CALIFORNIA REGIONAL WATER QUALITY CONTROL REGIONAL BOARD CENTRAL VALLEY REGION

ORDER NO. R5-2009-0023

WASTE DISCHARGE REQUIREMENTS

FOR

LAKE COUNTY SANITATION DISTRICT KELSEYVILLE COUNTY WATER WORKS DISTRICT NO. 3 WASTEWATER TREATMENT FACILITY LAKE COUNTY

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

- On 4 December 2006, Lake County Sanitation District submitted a Report of Waste Discharge (RWD) for upgrades to Kelseyville County Water Works District No. 3's existing wastewater treatment facility (WWTF), which serves the town of Kelseyville. Additional information was received from the Discharger on 16 May 2008, and various dates in October and November 2008.
- Kelseyville County Water Works District No. 3 owns the Kelseyville WWTF. The Board of Directors is the governing body of Kelseyville Water Works District No. 3. Lake County Sanitation District (hereafter "Discharger") operates the WWTF on behalf of Kelseyville County Water Works District No. 3 and is responsible for compliance with these waste discharge requirements (WDRs).
- 3. The Kelseyville WWTF includes a sanitary sewer system, wastewater treatment plant, and remote percolation/evaporation (P/E) ponds. The treatment plant is at 4395 Gaddy Lane in Kelseyville in (Section 11, T13N, R9W, MDB&M). The P/E ponds are on the western slope of Mt. Konocti in Section 13, T13N, R9W, MDB&M. The treatment plant and P/E ponds site occupy Assessor's Parcel Numbers (APNs) 008-039-06, 008-054-11, 008-054-12, 008-054-13, and 008-054-18. The WWTF location is shown on Attachment A, which is attached hereto and made part of this Order by reference.
- 4. WDRs Order No. 99-094, adopted by the Regional Water Board on 11 June 1999, prescribes requirements for the WWTF. Order No. 99-094 allows an average dry weather flow of up to 0.26 million gallons per day (mgd) and envisions that up to 5 million gallons (MG) per year of treated effluent will be recycled at a 5-acre vineyard owned and operated by Michael Fowler. The vineyard is adjacent to the P/E pond site in Section 19, T13N, R8W, MDB&M (APN 009-003-09). The recycled water discharge is regulated under separate WDRs (Order No. 99-070).
- The Discharger proposes to upgrade the WWTF to improve the treatment system and increase effluent storage/disposal capacity to comply with Cease and Desist Order (CDO) No. R5-2005-0007. Therefore, Order No. 99-094 will be rescinded and replaced with this Order.

Existing Facility and Discharge

6. The existing WWTF serves approximately 3,800 residents (1,297 single family dwelling units) of Kelseyville County Water Works District No. 3, Corinthian Bay, and Clear Lake State Park. The following table summarizes recent influent flow rates.

Calendar Year	Total Annual Influent Flow (MG)	Average Annual Flow (mgd)	Average Dry Weather Flow ¹ (mgd)	Peak Month Flow ² (mgd)
2004	95	0.26	0.20	0.45
2005	99	0.27	0.21	0.35
2006	90	0.25	0.18	0.41
2007	76	0.21	0.20	0.29
2008	NA	NA	NA	0.32

NA Data not yet available.

¹ Average daily flow for the months of August, September, and October, which consistently exhibit the lowest flows.

² Typically occurs in February or March.

Comparison of the daily dry weather flows and the peak month daily flow indicates that inflow and infiltration (I/I) contributes significantly to influent flows during the rainy season.

- 7. The sewer system consists of approximately 15 miles of gravity pipe and 6 miles of force main. Seven pump stations (PS-1, PS-2, PS-3, PS-4, PS-6, PS-7, and the State Park pump station) convey raw sewage from the gravity sewers through three separate force mains (the Kelseyville, Corinthian, and State Park force mains) to an 840-gallon concrete collection box on the southeast side of the treatment plant. The flow from each force main is individually metered to monitor the total influent flow to the treatment plant. Each of the District's pump stations has an alarm system with an autodialer to alert operations staff of power failures and high liquid levels. Portable generators are available to provide backup power to the pumps when needed.
- 8. The collection box has sluice gates to divide the influent flow between three aerated stabilization ponds if desired. However, the three treatment ponds are usually operated in series with Pond 1 receiving the raw sewage. Attachment B, which is attached hereto and made part of this Order by reference, is a site plan for the treatment plant.
- Pond 1 is operated as an aerated facultative pond, and Ponds 2 and 3 are operated as aerated stabilization ponds. A fourth pond (Pond 4) functions as a clear well for the effluent pumping station. Design data for the existing treatment plant ponds are summarized below.

Pond Name	Surface Area (acres)	Volume ¹ (MG)	Depth ² (feet)
1	2.75	4.3	3.5
2	3.72	5.9	3.5
3	3.85	5.8	3.5
4	0.91	1.1	3.5

¹ Total volume at two feet freeboard.

² Design operating depth with two feet of freeboard.

- 10. Sodium hypochlorite solution is injected into the treated effluent at the filter screen guide channel just upstream of the effluent pump vault. Contact is achieved within the 13,000-foot force main as the effluent is pumped to the P/E pond site for disposal.
- 11. Per the California Department of Public Health (CDPH), disinfection is not required to comply with the Title 22 water recycling requirements set forth in WDRs Order No. 99-070 for the crops being irrigated with reclaimed water, but the Discharger has been disinfecting the treated effluent for several years. According to the 1988 WWTF Operation and Maintenance Manual, the disinfection system is designed to reduce total coliform organisms to 23 MPN/100 mL as a 30-day median and 500 MPN/100 mL as a daily maximum if the contact time is 25 minutes or more at the design influent flow rate of 0.26 mgd. The Operation and Maintenance Manual recommends that the residual chlorine concentration be between 0.2 and 1.0 mg/L after 15 to 30 minutes of contact time, and that the chlorine dose rate should be adjusted based on monitoring data. The Discharger does not monitor the effluent for total coliform organisms, so the level of disinfection currently achieved is not known.
- 12. The seven P/E ponds, which are approximately 525 feet above treatment plant, are shown on Attachment C, which is attached hereto and made part of this Order by reference. Design data for the P/E ponds are summarized below.

Pond Name	Surface Area ¹ (acres)	Volume ¹ (MG)	Depth ¹ (feet)
H-1	1.10	1.28	3.9
H-2	1.53	1.81	3.9
H-3	1.39	1.48	3.5
H-4	1.23	1.31	3.5
G-1	1.07	1.13	3.5
G-2	1.29	1.36	3.5
G-3	1.25	1.32	3.5

At two feet of freeboard.

- 13. The effluent pump station has two pumps with a design capacity of 290 gallons per minute (gpm) each, or 580 gpm (0.835 mgd) total. The 13,000-foot effluent pipeline from the treatment plant to the remote P/E pond site is 6-inch diameter ductile iron and asbestos cement. Due to deterioration of the effluent pumps and pipeline, the current capacity of the effluent pumping system is approximately 0.47 mgd, which is less than the current peak day flow of 0.78 mgd and only slightly greater than the current peak month flow of 0.45 mgd.
- 14. The effluent pump station has automated controls and an alarm system to warn operators of power failure. An emergency standby generator is available in case of power failure.
- 15. The treatment plant has duplex units or spare parts for critical mechanical components, and a control system to monitor equipment status and performance. The control system includes an autodialer to alert plant operators of mechanical problems.
- 16. The Discharger regularly monitors treated effluent for pH, electrical conductivity (EC), biochemical oxygen demand (BOD), and settleable solids (SS). Effluent monitoring data for these parameters for January 2006 through July 2008 are summarized below.

		Treated Effluent Results			
Parameter	Units	Minimum	Maximum	Mean	
рН	std.	6.0	10.2	8.3	
EC	umhos/cm	325	905	606	
BOD	mg/L	10	57	28	
Settleable solids	ml/L	<0.1	0.1	<0.1	

17. In October and November of 2007, three samples of undisinfected effluent were submitted for additional analyses to support the Report of Waste Discharge. Analytical results for those samples are summarized below.

		Treated Effluent Results		ts	
Parameter	Units	Minimum	Maximum	_	Mean
Total coliform organisms ¹	MPN/100 mL	7,000	250,000		93,000
Fecal coliform organisms ¹	MPN/100 mL	1,600	14,000		6,400
Total nitrogen	mg/L	14	20		16.3
Total Kjeldahl nitrogen	mg/L	13	18		14.7
Nitrate+nitrite nitrogen	mg/L	1.5	2.4		2.0
Boron	mg/L		0.5	2	
Calcium	mg/L		29	2	
Iron	mg/L		<0.1	2	
Magnesium	mg/L		39	2	

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		Treated Effluent Results			ts
Parameter	Units	Minimum	Maximum		Mean
Manganese	mg/L		0.071	2	
Potassium	mg/L		19	2	
Sodium	mg/L		73	2	
Chloride	mg/L		64	2	
Total Alkalinity ³	mg/L		240	2	
Hardness as CaCO ₃	mg/L		234	2	

- -- Not analyzed.
- ¹ Samples were obtained at effluent pumping station before sodium hypochlorite was injected.
- ² Results are for a single sample obtained on 17 October 2007.
- ³ Bicarbonate alkalinity result was 230 mg/L or 96% of total alkalinity.
- 18. Order No. 99-094 prescribes a minimum pond freeboard of one foot. Beginning in 2001, the WWTF began to have capacity problems as a result of excessive inflow and infiltration (I/I). This led to numerous freeboard violations between February 2001 and April 2004. The Discharger prevented overtopping by placing sandbags around some of the treatment plant and P/E ponds to effectively raise the berm height.
- 19. In January 2005, the Regional Water Board adopted CDO No. R5-2005-0007 to require the Discharger to address the capacity issue and other violations of the WDRs¹. The CDO requires that the Discharger do the following:
 - a. Implement a spill contingency plan until long-term improvements have been completed;
 - b. Submit an I/I Assessment Report;
 - c. Submit a Wastewater Master Plan detailing proposed improvements to address the capacity problem and other violations;
 - d. Submit a Sewer System Operation, Maintenance, Overflow Prevention and Response Plan;
 - e. Submit a Revenue Plan and schedule for acquiring funding for the required improvements;
 - f. Submit a Report of Waste Discharge to apply for revised WDRs; and
 - g. Install groundwater monitoring wells.

Some of the required reports were submitted late and the original RWD was incomplete, but the Discharger has otherwise complied with the CDO.

¹ The other violations include low dissolved oxygen concentrations in the ponds, high pH, a 270-gallon sanitary sewer overflow, and failure to monitor groundwater.

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- 20. I/I is a significant problem that creates peak wet weather flows that greatly exceed both the treatment capacity and the capacity of the lift station/pipeline that conveys treated effluent to the P/E pond system. The Discharger has undertaken an I/I reduction program. The effectiveness of I/I reduction measures completed to date is not known because the last two winters have been dryer than normal. Freeboard has not been a problem at the treatment plant during the last two relatively dry winters, but both treatment and P/E pond levels were critically high (less than six inches of freeboard) during the wet winter of 2005/2006. The Discharger plans to continue its I/I reduction efforts and increase pond management activities.
- 21. As noted above, the Discharger has determined that the storage and disposal capacity deficit is partly due to deterioration of the effluent lift station pumps and the effluent pipeline. The current actual pumping capacity of the system is estimated to be 0.47mgd, as opposed to the 0.835 mgd design capacity.

Planned Changes in Discharge

- 22. The Discharger plans to upgrade the WWTF to comply with the CDO, and has secured approval for \$3.5 million in loans and grants from the State Water Resources Control Board for this purpose.
- 23. The improvements project currently planned (known as Phase I) will consist of increasing the effluent lift station capacity to 0.79 mgd; replacing 3,000 feet of effluent pipeline; reconfiguring the treatment ponds; and improving the treatment system to provide full secondary treatment within the footprint of the existing plant. A conceptual site plan for the upgraded treatment plant is shown on Attachment D, which is attached hereto and made part of this Order by reference.
- 24. Part of Treatment Pond 1 will be converted to an aerated lagoon system with both partially and fully mixed cells separated by baffle curtains. The fully mixed cell will have four 7.5-hp aerators, and the three partially mixed cells will each have one 2-hp aerator. The new treatment lagoon will be lined with 60-mil high density polyethylene (HDPE). The remainder of Pond 1, and Ponds 2 and 3 will serve as effluent storage ponds. Pond 4 will continue to be used as a clear well for the effluent pump station.
- 25. According to the RWD, Phase I will provide a firm treatment, storage and disposal capacity of 0.30 mgd as an average annual flow, and should accommodate projected growth through 2015, assuming a one percent population growth rate.
- 26. To accommodate projected flows for 2016 through 2025, the Wastewater Facilities Plan envisions that a second phase (Phase II) will consist of a new headworks system designed to accommodate 0.90 mgd; increasing the effluent lift station capacity again to 0.90 mgd; replacing another 6,400 feet of effluent pipeline; improving the chlorine disinfection system to increase contact time; and increasing the P/E pond system disposal capacity. The scope of the Phase II improvements is not fully defined, so this Order will have to be revised prior to any further expansion.

27. The RWD included a water balance for the both the current and Phase I design flow scenarios to demonstrate adequate treatment, storage and disposal capacity for current demand and anticipated development through approximately 2015. The water balance was prepared based on reasonable estimates of influent flows, I/I, precipitation, and evaporation. The water balance was used to model storage and disposal capacity during the 100-year, 365-day precipitation event with at least two feet of freeboard in every pond. The model indicates that the upgraded WWTF will provide the following capacities:

Condition	Current Capacity	Phase I Capacity
Average daily flow	0.21 mgd	0.31 mgd
Average daily dry weather flow	0.12 mgd	0.22 mgd
Peak month daily flow	0.39 mgd	0.48 mgd

The model shows that the P/E pond percolation rates are critical to the WWTF's effluent disposal capacity. The Discharger has recently completed percolation testing of five of the seven P/E ponds. Based on those tests, the percolation rate was highly variable between the P/E ponds and the average percolation rate was 0.60 inches per day. The RWD states that the Discharger currently scarifies each P/E pond every three to four years on a rotational basis. This schedule may not be adequate to maintain percolation rates high enough to support the proposed Phase I flows. However, the Phase I treatment system improvements may result in reduced organic loading to the P/E ponds, which may reduce the rate of clogging. Additionally, the Discharger states that it may be possible to increase the frequency of scarification to once every two years on average. Because of the uncertainty regarding sustainable P/E percolation rates, it is appropriate to require that the discharger submit and implement a plan to increase the frequency of scarification and re-evaluate percolation rates periodically, and continue its I/I reduction efforts. Because the current WWTF storage/disposal capacity is less that the current flows cited in Finding No. 6, it is also appropriate to limit influent flows rates to the maximum values tabulated in Finding No. 6 until the Phase I project is complete.

28. A previous order, WDRs Order No. 90-149, allowed the Discharger to land apply treated effluent to a 10-acre walnut orchard adjacent to the south side of the P/E ponds (Attachment C). The Discharger stopped using that area for effluent disposal and it was not included in the WDRs Order No. 99-094. The Discharger may wish to begin discharging to the orchard again, but is not prepared to provide sufficient details of the proposed discharge at this time. This Order may be reopened to prescribe requirements for discharges to the orchard if the Discharger submits an amended Report of Waste Discharge that describes the orchard discharge operation and provides a revised water balance capacity analysis.

Wastewater Collection System

- 29. The sanitary sewer system collects wastewater and consists of sewer pipes, manholes, and/or other conveyance system elements that direct raw sewage to the treatment facility. A "sanitary sewer overflow" is defined as a discharge to ground or surface water from the sanitary sewer system at any point upstream of the treatment facility. Temporary storage and conveyance facilities (such as wet wells, regulated impoundments, tanks, etc.) may be part of a sanitary sewer system and discharges to these facilities are not considered sanitary sewer overflows, provided that the waste is fully contained within these temporary storage/conveyance facilities. Sanitary sewer overflow is also defined in State Water Resources Control Board (State Water Board) Order No. 2006-0003-DWQ, *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems*.
- 30. Sanitary sewer overflows consist of varying mixtures of domestic and commercial wastewater, depending on land uses in the sewage collection system. The chief causes of sanitary sewer overflows include grease blockages, root blockages, debris blockages, sewer line flood damage, manhole structure failures, vandalism, pump station mechanical failures, power outages, storm or groundwater inflow/infiltration, lack of capacity, and/or contractor caused blockages.
- 31. Sanitary sewer overflows often contain high levels of suspended solids, pathogenic organisms, toxic pollutants, nutrients, oxygen demanding organic compounds, oil and grease, and other pollutants. Sanitary sewer overflows can cause temporary exceedance of applicable water quality objectives, pose a threat to public health, adversely affect aquatic life, and impair the public recreational use and aesthetic enjoyment of surface waters in the area.
- 32. The Discharger is expected to take all necessary steps to adequately maintain, operate, and prevent discharges from its sanitary sewer collection system and comply with State Water Board Order No. 2006-0003-DWQ.

Site-Specific Conditions

33. Based on the 2007 Consumer Confidence Report prepared pursuant to Section 116470 of the Health and Safety Code, the chemical character of the municipal water supply, which is obtained from four wells screened within the Kelsey Creek aquifer, is summarized below.

		Analytical Results		
Parameter	Units	Water Supply	Treated Effluent	
Total dissolved solids	mg/L	170		
Electrical conductivity	umhos/cm	300	606 ¹	
Total hardness	mg/L	156		
Boron	ug/L	101.5	500 ²	

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		Analytical Results		
Parameter	Units	Water Supply	Treated Effluent	
Chloride	mg/L	4.5	64 ²	
Sodium	mg/L	6.2	73 ²	
Nitrate	mg/L		2.0 ¹	
Sulfate	mg/L	3.9		

-- Not analyzed.

¹ Mean of results from Finding Nos. 16 and 17.

² Based on results from a single sample.

Based on these data, the community water supply is moderately hard, but exhibits low salinity. The prevalence of self-regenerating water softeners, which can contribute excess salinity to the WWTF influent, is not known. Although the increase in chloride and sodium is large, the incremental increase in overall salinity (measured as electrical conductivity) appears to be moderate compared to other municipalities in the Central Valley Region.

- 34. The wastewater treatment plant is at an elevation of approximately 1,380 feet above mean sea level (MSL), and the area around the plant is relatively flat with drainage to the north via Cole Creek. The P/E pond site is on the western slope of Mt. Konocti at an approximate elevation of 1,880 feet MSL and also drains to Cole Creek.
- 35. The wastewater treatment plant is within the 100-year floodplain of Cole Creek. The 2005 revised Firm Insurance Rate Map for the area indicates that flood depths at the plant may be up to two feet during the 100-year event. Although the wastewater treatment ponds are protected by berms, the RWD states that they may not be high enough in some areas to provide two feet of external freeboard to protect against inundation or washout during flooding. The pond berms will be evaluated and raised as need during the Phase I improvements project to provide full 100-year flood protection.
- 36. Surrounding land uses are primarily agricultural. According to the County Agricultural Commissioner's office, approximately 50 percent of the agricultural land in the Kelseyville area is planted to vineyards, 30 percent is planted to pears, and four percent is planted to walnuts.
- 37. Annual precipitation in the vicinity averages approximately 30 inches. The 100-year total annual precipitation is approximately 54 inches. The reference evapotranspiration rate is approximately 49 inches per year.

Groundwater Considerations

38. According to published reports, there are twelve groundwater basins in Lake County. They are composed primarily of shallow alluvial deposits and deposits of the Clear Lake Volcanics over the fractured basement rock of the Franciscan Formation². Kelseyville is within the Big Valley Basin, which contains 960 known active and abandoned wells. Approximately 472 wells are classified as either domestic or municipal, and 297 are classified as irrigation wells. Most of the wells are 25 to 150 feet deep.

- 39. Mount Konocti, approximately 3.5 miles east-southeast of the wastewater treatment plant, is a composite volcano with alternating layers of pyroclastic and lava rock. The P/E pond site is on the western flank of Mt. Konocti. According to The Big Valley Groundwater Management Plan³, much of the precipitation that infiltrates into the surface of the mountain escapes through springs around Soda Bay on the east side of the mountain. The spring water is characterized by high boron levels associated with geothermal water within the volcano. Underflow of groundwater from Mt. Konocti to the aquifers of the Big Valley Basin probably also occurs.
- 40. The primary sources of groundwater recharge in the Big Valley Basin are infiltration from Kelsey Creek and underflow from the Adobe Creek-Manning Creek Subbasin southwest of Kelseyville. Recharge from Mt. Konocti and the Central Upland System west of Kelseyville are believed to be smaller recharge sources.⁴
- 41. According to the Lake County General Plan Update Final Environmental Impact Report, Groundwater in the Big Valley Basin has lower concentrations of sodium, chloride, and sulfate than the other Lake County Basins. Geothermal influences can cause relatively high levels of iron and boron when groundwater levels are low, typically in the late fall. Boron is reportedly present at moderate levels, and iron, manganese, and/or hardness are problematic in some parts of the basin.
- 42. There is one dry monitoring well at the P/E pond site. Three groundwater monitoring wells were installed at the wastewater treatment plant in July 2008. Their locations are shown on Attachment B. Soils encountered during drilling were typically four feet of sandy silt underlain by ten feet of silty sand and silty gravelly sand to a depth of thirty feet below ground surface (bgs). The wells were installed to a total depth of 30 feet bgs with 15 feet of screen from 15 to 30 feet bgs. The depth to groundwater was not measured at the time of well construction, but was reportedly shallow. Water from monitoring well MW-3 exhibited significantly higher temperature than the other wells, possibly indicating direct influence from percolating wastewater and/or geothermal influence at that location.
- 43. Following well development, the three monitoring wells were sampled on 21 October 2008. Static groundwater levels prior to sampling ranged from 4.7 to 11.1 feet bgs, with an eastnortheast gradient of approximately 0.014 feet per foot. Based on the October 2008 data, MW-1 is upgradient of the plant and MW-3 is downgradient. MW-2 appears to be cross

² Lake County Water Inventory and Analysis, CDM (in cooperation with the California Department of Water Resources, Northern District), March 2006.

³ Big Valley Groundwater Management Plan, Lake County Flood Control and Water Conservation District, May 1999.

⁴ Bulletin 118, Big Valley Groundwater Basin Description, Department of Water Resources, February 2004.

Well ID	Reference Elevation ^{1, 2} (feet)	Measured Water Level 3 (feet)	Groundwater Elevation ² (feet)	Groundwater Depth (feet bgs)
MW-1	1366.35	9.3	1357.1	6.1
MW-2	1358.72	7.7	1351.0	4.7
MW-3	1356.70	14.1	1342.6	11.1

gradient of the plant. Well survey and groundwater elevation data for October 2008 are summarized below.

¹ Top of well casing elevation.

² 1988 North American Vertical Datum.

³ Below top of well casing.

44. Analytical data for the October 2008 groundwater sampling event are summarized below.

		A	Analytical Resu	Ilts
Constituent/Parameter	Units	MW-1	MW-2	MW-3
Total coliform organisms	MPN/100 mL	<1	<1	<1
E. coli	MPN/100 mL	<1	<1	<1
Electrical conductivity ¹	umhos/cm	1170	1167	380
Total dissolved solids	mg/L	580	590	240
Total Kjeldahl nitrogen	mg/L	<1	<1	<1
Nitrate nitrogen	mg/L	<0.20	2.6	0.91
pH ¹	Std.	6.6	7.5	6.8

¹ Field measured during well purging.

Based on these data, it appears that downgradient groundwater quality may be significantly better than upgradient quality. However, because of the prevalence of domestic and irrigation wells in the area, the October 2008 gradient may not be representative of the overall site trend. In addition, one sampling event is not sufficient to determine spatial and temporal trends in groundwater quality, and there are no usable monitoring wells at the P/E pond site. Therefore, there is not sufficient data to determine whether the wastewater treatment plant and/or the P/E ponds have unreasonably degraded the underlying groundwater. It is appropriate to require that the Discharger install monitoring wells designed to monitor groundwater up- and downgradient of the P/E ponds. It is also appropriate, after sufficient data have been collected, to require a formal determination of background groundwater quality and the degree to which degradation has occurred.

Basin Plan, Beneficial Uses, and Water Quality Objectives

- 45. The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins, Fourth Edition, (hereafter Basin Plan) designates beneficial uses, establishes water quality objectives, contains implementation plans and policies for protecting waters of the basin, and incorporates by reference plans and policies adopted by the State Water Board. Pursuant to Section 13263(a) of the California Water Code, waste discharge requirements must implement the Basin Plan.
- 46. Surface water drainage is to Clear Lake via Cole Creek. The beneficial uses of Clear Lake are municipal and domestic supply (MUN); agricultural supply (AGR); water contact recreation; noncontact water recreation; warm and cold freshwater habitat; warm water spawning, reproduction, and/or early development; and wildlife habitat.
- 47. The beneficial uses of the underlying groundwater are municipal and domestic supply, agricultural supply, and industrial supply.
- 48. The Basin Plan establishes narrative water quality objectives for chemical constituents, tastes and odors, and toxicity in groundwater. It also sets forth a numeric objectives for total coliform organisms
- 49. The Basin Plan's narrative water quality objective for chemical constituents, at a minimum, requires waters designated as domestic or municipal supply to meet the MCLs specified in Title 22. The Basin Plan recognizes that the Regional Water Board may apply limits more stringent than MCLs to ensure that waters do not contain chemical constituents in concentrations that adversely affect beneficial uses.
- 50. In summary, the narrative toxicity objective requires that groundwater be maintained free of toxic substances in concentrations that produce detrimental physiological responses in human, plant, animal, or aquatic life associated with designated beneficial uses. Quantifying a narrative water quality objective requires a site-specific evaluation of those constituents that have the potential to impact water quality and beneficial uses.
- 51. The Basin Plan's numeric water quality objective for bacteria requires that the most probable number (MPN) of coliform organisms over any seven-day period shall be less than 2.2 per 100 mL in MUN groundwater. The applicability of this objective to groundwater designated as MUN has been affirmed by State Water Board Order No. WQO-2003-0014 and by subsequent decisions of the Sacramento County Superior Court and California Court of Appeal, 3rd Appellate District.
- 52. The Water Quality Control Plan for the Tulare Lake Basin, Second Edition, contains salt management requirements that have been successfully implemented for several decades. The Tulare Basin Plan establishes several salt management requirements, including:
 - a. The incremental increase in salts from use and treatment must be controlled to the extent possible. The maximum EC shall not exceed the EC of the source water plus

500 umhos/cm. When the source water is from more than one source, the EC shall be a weighted average of all sources.

b. Discharges to areas that may recharge good quality groundwaters shall not exceed an EC of 1,000 umhos/cm, a chloride content of 175 mg/L, or a boron content of 1.0 mg/L.

These effluent limits are considered best practicable treatment or control (BPTC).

53. The Basin Plan encourages water recycling where practicable. The Discharger currently recycles less than one percent of its wastewater. However, the Discharger has developed and partially implemented a project that conveys recycled wastewater from other WWTFs in the Clear Lake area to The Geysers Geothermal Project where the water is used to recharge a deep geothermal reservoir that generates electricity. The third phase of this project, which is called the Full Circle project, will include a pipeline that will convey recycled water from the Kelseyville and Lakeport WWTFs to The Geysers. However, funding for the last phase of this public/private partnership has not yet been committed, so this remains part of the Discharger's long-range plans. Additionally, the Discharger has been investigating other recycling opportunities, particularly with local vineyard owners, and is attempting to gain federal funding for the extensive capital improvements needed through an economic stimulus package or similar mechanism.

Antidegradation Analysis

- 54. State Water Resources Control Board Resolution No. 68-16 ("Policy with Respect to Maintaining High Quality Waters of the State") (hereafter Resolution 68-16) prohibits degradation of groundwater unless it has been shown that:
 - a. The degradation is consistent with the maximum benefit to the people of the State;
 - b. The degradation will not unreasonably affect present and anticipated future beneficial uses;
 - c. The degradation does not result in water quality less than that prescribed in state and regional policies, including violation of one or more water quality objectives; and
 - d. The discharger employs best practicable treatment or control (BPTC) to minimize degradation.
- 55. Degradation of groundwater by some of the typical waste constituents released with discharge from a municipal wastewater utility after effective source control, treatment, and control is consistent with maximum benefit to the people of the State. The technology, energy, water recycling, and waste management advantages of municipal utility service far exceed any benefits derived from a community otherwise reliant on numerous concentrated individual wastewater systems, and the impact on water quality will be substantially less. Economic prosperity of valley communities and associated industry is of maximum benefit to the people of the State, and therefore sufficient reason to accommodate growth and groundwater degradation provided terms of the Basin Plan are met.

- 56. Constituents of concern that have the potential to degrade groundwater include salts (primarily EC, sodium, and chloride), nutrients and coliform organisms, as discussed below:
 - a. The EC of the effluent currently averages approximately 600 umhos/cm. Based on Finding No. 51, this is consistent with the Tulare Lake Basin Plan's established effluent limit of 500 umhos/cm over the source water. This limit was established after a full evaluation of BPTC for discharges in the Tulare Lake Basin. Circumstances and conditions with respect to treatment and control of salinity in the Sacramento-San Joaquin River Basin are similar to those of the Tulare Lake Basin. Therefore, the discharge will likely not impair the beneficial uses of groundwater due to increased salinity. Based on best professional judgment, an incremental increase of 500 umhos/cm over the source is BPTC for this discharge.
 - b. For nutrients such as nitrate, the potential for unreasonable degradation depends not only on the quality of the treated effluent, but the ability of the vadose zone below the effluent storage/disposal ponds to provide an environment conducive to nitrification and denitrification to convert the effluent nitrogen to nitrate and the nitrate to nitrogen gas before it reaches the water table. Although groundwater is quite shallow at the wastewater treatment plant, there is not enough site-specific data to determine the threat.
 - c. For coliform organisms, the potential for exceedance of the Basin Plan's numeric water quality objective depends on the ability of vadose zone soils below the effluent storage/disposal ponds and saturated soils within the shallow water bearing zone to provide adequate filtration. Again, there is not enough site-specific data to determine the threat. However, with regard to the wastewater treatment plant site, it seems likely that a coliform problem would have been evident in the first groundwater sampling event. The fact that total and fecal coliform organisms were not detected after many years of percolation from the unlined treatment and storage ponds indicates that there may be adequate filtration at the wastewater treatment plant site. Although disinfection would reduce the potential threat, the use of sodium hypochlorite would also increase the salinity of the effluent and create trihalomethanes. Therefore, pending completion of the *Background Groundwater Quality Study*, there is no reason to require disinfection at this time.
- 57. There is not sufficient data at this time to determine whether unreasonable groundwater degradation has, or likely will, result from the discharge. It is the responsibility of the Discharger to provide information for the Regional Water Board to evaluate whether any degradation caused by the discharge is consistent with Resolution No. 68-16. Although this Order allows expansion of the WWTF, the growth rate used for the Phase I design is minimal and the primary purpose of the project is to correct a long-standing capacity deficit rather than to accommodate growth. Sufficient reason exists to accommodate this minimal growth as long as future expansion proposals include appropriate BPTC measures and are accompanied by a complete antidegradation analysis. It is also appropriate to allow some groundwater degradation as long as it is consistent with the Basin Plan and Resolution No. 68-16 because economic prosperity of local communities and associated industry is of

benefit to the people of California. This Order establishes terms and conditions of discharge to ensure that the discharge does not unreasonably affect present and anticipated uses of groundwater and includes groundwater limitations that apply water quality objectives established in the Basin Plan to protect beneficial uses.

Treatment and Control Practices

- 58. The Discharger currently provides treatment and control of the discharge that incorporates:
 - a. Alarm and backup power systems to prevent bypass or overflow;
 - b. Secondary treatment of the wastewater;
 - c. Recycled water use at agronomic rates;
 - d. A Sanitary Sewer Operation, Maintenance, Overflow Prevention and Response Plan;
 - e. An operation and maintenance (O&M) manual; and
 - f. Certified operators to ensure proper operation and maintenance.
- 59. When the Phase I improvements project is complete, the facility will provide the following additional treatment and control measures:
 - a. Improved treatment reliability; and
 - b. A geosynthetic liner for the new wastewater treatment pond system⁵ to protect groundwater quality.

However, the effluent storage ponds and P/E ponds do not incorporate any specific measures to reduce the potential for groundwater degradation.

- 60. As noted above, it is not clear whether the wastewater treatment plant and P/E ponds pose a significant threat to groundwater quality, and the level of degradation that complies with Resolution No. 68-16 has not been fully evaluated. Therefore, it is appropriate for this Order to establish a schedule for tasks to formally evaluate groundwater quality, and to develop and begin to implement a salinity reduction program and evaluate additional BPTC measures if unreasonable groundwater degradation has, or will, occur. Completion of these tasks, and implementation of the approved strategies developed from that work, will ensure that BPTC and the highest water quality consistent with the maximum benefit to the people of the State will be achieved.
- 61. This Order establishes effluent and groundwater limitations for the WWTF that will not unreasonably threaten present and anticipated beneficial uses or result in groundwater quality that exceeds water quality objectives set forth in the Basin Plan.

⁵ Excluding those ponds at the wastewater treatment plant site that will be converted to effluent storage ponds.

Other Regulatory Considerations

- 62. The State Water Board adopted Order No. 97-03-DWQ (NPDES General Permit No. CAS000001) specifying waste discharge requirements for discharges of storm water associated with industrial activities, and requiring submittal of a Notice of Intent by all affected industrial dischargers. The wastewater treatment facility has a design capacity of less than 1.0 mgd and does not have a pretreatment program, and is therefore not required to obtain coverage under NPDES General Permit No. CAS000001.
- 63. On 2 May 2006, the State Water Board adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems General Order No. 2006-0003-DWQ (General Order). The General Order requires all public agencies that own or operate sanitary sewer systems greater than one mile in length to comply with the Order. The Discharger's collection system exceeds one mile in length, and therefore the General Order is applicable. The Discharger has filed a Notice of Intent (NOI) for coverage under the General Order with the State Water Resources Control Board.
- 64. Section 13267(b) of the California Water Code provides that: "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 discharging, or who proposes to 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".

The technical reports required by this Order and the attached "Monitoring and Reporting Program No. R5-2009-0023" are necessary to assure compliance with these waste discharge requirements. The Discharger owns and operates the facility that discharges the waste subject to this Order.

65. California Code of Regulations (CCR), Title 23, section 2232 states: "(a) Whenever a regional board finds that a publicly owned wastewater treatment plant will reach capacity within four years, the board shall notify the discharger. Such notification shall inform the discharger that the regional board will consider adopting a time schedule order pursuant to Section 13300 of the Water Code or other enforcement order unless the discharger can demonstrate that adequate steps are being taken to address the capacity problem. The notification shall require the discharger to submit a technical report to the regional board within 120 days showing how flow volumes will be prevented from exceeding existing capacity or how capacity will be increased."

Based on the above Findings, the Kelseyville WWTF may reach capacity within four years after completion of the Phase I improvements. Therefore, it is appropriate to require that the Discharger estimate when flows will reach the hydraulic and/or treatment capacities of the WWTF each year in accordance with Condition E.4 of the Standard Provisions and Reporting Requirements for Waste Discharge Requirements, which is also incorporated into the Provisions of this Order.

- 66. The California Department of Water Resources sets standards for the construction and destruction of groundwater wells (hereafter DWR Well Standards), as described in *California Well Standards Bulletin 74-90* (June 1991) and *Water Well Standards: State of California Bulletin 94-81* (December 1981). These standards, and any more stringent standards adopted by the State or county pursuant to CWC Section 13801, apply to all monitoring wells.
- 67. The action to adopt waste discharge requirements for this existing facility is exempt from the provisions of the California Environmental Quality (CEQA), in accordance with Title 14 CCR, Section 15301.
- 68. An Initial Study and Mitigated Negative Declaration were approved by the Lake County Planning Commission on 23 February 2006 and by the Lake County Board of Supervisors on 14 March 2006 in accordance with the California Environmental Quality Act (CCR, Title 14, Section 15261 et. seq.). The Initial Study describes the project under review as WWTF upgrades within the existing facility and easement footprints as follows:
 - a. Conversion of the existing facultative lagoon treatment system to dual-powered multicellular aerated lagoons system with a new electrical switchgear building.
 - b. Conversion of the remaining treatment ponds to an effluent equalization reservoir system.
 - c. Replacement of the influent collection box with a new headworks and screen.
 - d. Upgrading the existing chlorine storage, feed, and contact system.
 - e. Replacement of the existing effluent pump station
 - f. Construction of approximately 13,000 feet of new effluent pipeline within the easement of the existing pipeline.
 - g. Construction of groundwater monitoring wells at the P/E pond site.
- 69. The following mitigation measures to protect water quality were included as conditions of project approval:

Impact Type	Μ	itigation Required
a. To minimize and mitigate impacts to wetlands and riparian habitats during construction of the effluent pipeline:	i. ii. iii. v.	Complete a preliminary non-formal delineation of wetlands and other waters of the U.S. Avoid filling wetlands, riparian habitats, or other waters of the U.S. by relocating the pipeline. Where avoidance is not feasible, obtain and comply with all necessary permits. Construct and maintain adequate erosion control devices.
 b. To prevent impacts to vernal pools during construction of the effluent pipeline: 	i. ii. iii.	Complete a formal delineation of vernal pools. Provide at least a 100-foot buffer zone between the construction zone and any vernal pool. Comply with permit requirements.
c. To prevent impacts to wetlands and riparian habitats vernal pools if tunneling is used as an avoidance measure during construction of the effluent pipeline:	i. ii.	Complete preconstruction surveys at the tunneling entrances and exits to verify the absence of those features. Development of an emergency response plan for incidents of drilling mud seepage.
 d. To prevent impacts to storm water runoff quality: 	i. ii	Obtain an NPDES permit for discharges of storm water associated with construction activity.

- ii. Develop and implement a Storm Water Pollution Prevention Plan.
- 70. Implementation of the specific mitigation measures set forth in the Mitigated Negative Declaration and compliance with these waste discharge requirements will mitigate or avoid significant impacts to water quality.
- 71. The United States Environmental Protection Agency (EPA) has promulgated biosolids reuse regulations in 40 CFR 503, *Standard for the Use or Disposal of Sewage Sludge,* which establishes management criteria for protection of ground and surface waters, sets application rates for heavy metals, and establishes stabilization and disinfection criteria.
- 72. The Regional Water Board is using the Standards in 40 CFR 503 as guidelines in establishing this Order, but the Regional Water Board is not the implementing agency for

40 CFR 503 regulations. The Discharger may have separate and/or additional compliance, reporting, and permitting responsibilities to the EPA.

- 73. State regulations that prescribe procedures for detecting and characterizing the impact of waste constituents from waste management units on groundwater are found in Title 27. While the wastewater treatment facility is exempt from Title 27, the data analysis methods of Title 27 are appropriate for determining whether the discharge complies with the terms for protection of groundwater specified in this Order.
- 74. The discharge authorized herein and the treatment and storage facilities associated with the discharge, except for discharges of residual sludge and solid waste, are exempt from the requirements of Title 27, California Code of Regulations (CCR), Section 20005 et seq. (hereafter Title 27). The exemption, pursuant to Section 20090(a) of Title 27, is based on the following:
 - a. The waste consists primarily of domestic sewage and treated effluent;
 - b. The waste discharge requirements are consistent with water quality objectives; and
 - c. The treatment and storage facilities described herein are associated with a municipal wastewater treatment plant.
- 75. Pursuant to California Water Code Section 13263(g), discharge is a privilege, not a right, and adoption of this Order does not create a vested right to continue the discharge.

Public Notice

- 76. All of the above and the supplemental information and details in the attached Information Sheet, which is incorporated by reference herein, were considered in establishing the following conditions of discharge.
- 77. The Discharger and interested agencies and persons have been notified of the intent to prescribe waste discharge requirements for this discharge, and they have been provided an opportunity for a public hearing and an opportunity to submit their written views and recommendations.
- 78. All comments pertaining to the discharge were heard and considered in a public meeting.

IT IS HEREBY ORDERED that, pursuant to Sections 13263 and 13267 of the California Water Code, Order No. 99-094 is rescinded and Lake County Sanitation District, its agents, successors, and assigns, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, shall comply with the following:

[Note: Other prohibitions, conditions, definitions, and some methods of determining compliance are contained in the attached "Standard Provisions and Reporting Requirements for Waste Discharge Requirements" dated 1 March 1991.]

A. Discharge Prohibitions

- 1. Discharge of wastes to surface waters or surface water drainage courses is prohibited.
- 2. Discharge of wastewater at a location or in a manner different from that described in the Findings is prohibited.
- Discharge of waste classified as 'hazardous' under Section 2521, Chapter 15 of Title 23 or 'designated', as defined in Section 13173 of the California Water Code is prohibited.
- 4. Bypass or overflow of untreated or partially treated waste is prohibited.
- 5. Discharge of treated effluent to any site other than the P/E ponds described in the Findings is prohibited except as allowed under WDRs Order No. 99-070 or subsequent revisions thereto.
- 6. Application of recycled water in a manner or location other than that described herein and regulated under WDRs Order No. 99-070 is prohibited.
- 7. The use of recycled water for purposes other than vineyard irrigation as defined in Title 22 CCR Section 60304(a) and this Order is prohibited.

B. Discharge Specifications

1. **Effective immediately**, influent flows to the WWTF shall not exceed the following limits for any calendar year:

Influent Flow Measurement	Maximum Rate		
Total Annual Flow	107 MG		
Average Daily Flow ¹	0.29 mgd		
Average Dry Weather Flow ^{2, 3}	0.21 mgd		
Peak Month Flow ⁴	0.47 mgd		

¹ As determined by the total influent for the calendar year divided by 365.

- ² Dry weather is defined as the months of August through October, inclusive.
- ³ As determined by the total influent flow for the dry weather period divided by 92.
- ⁴ As determined by the total influent flow for the peak flow month divided by the number of days in that month.
- 2. Effective upon the Executive Officer's written approval of the report required pursuant to Provision F.1.b, influent flows to the WWTF shall not exceed the following limits for any calendar year:

Influent Flow Measurement	Maximum Rate		
Total Annual Flow	112 MG		
Average Daily Flow ¹	0.31 mgd		
Average Dry Weather Flow ^{2, 3}	0.22 mgd		
Peak Month Flow ⁴	0.48 mgd		
1	_		

¹ As determined by the total influent for the calendar year divided by 365.

- ² Dry weather is defined as the months of August through October, inclusive.
- ³ As determined by the total influent flow for the dry weather period divided by 92.
- ⁴ As determined by the total influent flow for the peak flow month divided by the number of days in that month.
- 3. No waste constituent shall be released or discharged, or placed where it will be released or discharged, in a concentration or in a mass that causes violation of the Groundwater Limitations.
- 4. Wastewater treatment, storage, and disposal shall not cause pollution or a nuisance as defined by Section 13050 of the California Water Code (CWC).
- 5. The Discharger shall operate all systems and equipment to optimize the quality of the treated effluent.
- 6. Public contact with wastewater shall be precluded or controlled through such means as fences and signs, or acceptable alternatives.
- 7. Objectionable odors originating at the facility shall not be perceivable beyond the limits of the wastewater treatment, storage or P/E ponds at an intensity that creates or threatens to create nuisance conditions.
- 8. As a means of discerning compliance with Discharge Specification B.7, the dissolved oxygen (DO) content in the upper one foot of any wastewater pond shall not be less than 1.0 mg/L for three consecutive weekly sampling events. If the DO in any single pond is below 1.0 mg/L for three consecutive sampling events, the Discharger shall report the findings to the Regional Water Board in writing within 10 days and shall include a specific plan to resolve the low DO results within 30 days.
- 9. Wastewater ponds shall be managed to prevent breeding of mosquitoes. In particular,
 - a. An erosion control program shall be implemented to ensure that small coves and irregularities are not created around the perimeter of the water surface.
 - b. Weeds shall be minimized through control of water depth, harvesting, or herbicides.
 - c. Dead algae, vegetation, and debris shall not accumulate on the water surface.

- 10. All treatment, storage, and disposal facilities shall be designed, constructed, operated, and maintained to prevent inundation or washout due to floods with a 100-year return frequency.
- 11. The WWTF shall have sufficient treatment, storage, and disposal capacity to accommodate allowable wastewater flow and design seasonal precipitation and ancillary inflow and infiltration during the winter months. Design seasonal precipitation shall be based on total annual precipitation using a return period of 100 years, distributed monthly in accordance with historical rainfall patterns.
- 12. The Discharger shall operate and maintain all ponds sufficiently to protect the integrity of containment levees and prevent overtopping and/or structural failure. Unless a California-registered civil engineer certifies (based on design, construction, and conditions of operation and maintenance) that less freeboard is adequate, the operating freeboard in any pond shall never be less than two feet (measured vertically from the lowest possible point of overflow). As a means of management and to discern compliance with this requirement, the Discharger shall install and maintain in each pond permanent staff gauges with calibration marks that indicate the water level at design capacity and enable determination of available operational freeboard.
- 13. On or about **15 October** of each year, available pond storage capacity shall at least equal the volume necessary to comply with Discharge Specifications B.11 and B.12.

C. Effluent Limitations

1. Effluent discharged to the P/E ponds shall not exceed the following limits:

Constituent	Units	Annual Average	Monthly Average	Daily Maximum
BOD ₅	mg/L		40	80
TSS	mg/L		40	80
Electrical Conductivity	umhos/cm	Water supply + 500		
1				

¹ 5-day biochemical oxygen demand.

² Total Suspended Solids.

2. No wastewater contained in any pond shall have a pH less than 6.5 or greater than 10.0.

D. General Solids Disposal Specifications

Sludge, as used in this document, means the solid, semisolid, and liquid residues removed during primary, secondary, or advanced wastewater treatment processes. Solid waste refers to grit and screenings generated during preliminary treatment. Residual sludge

means sludge that will not be subject to further treatment at the WWTF. Biosolids refers to sludge that has been treated and tested and shown to be capable of being beneficially and legally used pursuant to federal and state regulations as a soil amendment for agriculture, silviculture, horticulture, and land reclamation activities.

- 1. Sludge and solid waste shall be removed from screens, sumps, ponds, and clarifiers as needed to ensure optimal plant operation.
- Treatment and storage of sludge generated by the WWTF shall be confined to the WWTF property, and shall be conducted in a manner that precludes infiltration of waste constituents into soils in a mass or at concentrations that will violate the Groundwater Limitations of this Order.
- 3. Any storage of residual sludge, solid waste, and biosolids at the WWTF shall be temporary, and the waste shall be controlled and contained in a manner that minimizes leachate formation and precludes infiltration of waste constituents into soils in a mass or at concentrations that will violate the Groundwater Limitations of this Order.
- 4. Residual sludge, biosolids, and solid waste shall be disposed of in a manner approved by the Executive Officer and consistent with Title 27. Removal for further treatment, disposal, or reuse at disposal sites (i.e., landfills, WWTFs, composting sites, soil amendment sites) operated in accordance with valid waste discharge requirements issued by a regional water quality control board will satisfy this specification.
- 5. Use of biosolids as a soil amendment shall comply with valid waste discharge requirements issued by a regional water quality control board. In most cases, this will mean the General Biosolids Order (State Water Resources Control Board Water Quality Order No. 2000-10-DWQ, General Waste Discharge Requirements for the Discharge of Biosolids to Land for Use as a Soil Amendment in Agricultural, Silvicultural, Horticultural, and Land Reclamation Activities). For a biosolids use project to be covered by the General Biosolids Order, the Discharger must file a complete Notice of Intent and receive a Notice of Applicability for each project.
- 6. Use and disposal of biosolids shall comply with the self-implementing federal regulations of Title 40, Code of Federal Regulations (CFR), Part 503, which are subject to enforcement by the U.S. EPA, not the Regional Water Board. If during the life of this Order, the State accepts primacy for implementation of 40 CFR 503, then the Regional Water Board may also initiate enforcement where appropriate.

E. Groundwater Limitations

- 1. Release of waste constituents from any wastewater treatment or storage system component associated with the wastewater treatment facility shall not cause or contribute to groundwater:
 - a. Containing constituent concentrations in excess of the concentrations specified below or natural background quality, whichever is greater:

WASTE DISCHARGE REQUIREMENTS ORDER NO. R5-2009-0023 LAKE COUNTY SANITATION DISTRICT KELSEYVILLE COUNTY WATER WORKS DISTRICT NO. 3 WASTEWATER TREATMENT FACILITY LAKE COUNTY

Constituent	Units	Minimum Value	Maximum Value
Nitrate nitrogen	mg/L		10
рН	Std.	6.5	8.4
Total coliform organisms	MPN/100 mL		2.2
Title 22 ¹	As specified		MCL

¹ Includes all constituents listed in 22 CCR for which primary or secondary MCLs have been promulgated.

 Containing taste or odor-producing constituents, toxic substances, or any other constituents in concentrations that cause nuisance or adversely affect beneficial uses.

F. Provisions

- 1. The following reports shall be submitted pursuant to Section 13267 of the California Water Code and shall be prepared as described in Provision F.5:
 - a. By **30 October 2009**, the Discharger shall submit a technical report that presents the percolation rate test methodology, the 2008 percolation test results for each P/E pond (baseline results), and the results of post-scarification percolation testing completed in 2009. Based on the baseline and post-scarification results and consideration of reasonably achievable pond maintenance techniques and frequencies, the report shall define the long-term sustainable percolation for each P/E pond and the specific operation and maintenance requirements and schedule necessary to sustain that rate.
 - b. By **30 December 2009**, the Discharger shall submit a *Groundwater Monitoring Well Installation Workplan* prepared in accordance with, and including the items listed in, the first section of Attachment E: *"Requirements for Monitoring Well Installation Workplans and Monitoring Well Installation Reports."* The workplan shall describe installation of at least three new groundwater monitoring wells designed to ensure that background water quality is adequately characterized and any potential water quality impacts from the P/E pond discharge are detected. The system shall be designed to yield samples representative of the uppermost portion of the first aquifer underlying the P/E ponds. If additional monitoring wells are needed at the wastewater plant to ensure adequate monitoring upgradient and downgradient of the unlined ponds, the workplan shall include those additional wells.

If the registered professional responsible for development of the workplan believes that monitoring groundwater quality at the P/E pond site is infeasible or would be fruitless based on review of published local geology/hydrogeology reports, the workplan shall:

i. List the references reviewed;

- ii. Summarize the relevant findings of those reports;
- iii. State the specific reasons that monitoring would be infeasible or fruitless; and
- iv. Consider whether other forms of monitoring would be feasible and useful (e.g., wells designed to monitor at the soil/bedrock interface).
- c. By **30 May 2010**, the Discharger shall submit a technical report that certifies completion of the Phase I improvements construction work, certifies that operation of the new treatment and effluent pumping system has begun, and transmits a copy of the Final Operation and Maintenance Manual submitted to the State Water Board Division of Financial Assistance. The report shall include as-built drawings of the treatment pond and pond liner systems and a revised water balance that demonstrates the wastewater storage and disposal capacity of the WWTF.
- d. If additional groundwater monitoring wells are required pursuant to the approved workplan, by **30 August 2010**, the Discharger shall submit a *Monitoring Well Installation Report* prepared in accordance with, and including the items listed in, the second section of Attachment E: *"Monitoring Well Workplan and Monitoring Well Installation Report Guidance."* The report shall describe the installation and development of all new monitoring wells, and explain any deviation from the approved workplan.
- e. By **30 January 2012**, the Discharger shall submit a *Background Groundwater Quality Study Report*. The report shall present a summary of all historical monitoring data for each groundwater monitoring parameter/constituent identified in the MRP and calculation of the background groundwater concentration for electrical conductivity, total dissolved solids, nitrate nitrogen, total coliform organisms, sodium, chloride, iron, manganese and boron. Determination of background quality shall be made using the methods described in Title 27 CCR, Section 20415(e)(10), and shall be based on data from at least six quarterly (or more frequent) groundwater monitoring events. The report shall compare the calculated background concentration with the concentration in each downgradient well.
- 2. If the Background Groundwater Quality Study shows that the discharge of waste is causing groundwater to contain salinity constituents (i.e., electrical conductivity, total dissolved solids, sodium and chloride) in concentrations statistically greater than background water quality then, within **180 days** of the request of the Executive Officer, the Discharger shall submit and implement a Salinity Evaluation and Minimization Plan to address the sources of salinity discharged to the wastewater treatment system. At a minimum, the plan shall meet the following requirements outlined in CWC Section 13263.3(d)(3) Pollution Prevention Plans:
 - a. An estimate of all of the sources of a pollutant contributing, or potentially contributing, to the loadings of salinity in the treatment plant influent including

water supply, water softeners, and other residential, commercial and industrial salinity sources.

- b. An analysis of the methods that could be used to prevent the discharge of salinity into the facility, including application of local limits to industrial or commercial dischargers regarding pollution prevention techniques, public education and outreach, or other innovative and alternative approaches to reduce discharges of the pollutant to the facility. The analysis shall also identify sources, or potential sources, not within the ability or authority of the Discharger to control.
- c. An estimate of salinity load reductions that may be identified through the methods identified in CWC Section 13263.3(d)(3)(ii).
- d. A plan for monitoring the results of the salinity pollution prevention program.
- e. A description of the tasks, costs, and time required to investigate and implement various elements in the salinity pollution prevention plan.
- f. A statement of the Discharger's salinity pollution prevention goals and strategies, including priorities for short-term and long-term action, and a description of the Dischargers intended pollution prevention activities for the immediate future.
- g. A description of the Discharger's existing salinity pollution prevention programs.
- h. An analysis, to the extent feasible, of any adverse environmental impacts, including cross-media impacts or substitute chemicals that may result from the implementation of the pollution prevention program.
- i. An analysis, to the extent feasible, of the costs and benefits that may be incurred to implement the pollution prevention program.
- j. Progress to date in reducing the concentration and/or mass of salinity in the discharge.

If this report is required, progress in implementation of the plan shall be reported each year in the Annual Monitoring Report required pursuant to Monitoring and Reporting Program No. R5-2009-0023.

3. If the *Background Groundwater Quality Study* shows that the discharge of waste is causing groundwater to contain waste constituents (other than electrical conductivity, total dissolved solids, sodium and chloride) in concentrations statistically greater than background water quality then, within **180 days** of the request of the Executive Officer, the Discharger shall submit a *BPTC Evaluation Workplan* that sets forth the scope and schedule for a systematic and comprehensive technical evaluation of each component of the facility's waste treatment and disposal system to determine best practicable treatment and control. The workplan shall contain a preliminary evaluation of each component of the Group for completing the comprehensive technical evaluation. The

schedule to complete the evaluation shall be as short as practicable, and shall not exceed **one year** after receipt of comments on the workplan.

- 4. At least 180 days prior to any sludge removal and disposal, the Discharger shall submit a *Sludge Cleanout Plan*. The plan shall include a detailed plan for sludge removal, drying, and disposal. The plan shall specifically describe the phasing of the project, measures to be used to control runoff or percolate from the sludge as it is drying, and a schedule that shows how all dried biosolids will be removed form the site prior to the onset of the rainy season (1 October).
- 5. The Discharger shall continue to evaluate and correct I/I as proposed in the August 2005 *Kelseyville Wastewater Collection System I/I Analysis Report* or approved revision thereto.
- 6. A discharger whose waste flow has been increasing, or is projected to increase, shall estimate when flows will reach hydraulic and treatment capacities of its treatment, collection, and disposal facilities. The projections shall be made in January, based on the last three years' average dry weather flows, peak wet weather flows and total annual flows, as appropriate. When any projection shows that capacity of any part of the facilities may be exceeded in four years, the discharger shall notify the Regional Water Board by **31 January**.
- 7. All technical reports required herein 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. To demonstrate compliance with Sections 415 and 3065 of Title 16, CCR, all technical reports must contain a statement of the qualifications of the responsible registered professional(s). As required by these laws, completed technical reports must bear the signature(s) and seal(s) of the registered professional(s) in a manner such that all work can be clearly attributed to the professional responsible for the work.
- 8. The Discharger shall comply with the Monitoring and Reporting Program No. R5-2009-0023, which is part of this Order, and any revisions thereto as ordered by the Executive Officer.
- 9. The Discharger shall comply with the "Standard Provisions and Reporting Requirements for Waste Discharge Requirements", dated 1 March 1991, which are attached hereto and made part of this Order by reference. This attachment and its individual paragraphs are commonly referenced as "Standard Provision(s)."
- 10. The Discharger shall submit to the Regional Water Board on or before each compliance report due date, the specified document or, if appropriate, a written report detailing compliance or noncompliance with the specific schedule date and task. If noncompliance is being reported, then the Discharge shall state the reasons for such

noncompliance and provide an estimate of the date when the Discharger will be in compliance. The Discharger shall notify the Regional Water Board in writing when it returns to compliance with the time schedule.

- 11. The Discharger shall use the best practicable cost-effective control technique(s) including proper operation and maintenance, to comply with this Order.
- 12. The Discharger shall provide certified wastewater treatment plant operators in accordance with Title 23 of the California Code of Regulations, Division 3, Chapter 26.
- 13. As described in the Standard Provisions, the Discharger shall report promptly to the Regional Water Board any material change or proposed change in the character, location, or volume of the discharge.
- 14. The Discharger shall report to the Regional Water Board any toxic chemical release data it reports to the State Emergency Response Commission within 15 days of reporting the data to the Commission pursuant to section 313 of the "Emergency Planning and Community Right to Know Act of 1986."
- 15. The Discharger shall comply with the requirements of the Statewide General Waste Discharge Requirements (General WDRs) for Sanitary Sewer Systems (Water Quality Order No. 2006-0003), the Revised General WDRs Monitoring and Reporting Program (Water Quality Order No. 2008-0002-EXEC), and any subsequent revisions thereto. Upon the reduction, loss, or failure of the sanitary sewer system resulting in a sanitary sewer overflow, the Discharger shall notify the Regional Water Board in accordance with Water Quality Order No. 2008-0002-EXEC and take any necessary remedial action to (a) control or limit the volume of sewage discharged, (b) terminate the sewage discharge as rapidly as possible, and (c) recover as much as possible of the sewage discharged (including wash down water) for proper disposal. The Discharger shall implement all applicable remedial actions including, but not limited to, the following:
 - a. Interception and rerouting of sewage flows around the sewage line failure;
 - b. Vacuum truck recovery of sanitary sewer overflows and wash down water;
 - c. Use of portable aerators where complete recovery of the sanitary sewer overflows are not practicable and where severe oxygen depletion is expected in surface waters; and
 - d. Cleanup of sewage-related debris at the overflow site.
- 16. The Discharger shall not allow pollutant-free wastewater to be discharged into the wastewater collection, treatment, and disposal system in amounts that significantly diminish the system's capability to comply with this Order. Pollutant-free wastewater means rainfall, groundwater, cooling waters, and condensates that are essentially free of pollutants.

WASTE DISCHARGE REQUIREMENTS ORDER NO. R5-2009-0023 LAKE COUNTY SANITATION DISTRICT KELSEYVILLE COUNTY WATER WORKS DISTRICT NO. 3 WASTEWATER TREATMENT FACILITY LAKE COUNTY

- 17. In the event of any change in control or ownership of the WWTF, the Discharger must notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be immediately forwarded to this office. To assume operation as Discharger under this Order, the succeeding owner or operator must apply in writing to the Executive Officer requesting transfer of the Order. The request must contain the requesting entity's full legal name, the state of incorporation if a corporation, the name and address and telephone number of the persons responsible for contact with the Regional Water Board, and a statement. The statement shall comply with the signatory paragraph of Standard Provision B.3 and state that the new owner or operator assumes full responsibility for compliance with this Order. Failure to submit the request shall be considered a discharge without requirements, a violation of the California Water Code. Transfer shall be approved or disapproved by the Executive Officer.
- 18. The Discharger shall comply with all conditions of this Order, including timely submittal of technical and monitoring reports as directed by the Executive Officer. Violations may result in enforcement action, including Regional Water Board or court orders requiring corrective action or imposing civil monetary liability, or in revision or recession of this Order.
- 19. A copy of this Order shall be kept at the discharge facility for reference by operating personnel. Key operating personnel shall be familiar with its contents.
- 20. The Regional Water Board will review this Order periodically and will revise requirements when necessary.

I, PAMELA C. CREEDON, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Central Valley Region, on 5 February 2009.

PAMELA C. CREEDON, Executive Officer

ALO: 2/26/09

ATTACHMENT A



ATTACHMENT B



CH2M Hill, July 2008; RWD Addendum, November 2008

ORDER NO. R5-2009-0023

LAKE COUNTY

Approx. Scale: 1" =370'

ATTACHMENT C



ATTACHMENT D



ATTACHMENT E

REQUIREMENTS FOR MONITORING WELL INSTALLATION WORKPLANS AND MONITORING WELL INSTALLATION REPORTS

Prior to installation of groundwater monitoring wells, the Discharger shall submit a workplan containing, at a minimum, the information listed in Section 1 below. Wells may be installed after staff approves the workplan. Upon installation of the monitoring wells, the Discharger shall submit a well installation report that includes the information contained in Section 2 below. All workplans and reports must be prepared under the direction of, and signed by, a registered geologist or civil engineer licensed by the State of California.

SECTION 1 - Monitoring Well Installation Workplan and Groundwater Sampling and Analysis Plan

The monitoring well installation workplan shall contain the following minimum information:

A. General Information:

Purpose of the well installation project Brief description of local geologic and hydrogeologic conditions Proposed monitoring well locations and rationale for well locations Topographic map showing facility location, roads, and surface water bodies Large scaled site map showing all existing on-site wells, proposed wells, surface drainage courses, surface water bodies, buildings, waste handling facilities, utilities, and major physical and man-made features

B. Drilling Details:

On-site supervision of drilling and well installation activities Description of drilling equipment and techniques Equipment decontamination procedures Soil sampling intervals (if appropriate) and logging methods

C. Monitoring Well Design (in narrative and/or graphic form):

Diagram of proposed well construction details

- Borehole diameter
- Casing and screen material, diameter, and centralizer spacing (if needed)
- Type of well caps (bottom cap either screw on or secured with stainless steel screws)
- Anticipated depth of well, length of well casing, and length and position of perforated interval
- Thickness, position and composition of surface seal, sanitary seal, and sand pack
- Anticipated screen slot size and filter pack
- D. Well Development (not to be performed until at least 48 hours after sanitary seal placement):

Method of development to be used (i.e., surge, bail, pump, etc.) Parameters to be monitored during development and record keeping technique Method of determining when development is complete Disposal of development water

ATTACHMENT E MONITORING WELL REPORT REQUIREMENTS

- E. Well Survey (precision of vertical survey data shall be at least 0.01 foot): Identify the Licensed Land Surveyor or Civil Engineer that will perform the survey Datum for survey measurements List well features to be surveyed (i.e. top of casing, horizontal and vertical coordinates, etc.)
- F. Schedule for Completion of Work
- G. Appendix: Groundwater Sampling and Analysis Plan (SAP) The Groundwater SAP shall be included as an appendix to the workplan, and shall be utilized as a guidance document that is referred to by individuals responsible for conducting groundwater monitoring and sampling activities.

Provide a detailed written description of standard operating procedures for the following:

- Equipment to be used during sampling
- Equipment decontamination procedures
- Water level measurement procedures
- Well purging (include a discussion of procedures to follow if three casing volumes cannot be purged)
- Monitoring and record keeping during water level measurement and well purging (include copies of record keeping logs to be used)
- Purge water disposal
- Analytical methods and required reporting limits
- Sample containers and preservatives
- Sampling
 - General sampling techniques
 - Record keeping during sampling (include copies of record keeping logs to be

used)

- QA/QC samples
- Chain of Custody
- Sample handling and transport

SECTION 2 - Monitoring Well Installation Report

The monitoring well installation report must provide the information listed below. In addition, the report must also clearly identify, describe, and justify any deviations from the approved workplan.

A. General Information:

Purpose of the well installation project

Brief description of local geologic and hydrogeologic conditions encountered during installation of the wells

Number of monitoring wells installed and copies of County Well Construction Permits Topographic map showing facility location, roads, surface water bodies Scaled site map showing all previously existing wells, newly installed wells, surface water bodies, buildings, waste handling facilities, utilities, and other major physical and man-made features.

B. Drilling Details (in narrative and/or graphic form):

On-site supervision of drilling and well installation activities Drilling contractor and driller's name Description of drilling equipment and techniques Equipment decontamination procedures Soil sampling intervals and logging methods Well boring log

- Well boring number and date drilled
- Borehole diameter and total depth
- Total depth of open hole (same as total depth drilled if no caving or back-grouting occurs)
- Depth to first encountered groundwater and stabilized groundwater depth
- Detailed description of soils encountered, using the Unified Soil Classification System
- C. Well Construction Details (in narrative and/or graphic form):
 - Well construction diagram, including:
 - Monitoring well number and date constructed
 - Casing and screen material, diameter, and centralizer spacing (if needed)
 - Length of well casing, and length and position of perforated interval
 - Thickness, position and composition of surface seal, sanitary seal, and sand pack
 - Type of well caps (bottom cap either screw on or secured with stainless steel screws)
- E. Well Development:

Date(s) and method of development

How well development completion was determined

Volume of water purged from well and method of development water disposal Field notes from well development should be included in report

F. Well Survey (survey the top rim of the well casing with the cap removed): Identify the coordinate system and datum for survey measurements

Describe the measuring points (i.e. ground surface, top of casing, etc.)

Present the well survey report data in a table

Include the Registered Engineer or Licensed Surveyor's report and field notes in appendix
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM NO. R5-2009-0023 FOR LAKE COUNTY SANITATION DISTRICT KELSEYVILLE COUNTY WATER WORKS DISTRICT NO. 3 WASTEWATER TREATMENT FACILITY LAKE COUNTY

This Monitoring and Reporting Program (MRP) describes requirements for monitoring the wastewater treatment facility (WWTF) influent, effluent, wastewater treatment and storage ponds, percolation/evaporation (P/E) ponds, groundwater, and biosolids disposal. 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 Executive Officer.

Regional Water Board staff shall approve specific sampling locations prior to any sampling activities. All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. The time, date, and location of each sample shall be recorded on the sample chain of custody form.

Field test instruments (such as those used to test dissolved oxygen, pH, and electrical conductivity) may be used provided that:

- 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 submitted as described in the "Reporting" section of this MRP.

INFLUENT MONITORING

The Discharger shall monitor influent wastewater in accordance with the following. Samples shall be representative of the influent to the first treatment pond. Grab samples are considered representative of the influent. Influent monitoring shall include, at a minimum, the following:

<u>Constituent</u>	<u>Units</u>	Type of Sample	Sampling Frequency	Reporting Frequency
Local precipitation	inches	Rain Gauge Observation ¹	Daily	Monthly
Flow	gpd	Flow Meter Observation	Daily	Monthly
BOD ¹	mg/L	Grab	Monthly	Monthly
Total Suspended Solids	mg/L	Grab	Monthly	Monthly

¹ Using either a properly calibrated and maintained on-site rain gauge or daily results from an appropriately sited precipitation observation station operated by others (specify station name; location; owner; and data source contact information, e.g., internet address).

² Five-day, 20° Celsius biochemical oxygen demand.

EFFLUENT MONITORING

The Discharger shall monitor effluent wastewater in accordance with the following. Samples shall be representative of the effluent discharged from the treatment and storage ponds to the P/E ponds. Grab samples are considered representative. Effluent monitoring shall include, at a minimum, the following:

<u>Constituent</u>	<u>Units</u>	Type of <u>Sample</u>	Sampling <u>Frequency</u>	Reporting <u>Frequency</u>
BOD	mg/L	Grab	Weekly	Monthly
Total Suspended Solids	mg/L	Grab	Weekly	Monthly
Electrical Conductivity	umhos/cm	Grab	Weekly	Monthly
Total Kjeldahl nitrogen	mg/L	Grab	Monthly	Monthly
Nitrate nitrogen	mg/L	Grab	Monthly	Monthly
Sodium	mg/L	Grab	Quarterly	Monthly ¹
Chloride	mg/L	Grab	Quarterly	Monthly ¹
Boron	mg/L	Grab	Quarterly	Monthly ¹

¹ Results shall be reported in the Monthly Monitoring Report for the month during which samples were obtained.

WWTF POND MONITORING

The Discharger shall monitor all ponds at the WWTF, including the treatment, storage and P/E ponds, in accordance with the following. Samples shall be collected from permanent monitoring locations that will provide samples representative of the wastewater in each pond. Freeboard shall be measured vertically from the water surface to the lowest elevation of the pond berm, and shall be measured to the nearest 0.10 feet. Pond monitoring shall include, at a minimum, the following:

Constituent/Parameter	<u>Units</u>	Type of Sample	Sampling <u>Frequency</u>	Reporting <u>Frequency</u>
Freeboard	0.1 feet	Staff Gauge Observation	Weekly	Monthly
Dissolved Oxygen ^{1,}	mg/L	Grab	Weekly ²	Monthly
рН	pH units	Grab	Weekly	Monthly
Pond berm condition P/E pond percolation		Observation	Weekly Every three	Monthly
rate	inches/day		years ³	Annual ⁴

¹ Samples shall be collected opposite each pond inlet at a depth of one foot between 0700 and 0900 hours.

² If the result for any pond is less than 1.0 mg/L, the sampling frequency shall be increased for a period sufficient to confirm the magnitude and duration of the problem and aid in identification and resolution of the problem in accordance with the Discharge Specifications.

- ³ Measured from the date of completion of the last percolation rate test for each pond.
- ⁴ Percolation rate test results shall be presented in the Annual Monitoring Report for the year in which the test(s) were completed.

In addition, the Discharger shall inspect the condition of the ponds once per week and document visual observations. Notations shall include observations of:

- a. Presence of weeds in the water or along the berm;
- b. Accumulations of dead algae, vegetation, scum, or debris on the pond surface;
- c. Animal burrows in the berms;
- d. Evidence of seepage from the berms or downslope of the P/E ponds
- e. Flies or mosquitoes in the water or at the water surface; and
- f. The color of the water (e.g., dark sparkling green, dull green, yellow, gray, tan, brown, etc.).

RECYCLED WATER MONITORING

The Discharger shall monitor discharges of recycled water to the vineyards in accordance with the following. Samples shall be representative of the effluent discharged from the P/E ponds to the recycling area. Grab samples are considered representative. Recycled water monitoring shall include, at a minimum, the following:

<u>Constituent</u>	<u>Units</u>	Type of <u>Sample</u>	Sampling <u>Frequency</u>	Reporting Frequency
Flow	gpd	Flow Meter Observation	Daily	Monthly
BOD	mg/L	Grab	Weekly ¹	Monthly
Total Suspended Solids	mg/L	Grab	Weekly ¹	Monthly

One sample shall be analyzed for each calendar week that recycled water discharge occurs.

GROUNDWATER MONITORING

1

Effective immediately, the Discharger shall establish a quarterly sampling schedule for groundwater monitoring, with samples obtained approximately every three months.

These monitoring requirements apply to all three existing monitoring wells, as well as those constructed after issuance of this MRP. Prior to construction of any additional groundwater monitoring wells, the Discharger shall submit a *Monitoring Well Installation Workplan* for review and approval. Once installed, all new monitoring wells shall be added to the MRP, and shall be sampled and analyzed according to the schedule below.

Prior to well purging, groundwater elevations shall be measured. Depth to groundwater shall be measured to the nearest 0.01 feet. Water table elevations shall be calculated and used to determine groundwater gradient and direction of flow. The monitoring wells shall be purged

MONITORING AND REPORTING PROGRAM NO. R5-2009-0023 LAKE COUNTY SANITATION DISTRICT KELSEYVILLE COUNTY WATER WORKS DISTRICT NO. 3 WWTF LAKE COUNTY

of at least three well volumes or until temperature, pH, and electrical conductivity have stabilized. Samples shall be collected and analyzed using approved EPA methods. Groundwater monitoring shall include, at a minimum, the following:

<u>Constituent</u>	<u>Units</u>	Type of <u>Sample</u>	Sampling Frequency	Reporting Frequency
Depth to groundwater	0.01 feet	Measurement	Quarterly	Quarterly
Groundwater elevation ¹	0.01 feet	Calculated	Quarterly	Quarterly
Gradient	feet/feet	Calculated	Quarterly	Quarterly
Gradient direction	Degrees	Calculated	Quarterly	Quarterly
рН	pH units	Grab	Quarterly	Quarterly
Electrical conductivity	umhos/cm	Grab	Quarterly	Quarterly
Total dissolved solids	mg/L	Grab	Quarterly	Quarterly
Nitrate nitrogen	mg/L	Grab	Quarterly	Quarterly
Ammonia nitrogen	mg/L	Grab	Quarterly	Quarterly
Total Kjeldahl nitrogen	mg/L	Grab	Quarterly	Quarterly
Total coliform organisms ²	MPN/100 ml	Grab	Quarterly	Quarterly
Standard minerals ³	mg/L	Grab	Quarterly ⁴	Quarterly
Metals ⁵	ug/L	Grab	Quarterly ⁴	Quarterly

¹ Groundwater elevations shall be determined based on depth-to-water measurements using a surveyed elevation reference point on the well casing.

² Using a minimum of 15 tubes or three dilutions.

³ Standard Minerals shall include, at a minimum, the following elements/compounds: boron, bromide, calcium, chloride, fluoride, magnesium, phosphate, potassium, sodium, sulfate, total alkalinity (including alkalinity series), and hardness as CaCO₃.

⁴ Standard minerals and metals shall be analyzed for at least six consecutive quarters to support the Background Groundwater Quality Study. Following completion of that study, monitoring for standard minerals and metals is not required.

⁵ At a minimum, the following metals shall be included: arsenic, copper, lead, iron, manganese, nickel, and zinc. Samples tested for metals shall be filtered prior to preservation to ensure that analytical results report dissolved concentrations.

BIOSOLIDS MONITORING

The Discharger shall keep records regarding biosolids generated by the treatment processes, including any analytical test results; the quantity of biosolids removed for disposal; the quantity of biosolids removed from the ponds and temporarily stored on site; and steps taken to prevent nuisance conditions. Records shall be stored onsite and available for review during inspections.

If biosolids are transported off-site for disposal, then the Discharger shall submit records identifying the hauling company, the amount of biosolids transported, the date removed from the facility, the disposal facility name and address, and copies of all analytical data required by the entity accepting the waste. These records shall be submitted as part of the Annual Monitoring Report.

WATER SUPPLY MONITORING

The Discharger shall monitor the community water supply wells as required by the California Department of Public Health and shall report the following minimum monitoring data for each water supply well to the Regional Water Board:

<u>Constituent</u>	<u>Units</u>	Type of <u>Sample</u>	Sampling <u>Frequency</u>	Reporting <u>Frequency</u>
Volume pumped to community distribution system	MG			Annually
Total dissolved solids	mg/L	Grab	Annually	Annually
Electrical Conductivity	umhos/cm	Grab	Annually	Annually
Nitrate nitrogen	mg/L	Grab	Annually	Annually
Standard minerals ¹	mg/L	Grab	Annually	Annually
Metals ²	ug/L	Grab	Annually	Annually

¹ Standard Minerals shall include, at a minimum, the following elements/compounds: boron, bromide, calcium, chloride, fluoride, magnesium, phosphate, potassium, sodium, sulfate, total alkalinity (including alkalinity series), and hardness as CaCO₃.

² At a minimum, the following metals shall be included: arsenic, copper, lead, iron, manganese, nickel, and zinc. Analytical methods shall be selected to provide reporting limits below the applicable water quality limit for each constituent.

REPORTING

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., influent, effluent, 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 to the Regional Water Board.

A. Monthly Monitoring Reports

Monthly Monitoring Reports shall be submitted to the Regional Water Board on the **1st day of the second month following sampling** (i.e. the January Report is due by 1 March). Each report shall bear the certification and signature of the Discharger's authorized representative. At a minimum, the monthly monitoring reports shall include:

1. Results of the following monitoring:

- a. Influent monitoring (including calculation of monthly average flow, monthly total flow, and total precipitation);
- b. Effluent monitoring;
- c. WWTF pond monitoring; and
- d. Recycled water monitoring.
- 2. A comparison of monitoring data to the discharge specifications and effluent limitations, disclosure of any violations of the WDRs, and an explanation of any violation of those requirements. Data shall be presented in tabular format.
- 3. Copies of current calibration logs for all field test instruments.
- 4. Copies of laboratory analytical report(s).
- 5. A summary pond condition inspection report that includes dates of inspection, problems identified, repairs recommended, repairs completed, and dates of completion.

B. Quarterly Monitoring Reports

The Discharger shall submit quarterly monitoring reports to the Regional Water Board by the **1st day of the second month after the quarter** (i.e. the January-March quarter is due by May 1st) each year.

As required by the California Business and Professions Code Sections 6735, 7835, and 7835.1, all Quarterly Monitoring Reports shall be prepared under the direct supervision of a registered Professional Engineer or Geologist and signed by the registered professional.

The Quarterly Monitoring Report shall include the following:

- 1. Results of groundwater monitoring.
- 2. A narrative description of all preparatory, monitoring, sampling, and analytical testing activities for the groundwater monitoring. The narrative shall be sufficiently detailed to verify compliance with the WDRs, this MRP, and the Standard Provisions and Reporting Requirements. The narrative shall be supported by field logs for each well documenting depth to groundwater; parameters measured before, during, and after purging; method of purging; calculation of casing volume; and total volume of water purged.
- 3. Calculation of groundwater elevations, an assessment of groundwater flow direction and gradient on the date of measurement, comparison of previous flow direction and gradient data, and discussion of seasonal trends, if any.
- 4. A narrative discussion of the analytical results for all groundwater locations monitored including spatial and temporal tends, with reference to summary data tables, graphs, and appended analytical reports (as applicable).

- 5. A comparison of monitoring data to the groundwater limitations and an explanation of any violation of those requirements.
- 6. Summary data tables of historical and current water table elevations and analytical results.
- A scaled map showing relevant structures and features of the facility, the locations of monitoring wells and any other sampling stations, and groundwater elevation contours referenced to mean sea level datum.
- 8. Copies of laboratory analytical report(s) for groundwater monitoring.

C. Annual Report

An Annual Report shall be prepared as the fourth quarter monitoring report. The Annual Report shall include all monitoring data required in the monthly/quarterly schedule. The Annual Report shall be submitted to the Regional Water Board by 1 **February** each year. In addition to the data normally presented, the Annual Report shall include the following:

- 1. The contents of the regular quarterly monitoring report for the last quarter of the year.
- 2. Analytical results for all water supply and other annual monitoring.
- 3. If requested by staff, tabular and graphical summaries of all data collected during the year.
- 4. An evaluation of the performance of the WWTF, including discussion of capacity issues, infiltration and inflow (I/I) rates, nuisance conditions, and a forecast of the flows anticipated in the next year.
- 5. Documentation of the P/E pond percolation test method; percolation test data and calculated percolation rate for each P/E pond tested during the year; and P/E pond maintenance/scarification work completed during the year.
- 6. An evaluation of the groundwater quality beneath the wastewater treatment facility.
- 7. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into full compliance with the waste discharge requirements.
- 8. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
- 9. Summary of information on the disposal of biosolids as described in the "Biosolids Monitoring" section.
- 10. A copy of the WWTF operator's current certification.

- 11. A discussion of the following:
 - a. Specific I/I evaluation and reduction tasks completed during the year;
 - b. As applicable, specific salinity reduction efforts implemented in accordance with the approved *Salinity Evaluation and Minimization Plan*;
 - c. As applicable, specific best practical treatment and control measures implemented pursuant to the approved *BPTC Evaluation Workplan* (if one was required by the Executive Officer); and
 - d. As applicable, an evaluation of the effectiveness of the salinity reduction/BPTC measures that were implemented based on monitoring data.

A letter transmitting the self-monitoring reports shall accompany each report. The letter shall include a discussion of requirement violations found during the reporting period, and actions taken or planned for correcting noted violations, such as operation or facility modifications. If the Discharger has previously submitted a report describing corrective actions and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. The transmittal letter shall contain the penalty of perjury statement by the Discharger, or the Discharger's authorized agents, as described in the Standard Provisions General Reporting Requirements Section B.3.

The Discharger shall implement the above monitoring program as of the date of this Order.

Ordered by:

PAMELA C. CREEDON, Executive Officer

(Date)

ALO:02/26/2009

INFORMATION SHEET

ORDER NO. R5-2009-0023 LAKE COUNTY SANITATION DISTRICT KELSEYVILLE WATER WORKS DITRECT NO. 3 WWTF LAKE COUNTY

Background

The Kelseyville WWTF serves approximately 3,800 residents (1,297 single family dwelling units) of Kelseyville County Water Works District No. 3, Corinthian Bay, and Clear Lake State Park. The community is small and has a financial hardship.

The WWTF is currently regulated by Waste Discharge Requirements (WDRs) Order No. 99-094. The treatment plant currently provides secondary treatment and chlorine disinfection, and effluent is pumped to a remote disposal site that has seven percolation/evaporation (P/E) ponds. A small amount of treated effluent is recycled at a 5-acre vineyard owned and operated by Michael Fowler. The recycled water discharge is regulated under separate WDRs (Order No. 99-070). The current average dry weather influent flow rate is about 0.21 mgd.

Beginning in 2001, the WWTF began to have capacity problems as a result of excessive inflow and infiltration (I/I). This led to instances where freeboard in the treatment and P/E ponds was less than one foot. In January 2005, the Regional Water Board adopted CDO No. R5-2005-0007 to require the Discharger to address the capacity issue and other violations of the WDRs, which included low dissolved oxygen concentrations in the ponds, high pH, a 270-gallon sanitary sewer overflow, and failure to monitor groundwater. The CDO requires that the Discharger correct the conditions that led to the violations and install groundwater monitoring wells.

As a result of work completed to comply with the CDO, the Discharger determined that I/I is a significant problem that creates peak wet weather flows that greatly exceed both the treatment capacity and the capacity of the lift station/pipeline that conveys treated effluent to the P/E pond system. The storage and disposal capacity deficit is partly due to deterioration of the effluent lift station pumps and the effluent pipeline.

The Discharger proposes to upgrade the WWTF to improve the treatment system and increase effluent storage/disposal capacity to comply with Cease and Desist Order (CDO) No. R5-2005-0007, and has secured approval for \$3.5 million in loans and grants from the State Water Resources Control Board for this purpose.

The improvements project currently planned (known as Phase I) will consist of increasing the effluent lift station capacity to 0.79 mgd; replacing 3,000 feet of effluent pipeline; reconfiguring the treatment ponds; and improving the treatment system to provide full secondary treatment within the footprint of the existing plant. The new treatment lagoon will be lined with 60-mil high density polyethylene (HDPE). The remainder of the treatment plant ponds will serve as effluent storage ponds. According to the RWD, Phase I will provide a firm treatment, storage and disposal capacity of 0.30 mgd as an average annual flow, and should accommodate projected growth through 2015, assuming a one percent population growth rate.

ORDER NO. R5-2009-0023 LAKE COUNTY SANITATION DISTRICT KELSEYVILLE WATER WORKS DITRECT NO. 3 WWTF LAKE COUNTY

Groundwater Conditions

Kelseyville is within the Big Valley Basin, one of twelve groundwater basins in Lake County. Groundwater is contained in shallow alluvial deposits and deposits of the Clear Lake Volcanics over the fractured basement rock of the Franciscan Formation. Groundwater is used extensively for municipal, domestic, agriculture uses, and there are about 960 known wells in the Big Valley basin, most of which are 25 to 150 feet deep.

The P/E pond site is on the western flank of Mt. Konocti, a composite volcano. The primary sources of groundwater recharge in the Big Valley Basin are infiltration from Kelsey Creek and underflow from the Adobe Creek-Manning Creek Subbasin southwest of Kelseyville. Recharge from Mt. Konocti and the Central Upland System west of Kelseyville are believed to be smaller recharge sources.

Groundwater in the Big Valley Basin has lower concentrations of sodium, chloride, and sulfate than the other Lake County Basins. Geothermal influences can cause relatively high levels of iron and boron when groundwater levels are low, typically in the late fall. Boron is reportedly present at moderate levels, and iron, manganese, and/or hardness are problematic in some parts of the basin.

There are no monitoring wells at the P/E pond site, but three groundwater monitoring wells were installed at the wastewater treatment plant in July 2008. Soils encountered during drilling were typically four feet of sandy silt underlain by ten feet of silty sand and silty gravelly sand to a depth of thirty feet below ground surface (bgs). Following well development, the three monitoring wells were sampled on 21 October 2008. Static groundwater levels prior to sampling ranged from 4.7 to 11.1 feet bgs, with an east-northeast gradient of approximately 0.014 feet per foot. Based on the October 2008 data, MW-1 is upgradient of the plant and MW-3 is downgradient. MW-2 appears to be cross gradient of the plant.

Analytical data for the October 2008 groundwater sampling event indicates significant spatial variability between the three wells with respect to salinity constituents. However, one sampling event is not sufficient to determine spatial and temporal trends in groundwater quality, and there are no monitoring wells at the P/E pond site. Therefore, there is not sufficient data to determine whether the wastewater treatment plant and/or the P/E ponds have unreasonably degraded the underlying groundwater.

It is appropriate to require that the Discharger install additional monitoring wells designed to monitor groundwater up- and downgradient of the P/E ponds. It is also appropriate, after sufficient data have been collected, to require a formal determination of background groundwater quality and the degree to which degradation has occurred.

Basin Plan, Beneficial Uses, and Water Quality Objectives

The Kelseyville WWTF is in the Sacramento River Basin. Surface water drainage is to Clear Lake via Cole Creek. The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins (Basin Plan) designates beneficial uses, establishes water quality objectives, contains implementation plans and policies for protecting waters of the basin, and incorporates by reference plans and policies adopted by the State Water Board.

Increasing salinity in groundwater is a significant problem throughout most of the Central Valley Region. Although not directly applicable to the Sacramento River and San Joaquin River Basins, the Tulare Lake Basin Plan's salt management requirements have been successfully implemented for several decades. The Regional Water Board encourages proactive management to control addition of salt through use, and has established a guideline for allowable incremental salinity increase of 500 umhos/cm over the electrical conductivity of the source water in the Sacramento River and San Joaquin River Basins. When appropriate to assure compliance with a groundwater limitation for any constituent, more restrictive limitations on salt constituents added through use may be established by the Regional Water Board.

The Basin Plan encourages water recycling where practicable. The Discharger currently recycles less than one percent of its wastewater. However, the Discharger has developed and partially implemented a project that conveys recycled wastewater from other WWTFs in the Clear Lake area to The Geysers Geothermal Project where the water is used to recharge a deep geothermal reservoir that generates electricity. The third phase of this project will convey recycled water from the Kelseyville WWTF to The Geysers. However, funding has not yet been committed, so this remains part of the Discharger's long-range plans. Additionally, the Discharger has been investigating other recycling opportunities and is attempting to fund the extensive capital improvements needed.

Antidegradation Analysis

The antidegradation directives of State Water Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality Waters in California," or "Antidegradation Policy" requires that waters of the State that are better in quality than established water quality objectives be maintained "consistent with the maximum benefit to the people of the State." Waters can be of high quality for some constituents or beneficial uses and not others. Policy and procedures for complying with this directive are set forth in the Basin Plan.

The technology, energy, water recycling, and waste management advantages of municipal utility service far exceed any benefits derived from a community otherwise reliant on numerous concentrated individual wastewater systems. Degradation of groundwater by some of the typical waste constituents released with discharge from a municipal wastewater utility after effective source control, treatment, and control is consistent with maximum benefit to the people of the State provided terms of the Basin Plan are met. Constituents of concern that have the potential to degrade groundwater include salts (primarily EC, sodium, and chloride), nutrients and coliform organisms, as discussed below:

- 1. The EC of the effluent currently averages approximately 600 umhos/cm. Based on best professional judgment, an incremental increase of 500 umhos/cm over the source is BPTC for this discharge is appropriate as an effluent limit.
- 2. Nutrients such as nitrate may pose a threat of unreasonable degradation. Although groundwater is quite shallow at the wastewater treatment plant, there is not enough site-specific data to determine the threat.

3. Coliform organisms may pose a threat of exceeding the Basin Plan's numeric water quality objective. The fact that total and fecal coliform organisms were not detected after many years of percolation from the unlined treatment and storage ponds indicates that there may be adequate filtration at the wastewater treatment plant site. Although disinfection would reduce the potential threat, the use of sodium hypochlorite would also increase the salinity of the effluent and create trihalomethanes. Therefore, pending completion of the *Background Groundwater Quality Study*, there is no reason to require disinfection at this time.

There is not sufficient data at this time to determine whether unreasonable groundwater degradation has, or likely will, result from the discharge. It is the responsibility of the Discharger to provide information for the Regional Water Board to evaluate whether any degradation caused by the discharge is consistent with Resolution No. 68-16. Although this Order allows expansion of the WWTF, the growth rate used for the Phase I design is minimal and the primary purpose of the project is to correct a long-standing capacity deficit rather than to accommodate growth. Sufficient reason exists to accommodate this minimal growth as long as future expansion proposals include maximizing recycling efforts, additional BPTC measures, and a complete antidegradation analysis.

Treatment and Control Practices

Upon completion of the proposed Phase I project, the Discharger will provide treatment and control of the discharge that incorporates:

- 1. Alarm and backup power systems to prevent bypass or overflow;
- 2. Secondary treatment of the wastewater;
- 3. A geosynthetic liner for the new wastewater treatment pond system to protect groundwater quality.
- 4. Recycled water use at agronomic rates;
- 5. A Sanitary Sewer Operation, Maintenance, Overflow Prevention and Response Plan;
- 6. An operation and maintenance (O&M) manual; and
- 7. Certified operators to ensure proper operation and maintenance.

However, the effluent storage ponds and P/E ponds do not incorporate any specific measures to reduce the potential for groundwater degradation. As noted above, it has not been established that the wastewater treatment plant and P/E ponds pose no significant threat to groundwater quality, and the level of degradation that complies with Resolution No. 68-16 has not been fully evaluated. Therefore, this Order establishes a schedule for tasks to formally evaluate groundwater quality, and to develop and begin to implement a salinity reduction program and evaluate additional BPTC measures if unreasonable groundwater degradation has, or will, occur. Completion of these tasks, and implementation of the approved strategies developed from that work, will ensure that BPTC and the highest water quality consistent with the maximum benefit to the people of the State will be achieved.

Title 27

Title 27, CCR, section 20005 et seq. (Title 27) contains regulations to address certain discharges to land. Title 27 establishes a waste classification system, specifies siting and construction standards for full containment of classified waste, requires monitoring of groundwater and the unsaturated zone for any indication of failure of containment, and specifies closure and post-closure maintenance requirements. Generally, no degradation of groundwater quality by any waste constituent in a classified waste is acceptable under Title 27 regulations.

Discharges of domestic sewage and treated effluent can be treated and controlled to a degree that will not result in unreasonable degradation of groundwater. For this reason, they have been conditionally exempted from Title 27. Treatment and storage facilities for sludge that are part of the WWTF are considered exempt from Title 27 under section 20090(a), provided that the facilities not result in a violation of any water quality objective. However, residual sludge (for the purposes of the proposed Order, sludge that will not be subjected to further treatment by the WWTF) is not exempt from Title 27. Solid waste (e.g., grit and screenings) that results from treatment of domestic sewage and industrial waste also is not exempt from Title 27. This residual sludge and solid waste are subject to the provisions of Title 27.

Accordingly, the municipal discharge of effluent and the operation of treatment or storage facilities associated with a municipal wastewater treatment plant can be allowed without requiring compliance with Title 27, but only if the resulting groundwater degradation is in accordance with the Basin Plan.

Discharge Prohibitions, Specifications and Provisions

The Discharger's water balance capacity analysis indicates that the upgraded WWTF will provide the following capacities:

Condition	Current Capacity	Phase I Capacity
Average daily flow	0.21 mgd	0.31 mgd
Average daily dry weather flow	0.12 mgd	0.22 mgd
Peak month daily flow	0.39 mgd	0.48 mgd

However, the model shows that the P/E pond percolation rates are critical to the WWTF's effluent disposal capacity. Because of the uncertainty regarding sustainable P/E percolation rates, the proposed Order requires that the discharger submit and implement a plan to increase the frequency of scarification, re-evaluate percolation rates periodically, and continue its I/I reduction efforts. Because the current WWTF storage/disposal capacity is less that the current flows cited in the Findings, this Order also limits influent flows rates to the maximum values tabulated above until the Phase I project is complete.

The effluent limits for BOD and TSS of 40 mg/L monthly average and 80 mg/L daily maximum are based on reasonable expectations of performance of the secondary treatment system.

Although the Discharger has historically used sodium hypochlorite to disinfect effluent discharged to the P/E ponds, disinfection is not required to comply with the Title 22 water recycling requirements set forth in WDRs Order No. 99-070. Therefore, this Order does not require disinfection or set effluent limits for total coliform organisms.

As noted above, the EC of the treated effluent is currently within the generally accepted range of 500 umhos/cm over the EC of the water supply. This Order imposes an effluent limit of 800 umhos/cm, which accommodates the temporal variability of the effluent EC without allowing any overall increase.

The proposed Order prescribes groundwater limitations that implement water quality objectives for groundwater from the Basin Plan. The limitations require that the discharge not cause or contribute to exceedance of these objectives or natural background water quality, whichever is greatest.

The Provisions require submittal of certain technical reports to verify completion of the Phase I improvements project and compliance with requirements to install monitoring wells, evaluate groundwater quality, maintain sustainable percolation rates for the P/E ponds and implement salinity reduction and/or BPTC measures as necessary to comply with the groundwater limitations.

The Monitoring and Reporting Program is designed to verify compliance with effluent limitations, groundwater limitations, and operational requirements of the WDRs.

ALO:2/26/09



California Regional Water Quality Control Board Central Valley Region

Karl E. Longley, ScD, P.E., Chair



Arnold Schwarzenegger Governor

11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114 Phone (916) 464-3291 • FAX (916) 464-4645 http://www.waterboards.ca.gov/centralvalley

25 February 2009

Mr. Mark Dellinger Lake County Sanitation District 230-A Main Street Lakeport, CA 95453 CERTIFIED MAIL 7008 1140 0002 8805 7579

NOTICE OF ADOPTION OF WASTE DISCHARGE REQUIREMENTS FOR LAKE COUNTY SANITATION DISTRICT KELSEYVILLE WATER WORKS DISTRICT NO. 3 WASTEWATER TREATMENT FACILITY LAKE COUNTY

Waste Discharge Requirements (WDRs) Order No. R5-2009-0023 for the Kelseyville Water Works District No. 3 wastewater treatment facility was adopted by the California Regional Water Quality Control Board, Central Valley Region, at its 5 February 2009 meeting.

Please note that the WDRs contain a compliance schedule for submitting certain technical reports. The first of these reports is the P/E Pond Percolation Rate Report, which is due by **30 October 2009**. The WDRs also include a Monitoring and Reporting Program (MRP) that contains specific monitoring requirements that Lake County Sanitation District must implement. Please review the MRP closely so that you may establish the appropriate sampling schedules and protocols. A copy of the WDRs must be maintained at the facility and must be accessible to anyone operating the aggregate wash water system.

As you know, the waste discharge to land program in the Rancho Cordova office has been reorganized into separate permitting and compliance units. All regular **monitoring reports should be addressed to Guy Childs**, and he will continue to be your contact on all compliance and enforcement matters. All **technical reports required by the Provisions of the WDRs should be addressed to Anne Olson**, who is your permitting contact.

In order to conserve paper and reduce mailing costs, a paper copy of the WDRs has been sent only to the Discharger. Interested parties are advised that the full text of this order is available on the Regional Water Board's web site at

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/index.shtml.

California Environmental Protection Agency

Anyone without access to the Internet who needs a paper copy of the order can obtain one by calling Regional Water Board staff.

If you have any questions regarding your new WDRs, please call Anne Olson at (916) 464-4740.

MARY E. SERRA, P.E. Chief Waste Discharge to Land Permitting Unit

- Enclosures Waste Discharge Requirements Standard Provisions and Reporting Requirements
- cc w/o enc: Gordon Innes, Division of Water Quality, State Water Board, Sacramento Meghan Brown, Division of Financial Assistance State Water Board, Sacramento Ray Ruminski, Lake County Environmental Health Department, Lakeport Nolan Randall, CH2M Hill, Redding

alo:2/26/09