



Central Valley Regional Water Quality Control Board

2 October 2026

Seoung S. Lee
3511 Hotel LLC
40820 Sierra Drive
Three Rivers, CA 93271

CERTIFIED MAIL
7021 2720 0000 9985 3634

REVISED NOTICE OF APPLICABILITY; STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ, GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; 3511 HOTEL LLC; COMFORT INN & SUITES THREE RIVERS WASTEWATER TREATMENT SYSTEM; TULARE COUNTY

On 28 August 2019, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) issued Notice of Applicability (NOA) 2014-0153-DWQ-R5314 to BSK Investments, LLC for the Comfort Inn & Suites Three Rivers wastewater treatment system (Facility). The 2019 NOA enrolled the Facility under State Water Resources Control Board Order WQ 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order). The NOA was revised on 25 November 2019 to correct and clarify the permitted flow limit and specifications, and again on 19 October 2022 to recognize a change in ownership of the Facility to SUK Inc. and JUM LLC. On 25 March 2026, SUK Inc. and JUM LLC submitted a report of waste discharge (RWD) requesting updated coverage under the General Order for treatment system modifications and increased wastewater discharge from the Facility. The RWD included a technical report prepared by James Cooper, a California registered engineer (RCE 26918), and a Form 200. Additional Facility information was submitted on 30 April 2026, 9 June 2026, and 8 July 2026. On 28 August 2026, an updated Form 200 was received indicating a change in ownership of the Facility signed by Sue K Choi, Chief Executive Officer of 3511 Hotel LLC (Discharger).

Based on the information provided, the Facility treats and disposes less than 100,000 gallons of domestic wastewater per day and is therefore eligible for coverage under the General Order. This NOA serves as formal notice that the General Order is applicable to your system and the wastewater discharge described in the March 2026 RWD and subsequent submittals. You are hereby assigned enrollee number

NICHOLAS AVDIS, CHAIR | PATRICK PULUPA, EXECUTIVE OFFICER

1685 E Street, Fresno, CA 93706 | www.waterboards.ca.gov/centralvalley

2014-0153-DWQ-R5314-01 for your system. Please note that issuance of this NOA and the attached Monitoring and Reporting Program (MRP) supersede and terminate NOA 2014-0153-DWQ-R5314, and its associated MRP.

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 treatment and disposal methods must be completed in accordance with the appropriate treatment system sections of the General Order and the attached **MRP No.**

2014-0153-DWQ-R5314-01. The revised MRP was developed after consideration of your waste characterization and site conditions described in the attached memorandum.

BACKGROUND

The Discharger owns and operates the Facility located at 40820 Sierra Drive in Three Rivers (Section 26, Township 17 South, Range 28 East, Mount Diablo Base and Meridian) in Tulare County. The Facility treats and disposes domestic wastewater from the Comfort Inn & Suites Three Rivers hotel (Hotel), which provides year-round lodging for travelers and tourists near the Three Rivers community. The previous NOA issued for the Facility authorized the discharge of up to 5,500 gallons per day (gpd) of treated effluent (calculated as a monthly average) to its leach field system, and the monthly average daily discharge of up to 3,750 gpd to the media bed filtration system (Orenco AX-Max 150-28) and subsurface drip irrigation system.

DISCHARGE DESCRIPTION

Domestic wastewater from the Hotel is generated from flush toilets, showers, and washing machines, and is conveyed to the Facility for treatment and disposal. The wastewater from the Hotel is directed to the Facility via gravity flow main sewer lines connected directly to the Hotel buildings. The sewer lines feed three septic tanks connected in series. The first septic tank is 5,000 gallons, the second is 8,000 gallons, and the third is 15,000 gallons. From the last septic tank, wastewater is sent to a distribution box where wastewater is either discharged to a pressure-dosed leach field or a subsurface irrigation system. Wastewater distributed to the subsurface irrigation system receives additional treatment via the media bed filtration system and Geoflow biodisk filters prior to disposal. The leach field covers approximately 3,500 square feet and has a design flow of 5,500 gpd, and the subsurface drip irrigation area covers approximately 20,000 square feet and has a design disposal capacity of 5,000 gpd but is limited by the treatment capacity of the current media bed filtration system (3,750 gpd).

Proposed modifications to the Facility include the addition of a 21-foot Orenco T-MAX 7,500-gallon meander tank to replace the second 8,000-gallon septic tank, removal of the current media bed filtration system in favor of a new 11,750 gpd media bed filtration package treatment system equipped with ultraviolet (UV) disinfection (Orenco AX-MAX 250-35 and AX-MAX 225-35), and an expanded subsurface drip irrigation area. The

layout of the proposed modifications are shown in the flow schematic included as **Attachment C**.

The leach field and subsurface irrigation area will be automated for zone dosing providing rest periods between cycles. Additionally, the Discharger proposes to add two zones to the subsurface drip irrigation area comprising an approximate 5,000 square feet. The expanded disposal area will add about 1,250 gpd of discharge capacity to the subsurface drip irrigation area for a total design capacity of 6,250 gpd. The combined design capacity of both subsurface disposal areas will be 11,750 gpd, which is consistent with the treatment capacity of the new media bed filtration system.

FACILITY SPECIFIC REQUIREMENTS AND EFFLUENT LIMITATIONS

The Discharger will maintain exclusive control over the discharge and shall comply with the terms and conditions of this NOA, the General Order with all attachments, and MRP No. 2014-0153-DWQ-R5314-01.

In accordance with Section B.1 of the General Order, treated wastewater discharged from the treatment system **shall not exceed 5,500 gpd to the leach field, and discharge to subsurface drip irrigation area shall not exceed 6,250 gpd for a combined monthly average daily discharge of 11,750 gpd to the subsurface disposal areas**. In accordance with the requirements of the General Order, this NOA does not include a nitrogen effluent limitation since the design flow rate to the leach field is less than 20,000 gpd.

The General Order states in Section B.1 that the Discharger shall comply with the setbacks described in Table 3 of the General Order. This table summarizes different setback requirements for wastewater treatment system equipment, activities, land application areas, and storage and/or treatment ponds from sensitive receptors and property lines where applicable. The Discharger shall comply with the applicable setback requirements, as summarized in the following table:

Table 1 - Setback Requirements

Equipment or Activity	Domestic Well	Flowing Stream	Ephemeral Stream Drainage	Property Line
Septic Tank, Treatment System, and Collection System	150 ft	50 ft	50 ft	5 ft
Leach Field	100 ft	100 ft	50 ft	5 ft

The Discharger shall comply with the applicable section of the General Order, including:

- Section B.2 – Septic Systems
- Section B.4 – Activated Sludge Systems
- Section B.6 – Subsurface Disposal Systems

- Section B.8 – Sludge/Solids/Biosolids Disposal
- Section C.1 – Groundwater and Surface Water Limitations (excluding the water quality objectives for salinity provided the Discharger continue to participate in and comply with the Salt Control Program Alternative Permitting Approach requirements)

As discussed in the attached memorandum, the Discharger shall comply with the effluent limitations specified in Table 1 below when discharging to the onsite subsurface drip irrigation system. Compliance with the effluent limitations specified in Table 2 shall be determined at a point after the UV disinfection system and prior to discharge to the subsurface disposal area.

Table 2 – Effluent Limitations

Constituent	Unit	Monthly Average	7-Day Average
Biochemical Oxygen Demand (BOD)	mg/L	30	45
Total Suspended Solids (TSS)	mg/L	30	45
Total Coliform Organisms	MPN/100 mL	--	2.2

Provision E.1 of the General Order requires discharges enrolled under the General Order to prepare and implement the following reports within **90 days** of the issuance of the NOA (**by 31 December 2026**):

- Spill Prevention and Emergency Response Plan
- Sampling and Analysis Plan
- Sludge Management Plan

A copy of the Spill Prevention and Emergency Response Plan, the Sampling and Analysis Plan, and Sludge Management Plan shall be maintained at the Facility and shall be presented to the Regional Water Board staff upon request. The Sludge Management Plan shall be submitted to the Central Valley Water Board **within 90 days** of the issuance of the NOA.

As stated in Section E.2.w of the General Order, in the event any change in control or ownership of the Facility or wastewater disposal areas, the Discharger must notify the succeeding owner or operator of the existence of this General Order by letter, a copy of which shall be immediately forwarded to the Central Valley Water Board Executive Officer.

Failure to comply with the requirements in this NOA, General Order 2014-0153-DWQ, with all attachments, and **MRP No. 2014-0153-DWQ-R5314-01** could result in an enforcement action as authorized by provisions of the California Water Code. Discharge of wastes other than those described in this NOA is prohibited. If the method of waste

disposal changes from that described in this NOA, you must submit a new Report of Waste Discharge describing the new operation.

The required annual fee specified in the annual billing from the State Water Board shall be paid until this NOA is officially terminated. You must notify this office in writing if the discharge regulated by the General Order ceases, so that we may terminate coverage and avoid unnecessary billing.

On 31 May 2018, the Central Valley Water Board adopted Basin Plan amendments incorporating new strategies for addressing ongoing salt and nitrate accumulation in the Central Valley as part of the Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) initiative. Further details of these strategies are discussed in the enclosed memorandum. As these strategies are implemented, the Central Valley Water Board may find it necessary to modify the requirements of this NOA to ensure the goals of the Salt and Nitrate Control Program are met.

All regulatory documents, submissions, materials, data, monitoring reports, and correspondence should be converted to a searchable Portable Document Format (PDF) and submitted electronically via the State Water Resources Control Board's GeoTracker database. GeoTracker is an Internet-accessible database system used by the State Water Board, regional boards, and local agencies to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. This system consists of a relational database, online compliance reporting features, a geographical information system (GIS) interface, and other features that are utilized by regulatory agencies, regulated industries, and the public to input, manage, or access compliance and regulatory tracking data. Guidance for creating an account and submitting reports to the GeoTracker database is provided in the attached MRP.

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Resources Control Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, section 2050 and following. The State Water Resources Control Board must receive the petition by 5:00 p.m., 30 days after the date of this NOA, except that if the thirtieth day following the date of this NOA falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Resources Control Board by 5:00 p.m. on the next business day. [Copies of the law and regulations applicable to filing petitions](#) may be found on the internet (https://www.waterboards.ca.gov/public_notices/petitions/water_quality/) or will be provided upon request.

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 [General Order](#) is available on the State Water Board's website at:

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

If you have any questions regarding this matter, please contact Virat Kang by phone at (559) 488-4345, by email at Virat.Kang@waterboards.ca.gov.

**Alexander
Mushegan**
Digitally signed by
Alexander Mushegan
Date: 2026.10.02
08:55:28 -07'00'
for Patrick Pulupa
Executive Officer

Attachments:

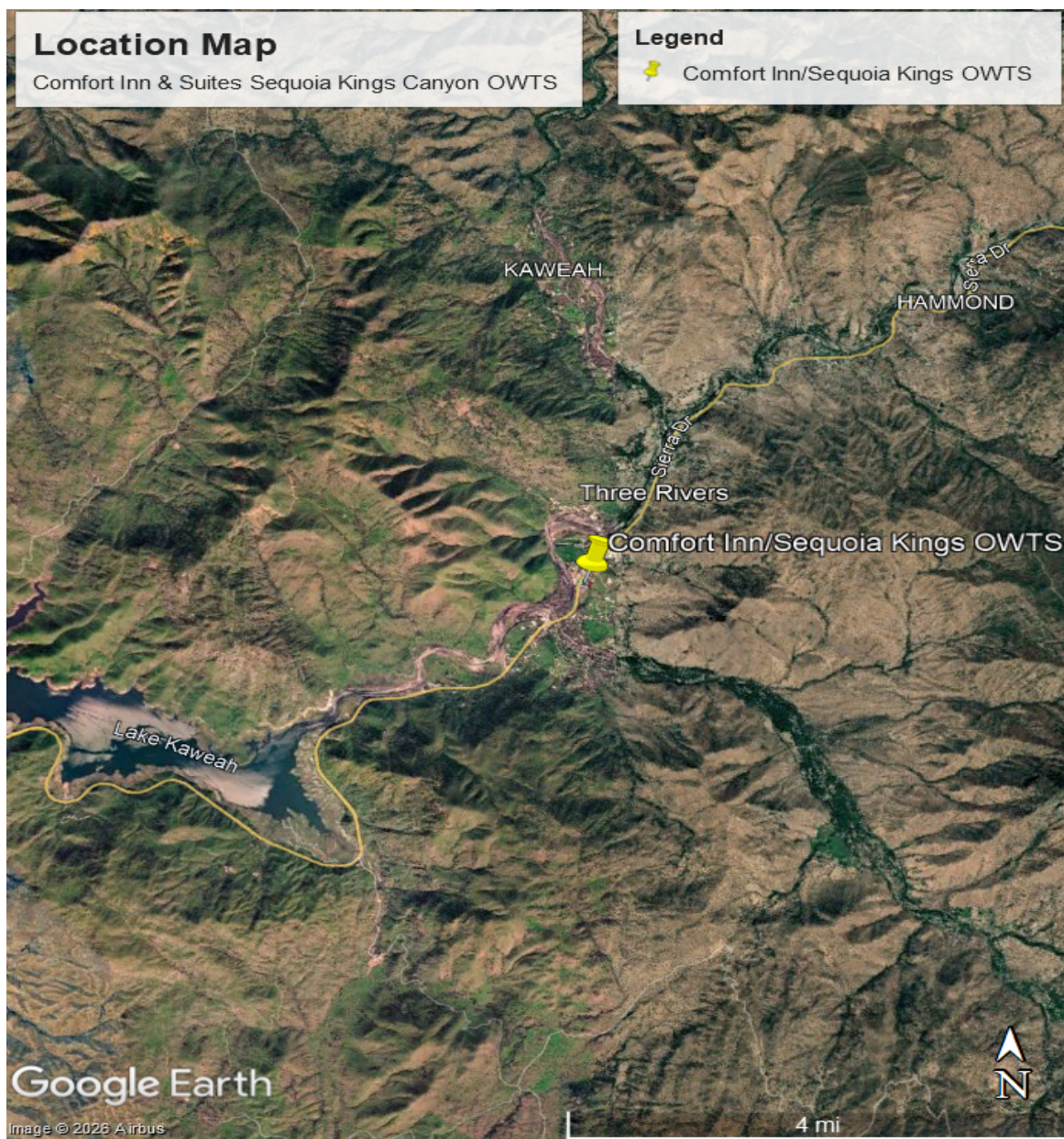
- Attachment A – Location Map
- Attachment B – Site Map
- Attachment C – Flow Schematic

Enclosures:

- Monitoring and Reporting Program 2014-0153-DWQ-R5314-01
- 2 October 2026 Regional Water Board Staff Memorandum
- State Water Resources Control Board Order WQ 2014-0153-DWQ (Discharger Only)

cc via email w/ enc:

- Omar Mostafa, Central Valley Water Board, Fresno
- Tulare County, Environmental Health, Tulare
- Debbie Mackey, Central Valley Clean Water Association, Grass Valley
- Charles Kang, 3511 Hotel LLC, Three Rivers
- David Annis, DCA Geological Consulting, Fresno
- James Cooper, DCA Geological Consulting



ATTACHMENT A – LOCATION MAP

NOTICE OF APPLICABILITY 2014-0153-DWQ-R5314-01

FOR

3511 HOTEL LLC

COMFORT INN & SUITES THREE RIVERS

WASTEWATER TREATMENT FACILITY

TULARE COUNTY



ATTACHMENT B – SITE MAP

NOTICE OF APPLICABILITY 2014-0153-DWQ-R5314-01

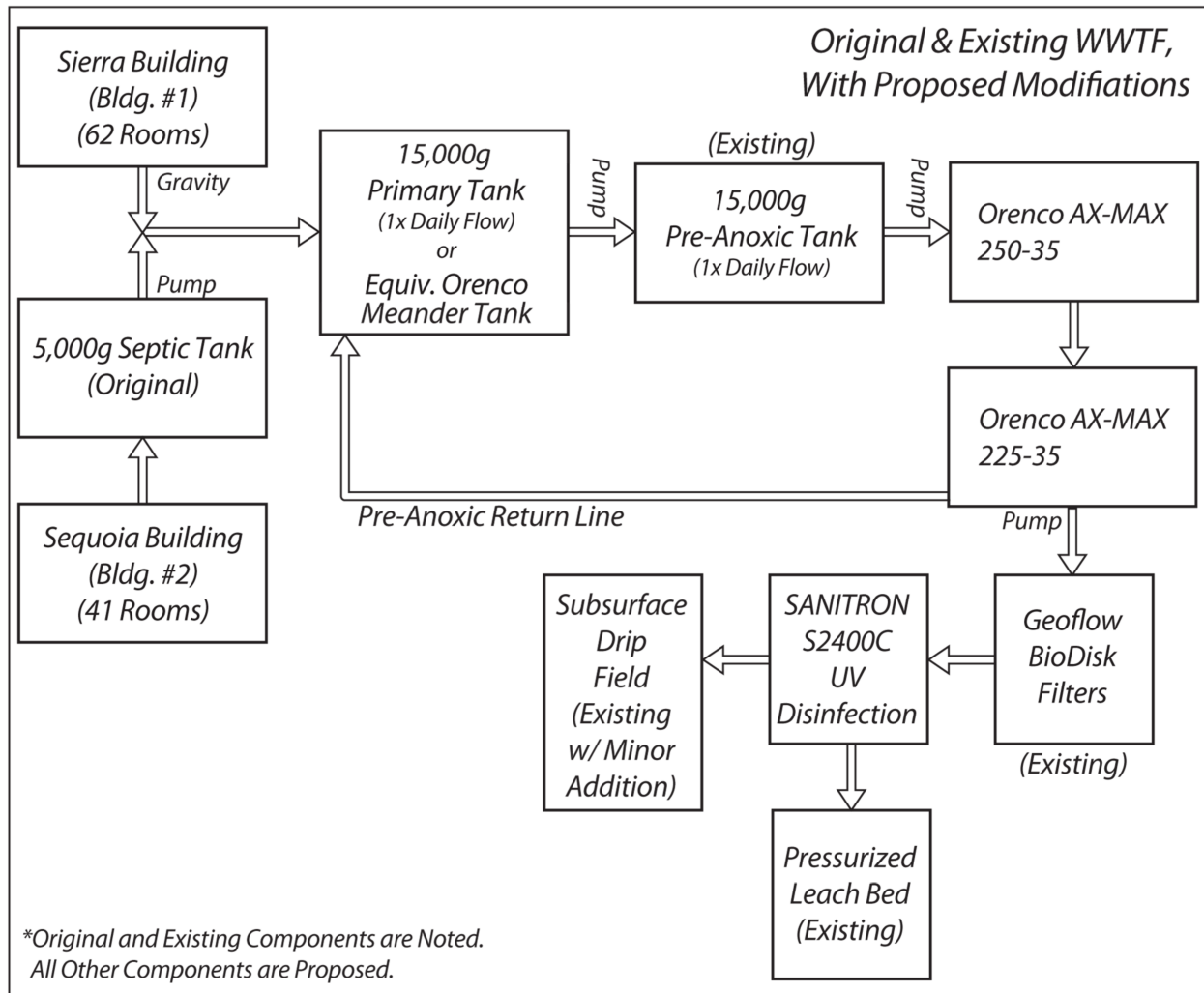
FOR

3511 HOTEL LLC

COMFORT INN & SUITES THREE RIVERS

WASTEWATER TREATMENT FACILITY

TULARE COUNTY



ATTACHMENT C – FLOW SCHEMATIC
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5314-01
FOR
3511 HOTEL LLC
COMFORT INN & SUITES THREE RIVERS
WASTEWATER TREATMENT FACILITY
TULARE COUNTY

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION
MONITORING AND REPORTING PROGRAM NO. 2014-0153-DWQ-R5314-01
FOR
3511 HOTEL LLC
COMFORT INN & SUITES THREE RIVERS
WASTEWATER TREATMENT SYSTEM
TULARE COUNTY**

This Monitoring and Reporting Program (MRP) describes requirements for monitoring a wastewater treatment system. This MRP is issued pursuant to Water Code section 13267, 3511 Hotel LLC (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.

Section 13267 of the California Water Code 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.”

Section 13268 of the California Water Code 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 and 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.”

The Discharger owns and operates Comfort Inn & Suites Three Rivers wastewater treatment system (Facility) that is subject to the Notice of Applicability (NOA) 20140-153-DWQ-R5314-01, which enrolls the Facility under State Water Resources Control Board Order WQ 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order). The reports required by this MRP 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 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.

SEPTIC TANK MONITORING

All septic tanks shall be inspected and/or pumped at least as frequently as described below in Table 1. Inspections of sludge and scum depth are not required if the tanks are pumped at least annually.

Table 1 - Septic Tank Monitoring Requirements

Parameter	Units	Measurement Type	Inspection/Reporting Frequency
Sludge depth and scum thickness in each compartment of each tank	Feet	Staff Gauge	Annually
Distance between bottom of scum layer and bottom of outlet device	Inches	Staff Gauge	Annually

Parameter	Units	Measurement Type	Inspection/Reporting Frequency
Distance between top of sludge layer and bottom of outlet device	Inches	Staff Gauge	Annually
Effluent filter condition (if equipped, clean as needed)	NA	NA	Annually

If a septic tank is pumped during the year, the pumping report shall be submitted with the annual report. All pumping reports shall be submitted with the next regularly scheduled monitoring report. At a minimum, the record shall include the date, nature of service, service company name, and service company license number.

EFFLUENT MONITORING

Effluent samples shall be taken from a location that represents the treated effluent from the media bed filtration system distributed to the leach bed and subsurface drip irrigation systems. At a minimum, effluent monitoring shall include the monitoring specified in Table 2.

Table 2 - Effluent Monitoring Requirements

Constituent	Units	Sample Type	Sample Frequency	Reporting Frequency
Flow Rate (see 1 below)	gpd	Metered	Continuous	Quarterly
EC	µmhos/cm	Grab	Monthly	Quarterly
TSS	mg/L	Grab	Monthly	Quarterly
BOD ₅	mg/L	Grab	Monthly	Quarterly
Total Nitrogen (as N)	mg/L	Grab	Monthly	Quarterly

1. Effluent flow rates for the leach bed and subsurface drip irrigation systems shall be monitored independent of each other and reported separately in the applicable monitoring report. Flow rates may be metered or estimated based on pump run times or other approved method. The method of measurement shall be reported in the required self-monitoring reports.

DISINFECTION SYSTEM MONITORING

Ultraviolet light (UV) disinfection system monitoring shall be collected immediately downstream of the UV system. At a minimum, UV disinfection system monitoring shall include the monitoring specified in Table 3.

Table 3 - UV Disinfection System Monitoring Requirements

Constituent	Units	Sample Type	Sample Frequency	Reporting Frequency
Total Coliform Organisms	MPN/100 mL	Grab	Monthly	Quarterly
Turbidity (see 2 below)	NTU	Meter	Continuous (see 1 below)	Quarterly
UV Transmittance	Percent (%)	Meter	Continuous (see 1 below)	Quarterly
UV Intensity	mW/cm2	Meter	Continuous (see 1 below)	Quarterly
UV Dose (see 3 below)	mW/cm2	Calculated	Continuous (see 1 below)	Quarterly

1. For continuous analyzers, the Discharger shall report documented routine meter maintenance activities including date, time of date, and duration, in which the analyzer(s) is not in operation.
2. The turbidity meter shall be stationed immediately after the filters, prior to the UV disinfection unit. Report daily average turbidity and maximum turbidity.
3. Report daily minimum, daily average, and weekly average UV dose.

SUBSURFACE DISPOSAL AREAS

In general, monitoring shall be sufficient to determine if wastewater is evenly applied, the disposal area is not saturated, burrowing animals and/or deep-rooted plants are not present, and odors are not present. Inspection of dosing pump controllers, automatic distribution valves, etc. is required to maintain optimum treatment in the disposal area (and any sand or media filter, if present). Monitoring of the leach bed and subsurface drip irrigation systems, at a minimum, include the monitoring specified in Table 4.

Table 3 - Subsurface Disposal Area Monitoring Requirements

Constituent	Inspection Frequency	Reporting Frequency
Pump Controllers, Automatic Valves, etc. (see 1 below)	Quarterly	Quarterly
Nuisance Odor Condition	Quarterly	Quarterly
Saturated Soil Conditions (see 2 below)	Quarterly	Quarterly
Plant Growth (see 3 below)	Quarterly	Quarterly
Vectors or Animals Burrowing (see 4 below)	Quarterly	Quarterly

1. All pump controllers and automatic distribution valves shall be inspected for proper operation as recommended by the manufacturer.
2. Inspect disposal areas for saturated conditions.
3. Shallow-rooted plants are generally desirable, deep-rooted plants, such as trees, shall be removed as necessary.
4. Evidence of animals burrowing shall be immediately investigated, and burrowing animal populations controlled as necessary.

SLUDGE/BIOSOLIDS 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

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 discernable. 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.

GeoTracker Electronic Reporting Requirements: All monitoring reports and monitoring results shall be submitted to GeoTracker in accordance with the timeframes specified below and in searchable Portable Document Format (PDF). The Discharger shall follow the applicable Electronic Submittal of Information (ESI) requirements under the Facility-specific **Global Identification Number WDR100045770** at the [GeoTracker](https://geotracker.waterboards.ca.gov/esi/login.asp) database (<https://geotracker.waterboards.ca.gov/esi/login.asp>).

In order to submit reports electronically, the Discharger shall create a secure GeoTracker Electronic Submittal of Information (ESI) account and log in credentials, claim their facility by requesting access in GeoTracker, and finally uploading PDF copies of the required reports via the ESI portal as outlined in the GeoTracker ESI Beginner's Guide for Responsible Parties (Beginner's Guide) linked below. The Discharger may complete the above tasks by accessing the 'Getting Started' section on the [GeoTracker ESI webpage](https://www.waterboards.ca.gov/ust/electronic_submittal/index.html) (https://www.waterboards.ca.gov/ust/electronic_submittal/index.html).

Additional GeoTracker support information can be found at the following:

- a. 'Guides/Resources' document link in the "Tools" on the Discharger's GeoTracker ESI account.
- b. Resources on the GeoTracker ESI website, such as the [Beginner's Guide](https://www.waterboards.ca.gov/ust/electronic_submittal/docs/geotracker_esi_rp_beginners_guide_revisedoct2019.pdf) (https://www.waterboards.ca.gov/ust/electronic_submittal/docs/geotracker_esi_rp_beginners_guide_revisedoct2019.pdf)
- c. General GeoTracker Help Desk contact information:
Phone: 1-866-480-1028, Email: geotracker@waterboards.ca.gov

A transmittal letter shall accompany each monitoring report. The letter shall include a discussion of all violations of this MRP during the reporting period and actions taken or planned for correcting each violation. If the Discharger has previously submitted a report describing corrective actions taken and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. The transmittal letter shall contain a statement by the Discharger or the Discharger's authorized agent certifying under penalty of perjury that the report is true, accurate and complete to the best of the signer's knowledge.

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, groundwater, etc.), and reported analytical result for each sample are readily discernible. The data shall be summarized in such a manner to clearly illustrate compliance with waste discharge requirements and spatial or temporal trends, as applicable. The results of any monitoring done more frequently than required at the locations specified in the Monitoring and Reporting Program shall be reported in the next scheduled monitoring report.

Laboratory analysis reports shall be included in the monitoring reports. All laboratory reports must also be retained for a minimum of three years. For a discharger conducting any of its own analyses, reports must also be signed and certified by the chief of the laboratory.

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.

All monitoring reports that involve planning, investigation, evaluation or design, or other work requiring interpretation and proper application of engineering or geologic sciences, shall be prepared by or under the direction of persons registered to practice in California pursuant to California Business and Professions Code sections 6735, 7835, and 7835.1.

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 the minimum, the quarterly reports shall include:

1. Results of all required monitoring.
2. A comparison of monitoring data to the requirements (including the flow limitations), disclosure of any violations of the NOA and/or General Order, and an explanation of any violation of those requirements. (Data shall be presented in tabular format).
3. 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 the capacity issues nuisances' 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.
3. 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.
4. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
5. 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 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:

Alexander
Mushegan

Digitally signed by
Alexander Mushegan
Date: 2026.10.02
08:55:54 -07'00'

For PATRICK PALUPA, Executive Officer

GLOSSARY

bgs	Below ground surface
BOD ₅	Five-day biochemical oxygen demand
DO	Dissolved oxygen
EC	Electrical conductivity at 25° C
TDS	Total dissolved solids
TKN	Total Kjeldahl nitrogen
TSS	Total suspended solids
Continuous	The specified parameter shall be measured by a meter continuously.
Daily	Every day except weekends or holidays.
Weekly	Once per week.
Monthly	Once per calendar month.
Quarterly	Once per calendar quarter.
Annually	Once per year.
mg/L	Milligrams per liter
µmhos/cm	Micromhos per centimeter
gpd	Gallons per day
mgd	Million gallons per day
MPN/100 mL	Most probable number [of organisms] per 100 milliliters
ND	Denotes not detected

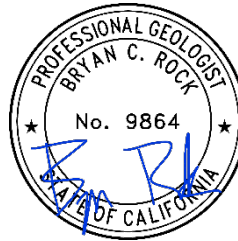
Central Valley Regional Water Quality Control Board

TO: Alexander Mushegan
Supervising Water Resource Control Engineer
RCE 84208

FROM: Bryan C. Rock
Senior Engineering Geologist
PG 9864

Virat Kang
Water Resource Control Engineer

DATE: 2 October 2026



APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ, GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; 3511 HOTEL LLC; COMFORT INN & SUITES THREE RIVERS WASTEWATER TREATMENT FACILITY; TULARE COUNTY

On 28 August 2019, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) issued Notice of Applicability (NOA) 2014-0153-DWQ-R5314 for the Comfort Inn & Suites Three Rivers wastewater treatment system (Facility). The 2019 NOA enrolled the Facility under State Water Resources Control Board (State Water Board) Water Quality Order 2014-0153-DWQ, General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems (General Order). The NOA was revised on 25 November 2019 and again on 19 October 2022 to correct the volume of the discharge authorized and reflect a change in ownership of the Facility, respectively. The 2022 revised NOA listed SUK Inc. and JUM LLC, collectively, as the owners of the Facility.

On 25 March 2026, SUK Inc. and JUM LLC submitted a report of waste discharge (RWD) requesting updated coverage under the General Order for treatment system modifications and increased wastewater flow for the Facility. The RWD included a technical report prepared by Mr. James Cooper, a California registered engineer (RCE 26918), and a Form 200. Additional Facility information was submitted on

30 April 2026, 9 June 2026, and 8 July 2026. On 3 August 2026, Central Valley Water Board Staff (Staff) were informed of a Facility ownership change. On 28 August 2026, Staff received an updated Form 200 and supporting documentation indicating that ownership of the Facility had been transferred to 3511 Hotel LLC (Discharger). The updated Form 200 was signed by Sue K Choi, Chief Executive Officer for the Discharger.

The Facility is designed to have domestic wastewater flows less than 100,000 gallons per day (gpd). Therefore, this memorandum provides a summary of the applicability of the Facility to be covered under the General Order.

DESCRIPTION OF DISCHARGE

The Facility is owned and operated by the Discharger and accepts domestic wastewater from the Comfort Inn & Suites hotel (Hotel), which provides year-round lodging for travelers and tourists near the Three Rivers community. Domestic wastewater from the Hotel consists of domestic wastewater generated from toilets, showers, and washing machines. The monthly average daily wastewater flow from the Hotel during 2025 was 9,771 gpd or approximately 147 gallons per occupied room. The wastewater from the Hotel is directed to the Facility for treatment via gravity flow main sewer lines connected directly to the Hotel buildings. The wastewater is currently treated through a series of septic tanks before it is pumped to the leach field or subsurface drip irrigation area for disposal. The leach field covers approximately 3,500 square feet and the subsurface drip irrigation area covers approximately 20,000 square feet. The system was intended to divert approximately 50 percent of the effluent to the leach field and the remaining 50 percent to the sub surface drip irrigation system. However, there have been multiple reports that the wastewater was surfacing from the Facility's disposal areas, producing objectionable odors.

PROPOSED CHANGES

Proposed modifications to the Facility described in the 2026 RWD include the addition of a new 21-foot Orenco T-MAX 7,500-gallon meander tank, a new media bed filtration treatment plant which includes an ultraviolet (UV) disinfection, and an increased subsurface drip irrigation area. The leach field and subsurface irrigation area will be automated for zone dosing providing rest periods between cycles.

Once the new system is completed, the wastewater from Building 2 consisting of 42 rooms will flow to the original 5,000-gallon septic tank. Fluids from this original septic tank and the wastewater from Building 1 will flow into a new 21-foot Orenco T-MAX 7,500-gallon meander tank. From the primary tank, the wastewater will be pumped into an existing underground 15,000-gallon Pre-Anoxic Tank. Following the Pre-Anoxic Tank, a new 11,750 gpd media bed filtration package treatment system equipped with ultraviolet (UV) disinfection (Orenco AX-MAX 250-35 and AX-MAX 225-35). The AX-MAX 225-35 will have a pre-anoxic return line connecting back to the primary tank to facilitate denitrification in the system. The treated effluent will then be diverted to the

subsurface drip irrigation area or to the pressurized leach bed. The 2026 RWD also proposes to expand the subsurface drip irrigation area by approximately 5,000 square feet to a total of 25,000 square feet for a total design capacity of 6,250 gpd. The combined design capacity of both subsurface disposal areas will be 11,750 gpd.

Proposed future flows of the Facility on a per room basis are expected to decrease due to conservation practices and the addition of water saving fixtures. Hotel laundry will only be allowed on days when staff can verify that flows will not exceed the proposed flow limit. Future effluent flows are expected to be 114 gpd per room. The proposed disposal area's design capacity is 11,750 gpd and the anticipated effluent flow, considering 100% occupancy, is 11,742 gpd. Monthly occupancy and effluent flow averages observed during 2025, and anticipated future flows based on 2025 occupancy and proposed water saving measures are summarized in Table 1 below.

Table 1: Historic and Anticipated Flows

Month	2025 Monthly Occupancy %	2025 Existing Total Flow (gpd)	Anticipated Total Flows (gpd)
January	37	5,781	4,291
February	47	7,792	5,549
March	52	9,007	6,090
April	86	11,107	10,040
May	91	11,906	10,665
June	95	11,993	11,100
July	92	12,655	10,848
August	85	13,751	9,981
September	76	9,600	8,957
October	62	8,123	7,233
November	51	9,190	5,932
December	33	6,526	3,909
Average	--	9,771	7,883

EFFLUENT CHARACTERISTICS

MRP 2014-0153-DWQ-R5314 required the Discharger to conduct quarterly effluent monitoring. Table 2 below summarizes the Facility's 2025 reported effluent quality.

Table 4 - 2025 Effluent Characteristics

Constituent	Units	2025 Maximum	2025 Average [Range]	Previous NOA Limit
Biochemical Oxygen Demand (BOD ₅)	mg/L	6.7	5.15 [2.9-6.7]	30/45

Constituent	Units	2025 Maximum	2025 Average [Range]	Previous NOA Limit
Electrical Conductivity (EC)	µmhos/cm	930	860 [760-930]	--
Total Kjeldahl Nitrogen (TKN)	mg/L	43	17 [3.4-43]	--
Total Nitrogen	mg/L	78	42 [22-78]	--
Total Suspended Solids (TSS)	mg/L	ND	ND	30/45

Using published sources for influent and effluent quality (Crites and Tchobanoglous, 1998; Hantzsche and Finnemore, 1992; etc.) the RWD provided estimates of the influent and effluent quality following the proposed treatment modifications, as shown in Table 3 below.

Table 5 - Anticipated Influent and Effluent Quality

Constituent	Units	Influent	Effluent	NOA Limit
BOD	gpd	250-300	<30	30/45
TSS	mg/L	100-350	<30	30/45
Total Nitrogen	mg/L	60-100	15-26	--
Total Coliform Organisms	MPN/100 ml	---	<2.2	--
EC	µmhos/cm	1,265-2,040	1,265-2,040	--
Total Dissolved Solids (TDS)	mg/L	530-1,130	530-1,130	--

POTENTIAL THREAT TO WATER QUALITY

The RWD did not provide a summary/review of source water quality. Staff's review of State Water Resources Control Board's Groundwater Ambient Monitoring Assessment (GAMA) Program database indicates that EC for groundwater locally varies from around 190 to 850 µmhos/cm. According to the 2026 RWD, groundwater in the area is approximately 10 feet below ground surface (bgs). A domestic well is depicted on the property in a site drawing included with the 2026 RWD and appears to be at least 200 feet away from the Facility's subsurface irrigation and leach bed systems; however, no

water quality data from the well is available. The Facility has been issued notices of violation for surfacing effluent at the disposal areas. The improvements outlined in the 2026 RWD are intended to correct the identified violations by ensuring the Discharger can manage the proposed effluent volumes and effectively treat and disinfect wastewater, thereby significantly reducing potential impacts to underlying groundwater quality.

On 22 January 2026, two test holes were excavated at the proposed dispersal area. The first test hole was excavated to a maximum explored depth of 10 feet bgs and was described as having a sandy loam soil and cemented peds between 4 and 6 feet. The second test hole was excavated to a maximum explored depth of about 2 feet bgs. Further excavation was not conducted as the test hole encountered the existing leach bed and fully saturated conditions at the maximum explored depth.

The average percolation rate observed during the January 2026 exploration was 50 minutes per inch (MPI). According to Table 5 of the General Order, the minimum depth to groundwater from the base of the subsurface disposal area to first encountered groundwater in areas where percolation is 50 MPI should be at least 5 feet bgs. The subsurface drip irrigation lines will be placed approximately one foot bgs, leaving about nine feet of soil column between the drip lines and shallow underlying groundwater. The base of the leach bed trench is approximately six feet bgs, leaving only four feet of soil column between it and shallow groundwater; however, the Discharger's proposed treatment system upgrades provides for UV disinfection that should mitigate potential impacts to shallow groundwater from pathogens.

A previous soil exploration was conducted on 27 April 2017 near the disposal area. The exploration described the soils as coarse sand overlain and underlain by sandy loam. The 2017 exploration encountered shallow groundwater at approximately 10 to 11 feet below the top of the mound.

Table 4: Effluent Limitations for Wastewater Treatment Systems of the General Order specifies different technology performance limitations based on the treatment provided. The BOD and TSS limits for activated sludge, MBR, or similar treatment systems are applicable for the Facility's discharge from the treatment system to the subsurface disposal areas (monthly average of 30 mg/L and 7-day average of 45 mg/L). Monitoring is necessary to confirm the treatment system provides the level of treatment proposed in the RWD and to characterize the Facility's discharge.

Finding 6 of the General Order states dischargers enrolled under the General Order must comply with the applicable Basin Plan requirements, and that between the requirements of the General Order and the Basin Plan, the more stringent requirements prevail. The Tulare Lake Basin Plan, Section 3.2.1 contains a water quality objective for

bacteria requiring groundwater designated as municipal and domestic supply (MUN) have total coliform of less than 2.2 MPN/100 mL over any 7-day period. Because of the MUN designation and since the Discharger proposes to provide disinfection via UV light disinfection, it is appropriate for the NOA to specify a total coliform limit of 2.2 MPN/100 mL over any 7-day period as specified in the Basin Plan.

Based on the updated design of the Facility, the daily design flow rate from the treatment system will be 11,750 gpd. In accordance with the requirements of the General Order, discharges with flow rates less than 20,000 gpd are not required to meet a nitrogen effluent limitation. The Facility's wastewater treatment system meets applicable setbacks described in the General Order with domestic wells being over 150 feet away from the septic tanks and subsurface dispersal lines as well as the wastewater treatment system components being further than five feet away from the property lines.

The improvements outlined in the 2026 RWD, particularly UV disinfection, indicate the Discharger will be able to manage the proposed effluent volumes and treat and disinfect wastewater to significantly reduce potential impacts to underlying groundwater water quality.

MONITORING REQUIREMENTS

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

- Septic Tank Monitoring
- Activated Sludge Monitoring (Treatment System Monitoring)
- Subsurface Disposal Area Monitoring
- Solids Disposal Monitoring

SALT AND NITRATE CONTROL PROGRAMS

The Central Valley Water Board adopted Basin Plan amendments incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting (Resolution R5-2018-0034). The Basin Plan amendments became effective on 17 January 2020 and were revised by the Central Valley Water Board in 2020 with [Resolution R5-2020-0057](https://www.waterboards.ca.gov/rwqcb5/board_decisions/adopted_orders/resolutions/r5-2020-0057_res.pdf) (https://www.waterboards.ca.gov/rwqcb5/board_decisions/adopted_orders/resolutions/r5-2020-0057_res.pdf). The revisions to the Basin Plan amendments became effective on 10 November 2021.

For the Salt Control Program, the Discharger submitted a Notice of Intent and elected to participate in the Prioritization and Optimization Study. The Discharger has been issued **CV-SALTS ID: 3015** and is compliant with the Salt Control Program as of the date of this NOA.

For the Nitrate Control Program, the Facility and disposal area are not within a prioritized basin on the valley floor. Implementation within unprioritized basins/sub-basins that are outside the valley floor will occur at the direction of the Executive Officer. A Notice to Comply with the Nitrate Control Program may be issued at a later date if the Executive Officer determines it is necessary to protect water quality. Under these circumstances, it may be necessary to modify this NOA to incorporate applicable Nitrate Control Program findings and requirements.

[More information on the Salt and Nitrate Control Program](https://www.cvsalinity.org/public-info) may be found on the internet (<https://www.cvsalinity.org/public-info>).