

**STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401**

DRAFT TIME SCHEDULE ORDER R3-2025-0018

March 14, 2025

**REQUIRING THE
CITY OF GREENFIELD
TO COMPLY WITH REQUIREMENTS PRESCRIBED
IN GENERAL WASTE DISCHARGE REQUIREMENTS ORDER R3-2020-0020 FOR
DISCHARGES FROM DOMESTIC WASTEWATER SYSTEMS WITH FLOWS
GREATER THAN 100,000 GALLONS PER DAY**

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) finds that:

BACKGROUND

1. The city of Greenfield (Greenfield) owns and operates a domestic wastewater treatment plant (WWTP) located at the northeast end of Walnut Avenue, Greenfield, Monterey County.
2. The WWTP has a permitted average monthly flow of 1,200,000 gallons per day (gpd) and had an average influent flow of about 1,117,000 gpd in 2023. Treatment and disposal consist of mechanical screening followed by three circular clarifiers operated in parallel, three aerated ponds, two percolation and polishing ponds, and 26 acres of bermed rapid infiltration basins. Greenfield's WWTP employs treatment equivalent to secondary treatment (40 CFR §133.105).
3. On April 21, 2022, the Central Coast Water Board enrolled Greenfield into *General Waste Discharge Requirements Order R3-2020-0020 for Discharges from Domestic Wastewater Systems with Flows Greater than 100,000 Gallons per Day* (General Permit).¹ The General Permit regulates the discharge of secondary treated effluent from the WWTP to land, and the April 21, 2022 Notice of Applicability (2022 Notice of Applicability) includes facility-specific information and requirements. The 2022 Notice of Applicability did not include interim effluent limitations for five-day biochemical oxygen demand (BOD₅) or total suspended solids (TSS) for the first 24 months of enrollment pursuant to Part V.A (Effluent Limitations) of the General

¹ A direct link to the General Permit is available on our GeoTracker website (https://www.waterboards.ca.gov/centralcoast/board_decisions/adopted_orders/2020/r32020_0020.pdf) The General Permit enrollment letter and all recent reports and correspondence are available on GeoTracker under the "Site Maps/Documents" tab (https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=WDR100031387)

Permit. The General Permit and the 2022 Notice of Applicability require Greenfield to comply with the most recently issued monitoring and reporting program.

4. On October 4, 2024, Central Coast Water Board staff revised Greenfield’s 2022 Notice of Applicability and revised Monitoring and Reporting Program R3-2022-0024 by issuing a revised notice of applicability (2024 Notice of Applicability) and issuing Monitoring and Reporting Program R3-2024-0067 because Greenfield submitted an application to expand the disposal area. Greenfield made the request because all the ponds and disposal beds were full of wastewater and were not percolating well. The 2024 Notice of Applicability allows for conditional disposal to an emergency disposal area, and establishes a reduced permitted flow of 1,200,000 gpd (previously 1,500,000 gpd) corresponding to the decreased disposal capacity.
5. The General Permit includes facility-specific effluent limitations based on treatment technology and the water quality objectives for the underlying groundwater established in the Water Quality Control Plan for the Central Coastal Basin (Basin Plan). The WWTP overlies the Salinas Valley Lower Forebay sub-area groundwater basin.
6. The General Permit establishes BOD₅ and TSS effluent limitations for aerated treatment pond systems, as shown in Table 1. Pursuant to Table 5 of the 2024 Notice of Applicability, these effluent limitations went into effect on April 21, 2024, two years from the date the 2022 Notice of Applicability was issued to Greenfield. As of April 21, 2024, Greenfield must comply with these effluent limits at the monitoring locations specified in Monitoring and Reporting Program R3-2024-0067.

Table 1. Effluent Limitations: Treatment Pond Systems

Constituent	Units	30-Day Average	7-Day Average
BOD ₅	mg/L	45	65
TSS	mg/L	45	65

mg/L = milligrams per liter

7. In addition to effluent limitations, the General Permit requires that the discharge not “cause nitrate as nitrogen concentrations in underlying groundwater to exceed 10 mg/L, total nitrogen to exceed Basin Plan water quality objectives, or background concentrations, whichever is less.” The General Permit allows the discharger to choose the point of compliance for nitrogen in either groundwater or effluent; Greenfield currently has the limitations established in groundwater, as described in its 2024 Notice of Applicability. Through groundwater monitoring Greenfield must demonstrate compliance with the groundwater limits identified in Table 7 of the 2024 Notice of Applicability. The groundwater limits went into effect on April 21, 2022.

NEED FOR TIME SCHEDULE ORDER

8. As demonstrated by data Greenfield reported in its 2023-2024 quarterly reports and presented in Tables 2 and 3, WWTP effluent concentrations of BOD₅ and TSS exceed the General Permit effluent limitations. Greenfield’s WWTP has failed to

consistently treat wastewater so that it does not pose a threat to groundwater; therefore, a discharge of waste is taking place that violates or threatens to violate requirements prescribed by the Central Coast Water Board.

Table 2. Monthly BOD₅ Reported from September 2023 to September 2024, mg/L

Collection Date	Effluent Sample ES-1	Effluent Sample ES-2	Effluent Sample ES-3	Limitation
9/27/2023	34	88	36	45
10/18/2023	13	14	11	45
11/15/2023	26	21	28	45
12/13/2023	33	38	38	45
1/11/2024	29	58	46	45
2/7/2024	9	4	6	45
3/14/2024	28	33	32	45
4/17/2024	28	29	27	45
5/15/2024	14	24	23	45
6/19/2024	41	30	40	45
7/10/2024	27	49	26	45
8/7/2024	29	50	60	45
9/12/2024	21	32	9	45

*Bolted results indicate effluent limit exceedance in violation of the General Permit

Table 3. Monthly TSS Reported from September 2023 to September 2024, mg/L

Collection Date	Effluent Sample ES-1	Effluent Sample ES-2	Effluent Sample ES-3	Limitation
9/27/2023	144	128	118	45
10/18/2023	115	119	116	45
11/15/2023	104	86	74	45
12/13/2023	124	124	112	45
1/11/2024	96	98	96	45
2/7/2024	76	74	82	45
3/14/2024	84	86	102	45
4/17/2024	70	66	70	45
5/15/2024	148	156	108	45
6/19/2024	66	86	88	45
7/10/2024	80	160	96	45
8/7/2024	98	112	94	45
9/12/2024	96	130	92	45

*Bolted results indicate effluent limit exceedance in violation of the General Permit

- In addition, Greenfield's WWTP is not currently designed to remove nitrogen from wastewater, yet the General Permit prohibits the discharge from causing underlying groundwater to exceed water quality objectives. Existing groundwater quality data

from surrounding groundwater monitoring wells indicates that total nitrogen concentrations exceed the Salinas Valley Lower Forebay sub-area groundwater water quality objective, demonstrating that the discharge of waste is violating requirements prescribed by the Central Coast Water Board. Greenfield must improve treatment to comply with the nitrogen limitations in either effluent or groundwater. Pursuant to the General Permit, Greenfield can propose the compliance point in effluent, instead of groundwater, if it can achieve the 10 mg/L limitation in effluent.

Table 4. Groundwater Monitoring, Total Nitrogen as 25-month Rolling Median, mg/L

Monitoring Well (MW)	First Quarter January 18, 2023	Second Quarter April 4, 2023	Third Quarter July 11, 2023	Fourth Quarter October 17, 2023
MW-1	21.7	11	11	21.7
MW-1S	21.4	15.7	10.0	10.2
MW-2	5.7	7.2	8.6	22.6
MW-2D	19.7	17.3	17.0	16.6
MW-2S	11.5	13.1	22.0	22.3
MW-4D	12.0	9.0	9.0	9.0

*Bolded results indicate concentrations greater than the groundwater quality objective of 8 mg/L.

10. To comply with its effluent limitations and groundwater quality objectives, Greenfield has proposed to upgrade the WWTP to comply with the General Permit. This time schedule order requires Greenfield to implement actions to achieve compliance with the General Permit BOD₅, TSS, and total nitrogen limitations.
11. Greenfield submitted a *Time Schedule Compliance Plan* to the Central Coast Water Board on April 20, 2023, a *Time Schedule Compliance Plan Update 1* on April 26, 2024, and a *Revised Time Schedule Compliance Plan Update 1* on July 10, 2024.² The time schedule compliance plan presents water quality data, a detailed description and chronology of the efforts to improve treatment and disposal, justification for the need for additional time to comply with effluent and groundwater limitations, and a time schedule and justification of specific actions Greenfield will take to achieve compliance as soon as feasible.
12. Greenfield adopted a *WWTP Master Plan* in July 2021, which set forth actions needed to comply with the General Permit. The *WWTP Master Plan* proposed construction of a new wastewater treatment facility designed to comply with the effluent limitations. Greenfield conducted a feasibility assessment and has proposed

² These documents are available on the GeoTracker website at the link provided in Footnote 1.

to construct a modular/packaged membrane bioreactor (MBR) wastewater treatment system.

13. Greenfield completed the “Final Initial Study/Mitigated Negative Declaration for the Greenfield Wastewater Treatment Plant Improvement Project” documentation required under the California Environmental Quality Act (CEQA) in June 2024. The draft was released for public review on April 12, 2024.³
14. Greenfield is classified as a small, disadvantaged community, based on population and the community’s annual median household income as defined by California Water Code section 79505.5. Greenfield currently does not have the funds to construct the proposed MBR wastewater treatment system and has requested additional time to comply with the General Permit that allows them time secure funding. On July 29, 2024, Greenfield applied for grant funding to the State Water Resources Control Board’s Division of Financial Assistance. As of February 2025, the Division of Financial Assistance is waiting on Greenfield’s Urban Water Master Plan to deem the application complete.
15. This time schedule order establishes a final compliance date of June 30, 2030, which will provide Greenfield the time needed to finance, build, and implement actions to reduce BOD₅, TSS, and total nitrogen wastewater effluent concentrations.
16. This time schedule order includes performance-based BOD₅ and TSS interim effluent limits that are effective upon issuance of the time schedule order. The interim effluent limits were established through the Central Coast Water Board’s evaluation of TSS and BOD₅ effluent concentrations. The 30-day average limit is established based on the highest monthly average concentration from ES-1, ES-2 and ES-3, and the maximum is based on the highest concentration in all samples from September 2023 through September 2024. Data-based interim effluent limits are established that represent existing effluent quality, ensure effluent water quality is not further degraded over time, and give Greenfield time to implement actions to achieve compliance with the General Permit.
17. This time schedule order establishes interim effluent limitations because compliance with the final effluent limitations in the General Permit cannot be achieved by the wastewater treatment plant at this time.

REGULATORY BASIS

18. California Water Code section 13300 states:

Whenever a regional board finds that a discharge of waste is taking place or

³ The WWTP improvement project documents are available on Greenfield’s website:
<https://ci.greenfield.ca.us/534/City-of-Greenfield-Wastewater-Treatment->

threatening to take place that violates or will violate requirements prescribed by the regional board, or the state board, or that the waste collection, treatment, or disposal facilities of a discharger are approaching capacity, the board may require the discharger to submit for approval of the board, with such modifications as it may deem necessary, a detailed time schedule of specific actions the discharger shall take in order to correct or prevent a violation of requirements.

19. Chapter 3, Section II of the Basin Plan states:

Controllable water quality shall conform to the water quality objectives contained herein. When other conditions cause degradation of water quality beyond the levels or limits established as water quality objectives, controllable conditions shall not cause further degradation of water quality.

Controllable water quality conditions are those actions or circumstances resulting from man's activities that may influence the quality of the waters of the State and that may be reasonably controlled.

Water quality objectives are considered to be necessary to protect those present and probable future beneficial uses enumerated in Chapter Two of this plan and to protect existing high-quality waters of the State. These objectives will be achieved primarily through the establishment of waste discharge requirements and through implementation of this water quality control plan.

In setting waste discharge requirements, the Regional Board will consider the potential impact on beneficial uses within the area of influence of the discharge, the existing quality of receiving waters, and the appropriate water quality objectives. The Central Coast Water Board will make a finding of beneficial uses to be protected and establish waste discharge requirements to protect those uses and to meet water quality objectives.

20. California Water Code section 13267, subdivision (b)(1) provides as follows:

In conducting an investigation..., the regional board may require that any person who has discharged, discharges, ... or who proposes to discharge waste 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.

21. All reports required by this time schedule order are required pursuant to section 13267 of the California Water Code. The reports are necessary to determine compliance with this time schedule order and to ensure Greenfield attains

compliance with its waste discharge requirements. The burden of producing such reports, including costs, bears a reasonable relationship and is proportional to the need for ensuring compliance with this time schedule order and the existing General Permit.

22. Pursuant to California Water Code section 13167.5, the Central Coast Water Board must provide notice and a period of at least 30 days for public comment prior to the adoption of a time schedule order adopted pursuant to section 13300 that sets forth a schedule of compliance and required actions relating to waste discharge requirements prescribed pursuant to section 13263. The Central Coast Water Board provided notice and a 30-day public comment period from March 15, 2025 through April 15, 2025.
23. The Central Coast Water Board has notified Greenfield and interested agencies and persons of its intent to issue the time schedule order concerning violations or threatened violations of waste discharge requirements.
24. This enforcement action is taken for the protection of the environment and as such is exempt from the provisions of CEQA (Public Resources Code Section 21000, et seq.) in accordance with section 15321, chapter 3, title 14, of the California Code of Regulations. However, it should be noted that, for the purposes of the upgrades to the WWTP, Greenfield has complied with CEQA.

ORDERING

IT IS HEREBY ORDERED, pursuant to California Water Code sections 13300 and 13267 and to ensure compliance with the requirements of Waste Discharge Requirements Order R3-2020-0020:

1. Greenfield must comply with the interim BOD₅ and TSS effluent limits in Table 5, effective upon issuance of this time schedule order. The interim BOD₅ and TSS limits are effective until all the tasks below are complete or by June 30, 2030, whichever comes first.

Table 5. Interim Effluent Limitations

Constituent	Units	30-Day Average	Sample Maximum
Biochemical Oxygen Demand, 5-Day (BOD ₅)	mg/L	53	88
Total Suspended Solids (TSS)	mg/L	137	160

2. Greenfield must continue to implement interim measures to maximize the treatment and disposal capacity, e.g. operate the solids separator, upgrade the headworks rack screen, and temporarily disposing of wastewater in the emergency spray field.

3. Greenfield must complete the following tasks on or before the specified due dates:

Table 6. Task Summary

Number	Task	Due Date
1	Finalize the plans, specifications, and estimate (PS&E) for construction of a new wastewater treatment plant. Submit the 90% PS&E Design Report.	May 1, 2025
2	Submit a complete grant application and obtain DFA's approval of the application to get the project on the "fundable list."	May 1, 2025
3	Implement a fats, oils and grease (FOG) pretreatment program to reduce the FOG entering the WWTP. Conduct public outreach and implement inspections of local restaurants identified in the FOG pretreatment program.	June 30, 2025
4	Implement actions to reduce inflow and infiltration (I&I) including an upgrade of inadequate manhole covers and finalize plans to upgrade the Tyler lift station.	December 1, 2025
5	If Greenfield cannot obtain DFA funding for the entire project, demonstrate you can secure supplemental funding for the entire project cost. If Greenfield cannot get on the fundable list, provide a contingency plan for how it will fund wastewater treatment plant upgrades.	December 30, 2025
6	Finalize a funding agreement with the Division of Financial Assistance, if feasible.	June 30, 2026
7	Award a construction contract for the installation of the new wastewater treatment plant and related upgrades.	September 30, 2026
8	Begin construction of the new wastewater treatment plant.	March 30, 2027
9	Conduct a demonstration period to test the new system.	March 30, 2029
10	Complete the construction of the new WWTP. Startup of the new and upgraded WWTP.	June 30, 2030

4. In addition to the reports required by the current monitoring and reporting program, semiannual time schedule order status reports must be submitted on July 1 and December 1 of each year. Greenfield must submit semiannual status reports beginning July 1, 2025, and every six months thereafter until this time schedule order is confirmed to be complete by the Central Coast Water Board Executive Officer. At a minimum, the reports must include:

- i. A summary of tasks achieved, progress, or delays during the previous six months (significant activities);
- ii. Significant findings and associated actions;
- iii. Activities scheduled for the next six months; and

- iv. Summary of the BOD₅, TSS, and total nitrogen influent, midpoint, and effluent data from samples obtained within the previous six months. Also include a graph of concentration over time, discussion of trends, and comparison of data to interim effluent limitations. Greenfield must continue to collect data at the frequency and location included in Monitoring and Reporting Program R3-2024-0067 but provide a more detailed evaluation of the data in these semiannual status reports. Monitoring data will be used to determine compliance with interim effluent limitations set forth herein.
5. All reports required by this time schedule order must be signed by either a principal executive officer or ranking elected official, or by a duly authorized representative of that person⁴. All reports must be submitted with a signed and certified cover letter and uploaded to GeoTracker Global ID WDR100031387.
6. Any person signing a report required by this time schedule order must make the following certification:

“I certify under penalty of perjury that this document and all attachments were prepared by me, or under my direction or supervision, following a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. To the best of my knowledge and belief, this document and all attachments are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.”
7. If Greenfield is unable to perform any activity or submit any documentation in compliance with the deadlines set forth in Table 6 Task Summary, Greenfield may request, in writing, an extension of the time for Executive Officer review and approval. The extension request must include justification for the delay and must be submitted at least thirty days prior to the respective deadline to be considered complete and timely. The Executive Officer may approve an extension in writing to Greenfield.
8. During the effective period of this time schedule order, Greenfield must comply with all provisions of the General Permit and 2024 Notice of Applicability that are not in conflict with this time schedule order.

If, in the opinion of the Executive Officer, Greenfield fails to comply with any provisions of this time schedule order or fails to consistently demonstrate substantive progress towards achieving full compliance with effluent and groundwater limitations in the General Permit, the Executive Officer may terminate this time schedule order.

⁴ To designate an authorized representative, please complete this form and submit to the Central Coast Water Board.
https://www.waterboards.ca.gov/centralcoast/water_issues/programs/wastewater_permitting/docs/authorized-representative-form.pdf

Greenfield may also be subject to the issuance of a cease and desist order in accordance with California Water Code section 13301. The Central Coast Water Board reserves its right to take any enforcement action authorized by law.

Pursuant to California Water Code section 13320, any aggrieved person may seek review of this time schedule order by filing a petition with the State Water Resources Control Board (State Water Board) for review in accordance with California Water Code section 13320, and California Code of Regulations, title 23, section 2050 et seq. The State Water Board must receive the petition by 5 pm on 30th day after the date of this time schedule order, except that if the 30th day following the date of this time schedule order falls on a Saturday, Sunday or state holiday, the petition must be received by the State Water Board by 5 pm on the next business day. Copies of the law and regulations applicable to filing petitions are available online at the address below or will be provided upon request.

http://www.waterboards.ca.gov/public_notices/petitions/water_quality

This time schedule order will take effect on the date it is signed by the Executive Officer. The Executive Officer may modify the time schedule in this order to permit a specified task or tasks to be completed at later dates if Greenfield demonstrates and the Executive Officer determines that the delay was beyond the reasonable control of Greenfield.

ORDERED BY

Ryan E. Lodge
Executive Officer

WDR Program

ECM Subject Name = City of Greenfield Draft Time Schedule Order R3-2025-0018

ECM/CIWQS Place ID = 210685

GeoTracker No. = WDR100031387

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