Central Valley Regional Water Quality Control Board

18 September 2026

City of Lathrop
Gregory Gibson
390 Towne Centre Drive
Lathrop, CA 95330

via email
ggibson@ci.lathrop.ca.us

REVISED NOTICE OF APPLICABILITY

WATER QUALITY ORDER 2012-0010-DWQ
AQUIFER STORAGE AND RECOVER PROJECTS THAT INJECT DRINKING WATER INTO GROUNDWATER
FOR
CITY OF LATHROP
ASR WELL NO. 1
AQUIFER STORAGE AND RECOVERY PROGRAM
SAN JOAQUIN COUNTY

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) received a Notice of Intent (NOI) dated 9 June 2026 for the City of Lathrop (Discharger) to obtain coverage under the *General Waste Discharge Requirements for Aquifer Storage and Recovery (ASR) Projects That Inject Drinking Water into Groundwater* (Water Quality Order WQ 2012-0010-DWQ, General Order). The NOI included a Form 200, a Technical Report prepared by Luhdorff and Scalmanini Consulting Engineers (LSCE) on behalf of the City of Lathrop, documentation of a Notice of Determination for a Mitigated Negative Declaration for CEQA compliance, and documentation of well registration with the US Environmental Protection Agency Underground Injection Control Program. Based on the information provided in the NOI, the ASR Program meets the required conditions for coverage under the General Order, and a Notice of Applicability (NOA) was issued on 28 August 2026.

On 10 September 2026, the Discharger requested modifications to the NOA. Based on the information provided in the original NOI (dated 9 June 2026) and the additional information provided in the request for modifications, the discharge still meets the conditions of the General Order. This NOA is revised to clarify that during the injection phase, backflush water and recovered test water will be discharged to the on-site storm water drain system, which ultimately discharges to the River Islands lake system. In addition, minor editorial edits were also made.

This revised NOA serves as formal notice that the General Order is applicable to the ASR Program as described herein. The discharge is assigned

WQ 2012-0010-DWQ-RB5S-0009-01. Please include this number on all correspondence related to this discharge. A copy of the General Order WQ 2012-0010-DWQ is enclosed and also available on the State Water Boards Adopted Orders webpage.

(https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2012/wqo2012_0010_with%20signed%20mrp.pdf)

You should familiarize yourself with the entire General Order and its attachments enclosed with this letter. The ASR Program must be operated in accordance with the requirements contained in the General Order; Standard Provisions and Reporting Requirements for Waste Discharge Requirements (SPRRs) dated 1 March 1991, and with the information submitted in the NOI.

Sampling, monitoring, and reporting requirements must be completed in accordance with the Monitoring and Reporting Program (MRP) included in the General Order.

DESCRIPTION

The City of Lathrop has installed an ASR well at the River Islands potable water storage and sewer pumping facility, located along Steward Road in Lathrop in San Joaquin County (Attachment A). The overall objective of the ASR well is to support the development of a groundwater banking program to enhance the management of surplus surface water from the South County Water Supply Project (SCWSP) operated by the South San Joaquin Irrigation District (SSJID). ASR Well No. 1 is designed for seasonal storage, emergency storage, and/or long-term storage to support drought resiliency and water supply reliability. Approximately 942 acre-feet a year (AFY) or 307 million gallons of water is planned to be recharged into the aquifer per year.

To characterize the subsurface conditions and evaluate groundwater quality, two nearby test wells were drilled. MW-1 was installed in August 2022 and was drilled to 800 feet below ground surface (bgs). Well MW-1 includes three individual piezometers (MW-264, MW-535, and MW-765). MW-2 was installed in July 2023 to a depth of 1,200 feet bgs and includes two piezometers (MW-770 and MW-1000). Screen intervals are presented below and well locations are shown on Attachment A).

Table 1. MW-1 and MW-2 Screen Intervals

MW-1		MW-2	
Piezometer ID	**Screen Interval (feet bgs)**	**Piezometer ID**	**Screen Interval (feet bgs)**
MW-265	240 to 260	MW-770	740 to 760
MW-535	510 to 530	MW-1000	969 to 989

MW-1		MW-2	
Piezometer ID	**Screen Interval (feet bgs)**	**Piezometer ID**	**Screen Interval (feet bgs)**
MW-765	740 to 760		

Based on information gathered from these test wells, it was determined that the ASR storage zone of focus would be between 900 and 1,020 feet bgs. As a result of the initial subsurface investigation, ASR Well No. 1 was installed in 2025 and is screened from 900 to 930 feet bgs and 970 to 1,020 feet bgs. Construction details are summarized below.

Table 2. ASR Well No. 1 Construction Details (Note 1)

Year Drilled	2025
Depth of Well	1,030 feet bgs
Borehole Diameters	48 inches (0 to 70 feet bgs) 36 inches (70 to 1040 feet bgs)
Screened Intervals	900 to 930 feet bgs 970 to 1,020 feet bgs

Note 1: Additional well construction details are included in the NOI.

Groundwater quality data from MW-1, MW-2, and ASR Well No. 1 indicate that groundwater within the screened intervals is highly saline, with total dissolved solids (TDS) concentrations generally between 2,800 and 9,800 milligrams per liter (mg/L) and chloride concentrations between 1,800 and 3,900 mg/L, greater than the respective Water Quality Objectives (WQOs). Manganese concentrations were consistently elevated in all wells, ranging from approximately 260 to 1,900 micrograms per liter (µg/L), well above the WQO. Although groundwater quality improves with depth, groundwater quality in all intervals remain above drinking-water standards and are not suitable for potable use. Additional analytical data is included in the NOI.

Aquifer recharge water for ASR Well No. 1 will consist of water from the municipal water distribution system and treated Stanislaus River water supplied by the SSJID, which has a California Department of Public Health domestic supply permit for the treated water. This water is fully treated to drinking-water standards, based on testing, and has very low salinity (TDS concentrations generally range between 40 and 64 mg/L) and no exceedances of primary or secondary MCLs for any other monitored constituents. Because this water is of better quality than groundwater, injection will not degrade beneficial uses and is suitable for use as ASR recharge water, based on the NOI. More details on the quality of the recharge water are included in the NOI.

Before injection can begin, the City will complete several tasks, including installing water-level transducers in MW-1 and MW-2 and connecting ASR Well No. 1 to the City's potable pipeline for recharge water. Under this phase of the project, backflush and recovered test water will be directed to the on-site storm drain system, ultimately conveyed to the River Islands lake system. Recovery to the City's drinking water system will not occur until after the interim recharge program has been completed and final treatment methods have been installed (e.g., post-recovery pH adjustment).

Initial interim recharge testing is planned to begin after completion of construction and wellhead equipping, with full recharge anticipated to start in late 2026, followed by cycle testing in 2027.

ELIGIBILITY

Based on the information included in the NOI, the proposed ASR program is consistent with the requirements set forth in Attachment C of the General Order and meets the following eligibility criteria:

1. Water will be treated and delivered to the injection well in accordance with the requirements of a domestic water supply permit issued by the State Water Resources Control Board's Division of Drinking Water, formerly administered by the California Department of Public Health.

2. ASR Well No. 1 is enrolled in the U.S. EPA Underground Injection Control Program.

3. Injected water will be of sufficient quality to ensure compliance with the General Order.

4. No adverse water quality impacts are anticipated.

5. The ASR pilot test is not restricted by any local ordinance, prohibition, or other applicable law or regulation. The City of Lathrop filed a Negative Declaration with the San Joaquin County Clerk and the State Clearinghouse on 1 July 2025, and the Negative Declaration was adopted on 7 October 2025.

MONITORING AND REPORTING PROGRAM

The Discharger shall comply with the monitoring and reporting program requirements prescribed in the Monitoring and Reporting Program (MRP) included within the General Order. The construction of any proposed monitoring well(s) shall meet the local agency well standards. Permits for all new wells and any well abandonment work must be obtained from the local agency environmental health department.

GENERAL INFORMATION AND REQUIREMENTS

This NOA authorizes implementation of the proposed ASR Pilot Testing Program under Order 2012-0010-DWQ for ASR Well No. 1 cited in the NOI and discussed in this NOA.

The Discharger shall comply with the Prohibitions, Requirements, Groundwater and Surface Water Limitations, and Provisions of the General Order. All ASR functions must be operated in accordance with the requirements contained in the General Order and the NOI and supporting documentation.

Please review this NOA carefully to ensure that it completely and accurately reflects the proposed discharge. If the discharge violates the terms or conditions of the General Order, the Central Valley Water Board may take enforcement action, including the assessment of an administrative civil liability 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. You must notify this office in writing if the discharge regulated by this Order ceases so that coverage under the General Order can be terminated and to avoid unnecessary billing.

SALT AND NITRATE CONTROL PROGRAMS

As part of the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) initiative, the Central Valley Water Board adopted Basin Plan amendments incorporating the Salt Control Program and Nitrate Control Program at its 31 May 2018 (Resolution R5-2018-0034). The Basin Plan amendments became effective on 17 January 2020. On 10 December 2020, the Central Valley Water Board adopted revisions to the Basin Plan amendments with Resolution R5-2020-0057. (https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/resoluti ons/r5-2020-0057_res.pdf). Those revisions became effective on 10 November 2021.

The Discharger submitted a request for exemption from the Salt and Nitrate Control Programs for the Facility on 17 June 2026. Central Valley Water Board staff also reviewed a technical report detailing the ASR Program. Based on the findings from the exemption request letter and technical report, Central Valley Water Board staff concurr that the Facility be exempt from the Salt and Nitrate Control Program requirements for the following reasons:

1. The Facility’s discharge is treated potable water that originates from the Calaveras and Stanislaus Rivers which have low salinity concentrations and very low or non-detect nitrate concentrations. Through the treatment

processes, the facility does not meaningfully add salts and nitrates prior to the discharge.

2. The injection of treated surface water is likely to improve groundwater quality for salinity and nitrate.

Based on the above, the exemption request for the Salt and Nitrate Control Program was approved by the Executive Officer on 2 July 2026. However, if the Central Valley Water Board finds that the ASR Program causes or may cause groundwater degradation for salinity or nitrate, this discharge may be subject to the requirements of the Salt and Nitrate Control Programs.

DOCUMENT SUBMITTALS

All monitoring reports and other correspondence should be converted to searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50 MB should be emailed to:

centralvalleysacramento@waterboards.ca.gov

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

Facility Name:	ASR Well No. 1
County:	San Joaquin County
Program:	Groundwater Quality Protection Program
Order:	WQ 2012-0010-DWQ-RB5S-0009-01
CIWQS Place ID:	CW-898258

Documents that are 50 MB or larger should be transferred to a CD, DVD, or flash drive and mailed to:

Central Valley Regional Water Quality Control Board
ECM Mailroom
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Now that this revised Notice of Applicability has been issued, the Board's Compliance and Enforcement section will take over management of your case. Cat Wesoloski is your point of contact for questions regarding compliance with the General Order. If you find it necessary to make a change to your permitted operations, Cat will direct you to the appropriate Permitting staff. You may contact Cat at (916) 464-4708 or by email at catherine.wesoloski@waterboards.ca.gov.

For Patrick Pulupa
Executive Officer

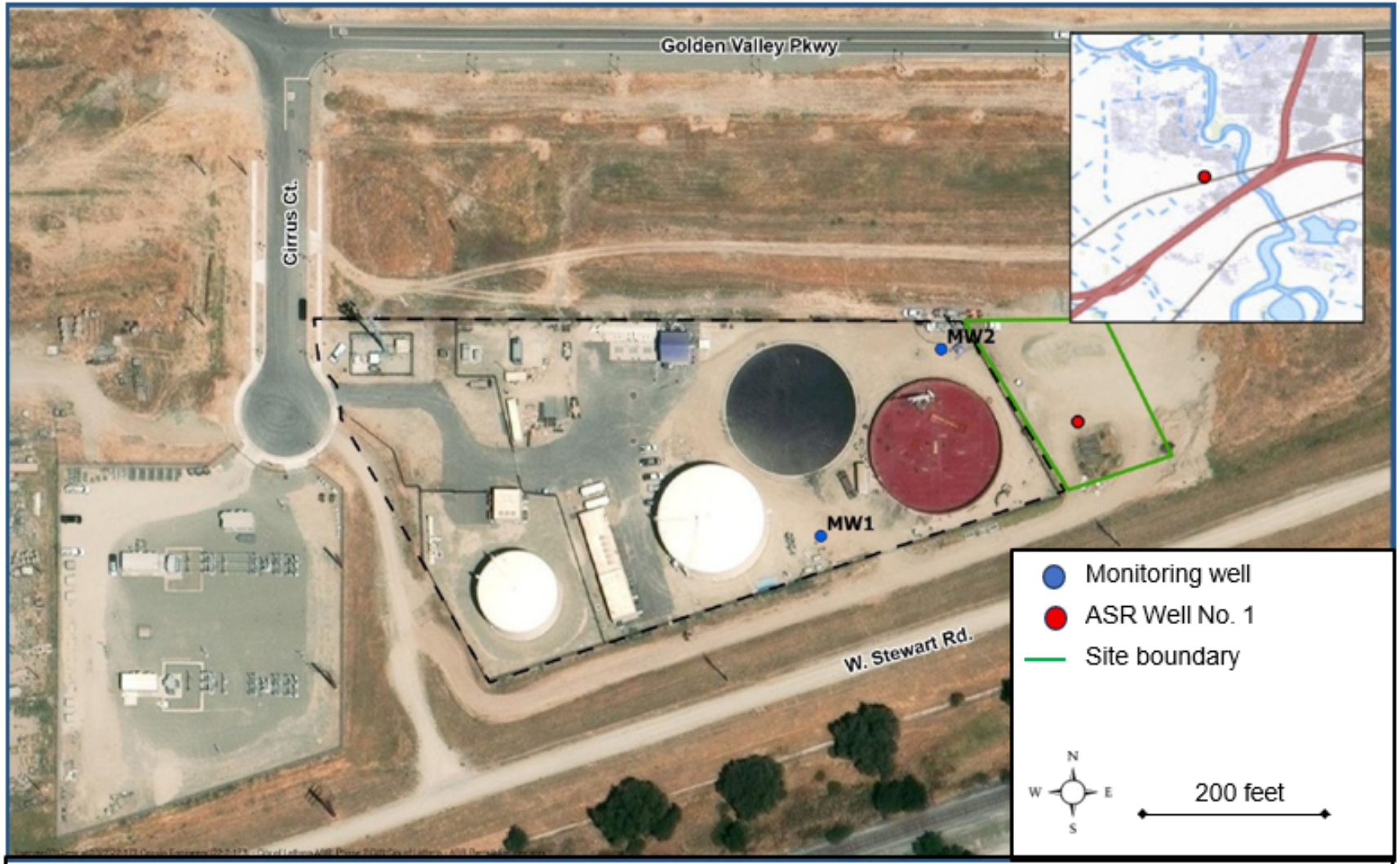
Attachment: Attachment A – Site Location and Features Map

Enclosures: WQ 2012-0010-DWQ (Discharger only)

cc w/o encl: San Joaquin County Environmental Health Department, Stockton

WQ 2012-0010-DWQ-RB5S-0009-01

ATTACHMENT A



SITE LOCATION AND FEATURES MAP
ASR WELL NO. 1

SAN JOAQUIN COUNTY