



Central Valley Regional Water Quality Control Board

22 June 2022

John Lin
Acts 2 Campus Network
1275 Harbor Bay Parkway
Alameda, CA 94502

CERTIFIED MAIL
7022 0410 0001 5235 7513

NOTICE OF APPLICABILITY (NOA); STATE WATER RESOURCES CONTROL BOARD ORDER WQ-2014-0153-DWQ; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; ACTS 2 CAMPUS NETWORK; JENNESS PARK CHRISTIAN CAMP WASTEWATER TREATMENT FACILITY; TUOLUMNE COUNTY

On 27 August 2007, Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff received a Report of Waste Discharge (RWD), including Form 200 and a technical report, on behalf of the California Southern Baptist Convention for the Jenness Park Christian Camp Wastewater Treatment Facility (Facility or WWTF). The RWD includes a technical report prepared by Robert M. Belt, a California Registered Civil Engineer (RCE 36139 –[Deceased]), and Cooper Kessel Architects and Associates. The Facility has not previously been issued waste discharge requirements (WDRs). Acts 2 Campus Network (Discharger) purchased the Facility on 1 July 2020 and submitted a Form 200 on 28 September 2021.

Based on the information provided, the Facility treats and disposes of less than 100,000 gallons per day (gpd) of domestic wastewater and is therefore eligible for coverage under the general and specific conditions of the State Water Resources Control Board Water Quality Order 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order). This letter serves as formal notice that the General Order is applicable to your system and the wastewater discharge described below. You are hereby assigned enrollee number **2014-0153-DWQ-R5370** for your system.

You should familiarize yourself with the entire General Order and its attachments enclosed with this letter, which describe mandatory discharge and monitoring requirements. Sampling, monitoring, and reporting requirements applicable to your treatment and disposal methods must be completed in accordance with the appropriate treatment system sections of the General Order and the attached Monitoring and Reporting Program (MRP) No. **2014-0153-DWQ-R5370**. This MRP was developed after

consideration of your waste characterization and site conditions described in the attached memorandum.

DISCHARGE DESCRIPTION

The Facility is at 29005 Highway 108, Cold Springs in Tuolumne County (see Attachments A and B). The Facility treats domestic wastewater produced at a summer camp with a variety of housing units for both temporary and permanent staff and up to 450 guests during peak summer periods. The camp includes a dining hall, 10 recreational vehicle (RV) spaces, an administrative office, and a laundry area with four washing machines.

The RWD proposed upgrading the existing wastewater treatment system from several septic tanks and leach fields to a new collection system, wastewater treatment plant, and leach field. As part of the upgrades, most of the septic tanks were converted to lift stations. The wastewater treatment system was upgraded as proposed. However, only one half of the proposed disposal system was constructed (i.e., just Leach Field B). Leach Field B is designed to handle 31,000 gpd. The upgraded wastewater treatment facility is designed to treat up to 62,000 gpd as a monthly average and 84,000 gpd as peak daily flow. Since the camp was not expanded as proposed, the flows to the Facility are considerably less than the Facility's treatment and disposal capacity and there are no current plans, according to the Discharger, to expand the camp. Therefore, the Discharger requested the NOA limit the monthly average flow to 20,000 gpd.

Attachment C includes a process flow diagram for the Facility. The wastewater passes through two package wastewater treatment units that includes primary settling, rotating biological contactors, secondary settling, and filtration. Following the treatment system, wastewater is conveyed to 5,000-gallon dosing tanks that discharge wastewater to the leach field. The leach field contains 1,600 linear feet of a three-foot wide by six-foot deep rock-filled trench.

FACILITY SPECIFIC REQUIREMENTS AND EFFLUENT LIMITATIONS

The Discharger will maintain exclusive control over the discharge and shall comply with the terms and conditions of this NOA, General Order 2014-0153-DWQ, all attachments, and MRP No. 2014-0153-DWQ-R5370.

In accordance with Section B.1.a of the General Order, the monthly average total discharge from the WWTF to the leach field **shall not exceed 20,000 gpd.**

The Facility's principal treatment process utilized for BOD₅ removal is a rotating biological contactor (RBC). The General Order includes a BOD₅ effluent limitation of 90 mg/L for trickling filters. Both RBCs and trickling filters are aerobic, fixed biofilm treatment processes typically used for BOD₅ removal. Therefore, since RBCs are not specifically mentioned in the General Order, this NOA specifies the BOD₅ effluent limitation of 90 mg/L since the Facility's RBC system is similar to a trickling filter system and should provide similar level of BOD treatment. The Discharger shall comply with the

following effluent limitation when discharging to the leachfield, as summarized in Table 1 below.

Table 1 – Effluent Limitation

Constituent	Monthly Average Limit
BOD ₅	90 mg/L

The General Order states in Section B.1 that the Discharger shall comply with the setbacks as described in Table 3 of the General Order. This table summarizes different setback requirements for wastewater treatment system equipment, activities, land application areas, and storage and/or treatment ponds from sensitive receptors and property lines, where applicable. The Discharger shall comply with the applicable setback requirements, as summarized in the Table 2 below:

Table 2 – Site-Specific Applicable Setback Requirements

Equipment or Activity	Domestic Well (feet)	Flowing Stream (feet)	Ephemeral Stream Drainage (feet)	Property Line (feet)	Lake or Reservoir (feet)
Septic Tank, Treatment Unit, Treatment System, or Collection System	150	50	50	5	200
Leach Field	100	100	50	5	200

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

1. All Wastewater Systems requirements in Section B.1. of the General Order;
2. Aerobic Treatment Units requirements in Section B.3 of the General Order;
3. Subsurface Disposal Systems requirements in Section B.6 of the General Order;
4. Sludge/Solids/Biosolids Disposal requirements in Section B. 8 of the General Order; and
5. Groundwater and Surface Water Limitations specified in Section C.1 of the General Order

Provision E.1 of the General Order requires dischargers enrolled under the General Order to prepare and implement the following reports **by 20 September 2022**.

- Spill Prevention and Emergency Response Plan (Provision E.1.a.).
- Sampling and Analysis Plan (Provision E.1.b).
- Sludge Management Plan (Provision E.1.c)

A copy of the Spill Prevention and Emergency Response Plan and the Sampling and Analysis Plan shall be maintained at the treatment facility and shall be presented to the

Regional Water Board staff upon request. The sludge management plan shall be submitted to the Central Valley Water Board by **20 September 2022**.

On 27 September 2019, Senate Bill 317 was signed by the Governor adding Section 25210.2 to the California Health and Safety Code, which contains chemical sale, use, and discharge prohibitions for recreational vehicle (RV) chemical wastes to land, as of 1 January 2022.

The Discharger shall post, in a conspicuous location, a notice stating the following:

“The State of California prohibits the use of products in RV holding tanks, including deodorizers, that contain bronopol, dowicil, formalin, formaldehyde, glutaraldehyde, paraformaldehyde, para-dichlorobenzene, benzene, toluene, xylene, ethylene glycol, 1,1,1-trichloroethane, trichloroethylene, or perchloroethylene. These chemicals can inhibit biological activity in onsite wastewater treatment systems and threaten groundwater and drinking water wells, and are strictly forbidden. Please use bacteria- or enzyme-based products.”

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

Failure to comply with the requirements in this NOA, General Order 2014-0153-DWQ, with all attachments, and **MRP No. 2014-0153-DWQ-R5370** could result in an enforcement action as authorized by provisions of the California Water Code. Discharge of wastes other than those described in this NOA is prohibited. If the method of waste disposal changes from that described in this NOA, you must submit a new Report of Waste Discharge describing the new operation. If wastewater flows to the Facility substantially increase and the monthly average flows approach or exceed 20,000 gpd, the Central Valley Water Board staff must be contacted to determine if further analysis is required.

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

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

On 31 May 2018, the Central Valley Water Board adopted Basin Plan amendments incorporating new strategies for addressing ongoing salt and nitrate accumulation in the Central Valley as part of the Central Valley Salinity Alternatives for Long-Term Sustainability (**CV-SALTS**) initiative. Further details of these strategies are discussed in

the enclosed memorandum. As these strategies are implemented, the Central Valley Water Board may find it necessary to modify the requirements of this NOA to ensure the goals of the Salt and Nitrate Control Program are met.

All monitoring reports and other correspondences shall be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to: centralvalleyfresno@waterboards.ca.gov. Documents that are 50MB or larger should be transferred to a disk and mailed to the Central Valley Water Board office at 1685 E Street, Fresno, CA 93706. To ensure that your submittals are routed to the appropriate staff, the following information block should be included in any email used to transmit documents to this office:

Program: Non-15,
Place ID: 657618,
Facility Name: Jenness Park Christian Camp WWTF,
Order: 2014-0153-DWQ-R5370.

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 Dale Harvey. Mr. Harvey can be reached at (559) 974-1965 or dale.harvey@waterboards.ca.gov. Questions regarding the permitting aspects of the NOA, and notification for termination of coverage under the Small Domestic General Order, shall be directed, via the paperless office system, to the WDR Permitting Unit, attention Jeff Robins. Jeff Robins can be reached at (559) 445-5976 or by email at Jeff.Robins@waterboards.ca.gov.

Any person aggrieved by this action of the Central Valley Water Board may petition the State Water Resources Control Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Resources Control Board must receive the petition by 5:00 p.m., 30 days after the date of this NOA, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Resources Control Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the internet at [Copies of the laws and regulations applicable to filing petitions](https://www.waterboards.ca.gov/public_notices/petitions/water_quality) (https://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request. If you have any questions regarding this matter, please contact Jeff Robins by phone at (559) 445-5976 or by email at Jeff.Robins@waterboards.ca.gov.

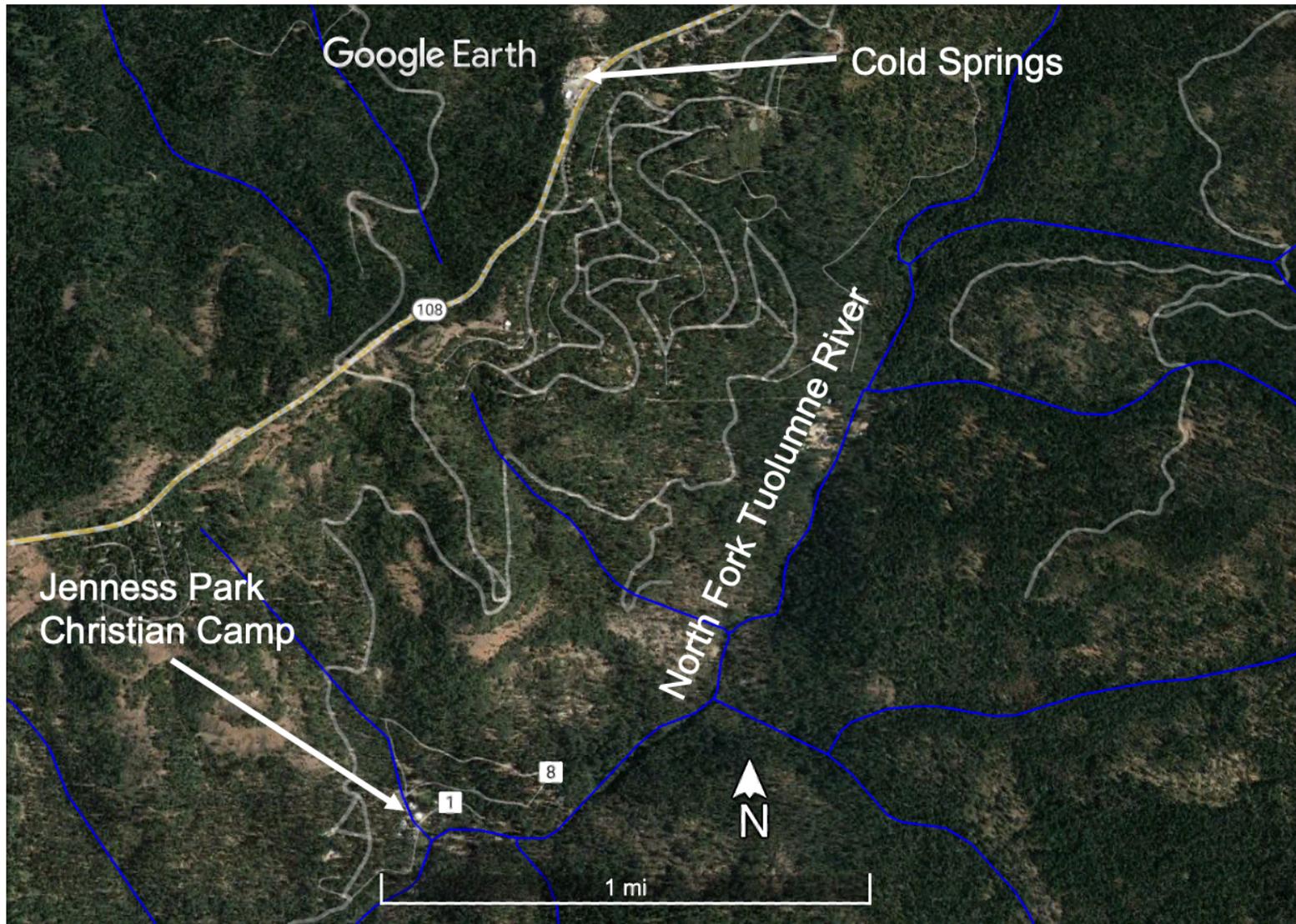
In order to conserve paper and reduce mailing costs, a paper copy of General Order WQO 2014-0153-DWQ has been sent only to the Discharger. Others are advised that the [General Order](#) is available on the State Water Board's website (http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf).

Original Signed by Clay L. Rodgers for:
Patrick Pulupa
Executive Officer

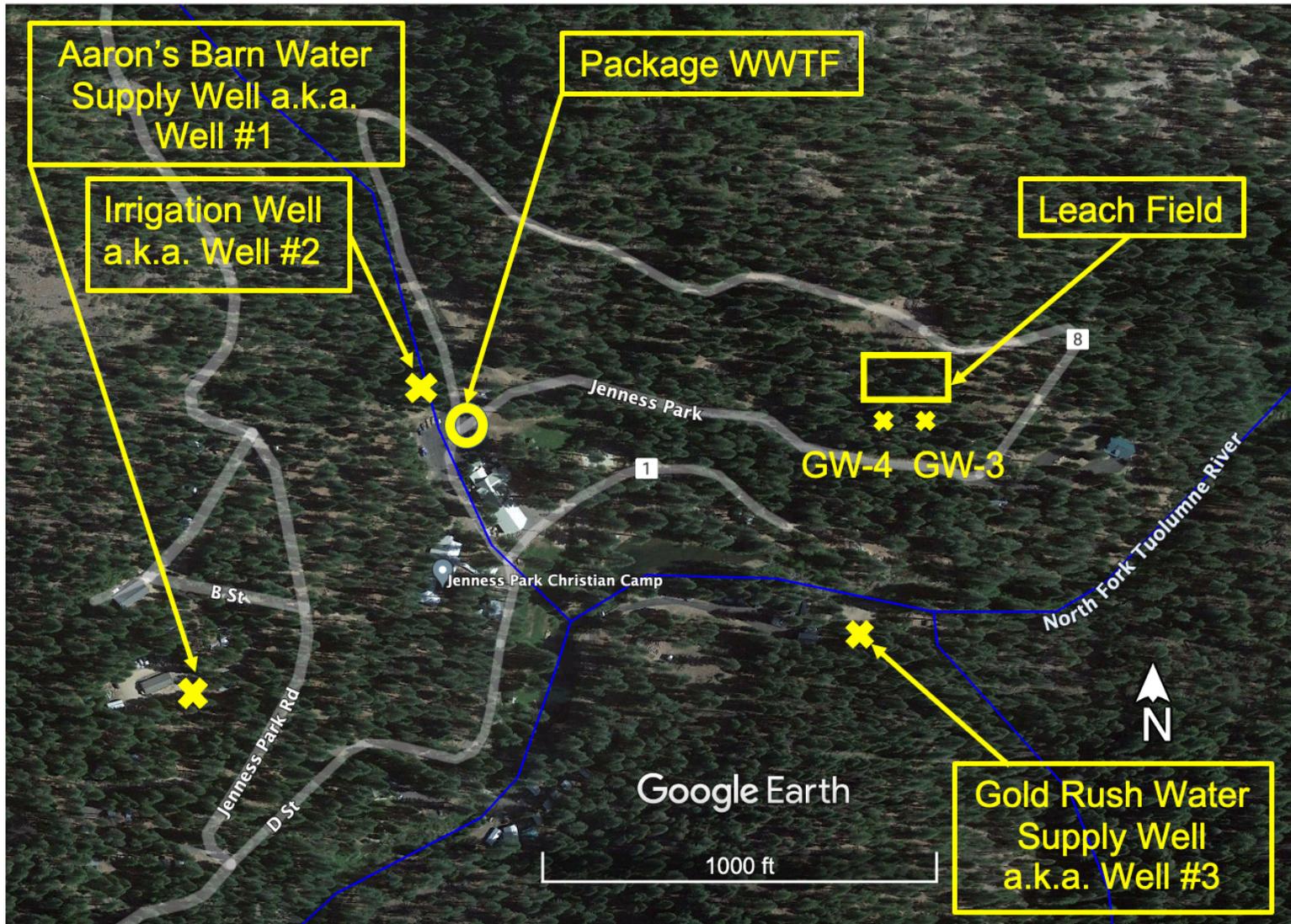
- Attachments:
- Attachment A – Site Location Map
 - Attachment B – Site Plan Map
 - Attachment C – Process Flow Diagram

- Enclosures:
- Monitoring and Reporting Program 2014-0153-DWQ-R5370
 - Staff Review Memorandum for Tuolumne County Jenness Park Christian Camp WWTF
 - State Water Resources Control Board Order WQ 2014-0153-DWQ (Discharger only)

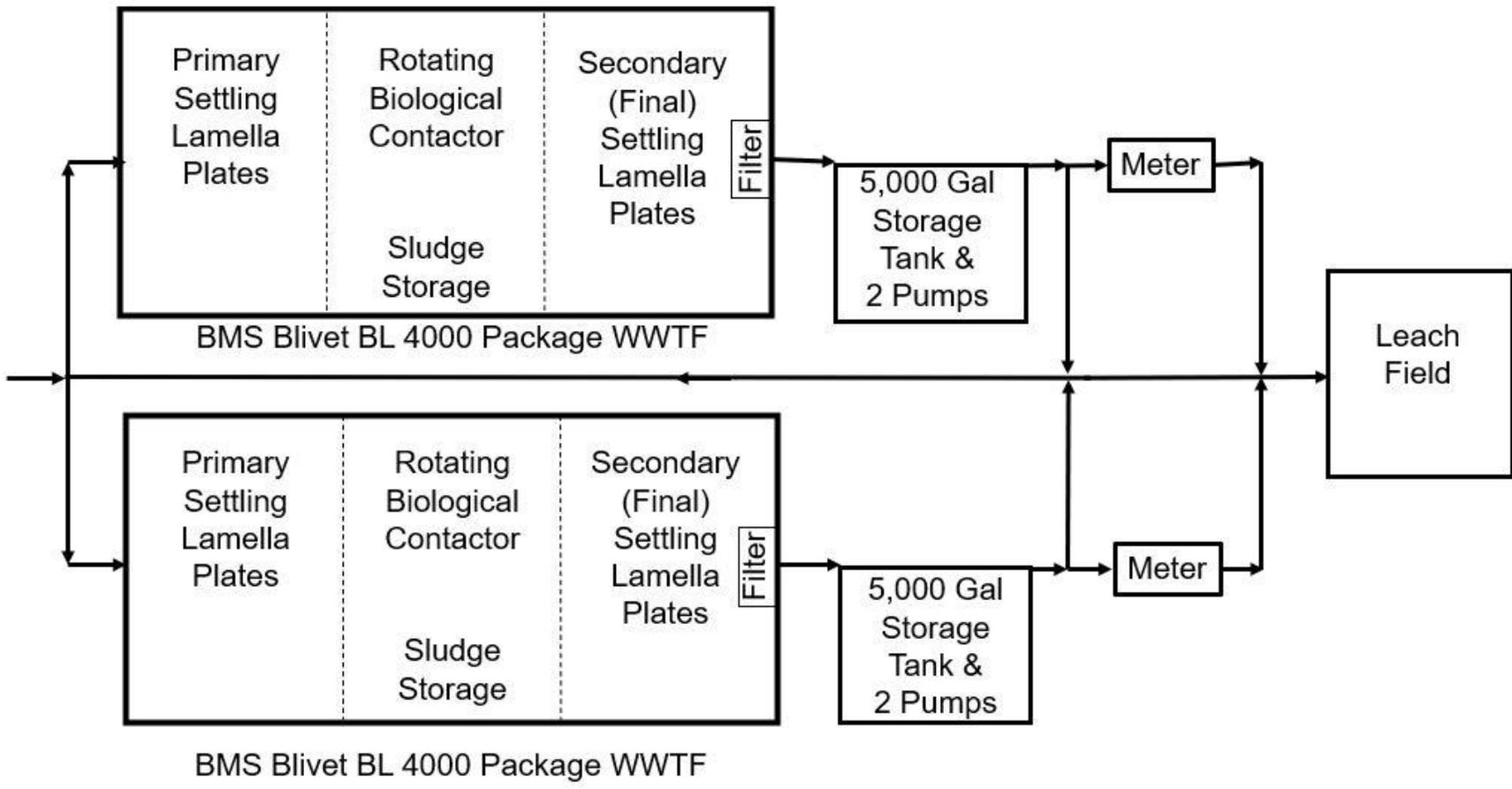
- cc's:
- Christopher Moskal, State Water Resources Control Board, OCC, Sacramento (via email)
 - Laurel Warddrip, State Water Resources Control Board, DWQ, Sacramento (via email)
 - Neal Funston, State Water Resources Control Board, Wastewater Operator Certification Program (via email)
 - Dale Harvey, Central Valley Water Board, Fresno (via email)
 - Tricia Wathen, State Water Resources Control Board, DDW, (via email)
 - Tuolumne County Public Works Department, Sonora, CA
 - Tuolumne County Environmental Health, Tuolumne, CA
 - Barry Lloyd, Jenness Park Christian Camp (via email)
 - Cooper Kessel, Architects and Builders, (via email)



ATTACHMENT A – SITE LOCATION MAP
NOTICE OF APPLICABILITY 2014-0153-DWQ-R5370
Drawing Reference: Google Earth



ATTACHMENT B - SITE PLAN MAP
 NOTICE OF APPLICABILITY 2014-0153-DWQ-R5370
 Drawing Reference: Google Earth



ATTACHMENT C – PROCESS FLOW DIAGRAM
 NOTICE OF APPLICABILITY 2014-0153-DWQ-R5370

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION**

**MONITORING AND REPORTING PROGRAM NO. 2014-0153-DWQ-R5370
FOR
ACTS 2 CAMPUS NETWORK
JENNESS PARK CHRISTIAN CAMP
WASTEWATER TREATMENT FACILITY
TUOLUMNE COUNTY**

This Monitoring and Reporting Program (MRP) describes requirements for monitoring a wastewater treatment system. This MRP is issued pursuant to Water Code section 13267. Acts 2 Campus Network (Discharger) shall not implement any changes to this MRP unless and until a revised MRP is issued by the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) or Executive Officer.

Section 13267 of the California Water Code states, in part:

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region, or any citizen or domiciliary, or political agency or entity of this state who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge, waste outside of its region that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports and shall identify the evidence that supports requiring that person to provide the reports.”

Section 13268 of the California Water Code states, in part:

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

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

The Discharger owns and operates the Jenness Park Christian Camp Wastewater Treatment System (Facility or WWTF) that is subject to the Notice of Applicability (NOA) 2014-0153-DWQ-R5370, which enrolls the WWTF under State Water Resources

Control Board Order WQ 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order). The reports required in this MRP are necessary to ensure that the Discharger complies with the NOA and General Order. Pursuant to Water Code section 13267, the Discharger shall implement this MRP and shall submit the monitoring reports described herein.

All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. The name of the sampler, sample type (grab or composite), time, date, location, bottle type, and any preservative used for each sample shall be recorded on the sample chain of custody form. The chain of custody form must also contain all custody information including date, time, and to whom samples were relinquished. If composite samples are collected, the basis for sampling (time or flow weighted) shall be approved by Central Valley Water Board staff.

Field test instruments (such as those used to test pH, dissolved oxygen, and electrical conductivity) may be used provided that they are used by a State Water Resources Control Board, Environmental Laboratory Accreditation Program (ELAP) certified laboratory, or:

1. The user is trained in proper use and maintenance of the instruments;
2. The instruments are field calibrated prior to monitoring events at the frequency recommended by the manufacturer;
3. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
4. Field calibration reports are maintained and available for at least three years.

WASTEWATER TREATMENT SYSTEM MONITORING

Effluent samples shall be taken at a location that represents the effluent quality from the dosing tanks to the leach field. At a minimum, effluent monitoring shall include the monitoring specified in Table 1 below. Monitoring specified in Table 1 is only required when discharge of wastewater to the leach field system occurs.

Table 1 – Effluent Monitoring

Constituent	Units	Sample Type	Monitoring Frequency	Reporting Frequency
Flow	gpd	Meter	Continuous (see 1 below)	Quarterly
BOD ₅	mg/L	Grab	Monthly	Quarterly
TSS	mg/L	Grab	Monthly	Quarterly
pH	SU	Grab	Monthly	Quarterly
EC	µmhos/cm	Grab	Monthly	Quarterly

Constituent	Units	Sample Type	Monitoring Frequency	Reporting Frequency
Total Nitrogen (as N)	mg/L	Grab	Quarterly	Quarterly

1. For continuous analyzers, the Discharger shall report documented routine meter maintenance activities including date, time of day, and duration, in which the analyzer(s) is not in operation.

RECREATIONAL VEHICLE MONITORING

Any wastewater system that has accepted recreational vehicle, portable toilet, or similar waste in the previous 12 months shall perform the following additional monitoring. Samples shall be collected to characterize effluent that is stored in wastewater ponds or that will be applied to a disposal area. Wastewater shall be monitored as specified in Table 2 below.

Table 2 – Recreational Vehicle Monitoring Requirements

Constituent	Units	Sample Type	Sampling Frequency	Reporting Frequency
Zinc	mg/L	Grab	Quarterly	Quarterly
Phenol	mg/L	Grab	Quarterly	Quarterly
Formaldehyde	mg/L	Grab	Quarterly	Quarterly

SUBSURFACE DISPOSAL AREA MONITORING

In general, monitoring shall be sufficient to determine if wastewater is evenly applied, the disposal area is not saturated, burrowing animals and/or deep-rooted plants are not present, and odors are not present. Inspection of dosing pump controllers, automatic distribution valves, etc. is required to maintain optimum treatment in the disposal area (and any sand or media filter, if present). Monitoring of the leach field systems shall, at a minimum, include the monitoring specified in Table 3 below. Monitoring in Table 3 is only required during the quarters when discharge of wastewater to the leach field system occurs.

Table 3 – Subsurface Disposal Area Monitoring

Constituent	Inspection Frequency	Reporting Frequency
Pump Controllers, Automatic Valves, etc. (See 1 below)	Quarterly	Quarterly
Nuisance Odor Conditions	Quarterly	Quarterly
Saturated Soil Conditions (See 2 below)	Quarterly	Quarterly
Plant Growth (See 3 below)	Quarterly	Quarterly

Constituent	Inspection Frequency	Reporting Frequency
Vectors or Animal Burrowing (See 4 below)	Quarterly	Quarterly
Disposal Field Effluent Observation Wells (See 5 below)	Quarterly	Quarterly

1. All pump controllers and automatic distribution valves shall be inspected for proper operation as recommended by the manufacturer.
2. Inspect a disposal area for saturated conditions.
3. Shallow-rooted plants are generally desirable, deep-rooted plants such as trees shall be removed as necessary.
4. Evidence of animals burrowing shall be immediately investigated, and burrowing animal populations controlled as necessary.
5. Record water levels in the wells and adjust trim valves to balance water depth between lateral pairs.

SLUDGE MONITORING

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

GROUNDWATER MONITORING

Analysis of the data and groundwater flow directions shall be performed at least annually and shall be performed under the supervision of a California licensed professional. The Discharger may request a reduced monitoring and reporting schedule once adequate data has been collected to characterize the site.

Prior to sampling, groundwater elevations shall be measured, and the wells shall be purged of at least three well volumes and until pH and electrical conductivity have stabilized. No-purge, low-flow, or other sampling techniques are acceptable if they are described in an approved Sampling and Analysis Plan. Depth to groundwater shall be measured to the nearest 0.25 inches. Groundwater elevations shall be calculated. Samples shall be collected using approved USEPA methods.

The Discharger shall monitor groundwater monitoring wells #3 and #4 (any other subsequently approved wells) as specified in Table 3 below. If the monitoring wells are dry and the Discharger cannot collect a groundwater sample, the Discharger shall note that in the quarterly self-monitoring report.

Table 4 - Groundwater Monitoring Requirements

Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Groundwater Elevation (See 1 below)	0.25 inches	Calculated	Quarterly	Annually
Depth to Groundwater	0.25 inches	Measurement	Quarterly	Annually
Total Coliform Organisms	MPN/100 mL	Grab	Quarterly	Annually
EC	µmhos/cm	Grab	Quarterly	Annually
Nitrate (as Nitrogen)	mg/L	Grab	Quarterly	Annually

1. Groundwater elevation shall be based on depth to water using a surveyed measuring point elevation on the monitoring well and a surveyed reference elevation.

WASTEWATER COLLECTION SYSTEM OBSERVATIONS

The Discharger shall conduct monthly observations of the wastewater collection system, specifically any pipelines crossing a stream or surface water body. The Discharger shall note the conditions of the pipes and insulated sleeves as well as any evidence of leaks. Any cracks or leaks shall be repaired immediately. A log of all observations and repairs shall be recorded and included in the quarterly self-monitoring reports.

REPORTING

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, solids, etc.), and reported analytical or visual inspection results are readily discernable. The data shall be summarized to clearly illustrate compliance with the General Order and NOA as applicable. The results of any monitoring done more frequently than required at the locations specified in the MRP shall be reported in the next regularly scheduled monitoring report and shall be included in calculations as appropriate.

All regulatory documents, submissions, materials, data, monitoring reports, and correspondence should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to: centralvalleyfresno@waterboards.ca.gov. Documents that are 50MB or larger should be transferred to a disk and mailed to the appropriate Regional Water Board office, in this case 1685 E Street, Fresno, CA 93706. To ensure that your submittals are routed to the appropriate staff, the following information block should be included in any email used to transmit documents to this office:

Program: Non-15,
Place ID: 657618,
Facility Name: Jenness Park Christian Camp,
Order: 2014-0153-DWQ-R5370

A. Quarterly Monitoring Reports

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

1. Results of all required monitoring.
2. A comparison of monitoring data to the requirements (including the flow limitation), disclosure of any violations of the NOA and/or General Order, and an explanation of any violation of those requirements. Data shall be presented in tabular format.
3. Copies of laboratory analytical report(s) and chain of custody form(s).
4. A copy of the logs from the wastewater collection system observations conducted during the quarter. The Discharger shall note if any repairs were conducted or need to be conducted.
5. For each groundwater monitoring well, a table showing the results of groundwater monitoring for the parameters/constituents listed in Table 4 for at least the last five years, up through the current quarter.

B. Annual Report

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

1. Tabular and graphical summaries of all monitoring data collected during the year.
2. An evaluation of the performance of the wastewater treatment system, including discussion of the capacity issues, nuisance conditions, system problems and a forecast of the flows anticipated in the next year. A flow rate evaluation, as described in the General Order (Provision E.2.c), shall also be submitted.
3. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into compliance with the NOA and/or General Order.
4. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
5. The name and contact information for the wastewater operator responsible for operation, maintenance, and system monitoring.
6. If groundwater monitoring samples were able to be collected during the year, the annual report shall include a groundwater contour map based on

groundwater elevations for each quarter of the calendar year. The maps shall show the gradient and direction of groundwater flow under/around the facility and/or effluent disposal area for each quarter. The maps shall also include the locations of monitoring wells and subsurface wastewater disposal area.

7. If groundwater monitoring samples were able to be collected during the year, the annual report shall include an evaluation of the groundwater quality beneath the site and determination of compliance or noncompliance with the Groundwater Limitations specified in Section C.1 of the General Order

A letter transmitting the monitoring reports shall accompany each report. The letter shall report violations found during the reporting period, and actions taken or planned to correct the violations and prevent future violations. The transmittal letter shall contain the following penalty of perjury statement and shall be signed by the Discharger or the Discharger's authorized agent:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

The Discharger shall begin implementing the above monitoring program the first day of the month following issuance of this MRP.

Ordered by:

Original Signed by Clay L. Rodgers for:
PATRICK PULUPA, Executive Officer

6/22/2022
(Date)

GLOSSARY

BOD ₅	Five-day biochemical oxygen demand
CaCO ₃	Calcium carbonate
DO	Dissolved oxygen
EC	Electrical conductivity at 25° C
FDS	Fixed dissolved solids
TDS	Total dissolved solids
TKN	Total Kjeldahl nitrogen
TSS	Total suspended solids
Continuous	The specified parameter shall be measured by a meter continuously.
24-hr Composite	Samples shall be a flow-proportioned composite consisting of at least eight aliquots over a 24-hour period.
Daily	Every day except weekends or holidays.
Twice Weekly	Twice per week on non-consecutive days.
Weekly	Once per week.
Twice Monthly	Twice per month during non-consecutive weeks.
Monthly	Once per calendar month.
Quarterly	Once per calendar quarter.
Semiannually	Once every six calendar months (i.e., two times per year) during non-consecutive quarters.
Annually	Once per year.
mg/L	Milligrams per liter
mg/kg	Milligrams per kilogram
mL/L	Milliliters [of solids] per liter
µg/L	Micrograms per liter
µmhos/cm	Micromhos per centimeter
gpd	Gallons per day
gal/acre/mo	Gallons per acre per month
mgd	Million gallons per day
MPN/100 mL	Most probable number [of organisms] per 100 milliliters
NA	Denotes not applicable
NTU	Nephelometric Turbidity Units
UV	Ultraviolet
mJ/cm ²	Millijoules/cm ²
SU	Standard pH units



Central Valley Regional Water Quality Control Board

TO: Scott J. Hatton
Supervising Water Resource Control Engineer

FROM: Alexander S. Mushegan
Senior Water Resource Control Engineer
RCE 84208

Jeff Robins
Water Resource Control Engineer



DATE: 22 June 2022

APPLICABILITY OF COVERAGE UNDER STATE WATER RESOURCES CONTROL BOARD ORDER WQ 2014-0153-DWQ; GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS; ACT 2 CAMPUS NETWORK; JENNESS PARK CHRISTIAN CAMP WASTEWATER TREATMENT FACILITY; TUOLUMNE COUNTY

On 27 August 2007, Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff received a Report of Waste Discharge (RWD), including Form 200 and a technical report, on behalf of the California Southern Baptist Convention for the Jenness Park Christian Camp Wastewater Treatment Facility (Facility or WWTF). The RWD includes a technical report, dated 23 August 2007, prepared and stamped by Robert M. Belt, a California Registered Civil Engineer (RCE 36139 [*deceased*]), and Cooper Kessel from Cooper Kessel Architects and Associates. On 28 September 2021, Barry Lloyd (Facility contact) provided a revised Form 200 listing Acts 2 Campus Network (Discharger) as the new Facility owner. The Facility has not previously been issued waste discharge requirements (WDRs).

This memorandum provides a summary of Central Valley Water Board staff's review of the RWD, and subsequent materials, and the applicability of the Facility's discharge to be covered under State Water Resources Control Board Order WQ 2014-0153-DWQ, *General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems* (General Order).

BACKGROUND INFORMATION

The Discharger owns and operates the Facility, which is 0.9 miles southeast of Highway 108 and 1.6 miles south southwest of the community of Cold Springs in Tuolumne County. The Facility is on Assessor's Parcel Number (APN) No. 023-150-007, at 38.1373° N, 120.0637° W (see Attachments A and B of the NOA). The Facility treats domestic wastewater produced from a variety of housing units, which house temporary and permanent staff and up to 450 guests during peak summer periods. There are ten recreational vehicle (RV) spaces. They are occupied by visiting volunteer staff and ministers on a temporary basis. Each of the RV spaces allows the RV in the space to discharge wastewater directly into the wastewater collection system.

Prior to the 2007 upgrade, the camp was served by several septic tanks and leach fields. As part of the upgrade, all of the septic tanks were converted to pump stations to pump their wastewater to the new, centralized wastewater treatment facility and the new leach field. In 2007 when the RWD was submitted, the plan was to expand the camp to serve approximately 1,000 guests and staff. The expansion of the camp never occurred. According to Mr. Cooper Kessel, the upgraded wastewater treatment facilities described in the 2007 RWD were installed except that only one half of the proposed leach field (i.e., only Disposal Field B and not Disposal Field A) was installed.

Attachment C of the NOA is a process flow diagram for the Facility. The upgraded wastewater treatment system includes the installation of two, BMS Blivet 4000 packaged wastewater treatment units that each have an average design flow of 24,304 gallons per day (gpd) and a maximum daily design flow of 39,626 gpd. The treatment units contain primary treatment with lamella plates followed by secondary treatment with rotating biological contactors (RBC), followed by secondary/final settling with a second set of lamella plates. Each package unit also includes a Saran™ filter (framed fine screen filter) after the secondary settling. Treated wastewater is conveyed from each treatment train to a separate 5,000-gallon dosing tank.

According to the Facility operator, the treatment units are generally operated in series. Since the camp was not expanded as initially proposed, flows are significantly less than the Facility's design flows. Therefore, the Discharger requested the NOA specify a monthly average flow limit of 20,000 gpd.

With regards to sludge handling at the Facility, sludge settles in the bottom of the primary settling zone, the RBC tanks, and secondary settling zone. The manufacturer's literature estimates there is approximately 12 weeks of sludge storage capacity in the bottom of the zone where the RBCs are located. According to the Discharger, sludge is removed as needed (approximately quarterly basis) and disposed at the Tuolumne Utilities District/Sonora Regional Wastewater Treatment Facility.

Effluent from the dosing tanks is discharged to the onsite leach field. As mentioned above, only Leach Field B was constructed as proposed in the 2007 RWD. Leach Field B contains 1,600 linear feet of a 3-foot wide by 6-foot deep rock-filled trench. The

design calculations indicate each 50 feet of trench can dispose up to 1,000 gpd. Therefore, the 1,600 feet of trench can reportedly dispose up to 32,000 gpd. The separation of the trenches is approximately 10 feet on center. The leach field has eight separate zones. Each zone is dosed by an automatic distributing valve that advances to the next zone with each pump cycle.

POTENTIAL THREAT TO WATER QUALITY

The Discharger reported some monitoring data for the Facility up to mid-2019. The most recent data for 2018 and the first half of 2019 is shown in Table 1 below. Non-detect measurements are shown as "ND". To calculate averages containing ND measurements, ND's are valued as one-half the reporting limit for the measurement. "--" means no data was reported that month.

Table 1 – Wastewater Flow and Quality Data

Month	Monthly Average Flow (gpd)	BOD ₅ Influent (mg/L)	BOD ₅ Effluent (mg/L)	TSS Influent (mg/L)	TSS Effluent (mg/L)
Jan-18	6,672	77	ND	26	3
Feb-18	8,378	63	7	14	5
Mar-18	7,273	24	23	19	5
Apr-18	8,793	215	6	167	3
May-18	4,728	623	13	578	26
Jun-18	8,496	627	458	707	492
Jul-18	13,574	330	89	211	71
Aug-18	8,593	--	--	--	--
Sep-18	8,137	299	47	242	42
Oct-18	5,794	234	10	341	7
Nov-18	4,367	127	28	47	18
Dec-18	3,319	51	11	26	4
Jan-19	5,061	51	29	37	15
Feb-19	7,996	74	50	38	23
Mar-19	7,576	45	16	50	10
Apr-19	5,600	94	56	49	22
May-19	3,241	81	24	56	7
Jun-19	8,509	239	155	129	71
Average	7,006	191	60	161	48

Flows have historically been higher in the summer due to camp visitors. According to an onsite representative, since the camp was sold in 2019, fewer year-round residents reside at the camp.

To help determine underlying groundwater quality, Central Valley Water Board staff reviewed available well data for nearby wells using the [National Water Quality Monitoring Council's Water Quality Portal website](https://www.waterqualitydata.us/portal) (<https://www.waterqualitydata.us/portal>). Three wells were located within 12 miles of the discharge location (Well #A = 002NS016E10K001M, Well #B = 003N017E02G001M, and Well #C = 003N021E18E001M). The data are summarized in Table 2 below.

Table 2 – Groundwater Quality from Nearby Wells

Constituent/Parameter)	Well #A	Well #B	Well #C
Date Sampled	October-2008	July-2008	July-2008
Well Hole Depth (ft bgs)	400	580	650
EC (µmhos/cm @ 25°C)	153	226	110
TDS (mg/L)	124	178	88
Nitrite (as N) (mg/L)	ND	ND	ND
Nitrate (as N) (mg/L)	0.065	0.17	0.055
Inorganic Nitrogen (mg/L)	0.07	0.17	0.06
Ammonia and Ammonium (as N) (mg/L)	ND	ND	ND
Organic Nitrogen	ND	--	--
pH (SU)	6.3	6.8	6.6
Hardness (mg/L as CaCO ₃)	58.7	103	43.9
Sodium (mg/L)	9.32	6.75	5.58
Potassium (mg/L)	1.41	4.42	1.66
Chloride (mg/L)	1.45	0.99	0.82
Sulfate (mg/L)	6.17	0.44	0.2
Alkalinity (mg/L as CaCO ₃)	73.8	122	58.9

The most recent source water quality test results are shown in Table 3 below. The [Safe Drinking Water Information System](https://sdwis.waterboards.ca.gov/PDWW/index.jsp) (<https://sdwis.waterboards.ca.gov/PDWW/index.jsp>) provides the source water quality data. The RWD provides the location of the wells (Attachment B). According to the operator, Aaron's Barn Water Supply Well (Well #1) is the main potable water supply well for the camp. Well #2 is not connected to the potable water system and is considered an irrigation well. Gold Rush Water Supply Well (Well #3) is currently valved off from the current potable water supply but could be brought back on in an emergency.

Table 3 – Source Water Quality from Nearby Wells

Constituent/Parameter	Well #1	Well #3
Date Sampled	Dec-2020	Sep-2016
EC (µmhos/cm @ 25°C)	536	52
Total Dissolved Solids (mg/L)	370	45
Nitrate-Nitrite as Nitrogen (mg/L)	ND (see note 1)	ND (see note 1)
pH (SU)	8.4	7.4
Hardness, Total (mg/L as CaCO ₃)	108	11
Sodium (mg/L)	62.3	2
Potassium (mg/L)	ND	ND
Chloride (mg/L)	22	1.6
Sulfate (mg/L)	160	3.4
Alkalinity (mg/L as CaCO ₃)	37.8	22

1. Detection level of 0.4 mg/L.

The 2007 RWD proposed a total of eight groundwater monitoring wells (two upgradient and two downgradient for each of the two leach fields). Only two groundwater monitoring wells, downgradient of Leach Field B, were installed in 2008 and they are still functional. However, according to camp representatives, the monitoring wells have always been dry. The monitoring wells are approximately seven feet deep, one foot deeper than disposal trench. The two up-gradient wells for Leach Field B were never installed.

According to the RWD, the soils in the disposal field are classified as sandy loam or sandy clay loam, based on the USDA classification system. The underlying parent material is granitic in origin. Soil profile holes were excavated in eight locations to observe the soil horizons and look for evidence of groundwater. Most of the profile holes were a minimum of 11 feet deep. None of the holes encountered backhoe refusal or any evidence of groundwater. Fourteen percolation tests were conducted at various depths with an average depth of 74 inches. The average percolation rate was 6.6 minutes per inch with a range of 0.4 minutes per inch to 27.1 minutes per inch.

The RWD states all pipes crossing the river are in insulated pipe sleeves. There is one pipe crossing at the bridge crossing the North Fork of the Tuolumne River to the Ponderosa Flats area. On the drawing it states, “insulate force main and protect with C-900 plastic sleeve secured at 5-foot intervals to the bridge structure.” An onsite representative stated they inspect the pipe crossing annually for cracks or leaks and to make sure check valves are operating properly.

MONITORING REQUIREMENTS

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

- Aerated Treatment Unit Monitoring,
- Recreational Vehicle Discharge Monitoring,
- Subsurface Disposal Area Monitoring, and
- Solids Disposal Monitoring.
- Groundwater Monitoring

NITROGEN LIMIT EVALUATION

The General Order requires that wastewater systems with a flow rate greater than 20,000 gallons per day be evaluated to determine if nitrogen effluent limits are required, as described in Attachment 1 of the General Order. The Discharger requested the NOA specify a flow limit of 20,000 gpd. Therefore, a Nitrogen Effluent Limit Evaluation is not required for the Facility at this time. Furthermore, as discussed in more detail below, the Facility and the disposal areas are not within a prioritized basin for the Nitrate Control Program.

WASTEWATER TREATMENT OPERATION

The General Order (Provision E.2.k) requires that wastewater facilities “be supervised and operated by persons possessing a wastewater treatment operator certificate of the appropriate grade.” According to Neal Funston with the State Water Resources Control Board, the current operators have Distribution-1 licenses (a drinking water certificate), but do not have wastewater operator certifications. Mr. Funston stated the State Water Resources Control Board will contact the Discharger concerning operator certification once the NOA is issued.

SALT AND NITRATE CONTROL PROGRAMS

As part of the Central Valley Salinity Alternatives for Long Term Sustainability (CVSALTS) initiative, the Central Valley Water Board adopted Basin Plan amendments incorporating new programs for addressing ongoing salt and nitrate accumulation in the Central Valley at its 31 May 2018 Board Meeting (Resolution R5-2018-0034). Pursuant to the Basin Plan amendments, dischargers were sent a Notice to Comply on 5 January 2021 with instructions and obligations for the Salt Control Program within one year of the effective date of the amendments. Upon receipt of the Notice to Comply, the Discharger was given until 15 July 2021 to inform the Central Valley Water Board of their choice between Option 1 (Conservative Option for Salt Permitting) or Option 2 (Alternative Option for Salt Permitting). The Discharger submitted a Notice of Intent (CV SALTS ID: 2793) on 14 July 2021 selecting Option 2 and will participate in the Prioritization and Optimization Study.

For the Nitrate Control Program, the WWTF and disposal areas are not within a prioritized basin. Basin 5.022.02 (San Joaquin Valley-Modesto – about 38 miles away at its nearest location) is the nearest basin/sub-basins. Implementation within an unprioritized basin/sub-basins will occur at the direction of the Executive Officer. More

information on the Salt and Nitrate Control Programs can be found at the [CV-SALTS Website](https://www.cvsalinity.org/public-info) (<https://www.cvsalinity.org/public-info>).