



# **Central Valley Regional Water Quality Control Board**

27 August 2019

CERTIFIED MAIL 7018 3090 0001 1194 6671

Patrick Ostly, District Manager North of River Sanitary District No. 1 204 University Avenue Bakersfield, CA 93308 CERTIFIED MAIL 7018 3090 0001 1194 6664

Ben Sill, Site Operator Manager Sill Properties 1508 18<sup>th</sup> Street, Suite 320 Bakersfield, CA 93301

### NOTICE OF APPLICABILITY (NOA), STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2016-0068-R5010; WATER RECLAMATION REQUIREMENTS FOR RECYCLED WATER USE; NORTH OF RIVER SANITARY DISTRICT NO. 1; SILL RECLAMATION PROJECT NO. 2; KERN COUNTY

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff received the North of River Sanitary District No. 1 (District) 24 April 2015 Report of Waste Discharge (RWD) proposing to expand the Use Areas for the District's wastewater treatment facility (WWTF) by an additional 990 acres (Sill Reclamation Project No. 2). On 26 August 2019, the Central Valley Water Board received a letter and application fee for enrollment of Sill Reclamation Project No. 2 under State Water Resources Control Board Order WQ 2016-0068-DDW, *Water Reclamation Requirements for Recycled Water Use* (General Order). Our office also received a Title 22 Engineering Report, dated December 2014, which was then updated in August 2018. The Title 22 Engineering Report was conditionally accepted by the State Water Resources Control Board, Division of Drinking Water (DDW) on 19 February 2019.

The District (Administrator and Producer) owns and operates the North of River Sanitary District No. 1 WWTF. The WWTF is currently regulated by Waste Discharge Requirements (WDRs) Order R5-2009-0088 for the discharge of up to 7.5 million gallons per day (mgd) of undisinfected secondary treated wastewater to ponds and to 2,500 acres of Use Areas, of which, approximately 1,860 acres are owned and operated by Sill Properties and 640 acres are owned by the District and operated by Sill Properties.

The proposed project includes adding 990 acres of farmland to the District's existing 2,500 acres of Use Areas. **Attachment A** of this NOA provides a description of the Karl E. Longley ScD, P.E., CHAIR | PATRICK PULUPA, ESG., EXECUTIVE OFFICER



North of River Sanitary District No. 1 2 Sill Reclamation Project No. 2

proposed new Use Areas. **Attachment B** of this NOA provides an area map of the proposed new areas. The additional land will bring the total Use Area to about 3,490 acres. The existing, previously permitted 2,500 acres of Use Areas will continue to be regulated under the recycling specification in WDRs Order R5-2009-0088 while the additional 990 acres will be regulated under the reclamation requirements in the General Order. The 990 acres will be operated by Sill Properties. Sill Properties will be the only User under this recycled water use program. The proposed project will not result in changes to the WWTF configuration, character of the wastewater, and/or flow increase.

On 7 June 2016, the State Water Resources Control Board adopted the General Order to regulate the use of recycled water for all Title 22 uses except groundwater recharge. In addition, the General Order delegates the responsibility of administering water recycling programs to a designated Administrator to the fullest extent possible. Based on the information provided in the Notice of Intent, the proposed water recycling project satisfies the general and specific conditions of the General Order. Therefore, this serves as formal notice that Order WQ 2016-0068-DDW is applicable to the site and discharge described below. North of River Sanitary District No.1 will act as the Administrator of the Recycled Water Program for this discharge. You are hereby assigned

**WQ 2016-0068-R5010** for this discharge. Please include this Order number in all future correspondence related to this discharge.

# At least 30 days prior to conveying undisinfected secondary-treated water from the WWTF to the 990 acres of Use Area, the District shall submit the following:

- 1. An updated Water Use Agreement between the District and Sill Properties for the application of treated wastewater to the 990 acres of Use Areas described in this Notice of Applicability (NOA).
- 2. Certification from Sill Properties that the almond orchards in the 990 acres of Use Areas described in this NOA have been removed and fodder, fiber, and seed crops or other crops consistent with Title 22 regulations for use of undisinfected secondary-treated wastewater have been planted.

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 recycled water project must be completed in accordance with the attached *Monitoring and Reporting Program* (MRP) No. **WQ 2016-0068-R5010**. This MRP was developed after review of your RWD as described in the attached memorandum.

## WASTEWATER TREATMENT FACILITY

The WWTF currently consists of a headworks, two mechanical bar screens, grit removal, primary clarifier, tricking filter, secondary clarifier, two sludge digesters, sludge dewatering screw press, three lined sludge drying beds, and four ponds.

According to the Title 22 Engineering Report, the District is investigating the option of expanding the WWTF and increasing flows from 7.5 mgd to 12 mgd in the future. The expansion has not yet occurred.

# **RECYCLED WATER APPLICATION**

The District proposes to administer a recycled water use program for undisinfected secondary treated water, in which the District will serve as the sole Producer and Administrator.

# WATER RECYCLING PROGRAM ADMINISTRATION FOR AGRICULTURAL USE

The District as the Administrator, will be responsible for the administration of the Recycled Water Program authorized pursuant to this General Order, including the requirements of Title 22.

# **DIVISION OF DRINKING WATER CONSIDERATIONS AND REQUIREMENTS**

The District submitted a December 2014 Title 22 Engineering Report for DWW approval. On 9 May 2018, DDW provided the District a letter with comments that needed to be addressed. In response to DDW's letter, the District provided an updated August 2018 Title 22 Engineering Report, which was conditional accepted by DDW in a letter on 19 February 2019. In the conditional acceptance letter, DDW requested that the Central Valley Water Board incorporate various requirements to the permit issued to the District.

The requirements as follows:

- 1. The production, distribution, and use of undisinfected secondary recycled water must be as described in the DDW-accepted Report.
- 2. No irrigation with, or impoundment of, undisinfected secondary recycled water shall take place within 150 feet of any domestic water supply well.
- 3. Any irrigation runoff shall be confined to the recycled water use area.
- 4. The District must inspect irrigation well check valves annually to ensure the proper operations.
- 5. Notify DDW if location of biosolids land application areas are expanded. Include information on the proximity of biosolids land application area setback to nearest drinking water/domestic supply wells.
- 6. The District must submit an updated Report to DDW an updated Report of Waste Discharge to the Central Valley Water Board prior to moving forward with expansion of the WWTF.
- 7. Future revisions and updates to the Report including its attachments must be provided to DDW to demonstrate applicable changes to operations and management programs in place. If applicable, any updates or changes to the Report must also be made in any application documents and submitted to the Central Valley Water Board (i.e., any technical support document and Report of Waste Discharge document).

North of River Sanitary District No. 1 4 Sill Reclamation Project No. 2

## WATER RECYCLING REQUIREMENTS

- 1. The production, distribution, and use of recycled water shall be managed in accordance with the RWD, the Title 22 Engineering Report approved by the Division of Drinking Water, and this NOA.
- 2. Application of recycled water shall be limited to the uses described in the RWD, the Title 22 Engineering Report approved by the Division of Drinking Water, and this NOA.
- 3. The use of recycled water shall not cause pollution or nuisance, as defined by Water Code section 13050.
- 4. The recycled water shall be at least undisinfected secondary recycled water as defined by Title 22, section 60301.900.
- 5. Recycled water shall only be used to irrigate fodder, fiber, and seed crops as discussed in the Administrator's Title 22 Engineering Report or other crops consistent with Title 22 regulations for use of undisinfected secondary-treated wastewater.
- 6. North of River Sanitary District No. 1 shall promptly notify the Central Valley Water Board of any recycled water spills or unauthorized uses.

### **GENERAL INFORMATION AND REQUIREMENTS**

North of River Sanitary District No. 1 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 discharge 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 MRP WQ 2016-0068-R5010, and this letter authorizing applicability could result in enforcement actions, as authorized by provisions of the California Water Code.

The required annual fee specified in the annual billing from the State Water Resources Control Board shall be paid until this NOA is officially terminated. North of River Sanitary District No. 1 must submit in writing a Notice of Termination once the water recycling program has ended.

## DOCUMENT SUBMITTALS

The Central Valley Water Board has gone to a Paperless Office System. All regulatory documents, submissions, materials, data, monitoring reports, and correspondence should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to: <u>centralvalleyfresno@waterboards.ca.gov</u>. Documents that are 50MB or larger should be transferred to a disk and mailed to the Central Valley Water Board office at 1685 E Street, Fresno, CA 93706. To ensure that your submittals are routed to the appropriate staff, the following information block should be included in any email used to transmit documents to this office:

North of River Sanitary District No. 1 5 Sill Reclamation Project No. 2

> Program: Non-15, Place ID: 257062, Place Name: Sill Reclamation Project No. 2, Order: WQ 2016-0068-R5010

In order to conserve paper and reduce mailing costs, a paper copy of the General Order has been sent only to the Discharger. Others are advised that the <u>General Order</u> is available on the State Water Resources Control Board's website (https://www.waterboards.ca.gov/board\_decisions/adopted\_orders/water\_quality/2016/ wqo2016\_0068\_ddw.pdf).

Coverage for your Facility under the General Order shall become effective subject to this Notice of Applicability immediately.

If you have any questions regarding this matter, please contact Denise Soria by phone at (559) 444-2488 or by email at <u>dsoria@waterboards.ca.gov</u>.

| <i>Original Signed by</i><br>Patrick Pulupa<br>Executive Officer | y Scott Hatton for:  |
|--|--|
| Attachments:   | <ul> <li>Attachment A – Sill Reclamation Project No. 2 Description</li> </ul>                              |
|  | <ul> <li>Attachment B – Reclamation Area Map</li> </ul>  |
| Enclosures:  | <ul> <li>Monitoring and Reporting Program WQ 2016-0068-R5010</li> </ul>                                    |
|  | <ul> <li>Review Memorandum of North of River Sanitary District No. 1<br/>Expanded Reuse Project</li> </ul> |
|  | <ul> <li>State Water Resources Control Board Order<br/>WQ 2016-0068-DDW (Discharger only)</li> </ul>       |
|  | <ul> <li>Division of Drinking Water Conditional Acceptance Letter</li> </ul>                               |
| cc: •  | Timothy O'Brien, State Water Resources Control Board, Sacramento (via email)                               |
| •  | Chad J. Fischer, State Water Resources Control Board, Fresno (via<br>email)                                |
| •  | Kern County Environmental Health Services Department, Bakersfield  |
| •  | Kern County Planning Department, Bakersfield   |
| •  | Nika Sill Morse, Sill Properties, Bakersfield (via email)  |
| •  | Ramon Arredondo, North of River Sanitary District No. 1, Bakersfield<br>(via email)                        |
| •  | Monique Roberts, AECOM, Bakersfield (via email)  |

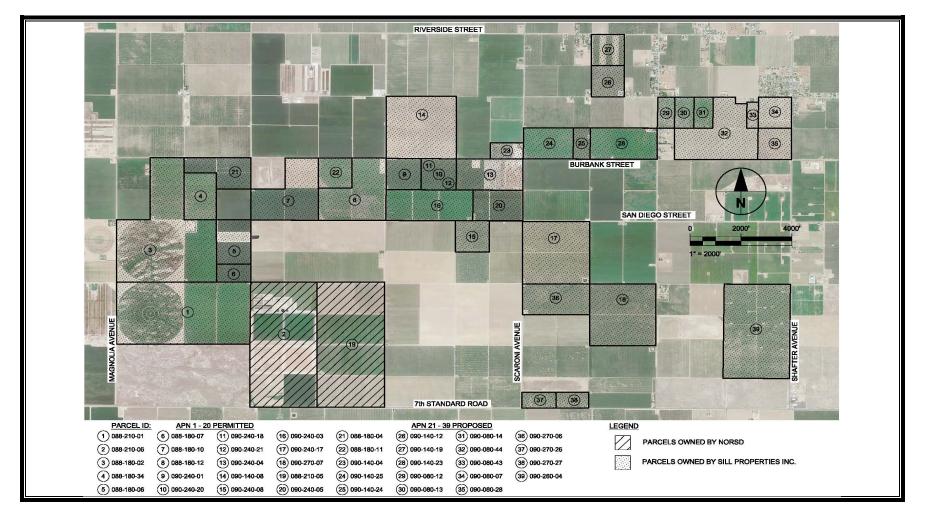
| Parcel<br>ID | Assessor Parcel<br>Number | Owner | Section | Township/Range | Parcel Size<br>(Acres) |
|--------------|---------------------------|-------|---------|----------------|------------------------|
| 21           | 088-180-04                | Sill  | 26      | 28/24          | 57.7                   |
| 22           | 088-180-11                | Sill  | 25      | 28/24          | 39.09                  |
| 23           | 090-140-04                | Sill  | 19      | 28/25          | 18.64                  |
| 24           | 090-140-25                | Sill  | 20      | 28/25          | 58.73                  |
| 25           | 090-140-24                | Sill  | 20      | 28/25          | 19.55                  |
| 26           | 090-140-12                | Sill  | 20      | 28/25          | 39.09                  |
| 27           | 090-140-19                | Sill  | 20      | 28/25          | 39.09                  |
| 28           | 090-140-23                | Sill  | 20      | 28/25          | 77.28                  |
| 29           | 090-080-12                | Sill  | 21      | 28/25          | 18.64                  |
| 30           | 090-080-13                | Sill  | 21      | 28/25          | 19.55                  |
| 31           | 090-080-14                | Sill  | 21      | 28/25          | 19.55                  |
| 32           | 090-080-44                | Sill  | 21      | 28/25          | 136.85                 |
| 33           | 090-080-43                | Sill  | 21      | 28/25          | 18.66                  |
| 34           | 090-080-07                | Sill  | 21      | 28/25          | 38.19                  |
| 35           | 090-080-28                | Sill  | 21      | 28/25          | 38.19                  |
| 36           | 090-270-06                | Sill  | 32      | 28/25          | 77.27                  |
| 37           | 090-270-26                | Sill  | 32      | 28/25          | 18.68                  |
| 38           | 090-270-27                | Sill  | 32      | 28/25          | 19.14                  |
| 39           | 090-260-04                | Sill  | 33      | 28/25          | 235.45                 |
|              |                           |       |         | Total          | 989.34                 |

ATTACHMENT A – SILL RECLAMATION PROJECT NO. 2 DESCRIPTION NOTICE OF APPLICABILITY WQ 2016-0068-R5010

FOR

NORTH OF RIVER SANITARY DISTRICT NO. 1; SILL RECLAMATION PROJECT NO. 2

KERN COUNTY



# ATTACHMENT B – RECLAMATION AREA MAP

NOTICE OF APPLICABILITY WQ 2016-0068-R5010 FOR NORTH OF RIVER SANITARY DISTRICT NO. 1; SILL RECLAMATION PROJECT NO. 2 KERN COUNTY

### CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL VALLEY REGION

#### MONITORING AND REPORTING PROGRAM NO. WQ 2016-0068-R5010 FOR NORTH OF RIVER SANITARY DISTRICT NO. 1 SILL RECLAMATION PROJECT NO. 2 KERN COUNTY

This Monitoring and Reporting Program (MRP) describes requirements for monitoring a recycled water system. This MRP is issued pursuant to Water Code section 13267. North of River Sanitary District No. 1 (Administrator) shall not implement any changes to this MRP unless and until a revised MRP is issued by the California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) Executive Officer.

The Administrator has applied for and received coverage for Sill Reclamation Project No. 2 that is subject to the Notice of Applicability (NOA) of Water Quality Order 2016-0068-DDW. The reports are necessary to ensure that the Administrator complies with the NOA and General Order. Pursuant to California Water Code section 13267, the Administrator shall implement this MRP and shall submit the monitoring reports described herein.

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; and
- 4. Field calibration reports are maintained and available for at least three years.

Monitoring requirements listed below may duplicate existing requirements under other orders including WDRs or waivers of WDRs that regulate agricultural discharges from irrigated lands. Duplication of sampling and monitoring activities are not required if the

North of River Sanitary District No. 1 - 2 - Sill Reclamation Project No. 2

monitoring activity satisfies the requirements of this General Order. Collecting composite samples is acceptable in most cases. The facility may continue using existing sampling collection equipment that is consistent with the applicable facility order. However, due to short sample holding times, bacteriological samples collected to verify disinfection effectiveness must be grab samples. In addition to submitting the results under another order, the results shall be submitted in the reports required by this General Order.

All of the monitoring listed below may not be applicable to all recycled water projects. Consult the NOA or Central Valley Water Board staff to determine applicable requirements.

# USE AREA MONITORING

The Administrator shall monitor use area(s) at a frequency appropriate to determine compliance with this General Order and the Administrator's recycled water use program requirements. An Administrator may assign monitoring responsibilities to a User as part the Water Recycling Use Permit program. The Administrator retains responsibility to ensure the data is collected, as well as prepared and submit the annual report.

The following shall be recorded for each user with additional reporting for use areas as appropriate. The frequency of use area inspections shall be based on the complexity and risk of each use area. Use areas may be aggregated to combine acreage for calculations or observation purposes. Use area monitoring shall include the following parameters:

| Parameter                           | Units            | Sample Type        | Sampling<br>Frequency | Reporting<br>Frequency |
|-------------------------------------|------------------|--------------------|-----------------------|------------------------|
| Recycled Water<br>User              |                  |                    |                       | Annually               |
| Recycled Water<br>Flow              | gpd <sup>1</sup> | Meter <sup>2</sup> | Monthly               | Annually               |
| Acreage Applied <sup>3</sup>        | acres            | Calculated         |                       | Annually               |
| Application Rate                    | Inches/acre/year | Calculated         |                       | Annually               |
| Applied Nitrogen<br>from Wastewater | lbs/acre/year    | Calculated         | Monthly               | Annually               |
| Applied Nitrogen<br>from Fertilizer | lbs/acre/year    | Estimated          | Monthly               | Annually               |
| Soil<br>Saturation/Ponding          |                  | Observation        | Quarterly             | Annually               |

#### Table 1 – Use Area Monitoring Requirements

<sup>&</sup>lt;sup>1</sup> gpd denotes gallons per day

<sup>&</sup>lt;sup>2</sup> Meter requires meter reading, a pump run time meter, or other approved method.

<sup>&</sup>lt;sup>3</sup> Acreage applied denotes the acreage to which recycled water is applied

North of River Sanitary District No. 1 - 3 - Sill Reclamation Project No. 2

| Parameter                       | Units | Sample Type | Sampling<br>Frequency | Reporting<br>Frequency |
|---------------------------------|-------|-------------|-----------------------|------------------------|
| Nuisance                        |       | Observation | Quarterly             | Annually               |
| Odors/Vector                    |       |             |                       |                        |
| Discharge Off-Site              |       | Observation | Quarterly             | Annually               |
| Notification Signs <sup>1</sup> |       | Observation | Quarterly             | Annually               |

# REPORTING

In reporting monitoring data, the Administrator shall arrange the data in tabular form so that the date, data type (e.g., flow rate, bacteriological, etc.), and reported analytical or visual inspection results are readily discernable. The data shall be summarized to 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.

The Central Valley Water Board has gone to a Paperless Office System. All regulatory documents, submissions, materials, data, monitoring reports, and correspondence should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to: <u>centralvalleyfresno@waterboards.ca.gov</u>. Documents that are 50MB or larger should be transferred to a disk and mailed to the appropriate Regional Water Board office, in this case 1685 E Street, Fresno, CA 93706. To ensure that your submittals are routed to the appropriate staff, the following information block should be included in any email used to transmit documents to this office:

Program: Non-15, Place ID: 257062, Place Name: Sill Reclamation Project No. 2, Order: WQ 2016-0068-R5010

# A. Annual Reports

Annual Reports shall be submitted to the Central Valley Water Board by **April 1st following the monitoring year**. The Annual Report shall include the following:

- A summary table of all recycled water Users and Use Areas. Maps may be included to identify Use Areas. Newly permitted recycled water Users and Use Areas shall be identified. When applicable, supplemental to the Title 22 Engineering Report and the State Water Board approval letter supporting those additions shall be included.
- 2. A summary table of all inspection and enforcement activities initiated by the Administrator. Include a discussion of compliance and the corrective action

<sup>&</sup>lt;sup>1</sup> Notification signs shall be consistent with the requirements of California Code of Regulations, title 22, section 60310(g)

taken, as well as any planned or proposed actions needed to bring the discharge into compliance with the NOA and/or General Order. Copies of documentation of any enforcement actions taken by the Administrator shall be provided.

- 3. An evaluation of the performance of the recycled water treatment facility, including discussion of capacity issues, system problems, and a forecast of the flows anticipated in the next year.
- 4. Tabular and graphical summaries of all monitoring data collected during the year.
- 5. The name and contact information for the recycled water operator responsible for operation, maintenance, and system monitoring.

A letter transmitting the annual monitoring report shall accompany each report. The letter shall summarize the numbers and severity of 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 Administrator or the Administrator'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 Administrator shall implement the above monitoring program as of the date of this MRP.

Ordered by:

*Original Signed by Scott Hatton for:* PATRICK PALUPA, Executive Officer

27 August 2019 (Date)





**Central Valley Regional Water Quality Control Board** 

- TO: Scott J. Hatton Supervising Water Resource Control Engineer RCE 67889
- FROM: Alexander S. Mushegan Senior Water Resource Control Engineer RCE 84208

Denise Soria Water Resource Control Engineer

**DATE:** 27 August 2019

#### APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2016-0068-DDW; WATER RECLAMATION REQUIREMENTS FOR RECYCLED WATER USE; NORTH OF RIVER SANITARY DISTRICT NO. 1; SILL RECLAMATION PROJECT NO. 2; KERN COUNTY

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff received, on 24 April 2015, a Report of Waste Discharge (RWD) signed and stamped by James Gardiner, a California registered professional civil engineer (RCE 48280) with AECOM, on behalf of North of River Sanitary District No. 1 (District). The RWD proposes to expand the reuse area for the District's wastewater treatment facility (WWTF) by an additional 990 acres owned by Sill Properties (Sill Reclamation Project No. 2). Subsequently, on 26 August 2019, the District submitted a letter and application fee for the enrollment of Sill Reclamation Project No. 2 under State Water Resources Control Board Order WQ 2016-0068-DDW, *Water Reclamation Requirements for Recycled Water Use* (General Order).

In addition to the RWD, our office received a Title 22 Engineering Report, dated December 2014 and updated on August 2018, for the proposed use of recycled water. The Title 22 Engineering Report is signed and stamped by Mr. Gardiner. The Title 22 Engineering Report was also submitted to the State Water Resources Control Board, Division of Drinking Water (DDW) and subsequently, conditionally accepted by DDW on 19 February 2019. This memorandum provides a summary of staff's review of the technical reports and evaluates if the proposed discharge of undisinfected secondary-treated wastewater to the additional 990 acres of land for recycled water uses is eligible for enrollment under the General Order.

KARL E. LONGLEY ScD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

#### **BACKGROUND INFORMATION**

Waste Discharge Requirements (WDRs) Order R5-2009-0088 regulates the discharge of 7.5 million gallons per day (mgd) of undisinfected secondary-treated wastewater from the District's wastewater treatment facility (WWTF) to four ponds and to about 2,500 acres of Use Areas. Three ponds are used to store treated wastewater, the fourth pond is used as an emergency pond. Approximately 1,860 acres are owned and operated by Sill Properties and 640 acres are owned by the District and operated by Sill Properties. The District is the primary entity responsible for the WWTF operations and maintenance. Sill Properties is the primary entity responsible for the application of recycled water and compliance with the water recycling requirements of WDRs Order R5-2009-0088.

On 20 February 1990, North of River Sanitary District No. 1 and Sill Properties entered into a Water Use Agreement for the disposal of wastewater to approximately 1,568 acres of land. The initial Water Use Agreement has been modified by agreements dated 26 April 1990, 15 September 1998, 20 May 2003, 16 May 2006, and 21 May 2013.

### **DESCRIPTION OF DISCHARGE**

The WWTF consists of a headworks, two mechanical bar screens, grit removal, primary clarifier, tricking filter, secondary clarifier, two sludge digesters, sludge dewatering screw press, three lined sludge drying beds, and four unlined ponds.

Undisinfected secondary-treated wastewater is drawn from ponds 1 and 3 and pumped or gravity fed to the distribution system owned and operated by Sill Properties. The distribution system is used to convey both treated wastewater and supplemental irrigation water from irrigation wells. According to the August 2018 Title 22 Engineering Report, all irrigation wells connected to the distribution system have a check valve isolating the well from the piping system. Sill Properties will be the only User under this recycled water use program.

Irrigation practices will consist of applying recycled water via flood irrigation. Crops grown in the new 990 acres will include fodder, fiber, and seed crop for nonhuman consumption. However, there are several parcels within the 990 acres that are currently under cultivation for almonds as shown in Table 1 below.

| APN        | Parcel<br>Size<br>(acres) | Planted with<br>Almonds (acres) |
|------------|---------------------------|---------------------------------|
| 090-140-04 | 18.64                     | 18.64                           |
| 090-140-12 | 39.09                     | 39.09                           |
| 090-140-19 | 39.09                     | 39.09                           |

## Table 1. Parcels with Almond Orchards

| APN        | Parcel<br>Size<br>(acres) | Planted with<br>Almonds (acres) |
|------------|---------------------------|---------------------------------|
| 090-080-44 | 136.85                    | 96                              |
| 090-270-06 | 77.27                     | 77.27                           |
| 090-260-04 | 235.45                    | 235.45                          |

On 23 May 2019, Central Valley Water Board staff inspected the District's WWTF and the Sill Properties Use Areas as part of the permitting process. Central Valley Water Board staff confirmed that most of the proposed parcels listed in Table 1 were planted with almond orchards except for parcel 090-270-06, which was planted with corn. According to Section 5. Use Areas of the Title 22 Engineering Report, the parcels currently cultivated with almonds will not be irrigated with undisinfected secondary wastewater. The almond orchards will be removed and replaced with a feed or fodder crop prior to applying undisinfected secondary wastewater.

As part of the District's contingency plan, the Use Areas will be irrigated with only undisinfected secondary-treated wastewater. According to Section 3. Recycled Wastewater of the Title 22 Engineering Report, in the event an individual wastewater treatment process fails, the process will be bypassed and partially treated or untreated wastewater will be diverted and stored in the emergency pond. Once the affected treatment process is operational, wastewater will be recirculated to the headworks for treatment.

The District adopted a Negative Declaration (SCH# 2014071002) in accordance with the California Environmental Quality Act and filed a Notice of Determination on 28 August 2014 for an increase in Use Areas by an additional 1,028 acres. According to the document, the proposed project will not have a significant effect on the environment.

## **DIVISION OF DRINKING WATER (DDW) CONSIDERATIONS**

The District submitted a Title 22 Engineering Report dated December 2014 and an updated Title 22 Engineering Report dated August 2018 to DDW for review of their proposed wastewater reclamation program. On 19 February 2019, DDW sent the District a conditional acceptance letter requesting that the Central Valley Water Board incorporate the following requirements in the waste discharge requirements:

- 1) The production, distribution, and use of undisinfected secondary recycled water must be as described in the DDW-accepted Report.
- 2) No irrigation with, or impoundment or, undisinfected secondary recycled water shall take place within 150 feet of any domestic water supply well.
- 3) Any irrigation runoff shall be confined to the recycled water use area.
- 4) The District must inspect irrigation well check valves annually to ensure proper operations.

- 5) Notify DDW if locations of biosolids land application areas are expanded. Include information on the proximity of biosolids land application area setback to nearest drinking water/domestic supply wells.
- 6) The District must submit an updated Report to DDW and updated RWD to the Central Valley Water Board prior to moving forward with expansion of the WWTF.
- 7) Future revisions and updates to the Report including its attachments must be provided to DDW to demonstrate applicable changes to operations and management programs in place. If applicable, any updates or changes to the Report must also be made in any application document and submitted to the Central Valley Water Board (i.e., any technical support documents and RWD documents).

#### MONITORING REQUIREMENTS

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

• Use Area Monitoring