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## Central Valley Regional Water Quality Control Board

28 May 2026

Michael Jones  
Keyes Community Services District  
5601 7<sup>th</sup> Street  
Keyes, Stanislaus County, CA 95307

**Certified Mailing Number**  
9589 0710 5270 3719 4725 92

### NOTICE OF APPLICABILITY

**RESOLUTION R5-2023-0061  
WAIVER OF WASTE DISCHARGE REQUIREMENTS, REPORTS OF WASTE  
DISCHARGE, AND/OR WATER RECYCLING REQUIREMENTS FOR SPECIFIC  
TYPES OF DISCHARGE WITHIN THE CENTRAL VALLEY REGION  
KEYES COMMUNITY SERVICES DISTRICT  
WELL #9 ARSENIC REMOVAL TREATMENT SYSTEM  
STANISLAUS COUNTY**

On 19 January 2026, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) received a Report of Waste Discharge (ROWD) from Keyes Community Services District (KCSD, hereafter referred to as Discharger). The Discharger seeks coverage under the Waiver of Waste Discharge Requirements, Reports of Waste Discharge, and/or Water Recycling Requirements for Specific Types of Discharge within the Central Valley Region (Low Threat Waiver, Resolution R5-2023-0061) for discharge of filter backwash water generated from the KCSD arsenic removal treatment facility at Well No.9 into an on-site backwash percolation pond (pond). The ROWD included a Form 200, project map, and a summary of the proposed wellhead treatment activities.

The submittal contains all the information required to evaluate the applicability of the discharge under the Low Threat Waiver. The discharge qualifies for the category of Filter Backwash and System Flushing from Water Treatment Systems (Category 13 in Attachment A). Based on the information provided, the proposed discharge meets the conditions of the Waiver.

The discharge is hereby covered under the Low Threat Waiver and assigned enrollee number **R5-2023-0061-0046**. Please include this number on all correspondence related to this discharge. A copy of the Low Threat Waiver is available on [Central Valley Water Board's website](#).

([https://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/waivers/r5-2023-0061.pdf](https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2023-0061.pdf))

## PROJECT DESCRIPTION

KCSD is a public water system serving approximately 5,601 residents in the community of Keyes, Stanislaus County. KCSD operates four groundwater supply wells (Nos. 7, 8, 9, and 10), all of which produce water that contains 1,2,3-Trichloropropane (TCP), and several of which exceed the arsenic Maximum Contaminant Level (MCL) of 10 ug/L. The most recent arsenic level was detected in the Keyes-Well No.9 was 12 ug/L. To address the arsenic exceedance, KCSD constructed a centralized arsenic treatment facility (CATF) and is currently completing the construction of several granular activated carbon (GAC) treatment systems to remove TCP.

Well No. 9 is located on Faith Home Road at Assessor's Parcel Number 041-041-035-000. The project involves the installation and operation of a dedicated arsenic removal treatment system at the Well No. 9 site. The discharge associated with this project is permanent and will continue for the operational life of the treatment system.

The arsenic treatment system at Well No. 9 uses an iron-based granular medium that binds arsenic from raw extracted groundwater to reduce concentrations below regulatory limits. The system operates in a lead-lag configuration, with feed water flowing downward through the lead adsorber before passing to the lag vessel for treatment prior to distribution. Iron based medium is a single-use medium — once adsorption sites are saturated, the media is replaced rather than regenerated. To maintain performance, the system is backwashed on a quarterly basis by passing raw water through the vessels for approximately 20 minutes at 6.5–9.5 gallons per minute per square foot, expanding the media bed by 30–50% to remove accumulated solids and restore efficiency. When the lead adsorber is exhausted, it is taken out of service and the lag vessel assumes the lead position, allowing operations to continue uninterrupted. Spent media is pneumatically transferred via slurry truck to an approved off-site disposal facility, and the adsorber is recharged with fresh media before being returned to service in the lag position.

Backwash water is generated on a quarterly basis using potable water, with each backwash cycle lasting approximately 20 minutes per vessel at a rate of 9.5 gallons per minute per square foot. With six vessels in operation, each backwash event generates approximately 128,820 gallons, equating to an average monthly discharge of approximately 42,940 gallons (0.042 million gallons per month). Backwash water is discharged to a 150,000-gallon on-site unlined percolation pond measuring approximately 75 feet by 75 feet, constructed with compacted native soil berms. Disposal occurs through infiltration into the subsurface of the Turlock Subbasin, with solids settling in the pond and periodically removed for off-site disposal at a designated landfill. The pond includes a rock-lined inlet to dissipate energy and minimize erosion

under varying hydraulic conditions. Discharge is entirely contained on-site and will not come into contact with nearby surface waters.

The attached Monitoring and Reporting Program (MRP) defines required discharge monitoring activities during initial system startup and periodically to monitor treatment system performance. The Discharger will notify the Central Valley Board prior to commencing initial discharge activities and within one week of completing discharge at the site. Upon request, the Discharger will submit a summary report to the Central Valley Water Board at the conclusion of the permit term documenting total discharge volumes and recorded freeboard measurements.

The project is within the jurisdiction of the Central Valley Water Board, and the operative Water Quality Control Plan is the Sacramento and San Joaquin River Basin, Fifth Edition, revised February 2019 (hereafter Basin Plan). The 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 §13263(a) of the California Water Code, waste discharge requirements must implement the Basin Plan.

## **FACILITY-SPECIFIC REQUIREMENTS**

Please familiarize yourself with the contents of the Low Threat Waiver, including the Conditions of Discharge (Attachment A of the Waiver). The discharge must be managed in accordance with the requirements contained in the Conditions of Discharge and with the information submitted in the RWD and this Notice of Applicability (NOA). Discharger is responsible for compliance with the Waiver and must provide sufficient oversight to ensure compliance and prompt reporting of any non-compliance. Upon completion of the discharge activities and confirmation that all backwash has percolated and/or evaporated, the Discharger shall notify the Central Valley Water Board to request termination of coverage under the Waiver. Discharge of backwash water at a location or in a manner different from that described in the NOI or this NOA is prohibited.

## **DOCUMENT SUBMITTAL**

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

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

**Facility Name:** Keyes Community Services District, Stanislaus County  
**Program:** Groundwater Quality Permitting Program  
**Order:** R5-2023-0061-0046  
**CIWQS Place ID:** 906317

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

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

All documents, including responses to inspections and written notifications, submitted to comply with this NOA shall be directed, via the paperless office system, to the Compliance and Enforcement Unit, attention to Howard Hold. Mr. Hold can be reached at (916) 464-4679 or [Howard.Hold@waterboards.ca.gov](mailto:Howard.Hold@waterboards.ca.gov). Questions regarding the permitting aspects of the Waiver, and notification for termination of coverage under this NOA, shall be directed, via the paperless office system, to the WDR Permitting Unit, attention Vishaal Kumar. Mr. Kumar can be reached at (916) 464-4625 or by email at [Vishaal.kumar@waterboards.ca.gov](mailto:Vishaal.kumar@waterboards.ca.gov).

for Patrick Pulupa  
Executive Officer

Attachments: Attachment A – Site Map  
Monitoring and Reporting Program

cc:

Stanislaus County Environmental Health Department  
Howard Hold, Central Valley Regional Water Quality Control Board (via email)

### ATTACHMENT A – PROJECT MAP



Drawing Reference:  
Google Earth

**FACILITY AND USE AREA MAP**  
KEYES COMMUNITY SERVICES DISTRICT  
WELL #9 ARSENIC REMOVAL TREATMENT SYSTEM  
STANISLAUS COUNTY