
Central Valley Regional Water Quality Control Board

6 November 2017

Lori Buffington
Rough and Ready Mobile Home Village
6175 West Alluvial Ave
Fresno, CA 93722

CERTIFIED MAIL
91 7199 9991 7035 8420 3477

NOTICE OF APPLICABILITY
GENERAL WASTE DISCHARGE REQUIREMENTS FOR
SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS
ORDER WQ 2014-0153-DWQ
FOR
ROUGH AND READY MHP, LLC
ROUGH AND READY MOBILE HOME VILLAGE
NEVADA COUNTY

Rough and Ready Mobile Home Park (MHP) LLC. submitted a Report of Waste Discharge (RWD) dated 22 June 2017 describing the Rough and Ready Mobile Home Village wastewater treatment facility (WWTF) in Nevada County. The WWTF provides treatment and disposal service for domestic wastewater generated from 35 mobile homes, four apartments, 20 non-transient recreational vehicle (RV) spaces, and one commercial building. The WWTF discharge has not been previously regulated by Waste Discharge Requirements (WDRs). Based on information provided in the RWD, the wastewater treatment system and discharge is consistent with the requirements of the State Water Resources Control Board (State Water Board) *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems*, Order WQ 2014-0153-DWQ (General Order). You are hereby assigned Order WQ 2014-0153-DWQ-R5247 for the discharge. A copy of the General Order is enclosed and also available at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf

You should familiarize yourself with the entire General Order and its attachments, which describe mandatory discharge and monitoring requirements. The General Order contains operational and reporting requirements by wastewater system type. Sampling, monitoring, and reporting requirements applicable to your treatment and disposal methods must be completed in accordance with the appropriate treatment system sections of the General Order and the attached Monitoring and Reporting Program (MRP) 2014-0153-DWQ-R5247. The Discharger is responsible for all the applicable requirements that exist in the General Order and this NOA.

EXISTING FACILITY AND DISCHARGE DESCRIPTION

The Rough and Ready Mobile Home Village WWTF is owned and operated by Rough and Ready MHP, LLC. (hereafter "Discharger") and is located at 14533 Rough and Ready Highway, Rough and Ready in Nevada County. The facility location and site features are shown on Attachment A, which

is attached hereto and is made part of this NOA by reference. The mobile home park is located more than a mile from an existing domestic wastewater collection system. Connection to a regional system is currently cost prohibitive due to high connection fees. Therefore, the waste is collected and treated on-site.

The wastewater treatment system is approximately 50 to 60 years old and receives domestic waste from mobile homes, apartments, RVs, and a single commercial building (currently closed and unoccupied). The RV units are permanently connected to the wastewater system and therefore, the RV wastewater does not contain chemicals associated with RV holding tanks, such as formaldehyde, zinc, or phenol. The wastewater system does not collect waste from transient RVs.

Wastewater from the mobile homes, apartments, and commercial building flows via gravity to a pond system. No pretreatment of the wastewater is conducted and all solid materials enter the ponds. Wastewater from the permanent RV units collects in a 1,500 gallon tank with a wastewater pump that pumps the water to the pond system. Solids collected in the tank are pumped out approximately every 6 months by a local septic system pumping and hauling company. The pond system consists of three unlined evaporation and percolation ponds, referred to as Ponds, 1, 2, and 3. Wastewater enters Pond 1, which is equipped with an aerator. Ponds 2 and 3 are only used if the wastewater in Pond 1 reaches the 2-foot freeboard. A flow schematic is shown on Attachment B, which is attached hereto and made part of this NOA by reference.

Wastewater flows entering the system are not metered. Flow volumes are estimated using information from similar types of facilities with similar wastewater systems and equivalent occupancies, and water usage from the metered on-site domestic well. At full capacity, approximately 118 people are on-site. Flow rates were estimated at 7,400 gallons per day (gpd), as described in the *Report of Waste Discharge* dated 22 June 2017.

The capacity of each pond was determined by a survey conducted in June 2017 by the Discharger's subcontractor. At the time of the survey, Ponds 2 and 3 were dry. The ponds have the following estimated depths, surface areas, and volumes:

| Pond Name | Depth (feet) | Surface Area (acres) ¹ | Volume (MG) ¹ |
|------------------|---------------------|--|---------------------------------|
| Pond 1 | 7.25 | 6,843 | 208,121 |
| Pond 2 | 7.2 | 4,358 | 122,423 |
| Pond 3 | 9.4 | 5,144 | 195,443 |

¹ Not including two feet of freeboard

Limited wastewater sampling has been conducted. A wastewater sample was recently collected on 9 June 2017 from Pond 1 and assumed to represent typical wastewater quality. The results are shown below.

| Constituent | Concentrations ¹ |
|----------------------------------|------------------------------------|
| Biochemical Oxygen Demand (mg/L) | 15.9 |
| Total Suspended Solids (mg/L) | 14 |
| Dissolved Oxygen (mg/L) | 4 |
| pH ² | 8.25 |
| Nitrate as Nitrogen (mg/L) | 2.53 |

¹ Multiple samples were collected on the same day. Maximum concentrations are shown.

² pH reading conducted on 31 May 2017.

Water balances were calculated for an average rainfall event and a 100-year event. During a 100-year rainfall event with the facility at full capacity, the pond system has sufficient capacity to maintain at least 2 feet of freeboard at all times.

Depth to groundwater in the area is unknown and is not currently monitored. The domestic drinking water well, located in the northern portion of the facility, is approximately 500 feet from Pond 1. The domestic well is regulated by the Nevada County Environmental Health Department.

SITE-SPECIFIC REQUIREMENTS AND EFFLUENT LIMITS

Note that the General Order contains prohibitions and specifications that apply to all wastewater treatment systems as well as those that only apply to specific treatment and/or disposal systems. The specific requirements and effluent limits for your treatment system are summarized below.

The wastewater treatment operator must be certified and familiar with the requirements contained in the General Order, this NOA, and the MRP.

Requirements by Wastewater System Type, Section B of General Order

B.1 All Wastewater Systems

This section applies in its entirety to the Rough and Ready Mobile Home Village WWTF with the following site specific requirements.

B.1.a Influent flow limits.

| Treatment Unit | Average Daily Flow | Maximum Annual Flow |
|----------------|--------------------|---------------------|
| Pond System | 8,400 gpd | 3 MG |

B.1.I Wastewater system setbacks.

| Equipment or Activity | Domestic Well | Flowing Stream | Ephemeral Stream Drainage | Property Line | Lake or Reservoir |
|---|---------------|----------------|---------------------------|---------------|-------------------|
| Septic Tank, Treatment System, & Collection System ¹ | 150 ft. | 50 ft. | 50 ft. | 5 ft. | 200 ft. |

¹ Setbacks referenced under "Septic Tank, Aerobic Treatment Unit, Treatment System, or Collection System" in Table 3 of General Order.

B.3 Aerobic Treatment Units

The WWTF utilizes an aerobic treatment unit; therefore this section applies in its entirety.

B.5 Pond Systems

The WWTF utilizes a pond system; therefore this section applies in its entirety.

Effluent Limitations, Section D of General Order

This section applies in its entirety to the Rough and Ready Mobile Home Village WWTF and shall include the following site specific limitations.

Pond 1 Effluent Limitations

The following limits apply to effluent in Pond 1.

| Constituent | Units | Limit |
|-------------|-------|-------|
| BOD | mg/L | 90 |

Effluent Limit Rationale

The pond treatment system is subject to technology performance effluent limits for biochemical oxygen demand (BOD) as specified in the General Order.

Staff evaluated the need for a total nitrogen effluent limit using the method contained in the General Order and determined that a nitrogen effluent limit is not required because the monthly average flow will be less than 20,000 gpd.

Technical Report Preparation Requirements, Provisions Section E.1 of General Order

The following technical reports shall be submitted as described below:

1. By **1 March 2017**, the Discharger shall submit a *Spill Prevention and Emergency Response Plan* (Response Plan) consistent with the requirements of General Order Provision E.1.a.
2. By **1 March 2017**, the Discharger shall submit a *Sampling and Analysis Plan* consistent with the requirements of General Order Provision E.1.b.

MONITORING AND REPORTING PROGRAM

The Discharger shall comply with MRP 2014-0153-DWQ-R5247, which is attached hereto and made part of this NOA by reference.

ENFORCEMENT

Please review this NOA carefully to ensure that it completely and accurately reflects the discharge. Discharge of wastes other than those described in this NOA is prohibited. Prior to allowing changes to the wastewater strength or generation rate, or to the method of waste disposal, you must contact the Central Valley Regional Water Board to determine if submittal of an RWD is required.

Rough and Ready Mobile Home Village will generate the waste subject to the terms and conditions of WQ 2014-0153-DWQ-R5247 and will maintain exclusive control over the discharge. As such, Rough and Ready MHP LLC. is primarily responsible for compliance with this NOA, MRP, and General Order, with all attachments. Failure to comply with the requirements in the General Order or this NOA could result in an enforcement action as authorized by provisions of the California Water Code.

ANNUAL FEES

Staff has determined the discharge is a threat to water quality and complexity rating of 3-C. The annual fee corresponding to a threat to water quality and complexity of 3-C is currently \$1,044. The fee is due and payable on an annual basis until coverage under the General Order is formally rescinded. Please note that the annual fees are reviewed each year and may change. If the wastewater discharge ceases, you must provide written notice so that we can terminate coverage under the General Order and no longer bill you.

DOCUMENT SUBMITTAL

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: Rough and Ready Mobile Home Village, Nevada County | | |
| Program: Non-15 Compliance | Order: 2014-0153-DWQ-R5247 | CIWQS Place ID: 841078 |

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

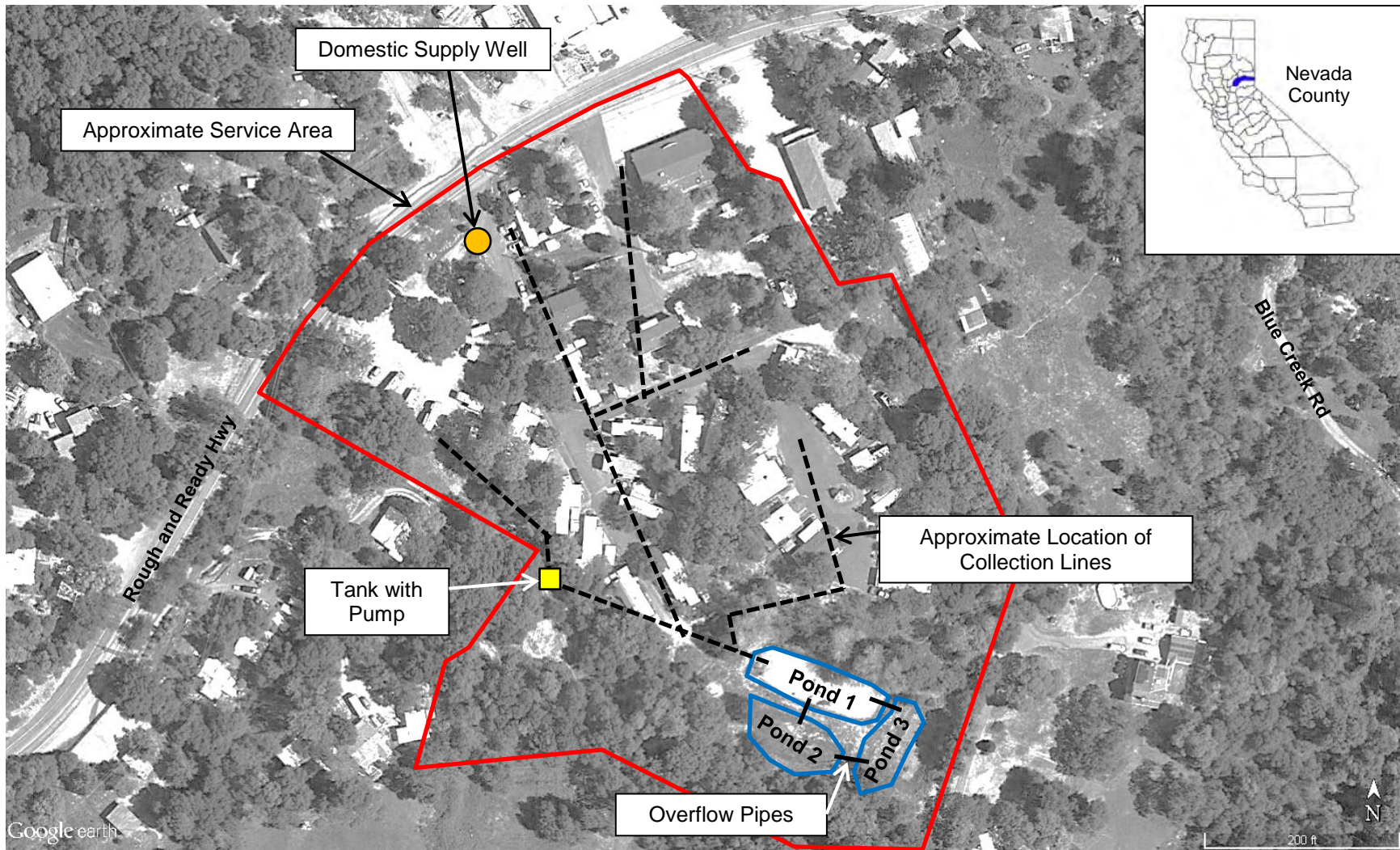
Now that the Notice of Applicability has been issued, the Board's Compliance and Enforcement section will take over management of your case. Guy Childs is your new point of contact for any questions about the General Order. If you find it necessary to make a change to your permitted operations, Guy will direct you to the appropriate Permitting staff. You may contact Guy at (916) 464-4648 or at gchilds@waterboards.ca.gov.

-- original signed by Andrew Altevogt for --

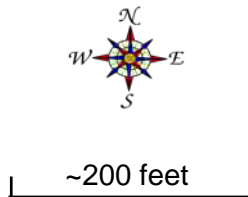
Pamela C. Creedon
Executive Officer

enc: Water Quality Order WQ 2014-0153-DWQ
Monitoring and Reporting Program 2014-0153-DWQ-R5247
Attachment A, Site Location and Site Plan
Attachment B, Wastewater Treatment System Schematic

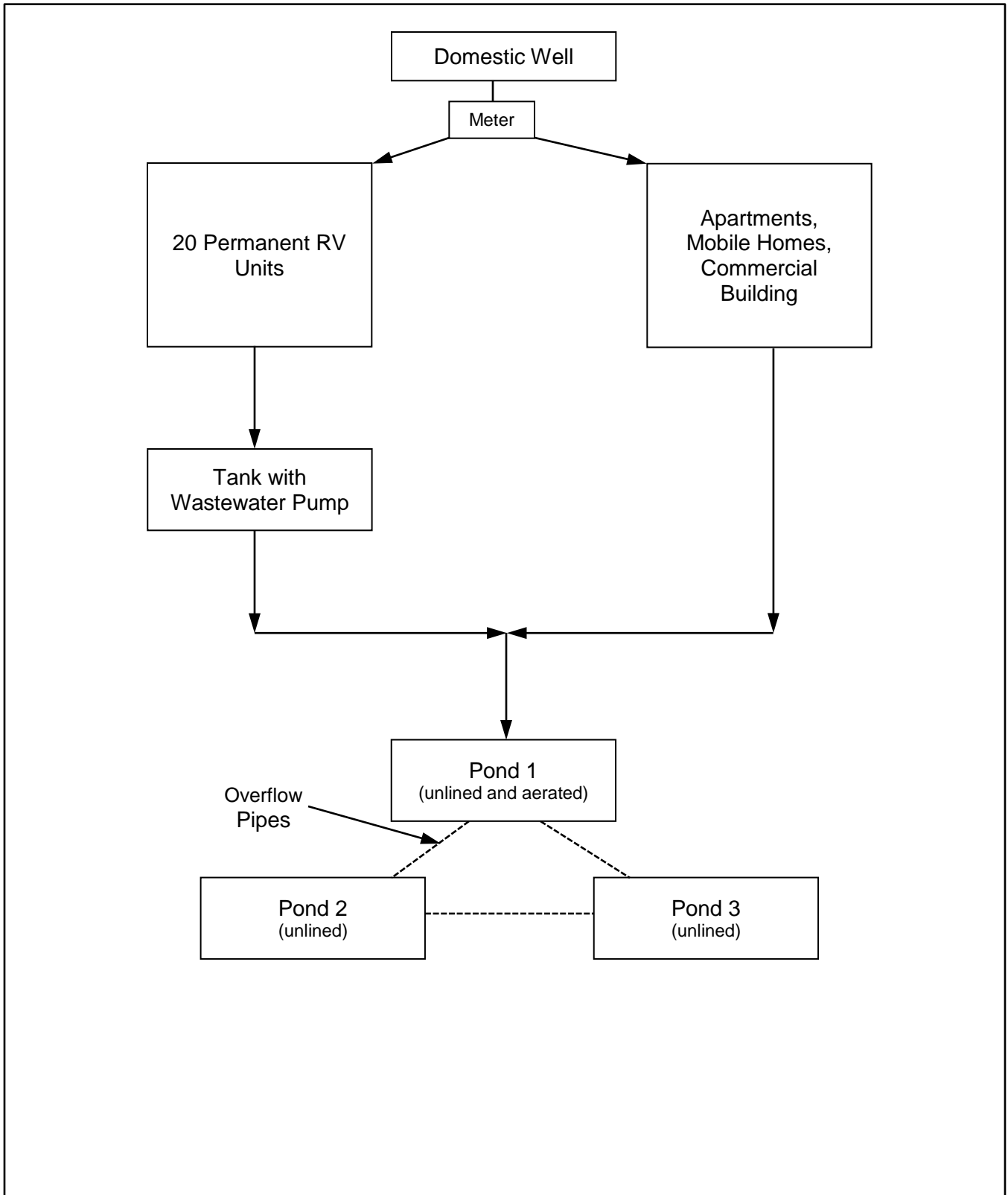
cc w/out enc: Timothy O'Brien, State Water Resources Control Board, Sacramento
Amy Irani, Nevada County Environmental Health Department, Nevada City



Note: Site features are not to scale and are approximately located.



ROUGH AND READY MOBILE HOME VILLAGE
NEVADA COUNTY



Drawing Reference:
Report of Waste Discharge, 22 June 2017

WASTEWATER FLOW SCHEMATIC
ROUGH AND READY MOBILE HOME
VILLAGE
NEVADA COUNTY

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM WQ 2014-0153-DWQ-R5247

FOR

ROUGH AND READY MHP, LLC
ROUGH AND READY MOBILE HOME VILLAGE
NEVADA COUNTY

This Monitoring and Reporting Program (MRP) describes requirements for monitoring a wastewater treatment system at the Rough and Ready Mobile Home Village. This MRP is issued pursuant to Water Code section 13267. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) or Executive Officer.

Water Code section 13267 states, in part:

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters 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.”

Water Code section 13268 states, in part:

“(a) Any person failing or refusing to furnish technical or monitoring program reports as required by subdivision (b) of section 13267, or failing or refusing to furnish a statement of compliance as required by subdivision (b) of section 13399.2, or falsifying any information provided therein, is guilty of a misdemeanor and may be liable civilly in accordance with subdivision (b).

(b)(1) Civil liability may be administratively imposed by a regional board in accordance with article 2.5 (commencing with section 13323) of chapter 5 for a violation of subdivision (a) in an amount which shall not exceed one thousand dollars (\$1,000) for each day in which the violation occurs.”

Rough and Ready MHP, LLC owns and operates the wastewater system that is subject to the Notice of Applicability (NOA) of Water Quality Order 2014-0153-DWQ-R5247. The reports are necessary to ensure that the Discharger complies with the NOA and General Order. Pursuant to Water Code section 13267, the Discharger shall implement this MRP and 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 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.

FLOW MONITORING

Flow volumes shall be estimated using water usage from the metered on-site domestic well and daily facility occupancy, as specified below:

| Parameter | Units | Type of Sample | Monitoring Frequency | Reporting Frequency |
|--------------------|--------------|-----------------------|-----------------------------|----------------------------|
| Average Daily Flow | MGD | Meter Observation | Weekly | Quarterly |

EFFLUENT MONITORING

Effluent samples shall be collected from Pond 1; a grab sample from Pond 1 collected from the opposite side of the wastewater inlet area will be considered to be representative of the effluent quality. At a minimum, the Discharger shall monitor effluent as specified below:

| Parameter | Units | Type of Sample | Monitoring Frequency | Reporting Frequency |
|-------------------------------|-------|----------------|----------------------|---------------------|
| BOD ₅ ¹ | mg/L | Grab | Monthly | Quarterly |

¹ 5-day Biochemical Oxygen Demand.

POND MONITORING

The Discharger shall monitor each pond as specified below.

| Parameter | Units | Type of Sample | Monitoring Frequency | Reporting Frequency |
|-------------------------------|----------|----------------|----------------------|---------------------|
| Freeboard ¹ | 0.1 feet | Staff Gage | Weekly | Quarterly |
| Levee Condition | -- | Observation | Weekly | Quarterly |
| Seepage ² | -- | Observation | Weekly | Quarterly |
| Odors | -- | Observation | Weekly | Quarterly |
| Dissolved Oxygen ³ | mg/L | Grab | Monthly | Quarterly |

¹ Freeboard shall be measured vertically from the surface of the pond water to the lowest elevation of the surrounding berm and shall be measured to the nearest 0.1 feet.

² Pond containment berms shall be observed for signs of seepage or surfacing water along the exterior toe. If surfacing water is found, then a sample shall be collected and tested for total coliform organisms and total dissolved solids.

³ Dissolved oxygen shall be monitored at each pond that contains at least one foot of standing water. The report shall state how much water was in the pond if dissolved oxygen was not monitored. Samples shall be collected opposite the pond inlet at a depth of one foot.

SOLIDS DISPOSAL MONITORING

The Discharger shall report the handling and disposal of all solids (e.g., screenings, grit, sludge, biosolids, etc.) generated at the wastewater system. Records shall include the name/contact information for the hauling company, the type and amount of waste transported, the date removed from the wastewater system, the disposal facility name and address, and copies of analytical data required by the entity accepting the waste. These records shall be submitted as part of the annual monitoring report.

REPORTING

All monitoring reports should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to: *centralvalleysacramento@waterboards.ca.gov*.

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

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

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 transmittal sheet:

Attention: Compliance/Enforcement Section
Rough and Ready MHP, LLC
Rough and Ready Mobile Home Village
Nevada County
Place ID: 841078

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, solids, etc.), and reported analytical or visual inspection results are readily discernible. The data shall be summarized to clearly 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.

Monitoring information shall include the method detection limit (MDL) and the Reporting limit (RL) or practical quantitation limit (PQL). If the regulatory limit for a given constituent is less than the RL (or PQL), then any analytical results for that constituent that are below the RL (or PQL) but above the MDL shall be reported and flagged as estimated. For a Discharger conducting any of its own analyses, reports must be signed and certified by the chief of the laboratory.

A. Quarterly Monitoring Reports

Quarterly reports shall be submitted to the Regional Water Board on the **first day of the second month after the quarter ends** (e.g., the January-March Quarterly Report is due by May 1st). The reports shall bear the certification and signature of the Discharger's authorized representative. At a minimum, the quarterly reports shall include:

1. Results of all required quarterly monitoring. Data shall be organized by the associated monitoring sections (e.g., Flow Monitoring, Effluent Monitoring, etc.) and presented in tabular format.
2. A comparison of monitoring data to the discharge specifications, flow limit, and effluent limits.
3. A disclosure of any violations of the NOA and/or General Order requirements and an explanation of corrective actions.
4. If requested by staff, copies of laboratory analytical report(s) and chain of custody form(s).

B. Annual Report

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

1. Tabular and graphical summaries of all monitoring data collected during the year.

2. An evaluation of the performance of the wastewater treatment system, including discussion of capacity issues, nuisance conditions, system problems, and a forecast of the flows anticipated in the next year. A flow rate evaluation, as described in the General Order (Provision E.2.c), shall also be submitted if required.
3. A statement of whether septic tanks were pumped during the year and a copy of pumping records. The report shall also contain a tabulated summary of historical pumping dates, nature of service, and service company names and license number.
4. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into compliance with the NOA and/or General Order.
5. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
6. The name and contact information for the wastewater operator responsible for operation, maintenance, and system monitoring.

A letter transmitting the monitoring reports shall accompany each report. The letter shall report 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 Discharger or the Discharger'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 the 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 Discharger shall implement the above monitoring program as of the date of this MRP.

Ordered by:

PAMELA C. CREEDON, Executive Officer

DATE

GLOSSARY

| | |
|------------------|--|
| BOD ₅ | Five-day biochemical oxygen demand |
| DO | Dissolved oxygen |
| Daily | Every day except weekends or holidays. |
| Twice Weekly | Twice per week on non-consecutive days. |
| Weekly | Once per week. |
| Twice Monthly | Twice per month during non-consecutive weeks. |
| Monthly | Once per calendar month. |
| Bimonthly | Once every two calendar months (i.e., six times per year) during non-consecutive months. |
| Quarterly | Once per calendar quarter. |
| Semiannually | Once every six calendar months (i.e., two times per year) during non-consecutive quarters. |
| Annually | Once per year. |
| mg/L | Milligrams per liter |
| gpd | Gallons per day |
| mgd | Million gallons per day |