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## Central Valley Regional Water Quality Control Board

29 November 2021

Patrick Covello, Warden  
Mule Creek State Prison  
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***REVISED WATER CODE SECTION 13383 ORDER TO MONITOR DISCHARGES TO SURFACE WATER; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION – MULE CREEK STATE PRISON, WDID#:5S03M2000307, AMADOR COUNTY***

The California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) finds the following:

1. **Responsible Party.** California Department of Corrections and Rehabilitation (CDCR or Permittee) owns and operates an MS4 at Mule Creek State Prison (Facility), located in Lone within Amador County.
2. **Mule Creek.** The Facility's MS4 discharges to Mule Creek, a water of the United States. Mule Creek is tributary to Dry Creek which runs into the Mokelumne River. The Central Valley Water Board's Water Quality Control Plan for the Sacramento River and San Joaquin River Basins designates the following beneficial uses for Mokelumne River, Camanche Reservoir and Delta and its tributaries, including Mule Creek: AGR, REC-1, REC-2, WARM, COLD, MIGR, SPWN, and WILD.
3. **Small MS4 General Permit.** The Facility is regulated under the State Water Resources Control Board (State Water Board) National Pollutant Discharge Elimination System General Permit for Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems, Water Quality Order 2013-0001-DWQ, as amended (Small MS4 General Permit) as a Non-Traditional MS4.
4. **Storm Water Control Program.** The Small MS4 General Permit requires CDCR to develop and implement a storm water control program for the Facility to

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

reduce the discharge of pollutants from its MS4 to waters of the United States and ensure compliance with applicable water quality requirements.

5. **Excessive Irrigation Discharges.** The Permittee has been submitting weekly monitoring reports since 2018 pursuant to a Water Code Section 13267 Order issued by the Central Valley Water Board on 14 February 2018. Weekly monitoring reports documented large volumes of irrigation water being discharged through the Facility's MS4 into Mule Creek.

A Non-Storm Water Discharge Report (Report) was required to be submitted by 1 February 2021, under a 22 December 2020 Water Code 13383 Order issued by the Central Valley Water Board. The Report required the Permittee to (1) demonstrate how the non-storm water discharge is in compliance with the Discharge Prohibitions in the Small MS4 General Permit; or (2) if the non-storm water discharge does not comply with the Discharge Prohibitions, provide a proposed plan, subject to Central Valley Water Board staff approval, to eliminate the non-storm water discharge. The proposed plan shall include the following: (a) details of proposed best management practices (BMPs) to be implemented to eliminate the non-storm water discharge, (b) details of interim actions to mitigate impact of non-storm water discharges to Mule Creek, (c) implementation schedule of the BMPs, and (d) date for expected compliance with the Discharge Prohibitions.

In accordance with the 22 December 2020 Water Code 13383 Order, the Permittee submitted a Non-Storm Water Discharge Report on 1 February 2021. The Non-Storm Water Discharge Report did not demonstrate compliance with the Small MS4 General Permit Discharge Prohibitions and Central Valley Water Board staff sent a comment letter on 29 June 2021 requesting additional information for a proposed plan (i.e., Non-Storm Water Discharge Elimination Plan) subject to Central Valley Water Board staff approval to eliminate the non-storm water discharge.

The Permittee submitted the Non-Storm Water Discharge Elimination Plan (Plan) on 1 September 2021. According to the Plan, the Permittee has implemented BMPs to minimize non-storm water discharges, which include adjusting the irrigation schedule, returning non-storm water flows to the onsite wastewater treatment plant, and installing flow meters at the internal slide gates, identified as MCSP 5 and MCSP6, to monitor the amount of non-storm water flow being routed to the wastewater treatment plant and any flows passing through the internal slide gates at MCSP5 and MCSP6.

Permanent mitigation of the non-storm water flows is part of the Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order, Order No. R5-2021-0001, where the Permittee has agreed to an Enhanced Compliance Action (ECA) called the Mule Creek State Prison – Landscape Irrigation System Replacement Project, which will install new piping for the irrigation system. The expected date of completion of the ECA is February 2025. In the interim, the Permittee will continue to implement the BMPs, above, and in addition, will install flow monitoring structures at the Mule Creek MS4 outfalls, identified as MCSP2

and MCSP3, to accurately demonstrate whether non-storm water flows are discharging into Mule Creek. Installation of the permanent monitoring structures at the Mule Creek MS4 outfalls is expected to be completed in November 2021.

6. **Water Code Section 13383.** Under Water Code section 13383, subdivision (a), the regional board “may establish monitoring, inspection, entry, reporting, and recordkeeping requirements . . . for any person who discharges, or proposes to discharge, to navigable waters . . . .” The regional board “may require any person subject to this section to establish and maintain monitoring equipment or methods, including, where appropriate, biological monitoring methods, sample effluent as prescribed, and provide other information as may be reasonably required.” (Water Code, § 13383, subd. (b); see also 33 U.S.C. § 1318(a); 40 C.F.R. § 122.41(h).)
7. **Potential Liability for Noncompliance.** Pursuant to Water Code section 13385, any person who violates a requirement established pursuant to section 13383 may be subject to an administrative civil liability up to \$10,000 for each day in which the violation occurs. The Central Valley Water Board may also seek judicially imposed civil liabilities up to \$25,000 for each day in which the violation occurs.
8. **Need for Monitoring and Reporting Requirements.** Due to potential water quality impacts to Mule Creek while the Facility’s storm water control program is being fully developed and implemented and to ensure compliance with Small MS4 General Permit requirements, the Central Valley Water Board has determined that an interim monitoring and reporting program is necessary to monitor MS4 discharges from the Facility to Mule Creek.

The requirements in this Order supplement and do not supersede existing monitoring and reporting requirements under the Small MS4 General Permit.

9. **Delegated Authority.** This Order is issued under authority delegated to the Central Valley Water Board’s Executive Officer pursuant to Resolution R5-2018-0057 and Water Code section 13223.

**IT IS HEREBY ORDERED** that, pursuant to Water Code section 13383, the 22 December 2020 Water Code Section 13383 Order to Monitor Discharges to Surface Water issued to CDCR is rescinded except for enforcement purposes and CDCR shall comply with the following monitoring and reporting requirements set forth below:

## **I. REPORTING REQUIREMENTS**

- A. **Quarterly Monitoring Report.** Permittee shall submit a Quarterly Monitoring Report by **1 May, 1 August, 1 November, and 1 February annually**. The Quarterly Monitoring Reports shall cover the following periods: (1) 1 January through 31 March, (2) 1 April through 30 June, (3) 1 July through 30 September, and (4) 1 October through December. The Quarterly Monitoring Report shall provide monitoring data and toxicity test results for the quarter and a copy of all sample documents, including chain of custody forms, toxicity test results, and all associated laboratory documents

B. **Annual Report.** The Small MS4 General Permit requires an Annual Report to be submitted by 15 October. The following additional information shall be included in the Annual Report:

1. Toxicity Testing

- a) The dates of sample collection and initiation of each toxicity test;
- b) A summary of the reported toxicity test results according to the test methods manual chapter on report preparation and test review; and
- c) All results for MS4 outfall parameters monitored concurrently with the toxicity test(s).

2. Monitoring data for the fiscal year covering 1 July through 30 June.

C. **Discharge Notification.** The Permittee shall notify the Central Valley Water Board within 24 hours of the Facility discharging through the MS4 to the receiving water. Notification shall be submitted into the SMARTS database and via e-mail to: RB5S-CentralValleySacramento@waterboards.ca.gov.

D. **Certification.** Any person signing a document submitted under this Order shall make the following Certification:

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 knowledge and 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.

E. **Submission.** All reports, notifications, and monitoring data shall be submitted into the SMARTS database. The monitoring data must be in an electronic format where the data can be manipulated.

## II. MONITORING REQUIREMENTS

A. **Monitoring Samples.** Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring locations specified below and, unless otherwise specified, before the monitored flow joins or is diluted by any other waste stream, body of water, or substance.

B. **Quality Assurance and Control.** Chemical, bacteriological, and bioassay analyses of any material required by this Order shall be conducted by a laboratory accredited for such analyses by the State Water Board, Division of

Drinking Water (DDW), in accordance with the provision of Water Code section 13176. Laboratories that perform sample analyses must be identified in all monitoring reports submitted to the Central Valley Water Board. Data generated from field measurements such as pH, dissolved oxygen (DO), electrical conductivity (EC), turbidity, and temperature are exempt pursuant to Water Code Section 13176. A manual containing the steps followed in this program for any field measurements such as pH, DO, EC, turbidity, and temperature must be kept onsite and shall be available for inspection by Central Valley Water Board staff. The Permittee must demonstrate sufficient capability (qualified and trained employees, properly calibrated and maintained field instruments, etc.) to adequately perform these field measurements. The Quality Assurance-Quality Control Program must conform to U.S. EPA guidelines or to procedures approved by the Central Valley Water Board.

- C. **Monitoring Instruments and Devices.** Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. All monitoring instruments and devices used by the Permittee to fulfill the prescribed monitoring program shall be properly maintained and calibrated as necessary, at least yearly, to ensure their continued accuracy. All flow measurement devices shall be calibrated at least once per year to ensure continued accuracy of the devices.
- D. **Analytical Methods.** The Permittee shall use the laboratory analytical methods in accordance with the Analytical Methods Report, submitted by the Permittee on 15 September 2020.

### III. MONITORING LOCATIONS

- A. **Monitoring Locations.** The Permittee shall establish the monitoring locations identified in Table A.
- B. **Executive Officer Approval.** Monitoring locations shall not be changed without notification to and the approval of the Executive Officer.

**Table A. Monitoring Station Locations**

<b>Discharge Point Name</b>	<b>Monitoring Location Name</b>	<b>Monitoring Location Description<sup>1</sup></b>
--	RAIN-1	Rain gage located at the Mule Creek Wastewater Treatment Plant
--	MCSP1 (RSW-001)	Upstream receiving water location
001	MCSP5 (OUTFALL-1)	MS4 slide gate
001-W	MCSP5-W	MS4 diversion to the Mule Creek Wastewater Treatment Plant

<b>Discharge Point Name</b>	<b>Monitoring Location Name</b>	<b>Monitoring Location Description<sup>1</sup></b>
002	MCSP6 (OUTFALL-2)	MS4 slide gate
002-W	MCSP6-W	MS4 diversion to the Mule Creek Wastewater Treatment Plant
003	MCSP2 (OUTFALL-3)	MS4 outfall into Mule Creek
004	MCSP3 (OUTFALL-4)	MS4 outfall into Mule Creek
--	MCSP4 (RSW-002)	Downstream receiving water location approximately 200 feet downstream (south) of MCSP3.
--	IRR	Irrigation Flow Meter

Table Notes:

1. Monitoring locations are shown in Figure 1 of this Order.

#### **IV. MS4 OUTFALL MONITORING REQUIREMENTS**

**Effective immediately and until the Permittee provides notification to Central Valley Water Board staff that the flow monitoring structures are operational at Discharge Points 003 and 004**, when discharging through the MS4 at 001, the Permittee shall monitor discharges from the Facility at Monitoring Location MCSP5, as shown in Table B. When discharging at 002, the Permittee shall monitor discharges at Monitoring Location MCSP6, as shown in Table B.

**Effective upon notification of Central Valley Water Board staff that the flow monitoring structures at Discharge Points 003 and 004 are operational**, the Permittee may discontinue monitoring discharges at 001 and 002 and begin monitoring discharges at 003 and 004. When discharging through the MS4 at 003, the Permittee shall monitor MS4 outfall discharges at MCSP2, as shown in Table B, and when discharging at 004, the Permittee shall monitor discharges at MCSP3, as shown in Table B.

MS4 outfall monitoring shall be collected concurrently (i.e., within four (4) hours) with receiving water monitoring specified in Table C.

**Table B. MS4 Outfall Monitoring**

<b>Parameter<sup>1</sup></b>	<b>Units</b>	<b>Sample Type</b>	<b>Minimum Sampling Frequency</b>
Total Volume Discharged during Event	Million Gallons	Calculated	1/event
Start of Discharge Event	Time	Gage	1/event
End of Discharge Event	Time	Gage	1/event
Duration of Discharge Event	Hours	Calculated	1/event

Parameter <sup>1</sup>	Units	Sample Type	Minimum Sampling Frequency
Biochemical Oxygen Demand 5-day @ 20°C (BOD)	mg/L	Grab	1/event
Chemical Oxygen Demand (COD)	mg/L	Grab	1/event
Dissolved Organic Carbon (DOC)	mg/L	Grab	1/event
Dissolved Oxygen	mg/L	Grab	1/event
Electrical Conductivity (EC) @ 25°C	µmhos/cm	Grab	1/event
Oil & Grease	mg/L	Grab	1/ event
Ammonia (Total as N)	mg/L	Grab	1/ event
pH	Standard Units	Grab	1/ event
Settleable Solids	ml/L	Grab	1/ event
Temperature	°C	Grab	1/ event
Total Dissolved Solids (TDS)	mg/L	Grab	1/ event
Total Hardness, (as CaCO <sub>3</sub> )	mg/L	Grab	1/ event
Total Suspended Solids (TSS)	mg/L	Grab	1/ event
Turbidity	NTU	Grab	1/ event
E. coli	CFU/100 mL	Grab	1/ event
Aluminum, Total recoverable <sup>2</sup>	µg/L	Grab	1/ event
Arsenic, Total recoverable	µg/L	Grab	1/ event
Copper, Dissolved	µg/L	Grab	1/ event
Iron, Total Recoverable <sup>2</sup>	µg/L	Grab	1/ event
Lead, Dissolved	µg/L	Grab	1/ event
Manganese, Total Recoverable <sup>2</sup>	µg/L	Grab	1/ event
Zinc, Dissolved	µg/L	Grab	1/ event
Volatile Organic Compounds (VOCs) per EPA Method 8260	µg/L	Grab	1/ event

Table Notes:

1. Analytical Methods. All parameters shall be analyzed using the analytical methods described in 40 CFR Part 136, unless approved by the Executive Officer.
2. Aluminum, Manganese, and Iron. Samples may be passed through a 1.5-micron filter to reduce filterable residue prior to analysis. Filter size recommended in EPA Approved Methods 30 CFR Part 136 for Total Dissolved Solids and Total Suspended Solids and is used for removing

suspended solids from a solid prior to analysis. Filtering the sample will remove suspended solids that may contribute to turbidity and color in samples that may negatively impact analytical results for metal concentrations while better representing the dissolved solids that may pass through a water treatment plant's filtration system.

3. For 1/event monitoring, an event begins when there is a discharge from 001 and/or 002, or when operational, 003 and/or 004. The discharge out of 001 and/or 002, or 003 and/or 004 may stop and start throughout a single event but is considered a single event until the discharge ceases AND there has been at least seven (7) days between precipitation events.

## V. RECEIVING WATER MONITORING REQUIREMENTS

**When discharging through the MS4 to Mule Creek**, the Permittee shall monitor receiving water at Monitoring Locations MCSP1 and MCSP4 as shown in Table C. Receiving water monitoring shall be collected concurrently with MS4 outfall monitoring (i.e., within four (4) hours). If there is no upstream flow in Mule Creek (i.e., steady, and continuous stream) during the monitoring event, receiving water monitoring is not required and the Permittee shall note that in the Quarterly Monitoring Report.

**Table C. Receiving Water Monitoring**

Parameter	Units	Sample Type	Minimum Sampling Frequency
Dissolved Organic Carbon (DOC)	mg/L	Grab	1/event
Dissolved Oxygen (DO)	mg/L	Grab	1/ event
Electrical Conductivity (EC) @ 25°C	µmhos/cm	Grab	1/ event
pH	Standard Units	Grab	1/ event
Temperature	°C	Grab	1/ event
Total Hardness (as CaCO <sub>3</sub> )	mg/L	Grab	1/ event
Total Suspended Solids (TSS)	mg/L	Grab	1/ event
Turbidity	NTU	Grab	1/ event
E. coli	CFU/100 mL	Grab	1/ event
Aluminum, Total Recoverable <sup>2</sup>	µg/L	Grab	1/ event
Arsenic, Total recoverable	µg/L	Grab	1/ event
Copper, Dissolved	µg/L	Grab	1/ event
Iron, Total Recoverable <sup>2</sup>	µg/L	Grab	1/ event
Lead, Dissolved	µg/L	Grab	1/event



Parameter	Units	Sample Type	Minimum Sampling Frequency
Manganese, Total Recoverable <sup>2</sup>	µg/L	Grab	1/ event
Zinc, Dissolved	µg/L	Grab	1/ event

Table Notes:

1. Analytical Methods. All parameters shall be analyzed using the analytical methods described in 40 CFR part 136, unless approved by the Executive Officer.
2. Aluminum, Manganese, and Iron. Samples may be passed through a 1.5-micron filter to reduce filterable residue prior to analysis. Filter size recommended in EPA Approved Methods 30 CFR Part 136 for Total Dissolved Solids and Total Suspended Solids and is used for removing suspended solids from a solid prior to analysis. Filtering the sample will remove suspended solids that may contribute to turbidity and color in samples that may negatively impact analytical results for metal concentrations while better representing the dissolved solids that may pass through a water treatment plant's filtration system.
3. For 1/event monitoring, an event begins when there is a discharge from 001 and/or 002, or when operational, 003 and/or 004. The discharge out of 001 and/or 002, or 003 and/or 004 may stop and start throughout a single event but is considered a single event until the discharge ceases AND there has been at least seven (7) days between precipitation events.

## VI. OTHER MONITORING REQUIREMENTS

**Effective immediately**, the Permittee shall monitor at 001-W and 002-W for flows diverted to the Mule Creek Wastewater Treatment Plant, as shown in Table D. Irrigation volume shall be monitored at IRR and rainfall amount shall be monitored at RAIN-1, as shown in Table D.

**Table D. Other Monitoring**

Parameter	Units	Sample Type	Minimum Sampling Frequency
Total Daily Flow Diverted to the Mule Creek Wastewater Treatment Plant	Million Gallons	Calculated	daily

Parameter	Units	Sample Type	Minimum Sampling Frequency
Total Daily Irrigation Volume	Gallons	Calculated/Gage	daily
Rainfall, 24-hour total	Inches	Gage	daily

## VII. WATER COLUMN TOXICITY TESTING REQUIREMENTS

**A. Acute Toxicity Testing.** The Permittee shall conduct acute toxicity testing to determine whether the MS4 discharge is contributing to acute toxicity to the receiving water. The Permittee shall meet the following acute toxicity testing requirements:

1. *Monitoring Frequency* – While discharging and concurrent with MS4 outfall constituent sampling required in V, above, the Permittee shall perform acute toxicity testing twice per year (i.e., one sample January – June and another sample July – December).
2. *Sample Types* – The Permittee shall use static renewal testing. The receiving water samples shall be grab samples and shall be taken at MCSP1 and MCSP4. A sufficient sample must be collected to perform the required tests.
3. *Test Species* – The test species shall be fathead minnows (*Pimephales promelas*).
4. *Methods* – The acute toxicity testing samples shall be analyzed using EPA-821-R-02-012 (Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fifth Edition, USEPA, October 2002, or most recent edition).
5. *Test Failure* – If an acute toxicity test does not meet all test acceptability criteria, as specified in the test method, the Permittee must re-sample and re-test to satisfy the monitoring frequency requirement (i.e., twice per year sampling).

## VIII. EFFECTIVE DATE

This Order is effective immediately and remains in effect until rescinded by the Executive Officer.

## IX. RIGHT TO PETITION

Persons aggrieved by this Central Valley Water Board action may petition the State Water Board for review in accordance with Water Code section 13320, and California Code of Regulations, title 23, section 2050 et seq. The State Water Board must receive the petition by 5pm on the 30th day after the date of this

Order, except that if the 30th day falls on a Saturday, Sunday or State holiday, in which case the petition must be received by the State Water Board by 5pm on the next business day. [Laws and regulations applicable to filing petitions](#) are available on the internet (at the address below), and copies will also be provided upon request.

([http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality))

If you have any questions, please contact Elizabeth Lee at (916) 464-4787 or at [Elizabeth.Lee@waterboards.ca.gov](mailto:Elizabeth.Lee@waterboards.ca.gov).

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For Patrick Pulupa  
Executive Officer

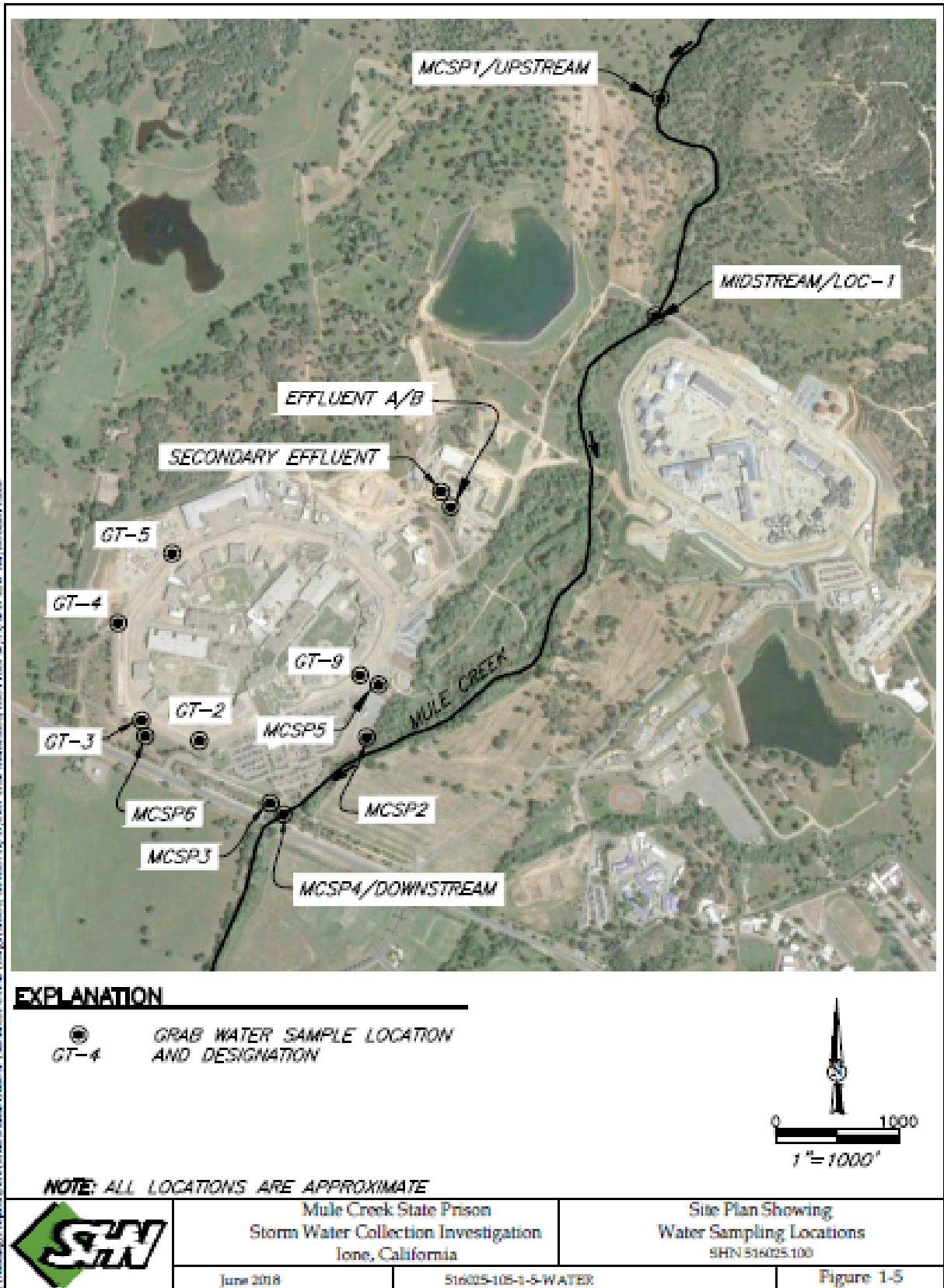
Attachment: Figure 1 – Mule Creek State Prison Water Sampling Locations, dated  
June 2018

cc: next page

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Jack Mitchell, Ledger Dispatch ([jmitchell@ledger.news](mailto:jmitchell@ledger.news))  
Greg Morris ([greg8355@gmail.com](mailto:greg8355@gmail.com))

**Figure 1 – Mule Creek State Prison Water Sampling Locations**



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