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## Central Valley Regional Water Quality Control Board

29 January 2025

City of Lathrop  
ASR Well No. 1  
390 Towne Centre Drive  
Lathrop, CA 95330

***sent via email***

### **REVISED NOTICE OF APPLICABILITY**

#### **WATER QUALITY ORDER 2003-0003-DWQ STATEWIDE WASTE DISCHARGE REQUIREMENTS FOR DISCHARGES TO LAND WITH A LOW THREAT TO WATER QUALITY CITY OF LATHROP, ASR WELL NO. 1, SAN JOAQUIN COUNTY**

Luhdorff & Scalmanini Consulting Engineers, on behalf of the City of Lathrop, submitted a Notice of Intent (NOI) dated 12 September 2025 to obtain coverage under Water Quality Order 2003-0003-DWQ, Statewide General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality (hereafter General Order) for well development and testing. The submittal contained all the information required to evaluate applicability of the General Order and the NOI is considered complete. The discharge is hereby covered under State Water Resources Control Board (State Water Board) General Order and issued enrollee number 2003-0003-DWQ-0253. Please include this number on all correspondence related to this discharge.

After the original NOA was issued on 21 November 2025, an error was noted in the Discharger's Monitoring Plan (DMP). A revised DMP was submitted on 23 January 2025, and the date referencing the DMP in *Facility Specific Requirements No. 1* has been revised in this NOA to refer to the updated DMP.

### **PROJECT LOCATION AND DESCRIPTION**

The project covered under this Notice of Applicability (NOA) consists of installing an Aquifer Storage and Recover (ASR) injection well and providing for the discharge of water generated during initial well development activities. The overall objective of the ASR well is to aid in the development of a groundwater banking program to enhance the management of surplus surface water from the South County Water Supply Project (SCWSP) operated by the South San Joaquin Irrigation District (SSJID). The proposed ASR well is designed for seasonal, emergency, and/ or long-term storage to support drought resiliency and water supply reliability. The installation of the ASR well is also

**MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER**

intended to comply with the Urban Community Drought Relief Program Guidelines (UCDRPG), conditions, and project schedules. The project site is located along Stewart Road in Lathrop, California.

Discharges from well installation and development activities will be directed to nearby manmade River Islands lakes (Attachment A) with permission from River Islands. The lakes are ornamental/storm water lakes that are not waters of the United States. Therefore, this discharge is not required to be regulated under the National Pollutant Discharge Elimination System (NPDES).

The installation and development of the ASR well will be conducted in phases and is scheduled to begin in February 2025. The total discharge volume to the lakes is expected to be approximately 7 million gallons. An existing storm water pipeline will be used to channel the discharge water to the lakes. Well cuttings will be spread over land owned by the City of Lathrop in the area shown on Attachment A.

Analytical data collected from nearby monitoring wells MW-1 and MW-2 were used to characterize groundwater quality and is considered representative of the proposed discharge. The monitoring wells are strategically located near the proposed ASR well and provide an understanding of the groundwater conditions. Analytical data from the monitoring wells are summarized below. Well screen intervals in feet below ground surface (bgs) are shown in parentheses.

**Table 1. Groundwater Quality (Expected Discharge Quality)**

Analyte	MW-1			MW-2	
	MW-265 (240-260)	MW-535 (510-530)	MW-765 (740-760)	MW-770 (740-760)	MW-1000 (969-989)
TDS (mg/L)	5,500	9,800	6,400	7,800	4,600
EC (µS/cm)	6,600	11,000	8,200	7,900	4,900
Chloride (mg/L)	2,500	3,900	2,900	2,900	1,800
pH	7.46	7.45	7.54	7.78	7.95

The lakes at River Islands consist of 24 lakes with circulation occurring throughout all 24 lakes. Direct discharge will occur in Lakes 1 and 2, as show on Attachment A. Analytical data collected from the Lakes 1 and 2 are summarized below.

**Table 2. Lake Water Quality**

Analyte	Lake 1	Lake 2
TDS (mg/L)	568	510
EC (µS/cm)	1,120	1,019

While the quality of water to be discharged into the lakes is considered poor quality in regard to salts, shallow groundwater in the area is also considered poor quality. Analytical data collected from nearby shallow groundwater monitoring wells are summarized below.

**Table 3. Shallow Groundwater Quality**

<b>Parameter</b>	<b>MWR-28</b>	<b>MWR-32</b>	<b>MWR-3</b>	<b>MWR-26</b>
Distance from ASR well location	3 miles	3 miles	0.8 miles	0.8 miles
Depth to GW (feet bgs)	24	24	10.6	9.5
TDS (mg/L)	2,630	5,230	6,830	1,200
EC (µS/cm)	4,215	6,960	9,374	2,000
Chloride (mg/L)	810	1,490	2,300	327

Based on analytical data collected from shallow groundwater monitoring wells shown in Table 3, the quality of the shallow groundwater is similar to the quality of the proposed discharge from ASR well development and testing. This indicates that the discharge from the ASR well will not likely impact groundwater quality beyond current conditions.

Implementation of ASR pilot testing activities will be enrolled separately under the State Water Resources Control Board's *General Waste Discharge Requirements for Aquifer Storage and Recovery Projects that Inject Drinking Water into Groundwater (WQO 2012-0010)*.

The Water Quality Control Plan for the Sacramento River and San Joaquin River Basins, Fifth Edition, revised February 2019 (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 §13263(a) of the California Water Code, waste discharge requirements must implement the Basin Plan.

**FACILITY-SPECIFIC REQUIREMENTS**

The General Order and this NOA regulates the discharge from the development and testing of an ASR well.

1. Water generated during development and testing shall be disposed of as described in the Notice of Intent, the DMP (submitted on 23 January 2025), and in accordance with the requirements contained in the General Order.
2. Discharges at a location or in a manner different from that described in the NOI or this NOA is prohibited
3. All technical reports required herein that involve evaluation, 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, section 6735, 7835, and 7835.1. 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.

4. A Technical Report shall be submitted to the Central Valley Water Board **90 days after the discharge to the lakes has completed**. The report shall provide the results of the analytical data collected in accordance with the Discharger's DMP and include a discussion on impacts to the lake water quality and groundwater quality.
5. Monitoring results shall be submitted on an annual basis in accordance the General Order's Monitoring and Reporting Program and the Discharger's DMP, which was included in the NOI. Annual monitoring reports shall be submitted to the Central Valley Water Board on the **15<sup>th</sup> day of the second month following monitoring** (i.e. the 2025 report is due February 15). Monitoring shall include the approximate volume of discharge at each discharge location and date of each discharge (see the MRP included in the Order).
6. The Discharger shall submit the required annual fee (as specified in the annual billing issued by the State Water Board) until the NOA is officially terminated.
7. Failure to abide by the conditions of the General Order, including its monitoring and reporting requirements, and this letter authorizing applicability could result in enforcement actions, as authorized by provisions of the California Water Code.

## **SALT AND NITRATE CONTROL PROGRAMS**

The Central Valley Water Board adopted Basin Plan amendments incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting. The Basin Plan amendments were conditionally approved by the State Water Resources Control Board on 16 October 2019 (Resolution 2019-0057) and by the Office of Administrative Law on 15 January 2020 (OAL Matter No. 2019-1203-03).

- a. For salinity, dischargers that are unable to comply with stringent salinity requirements will instead need to meet performance-based requirements and participate in a basin-wide effort to develop a long-term salinity strategy for the Central Valley. The Discharger, with CV-SALTS ID **3684**, has opted to participate in the Prioritization and Optimization (P&O) Study.
- b. For the Nitrate Control Program, the Facility falls within the Eastern San Joaquin Groundwater Basin (Priority 2). Due to the nature of the discharge, no action is required at this time and the Discharger is not required to enroll in the Nitrate Control Program for this specific project.

As these strategies are implemented, the Central Valley Water Board may find it necessary to modify the requirements of this NOA to ensure the goals of the Salt and Nitrate Control Programs are met. More information regarding this regulatory planning process can be found on the Central Valley Water Board CV-SALTS website ([https://www.waterboards.ca.gov/centralvalley/water\\_issues/salinity](https://www.waterboards.ca.gov/centralvalley/water_issues/salinity)).

## DOCUMENT SUBMITTALS

All monitoring reports and other correspondence should be converted to searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50 MB should be emailed to: [centralvalleysacramento@waterboards.ca.gov](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: ASR Well No. 1  
Program: Non-15 Compliance  
Order: WQO 2003-0003-DWQ-0253  
CIWQS Place ID: 898258

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

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

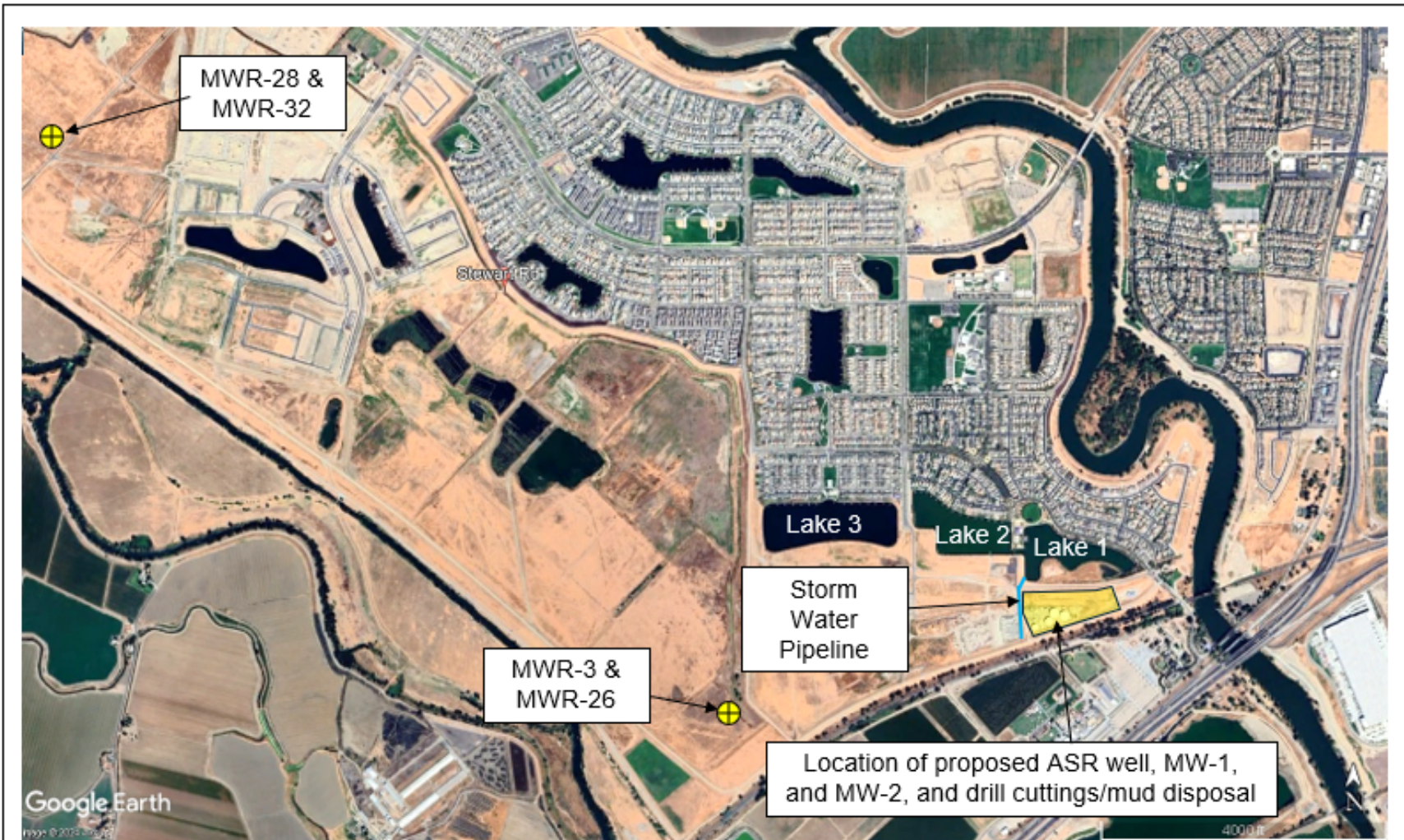
Now that the revised NOA has been issued, the Board's Compliance and Enforcement section will take over management of your case. Brendan Kenny is your point of contact for any questions about enrollment under the Order. All monitoring and technical reports should be submitted to him. The enclosed transmittal sheet shall be included with each monitoring report. If you find it necessary to make a change to your permitted operations, Brendan will direct you to the appropriate Permitting staff. You may contact Brendan at (916) 464-4635 or at [Brendan.kenny@waterboards.ca.gov](mailto:Brendan.kenny@waterboards.ca.gov).

for Patrick Pulupa  
Executive Officer


enclosures: Water Quality Order No. 2003-0003-DWQ  
Monitoring Report Submittal Transmittal Form

cc w/o encl: San Joaquin County Environmental Health Department, Stockton  
(*sent via email*)

ATTACHMENT A – SITE LOCATION AND FEATURES MAP



**Legend**

 Shallow groundwater monitoring well



2,000 ft



**SITE LOCATION AND FEATURES MAP**

**CITY OF LATHROP  
ASR WELL NO. 1**

**SAN JOAQUIN COUNTY**