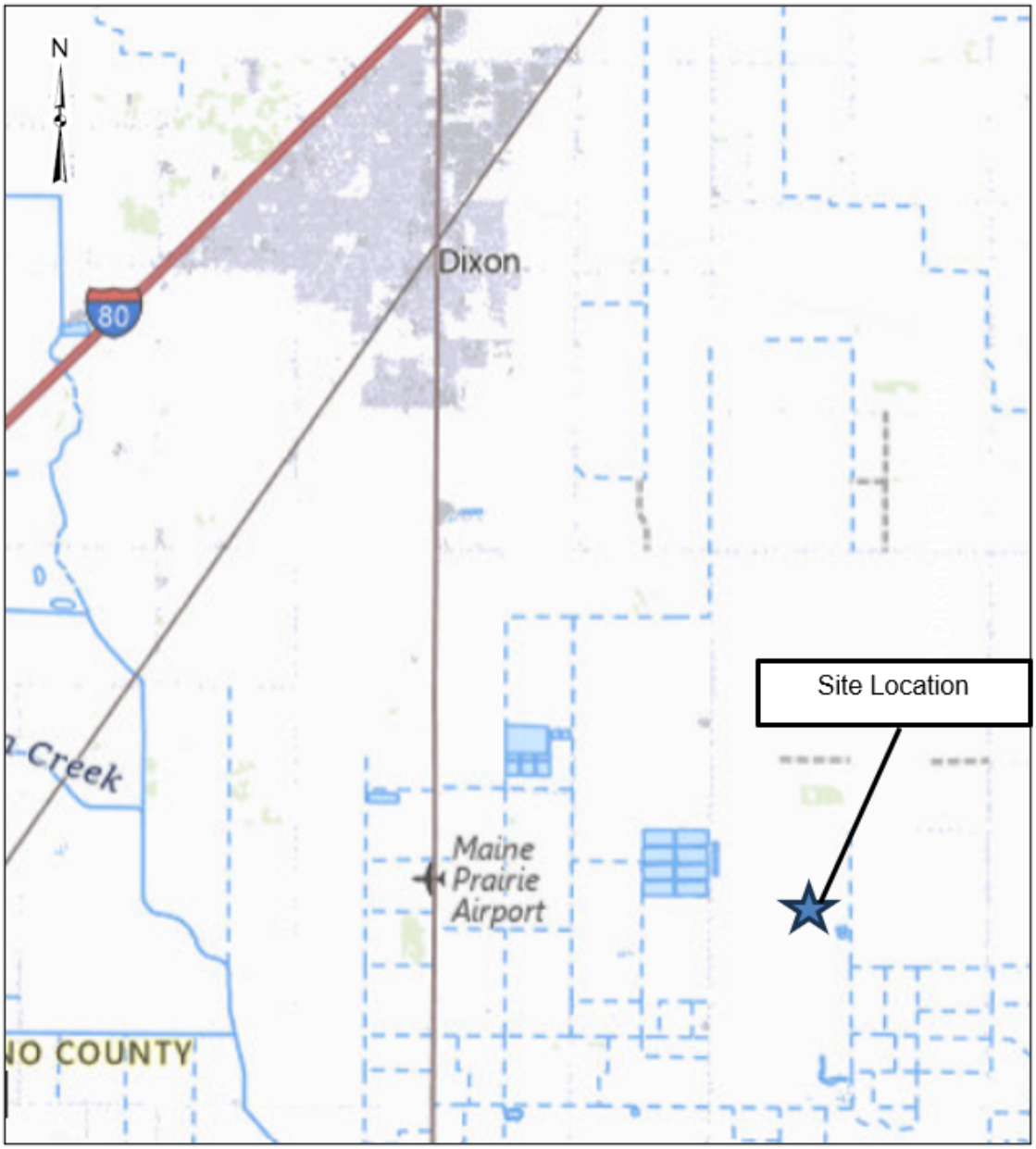
for Patrick Pulupa
Executive Officer

Attachments: Attachment A, Site Location Map
Attachment B, Site Plan
Staff Review Memorandum for Dixon Migrant Center

Enclosures: Monitoring and Reporting Program 2014-0153-DWQ-R5433
Water Quality Order WQ 2014-0153-DWQ

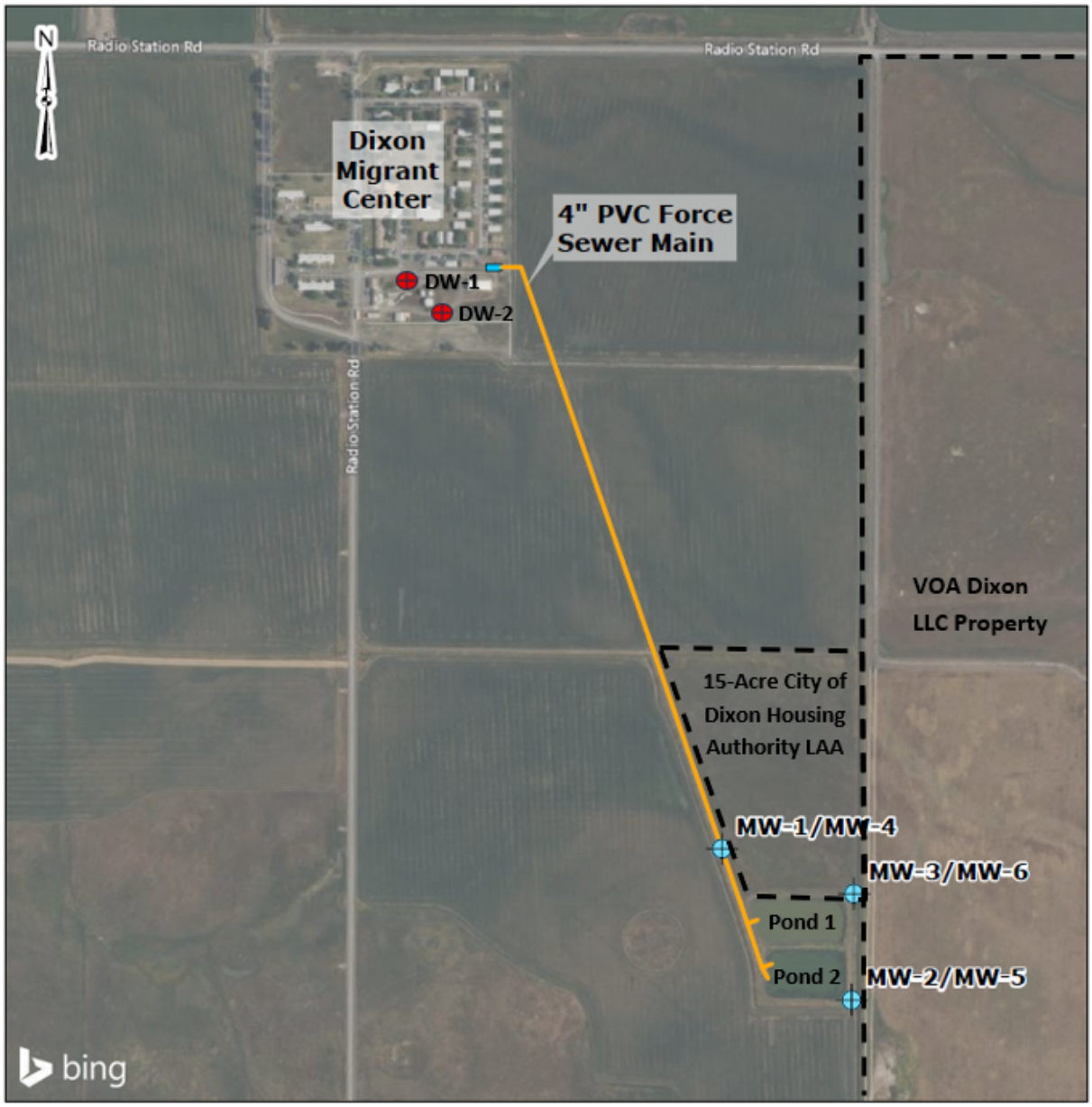
Cc via email: Trey Strickland, Solano County Environmental Health Services
Judy Ahman, VOA Dixon, LLC
Howard Hold, Central Valley Water Board
Ramon Arredondo, McMor Water Service Company

Attachment A



Source	**LOCATION MAP**
USGS Topographic Map Viewer ~0.5 miles	Dixon Migrant Center Solano County

Attachment B



Source	SITE PLAN
Groundwater Monitoring Well Replacement and Sampling Report Terracon, April 2025	Dixon Migrant Center Solano County

TO: John Murphy
Supervising Engineering Geologist

FROM: Scott Armstrong
Senior Engineering Geologist

Madeline Kelsch
Water Resources Control Engineer

DATE: 1 October 2025

APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; YOLO COUNTY HOUSING AUTHORITY AND VOA DIXON, LLC; DIXON MIGRANT CENTER WASTEWATER TREATMENT PLANT; SOLANO COUNTY

On September 11, 2024, the Yolo County Housing Authority submitted a Report of Waste Discharge (RWD) describing the Dixon Migrant Center Wastewater Treatment Facility (WWTF) in Solano County. Additional information was submitted on 26 September 2024, 18 April 2025 and 2 May 2025. A complete and signed Form 200 was received on 18 September 2025. The Discharger is requesting coverage under State Water Resources Control Board Order WQ 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order). This memorandum provides a summary of Central Valley Water Board staff's review of the RWD and the applicability that the existing discharge is eligible for enrollment under the General Order.

REGULATORY BACKGROUND

Wastewater discharge from the WWTF is currently regulated by Waste Discharge Requirements (WDR) Order 5-01-015, which was adopted on 26 January 2001, superseding the previous Order 95-128, adopted on 26 May 1995. Coverage under the General Order will become effective upon rescission of WDR Order 5-01-015, which will occur at an upcoming Central Valley Water Board meeting.

EXISTING FACILITY AND DISCHARGE DESCRIPTION

Waste Discharge Requirements (WDRs) Order 5-01-015 regulates the Dixon Migrant Center Wastewater Treatment Facility and allows the discharge of domestic wastewater to two percolation ponds with the following limits:

- Monthly average dry weather flow shall not exceed 25,000 gpd
- Daily maximum flows not to exceed 37,000 gpd

The Dixon Migrant Center provides housing for migrant workers and their families during the harvest season. There are approximately 370 residents and 15 teachers at the Dixon Migrant Center from May through October and 15 residents during the off

season (November through April). The Wastewater generated from the housing units and community facilities is collected in a 32,000-gallon septic tank then pumped through a 4-inch PVC sewer force main to two percolation ponds.

When wastewater volumes in the two ponds exceed capacity, wastewater can be pumped to the adjacent 15-acre parcel owned by the City of Dixon Housing Authority, or the adjacent 633-acre property (land application area) owned by VOA Dixon, LLC, for disposal. Native grasses are currently grown in the land application area. According to the RWD, no water has been land discharged to the property owned by VOA Dixon, LLC since 2017.

The ponds were constructed in 1984 to replace smaller wastewater ponds, and have the following estimated depth, surface area, and volume:

Pond Name	Design Water Depth (feet)	Surface Area at High Water Elevation (acres)	Volume (acre feet)
Pond No.1	2.55	1.68	3.75
Pond No.2	2.25	1.85	3.72

Wastewater characterization based on quarterly monitoring reports from 2018-2022 is summarized below. The ponds have been periodically dry during quarterly monitoring events since 2020, and samples are only collected when there is sufficient wastewater present in the ponds.

Constituent	Pond 1	Pond 2	Potential WQO
pH (standard units)	8.5 - 10	8.3 – 9.6	6.5 – 8.5, secondary MCL
Dissolved Oxygen (mg/L)	0.51 - 11	0.85 - 10	--
Electrical Conductivity (µmhos/cm)	1040 - 3440	933 - 3770	900-1600, secondary MCL (recommended – upper)
TSS (mg/L)	2 - 940	7 - 1000	--
TDS (mg/L)	1200 - 2800	760 - 2500	500 -1,000, secondary MCL (recommended – upper)
BOD_5 (mg/L)	9 - 460	12 - 330	--
Nitrate as Nitrogen (mg/L)	0.07 – 0.53	0.02 – 1.80	10 (primary MCL)

There are no plans to expand the WWTF. The Discharger does not anticipate flows to exceed 25,000 gpd as a monthly average dry weather flow or 37,000 gpd as a daily maximum flow. Based on historical and current flows, the WWTF is eligible for regulatory coverage under the General Order.

The pond system is not subject to technology performance effluent limits for BOD, because wastewater disposal is primarily by means of evaporation and percolation. Treatment is performed through the soil column.

The General Order includes five site specific conditions to be considered when evaluating a discharge and the need for nitrogen control. These five conditions include: flow, depth to groundwater, percolation rate, wastewater strength, and if nitrogen is of concern in the area. Although the septic tank and ponds are designed for a much higher capacity, historical and current flows are seasonal and have been less than 20,000 gpd. Recent data show the average depth to groundwater is approximately 15 feet. Historical and current nitrate concentrations in the wastewater do not exceed 10 mg/L, the primary maximum contaminant level for nitrate, and intrawell trend analysis shows there are no statistically significant increasing trends for nitrate in groundwater. Based on these conditions, a nitrogen effluent limit evaluation is not required.

MONITORING REQUIREMENTS

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

- Septic Tank Monitoring;
- Pond System Monitoring;
- Land Application Area Monitoring;
- Solids Disposal Monitoring; and
- Groundwater Monitoring

To establish a realistic estimate of statewide recycled water use and potential for increased recycled water use statewide, the Recycled Water Policy requires dischargers to report the volume of treated wastewater and recycled water. The treatment facility has a design flow of more than 20,000 gpd and therefore, the Discharger is required to submit volumetric annual reporting at this time.

SALT AND NITRATE CONTROL PROGRAMS

The Central Valley Water Board adopted Basin Plan amendments incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting (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).

For nitrate, dischargers that are unable to comply with stringent nitrate requirements will be required to take on alternate compliance approaches that involve providing replacement drinking water to persons whose drinking water is affected by nitrates. Dischargers may comply with the new nitrate program either individually or collectively with other dischargers. For the Nitrate Control Program, the facility falls outside of any prioritized Groundwater Basins.

For salinity, dischargers that are unable to comply with stringent salinity requirements will instead need to meet performance-based requirements and participate in a basin-wide effort to develop a long-term salinity strategy for the Central Valley. The Discharger, with CV-SALTS ID 1967, has opted to participate in the Prioritization and Optimization (P&O) Study.

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 Programs are met. This order may be amended or modified to incorporate newly applicable requirements. More information regarding this regulatory planning process can be found on the Central Valley Water Board CV-SALTS website (https://www.waterboards.ca.gov/centralvalley/water_issues/salinity).