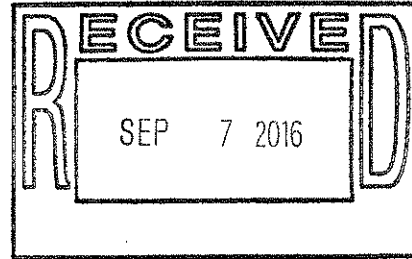


Central Valley Regional Water Quality Control Board

1 September 2016

James Anderson, General Manager  
Malaga County Water District  
3580 South Frank Avenue  
Fresno, CA 93725



**REVISED GROUNDWATER MONITORING WELL WORKPLAN REVIEW, MALAGA COUNTY WATER DISTRICT, WASTEWATER TREATMENT FACILITY, FRESNO COUNTY, WID 5D100124001, WDRS R5-2014-0145, CEASE AND DESIST ORDER R5-2014-146, NPDES NO. CA0084239**

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff reviewed the August 2016 *Revised Groundwater Monitoring Well Installation Workplan* (Workplan) for the subject facility (Facility). The submittal was prepared by Provost and Pritchard Consulting Group and electronically submitted on 19 August 2016. The Workplan was required by Tasks 4 and 4a of Cease and Desist Order R5-2014-0146 (Order) for the subject facility. Tasks 4 and 4a required the following:

4. *Comply with the following schedule to ensure sufficient and adequate data are available for determining compliance with Groundwater Limitations V.B in WDRs R5-2014-0145, and for determining if the disposal ponds meet exemptions from Title 27, California Code of Regulations (CCR) in section 20090(b). Adequate groundwater data include data that are representative of regional conditions unaffected by the Facility (i.e., background data), and data representative of first-encountered groundwater downgradient of the Facility at locations where impacts to groundwater from waste, storage, and/or treatment units at the Facility can be detected.*

- Task 4a** *Submit a technical report for a proposed groundwater monitoring well network that includes a monitoring well installation work plan and implementation schedule:*
- *The groundwater monitoring well network shall include one or more background monitoring wells representative of regional groundwater conditions and a sufficient number of designated monitoring wells to evaluate the extent to which, if any, the Facility has degraded or threatens to degrade groundwater. The groundwater monitoring well installation workplan shall satisfy Section 1 in Attachment A of this Order.*

**Compliance Date: 1 February 2016**

The Workplan proposes to replace all four groundwater monitoring wells. Wells MW-2R through MW-4R will be installed adjacent to the existing MW-2 through MW-4. MW-1R will be installed

about 840 feet west of MW-1 and is closer to the Facility. The wells will be installed about 40 feet below first encountered groundwater. The Workplan is summarized in the attached memorandum.

The Workplan was due 1 February 2016 and was submitted electronically on 19 August 2016 (200 days late).

The Workplan satisfies the requirements of Task 4a of the Order and is approved. As specified in the Order, the implementation of the monitoring well installation is to be completed within **180 days** of the date of this letter. As specified in the Order, a technical report of the installation and sampling of the new wells is to be submitted within **90 days** of installation of the new wells (270 days from the date of this letter).

If you have any questions regarding this matter, please contact Jeff Hannel at (559) 445-6193 or [jhannel@waterboards.ca.gov](mailto:jhannel@waterboards.ca.gov).



*for* Pamela C. Creedon  
Executive Officer

Attachment: Memorandum

cc: Shawn Vaughn, Provost and Pritchard, Visalia  
Charles Garabedian, Fresno

Central Valley Regional Water Quality Control Board

TO: Warren W. Gross  
Senior Engineering Geologist  
PG 4873, CHG 681



W. Dale Harvey  
Supervising WRC Engineer

Clay L. Rodgers  
Assistant Executive Officer

FROM: Jeffrey W. Hannel  
Engineering Geologist  
PG 5640, CHG 649



DATE: 1 September 2016

SUBJECT: **REVIEW OF REVISED GROUNDWATER MONITORING WELL  
INSTALLATION WORKPLAN, MALAGA CWD WWTF, FRESNO COUNTY,  
WDR R5-2014-0145, CEASE AND DESIST ORDER R5-2014-146, NPDES  
CA0084239**

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff reviewed the August 2016 *Revised Groundwater Monitoring Well Installation Workplan* (Workplan) for the subject facility (Facility). The submittal was prepared by Provost and Pritchard Consulting Group and submitted electronically on 19 August 2016. The Workplan was required by Tasks 4 and 4a of Cease and Desist Order R5-2014-0146 (Order) for the subject facility. Tasks 4 and 4a required the following:

4. *Comply with the following schedule to ensure sufficient and adequate data are available for determining compliance with Groundwater Limitations V.B in WDRs R5-2014-0145, and for determining if the disposal ponds meet exemptions from Title 27, California Code of Regulations (CCR) in section 20090(b). Adequate groundwater data include data that are representative of regional conditions unaffected by the Facility (i.e., background data), and data representative of first-encountered groundwater downgradient of the Facility at locations where impacts to groundwater from waste, storage, and/or treatment units at the Facility can be detected.*

Task 4a *Submit a technical report for a proposed groundwater monitoring well network that includes a monitoring well installation work plan and implementation schedule:*

- *The groundwater monitoring well network shall include one or more background monitoring wells representative of regional groundwater conditions and a sufficient number of designated monitoring wells to evaluate the extent to which, if any, the Facility has degraded or threatens to degrade*

*groundwater. The groundwater monitoring well installation workplan shall satisfy Section 1 in Attachment A of this Order.*

*Compliance Date: 1 February 2016*

Provost and Pritchard Consulting Group had previously submitted the June 2016 *Groundwater Monitoring Well Installation Workplan* for the Facility. Central Valley Water Board staff concluded that the proposed locations of the new groundwater monitoring wells and the use of Orange Avenue Landfill well CMT-1D as a downgradient well, as proposed in the June 2016 workplan, were inappropriate. The June 2016 workplan did not fulfill the requirements of Tasks 4 and 4a of the Order and was unacceptable. Central Valley Water Board staff correspondence dated 13 June 2016 noted that the June 2016 workplan was submitted late and that an acceptable workplan needed to be submitted forthwith. In response, Provost and Pritchard Consulting Group submitted the August 2016 Workplan.

The Workplan is summarized below, followed by staff comments.

### **Workplan Summary**

The current groundwater monitoring wells at the Facility were installed to a depth of about 70 feet and have been dry since 2013. Based on depth to groundwater in groundwater monitoring wells at the nearby Orange Avenue Landfill, groundwater is expected to be encountered at a depth of 90 feet. The Workplan proposes to replace MW-1 through MW-4 with MW-1R through MW-4R. Wells MW-2R through MW-4R will be installed adjacent to the existing wells. MW-1R will be installed about 840 feet west of the current MW-1, and closer to and upgradient of the Facility. The new wells will be installed to depths of about 130 feet with a 60-foot screened interval. The wells will be constructed of schedule 40 two-inch diameter PVC casing and 0.020-inch slotted screen. The sand pack will extend between depths of 67 to 132 feet bgs. A bentonite seal will be placed between depths of 64 and 67 feet bgs. The remainder of the well annulus will be backfilled with cement grout. The wells will be developed and surveyed.

The Workplan states that one additional groundwater monitoring well may be installed, if needed, once the California High Speed Rail construction is completed downgradient of the Facility.

As required by Monitoring and Reporting Program R5-2014-0145, the wells will be sampled monthly for a period of one year and quarterly after that.

As specified in the Order, the implementation of the monitoring well installation is to be completed within 180 days of the Executive Officer's approval of the Workplan. As specified in the Order, a technical report of the installation and sampling of the new wells is to be submitted within 90 days of installation of the new wells.

The Workplan states that "The ability for the Malaga County Water District to install a replacement groundwater monitoring well network is dependent on the availability of funds and will likely require a Community Development Block Grant."

### **Staff Comments**

The Workplan satisfies the requirements of Task 4a of the Order and should be approved. The report of the installation and sampling of the new wells is due no later than 270 days from the date of the Executive Officer's approval of the Workplan. The Workplan was due 1 February 2016 and was submitted electronically on 19 August 2016 (200 days late).

Any extensions to the due dates in the Order will require Central Valley Water Board approval at a public meeting.