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## Central Valley Regional Water Quality Control Board

11 August 2025

Lance Roberts  
Utilities Manager  
City of Lodi  
1331 South Ham Lane  
Lodi, CA 95642

**CERTIFIED MAIL**  
7021 1970 0000 8962 1652

### REVISED NOTICE OF APPLICABILITY

**STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2016-0068-DDW  
WATER RECLAMATION REQUIREMENTS FOR RECYCLED WATER USE  
CITY OF LODI  
WHITE SLOUGH WATER POLLUTION CONTROL FACILITY  
SAN JOAQUIN COUNTY**

On 28 December 2018, Notice of Applicability (NOA) WQ 2016-0068-DDW-R5007 was issued to the City of Lodi (Discharger/City), to regulate new recycled water facilities not covered under the Discharger's existing Waste Discharge Requirements Order No. R5-2007-0113-01. In May 2024, the Discharger submitted a Report of Waste Discharge (RWD) for revised Waste Discharge Requirements (WDRs) for the recycled water and biosolids reuse at the White Slough Water Pollution Control Facility (WPCF). The RWD included an approved *White Slough Water Pollution Control Facility Title 22 Engineering Report*, dated August 2018, and a request for revised regulatory coverage under Water Quality Order 2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use (General Order).

On 7 June 2016, the State Water Resources Control Board (State Water Board) adopted the General Order to regulate the use of recycled water for all Title 22 uses except groundwater recharge. The General Order delegates responsibility for administering water recycling programs to a designated Administrator. Based on the information provided in the RWD and August 2018 Title 22 Engineering Report, the Discharger's recycled water program satisfies the general and specific conditions of the General Order. Therefore, this serves as formal notice that General Order WQ 2016-0068-DDW is applicable, and the City of Lodi will act as the Administrator of the Recycled Water Program. The City will remain assigned to **WQ 2016-0068-DDW-R5007**. Please include this number on all correspondence related to this discharge.

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NICHOLAS AVDIS, CHAIR | PATRICK PULUPA, EXECUTIVE OFFICER

## **REGULATORY BACKGROUND**

Recycled water production and distribution at the WPCF is currently regulated by WDRs R5-2007-0113-01 and the site-specific NOA WQ 2016-0068-DDW-R5007. NOA WQ 2016-0068-DDW-R5007 was issued in 2018 to regulate distribution of tertiary treated wastewater to the tertiary storage pond and use from a future fill station, which was never constructed. All other uses of recycled water, including irrigation of land application areas and supply to non-city users, are covered by WDRs R5-2007-0113-01. Per the Discharger's request in the May 2024 RWD, regulation of the tertiary storage pond will be included in revised WDRs and distribution of recycled water to non-city users will be regulated under this revised NOA. WDRs Order No. R5-2007-0113-01 is scheduled to be rescinded and replaced at the August 2025 meeting of the Central Valley Regional Water Quality Control Board (Central Valley Water Board). Upon rescission of WDRs Order No. R5-2007-0113-01, the Discharger's recycled water distribution to non-city users will be regulated under this NOA and the corresponding revised Monitoring and Reporting Program (MRP) No. WQ 2016-0068-DDW-R5007.

## **WASTEWATER TREATMENT FACILITY**

The WPCF is located approximately four miles west of the City of Lodi at 12751 N Thornton Road in San Joaquin County. The Discharger owns and operates two separate wastewater collections systems as part of the WPCF, a municipal wastewater system and an industrial wastewater line that collects primarily food processing wastewater from a fruit cannery.

The municipal wastewater treatment process consists of a conventional activated sludge system with nitrification and denitrification, followed by tertiary treatment using filtration and ultraviolet (UV) disinfection. From the filter pump station, disinfected tertiary recycled water can be discharged to the Sacramento-San Joaquin River Delta at Dreger Cut under the Municipal General Order enrollee number R5-2023-0020-010 (NPDES No. CAG585001), sent to the WPCF's 100-million-gallon (MG) unlined Tertiary Storage Pond, or supplied to two on-site non-city recycled water users. The Discharger supplies tertiary recycled water to the Northern California Power Agency (NCPA) power plants, and the San Joaquin County Mosquito and Vector Control District (VCD) fish rearing ponds, located adjacent to the wastewater treatment facilities.

Undisinfected secondary treated municipal wastewater is pumped to the Discharger's 40-acres of storage ponds and land application areas (LAAs). Wastewater from the industrial line is either discharged to the LAAs during the irrigation season or mixed with undisinfected secondary treated effluent stored in the ponds during the non-irrigation season. Discharges of recycled water and industrial wastewater to the storage ponds and LAAs, and tertiary treated recycled water are regulated under R5-2007-0113-01, which is in the process of being revised.

This NOA regulates the distribution of disinfected tertiary treated recycled water produced at the WPCF for non-potable reuse by existing and future users as described in the Facility Changes section below.

## **FACILITY CHANGES**

The Discharger is engaged in the preliminary planning stages for private construction of a new hydrogen gas production facility within the Discharger-owned WPCF property. The privately owned hydrogen production facility will produce hydrogen gas from disinfected tertiary recycled water. The facility will be constructed on approximately 130 acres of existing LAAs for the facility and is anticipated to have a demand of up to 2.8 mgd of tertiary recycled water from the WPCF. Because the hydrogen production facility project is currently in preliminary planning stages, it was not included in the August 2018 Title 22 Engineering Report approved by the Division of Drinking Water, and is therefore not covered by this NOA.

## **RECYCLED WATER APPLICATION**

The City of Lodi administers a Recycled Water Program for the distribution of disinfected tertiary recycled water for non-potable reuse. The City serves as the Producer of the recycled water and the Administrator. As the Administrator, the City is responsible for the administration of the Recycled Water Program authorized pursuant to this General Order, including the requirements of Title 22.

Recycled water users must obtain a use permit from the Administrator for recycled water use. As appropriate, obtaining a permit requires completing an application (use application or application for recycled water service), submitting plans if applicable for review and approval, and receiving training. Training covers the approved Title 22 uses, use requirements, prohibited uses and any additional training specific to the distribution and use of recycled water.

Current recycled water use applications include the following:

1. NCPA Facility – Two NCPA facilities, a steam injection gas turbine plant and an energy center – with multiple types of generators - receive tertiary disinfected recycled water for steam production and cooling systems. The facility also uses recycled water for make-up water for two 250,000-gallon fire water tanks. All water supplied to NCPA must meet Disinfected Tertiary recycled water standards under Title 22. Water supplied to the NCPA facilities also receives additional treatment in two onsite water treatment plants.
2. VCD Ponds – The 13 ponds used for rearing mosquito fish are located just south of the WPCF treatment facilities. The ponds are supplied primarily by disinfected tertiary recycled water but can be supplemented by the City's onsite non-potable groundwater well. Recycled water delivered to the site is required to meet disinfected secondary-23 recycled water standards under Title 22, or better.

Future planned recycled water use applications not envisioned in the August 2018 Title 22 Engineering Report or covered by this NOA include but are not limited to the following:

1. PG&E Hydrogen Production Facility – The planned hydrogen facility will be located on a portion of the City's existing LAAs, and would accept up to 2.8 mgd of disinfected tertiary, which would serve as the source water for the hydrogen production. This project may result in a reduction of recycled water supplied to other sources, including to the City's existing LAA's, regulated under WDRs R5-2007-0113-01.

Any changes to the Recycled Water Program, including new use areas outside of the Discharger's recycled water service area or recycled water uses not previously specified in the August 2018 Title 22 Engineering Report, may require submittal of a new Notice of Intent and a supplement to the currently approved Title 22 report for review. A conditional acceptance letter from DDW and a revised NOA describing the additional uses shall be obtained prior to supplying recycled water to users and uses not covered by this NOA.

#### **WATER RECYCLING USE REQUIREMENTS**

1. The production, distribution, and use of recycled water shall be managed in accordance with the applicable NPDES permit (CA0077682), revised WDRs, Title 22 Engineering Report approved by DDW, and this NOA.
2. Application of recycled water shall be limited to the uses described in a 2018 Title 22 Engineering Report approved by DDW and this NOA.
3. The use of recycled water shall not cause pollution or nuisance, as defined by Water Code section 13050.
4. Unless specifically authorized by this order, the recycled water shall be disinfected tertiary recycled water as defined by Title 22, section 60301.230.
5. Recycled water supplied to the VCD ponds shall be at least disinfected secondary-23 recycled water, as defined by Title 22, section 60301.225.
6. The Administrator shall promptly notify the Central Valley Water Board of any recycled water spills or unauthorized uses in accordance with Water Code Section 13529.2.

#### **RECYCLED WATER USE AREA MONITORING AND REPORTING REQUIREMENTS**

Recycled water production, disinfection, storage, and use shall be monitored in accordance with the attached Monitoring and Reporting Program (MRP). When monitoring requirements listed in the attached MRP duplicate existing requirements under other WDRs or waivers, duplication of sampling and monitoring is not required if the monitoring activity satisfies the requirements of the General Order. The results of

such monitoring shall also be included as part of the annual report, required by this General Order's MRP. The annual report is due by 1 April following the monitoring year.

## **GENERAL INFORMATION AND REQUIREMENTS**

The Administrator shall comply with the Specifications, Water Recycling Administration Requirements, and General Provisions of the General Order. Please review this NOA carefully to ensure that it completely and accurately reflects the proposed Recycled Water Program. If the Administrator violates the terms or conditions, the Central Valley Water Board may take enforcement action, including the assessment of an administrative civil liability. Failure to abide by the conditions of the General Order, including revised MRP WQ 2016-0068-DDW-R5007, and this letter authorizing applicability could result in enforcement actions, as authorized by provision of the California Water Code.

The required annual fee specified in the annual billing from the State Water Board shall be paid until this NOA is officially terminated. The Administrator must submit in writing a Notice of Termination once the Recycled Water Program has ended.

## **SALT AND NITRATE CONTROL PROGRAMS**

In May 2018, the Central Valley Water Board approved new Salt and Nitrate Control Programs. The Salt Control Program was developed to address salt accumulation issues in surface water and groundwater throughout the Central Valley. The Discharger was issued CV-SALTS ID: 2625 for their recycled water use activities in accordance with WDRs Order R5-2007-0013-01, which will carry over to the new WRDs when issued. The Discharger selected Pathway Option 2, the Alternative Salinity Permitting Approach for participation in the Prioritization and Optimization Study (P&O Study).

The Nitrate Control Program is a prioritized program. The WPCF and recycled water use areas fall within Groundwater Basin 5-22.01 (Eastern San Joaquin Subbasin), which is a Priority 2 Basin. Notices to comply for dischargers in Priority 2 Basins were sent in December 2023, and recipients had until February 2025 to respond. The Discharger is listed as a participant in the Valley Water Collaborative's Preliminary Management Zone Implementation Plan for the Eastern San Joaquin Management Zone, and is, therefore, participating in the Management Zone Approach (Path B) for the Nitrate Control Program.

## **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 to the State Water Board's [GeoTracker database](https://geotracker.waterboards.ca.gov) (<https://geotracker.waterboards.ca.gov>). Confirmation of GeoTracker upload is to be emailed to: [centralvalleysacramento@waterboards.ca.gov](mailto:centralvalleysacramento@waterboards.ca.gov).

To ensure that your submittals are routed to the appropriate staff, the following information block should be included in the body of an email or any documentation submitted to the mailing address for this office:

Program: Non-15 Compliance  
Facility Name: White Slough WPCF  
Order: WQ 2016-0068-DDW-R5007  
County: San Joaquin County  
Place ID: 272444

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water 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 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 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) ([https://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](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 Central Valley Water Board's Compliance and Enforcement section will take over management of your case. Brendan Kenny is your point of contact for any questions regarding compliance with the General Order. If you find it necessary to make a change to your permitted operations, Brendan will direct you to the appropriate Permitting staff. You may contact Brendan at (916) 464-4635 or at [Brendan.Kenny@waterboards.ca.gov](mailto:Brendan.Kenny@waterboards.ca.gov).

for Patrick Pulupa  
Executive Officer

Attachment:

Attachment A: Recycled Water Service Map

Enclosures:

Monitoring and Reporting Program WQ 2016-0068-DDW-R5007

Cc via email:

Charles Swimley, City of Lodi  
Ken Capitanich, City of Lodi

Steven Shih, San Joaquin County Environmental Health Department  
Bhupinder Sahota, Division of Drinking Water, Stockton  
Brendan Kenny, Central Valley Water Quality Control Board



