

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LAHONTAN REGION
MEETING OF MAY 10-11, 2017
SOUTH LAKE TAHOE**

ITEM 11
EXECUTIVE OFFICER'S REPORT

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ENCLOSURE 1

**CALIFORNIA REGIONAL WATER QUALITY
CONTROL BOARD
LAHONTAN REGION**

MAY 2017 STANDING ITEMS

The Water Board has requested that it be kept informed of the status of a number of issues. The following table lists the items, the reporting frequency and the dates the items are due.

ISSUE	FREQUENCY	DUE DATE
Lake Tahoe Nearshore	Semi-Annual	July January
Status of Basin Plan Amendments	Annually	August
Status of Grants	Annually	April
Caltrans Statewide General Permit/Tahoe Basin	Annually	September
Tahoe Municipal Permit	Annually	July
County Sanitation Districts of Los Angeles – District. No. 14, Lancaster	Annually	March
County Sanitation Districts of Los Angeles – District No. 20, Palmdale	Annually	September
Status of Dairies	Annual	February
City of Barstow Nitrate/Orphan Perchlorate	Semi-Annual	September March
Pacific Gas & Electric Company	Quarterly	Feb, May (<i>April Agenda Item #9</i>), Aug, Nov
Leviathan Mine	Semi-Annual	January July
Salt & Nutrient Management Plans	Annually	May – Item #7
Onsite Septic Systems	Semi-Annual	March, September
Grazing Update	Annually	July
Bacteria Water Quality Objectives Project	Semi-Annual	May - Item #5 November
Quarterly Violations Report	Quarterly	Mar, June, Sept, Dec

ENCLOSURE 2



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State and Regional

1. Personnel Report – *Eric Shay*

New Hires

- Shelby Barker, Engineering Geologist, Land Disposal Unit, Victorville. Duties include project manager oversight for all active and closed San Bernardino County landfills; Molycorp Minerals LLC bankruptcy (continued permit compliance/bankruptcy oversight); cement plants; and CEQA review and comment. Shelby is replacing Christy Hunter, who is retiring in June.

Promotions

- Mary Fiore-Wagner, Senior Environmental Scientist (Specialist), Regional Monitoring Coordinator, South Lake Tahoe. Duties are divided between coordinating monitoring efforts with external entities and providing monitoring expertise to internal clients, climate change lead, and special investigation design and implementation.

Vacancies – We are currently recruiting for the following positions:

- Senior Engineering Geologist, Unit Chief for the Department of Defense & Site Cleanup Program Unit, Victorville. The previous incumbent was Cindi Mitton.
- Water Resource Control Engineer, North Basin Regulatory Unit, South Lake Tahoe. This position will focus on National Pollutant Discharge Elimination System Permitting activity and oversight for aquatic pesticides applied to waters, fish hatchery discharges, NPDES permits other than for domestic wastewater, and also on permitting dredge and fill activities. The previous incumbent was Tobi Tyler.
- Senior Engineering Geologist, Unit Chief for the Land Disposal Unit, Victorville. The previous incumbent was Patrice Copeland.
- Environmental Scientist (2 positions), Planning & Assessment Unit, South Lake Tahoe. Duties are split evenly between development of TMDLs and TMDL alternatives, Integrated Report, and Basin Plan amendments. The previous incumbents were: Kelly Huck, who has transferred to an Environmental Scientist position in the Surface Water and Ambient Monitoring Program in the South Lake Tahoe office; and Mary Fiore-Wagner, who was promoted to Senior Environmental Scientist (Specialist).
- Engineering Geologist, Land Disposal Unit, Victorville. This position develops waste discharge requirements and provides oversight of land disposal facilities, including landfills, mines, surface impoundments, and compost facilities. The previous incumbent was Brianna St. Pierre.
- Engineering Geologist, part-time, Leviathan Mine Unit, South Lake Tahoe. This is a new position that will provide technical assistance and review of groundwater investigations and meet other engineering geology needs at Leviathan mine.

Departures – None

2. **Princeton Groundwater Pollution and Hydrology Course, March 2017** - *Alonzo Poach*

Water Board staff members Alonzo Poach and Darin Witt recently attended the Princeton Groundwater Pollution and Hydrology Short Course (Princeton Course). The Princeton Course has been designed for groundwater hydrologists, geologists, engineers, chemists, environmental scientists, state/federal regulators, project managers, compliance/regulatory program managers for industry, and technical experts. Dr. Robert Cleary, Dr. John Cherry, Dr. Michael Kavanaugh, Dr. Bernard Kueper, Mr. Murray Einarson, Mr. David Kaminski, Dr. Douglas Larson, and Mr. Richard Rago presented lectures and are recognized as global experts in the environmental field. The instructors presented the most cutting-edge technologies in site assessment, aquifer testing, and remediation. Approximately 20 staff from State and Regional Water Boards attended the March 2017 course.

The Princeton Course focuses on concepts, principles, and professional practices relating to groundwater pollution, hydrology, and remediation from theory to practice. The course also presented topics of specific interest in the Lahontan Region. For example, several lectures presented the behaviors of dense non-aqueous phase liquids and spoke to proper implementation of monitored natural attenuation. Special lectures on the last day of the course targeted hot topics related directly to California groundwater including intrusion, high-resolution site characterization techniques, nitrate and perchlorate, and the Sustainable Groundwater Management Act. The Princeton Course was very informative and included useful reference materials. In the coming year, additional Water Board staff members plan to attend the Princeton Course. Attendance at these types of training courses are important to ensure that our staff remains up-to-date regarding emerging issues and new technologies pertinent to groundwater and water quality protection.

3. **The California Climate Change Symposium, Sacramento, CA – Brian Judge**

In January 2017, Dr. Amy Horn, Water Board member, and three Water Board employees participated in a two day California Climate Change Symposium (CCCS) hosted by the California Natural Resources Agency, the California Environmental Protection Agency, and the Governor's Office of Planning and Research. The symposium title was "Science to Safeguard California".

The CCCS serves as a forum for emerging research on how climate change may impact California. The symposium featured presentations on research from top climate scientists as well as discussions with policy-makers and community leaders. Panels and sessions included topics on cutting-edge research on extreme heat, drought, ocean acidification, wildfire, sea-level rise, fuel system vulnerabilities, biodiversity in coastal ecosystems, public health, water supply, and land use in the Central Valley.

Common themes repeated throughout the event were statements that California is using science and evidence based decision making; that California is a leader in carbon reduction efforts; and that actions undertaken in California have global reach, due the fact that California has the world's 6th largest economy.

Topics of concern for the Lahontan Region that were covered during the conference include extreme heat, forest health and vulnerability to fire, and new research on modelling the future snowpack in the Sierra Nevada. The modeling predicts a reduction, by the year 2100, of between 30 and 60 percent in water stored as snow on April 1. The variability in model outputs is dependent on the success of green-house gas reduction efforts. The modeling predicts that less water will be available for municipal and agricultural use, and increased water storage, re-use, and conservation is needed.

Attendance at the CCCS helped staff understand the current state of science and approaches being utilized in California, the United States, and internationally to reduce greenhouse gas emissions and to adapt to an increasingly unpredictable climate.



Attendees: Mary Fiore-Wagner, Brian Judge, Laurie Scribe, and Water Board member Dr. Amy Horne

4. **Emergency, Abandoned, & Recalcitrant (EAR) Account Process and Status Update - Brian Grey**

The EAR Account provides funding to Regional Water Boards and local agencies to initiate corrective action at petroleum underground storage tank sites. The EAR Account has historically received an annual five million dollar appropriation from the UST Cleanup Fund. As of March 7, 2017, Resolution No. 2017-0009 delegated authority to the Deputy Director of the Division of Financial Assurance to perform various functions to administer the EAR Account. The authorizations included the ability to approve or deny requests for funding and expenditures from the EAR Account in amounts that cumulatively do not exceed five million dollars per fiscal year. Thus, resolutions from Regional Water Boards adopting annual site lists are no longer necessary. Instead, to nominate new sites or sites not already on existing annual site lists, the Executive Officer would submit a request with a prioritized list of the proposed sites and site specific information for each nominated site as needed.

The Water Board had previously nominated six sites which are distributed through Kern (1), Nevada (1), and San Bernardino (4) counties. Sites nominated during previous fiscal years going back as far as FY 13/14 have not been worked on due to a lack of a Department of General Services (DGS) contractor. Recently, DGS awarded the contract to Geocon for northern sites and Stantec for southern sites. A kickoff meeting was held in late March 2017 to discuss roles and responsibilities. During the meeting, it was learned, of the six previously nominated sites, three sites are currently authorized to receive funding while the remaining three will be picked up on the next DGS funding cycle. The State Water Board is currently exploring options to substitute the three remaining sites for other ineligible or closed sites that are identified in the interim. Due to the unknowns associated with the DGS contract process, it is unclear when the three remaining sites will be worked on. Water Board staff has already contacted Stantec and Geocon and is in the process of developing scopes of work for the three DGS authorized sites. State Water Board contract analysts anticipate the scopes of work would likely be able to be implemented after July 2017.

Staff plans to (1) assist with site access and contract management on the three active EAR sites: Former Pat and Ollies Superstop, Truckee; Former JC Fennel & Sons, Boron; and Former Calico Truck Stop, Yermo, (2) develop scopes of work when funding is available for the three remaining nominated EAR sites: Former Xcel Station, Baker; Former EZ Serve Texaco, Barstow; and Former Transmission World, Barstow, and (3) evaluate if the twelve identified inactive UST cases are eligible and appropriate for the EAR Account program. Attached for reference are State Water Board's April 3, 2017 Request for Site Nominations letter (Attachment A), and the EAR Account Fact Sheet (Attachment B).

5. Standing Item - Bacteria Water Quality Objectives Project – Semi-Annual Update - Dan Sussman

Item Four on the 2015 Triennial Review Priority list is the revision of the water quality objectives for bacteria. The revisions may take into account (1) an updated statewide bacteria objective for the REC-1 (Water Contact Recreation) beneficial use, (2) revising the Lahontan Region objective from a fecal coliform standard to an *E. coli* based standard, and (3) making the current objective beneficial use specific.

The State Water Board is developing amendments to Water Quality Control Plans for Inland Surface Waters, Enclosed Bays and Estuaries and the Ocean Waters of California for statewide water contact recreation bacteria objectives, based on a 2012 USEPA recommendation. The REC-1 water quality objective will rely on *E. coli* as an indicator organism for freshwater. State Water Board staff has temporarily suspended work on the bacteria project to focus on completing two other water quality standards projects: 1) the mercury amendment provisions and related new beneficial uses will be heard by the State Water Board at its May 2 meeting, and 2) the sediment toxicity objectives project is scheduled to be completed by August. The tentative schedule for the State Board bacteria amendment is to have the project before the State Water Board at its November 21, 2017 meeting, following Regional Board and public comment this summer.

It is unclear if the Lahontan Basin Plan will require amendments to comply with the State Water Board amendment, but revisions to the Lahontan bacteria objective will have the advantage of being informed by the State Water Board documents. Staff will review the State Board proposal when released and develop a strategy to comply with State Water Board direction while still maintaining protection of the Region's many high quality waters.

6. Executive Officer Visits with Utility Districts in Lassen County - Rob Tucker

On March 20 and 21, 2017, staff and I spent two days meeting with a number of wastewater treatment system General Managers, a few utility district board members, environmental compliance officers for certain facilities and a few chief plant operators. Additionally, I addressed the Lassen County Board of Supervisors on March 21 at their normal meeting in the open forum. The meetings all seemed to go very well and many were surprised and pleased by my visit.

A reoccurring theme was inquiry on why permit fees were so high. I explained how the fees are established by the State Water Board and how they can participate in the annual public meetings in late summer. Otherwise, there were a few site specific issues with respect to individual facilities that I directed staff to review over the next few months. For example, to clear up an outstanding enforcement issue at Lassen National Forest and determine what is now needed.

The County Board of Supervisors was very inquisitive, and appeared to appreciate the opportunity to speak with me. The topics of interest to them were grazing issues and the tentative general order for marijuana growing that is being drafted by the State Water Board.

I received a letter from Spalding Community Service District thanking us for taking the time to visit with them and reiterating that their fees are too high.

7. Standing Item - Salt and Nutrient Management Plans (SNMP) in the Lahontan Region – Update - Cindy Wise

The Water Board has requested regular updates on the progress of Salt and Nutrient Management Plan (SNMP) development. The State's 2009 Recycled Water Policy (amended in 2013) requires local stakeholders to develop SNMPs for every groundwater basin in the state by May 2014 (with time extensions possible). This item and the table that follows it summarize the status of the SNMP efforts underway in the Region and report on new information since last year's April 2016 status update.

Our SNMP efforts focus on ten groundwater basins determined to be priority basins by information from the State's Groundwater Ambient Monitoring and Assessment (GAMA) Program. The ten priority basins are listed below, along with a brief statement on the status of SNMP development for each basin. More detailed status information is in the table that follows (Attachment C). (Note: These are ten priority basins of the more than 345 groundwater basins and sub-basins named in our Region.)

- Honey Lake Valley - draft SNMP plan completed in December 2015; staff review underway
- Tahoe Valley – preliminary draft SNMP plan (technical memo) completed in December 2015; staff review underway
- Martis Valley – no significant SNMP actions yet initiated
- Owens - no significant SNMP actions yet initiated
- Indian Wells Valley – a draft SNMP plan is under development; status of the plan was presented to the Regional Board in January 2017
- Tehachapi Valley East – preliminary draft SNMP plan completed in February 2010; CA Department of Water Resources grant award in June 2016 includes funds to revise the draft SNMP plan by December 2017
- Antelope Valley – final SNMP accepted by the Regional Board in November 2014
- Mojave (Upper, Middle, Lower) - final SNMP accepted by the Regional Board in February 2016

SNMP efforts are underway or completed in eight of our ten priority basins, addressing 78% of our priority basin acreage. In addition, a SNMP has been completed by the U.S. Army, Fort Irwin National Training Center for other groundwater basins in our Region – Langford Valley, Irwin Subbasin of Langford Valley and Bicycle Valley.

The Recycled Water Policy includes direction that SNMPs contain a provision for annual monitoring of Constituents of Emerging Concern (CECs.) CECs are unregulated constituents that could have toxicological effects such as pharmaceuticals, chemicals in personal care products, or nanoparticles. To better understand this direction, staff will participate in a workshop in May on the current state of knowledge for CECs. The workshop will focus on State Water Board efforts underway to monitor CECs, identify the CECs of highest risk to human health and the environment, and State Water Board work towards the overarching goal of developing a statewide strategy to address CECs.

8. South Lake Tahoe Groundwater Sustainability Agency - Lisa Dernbach

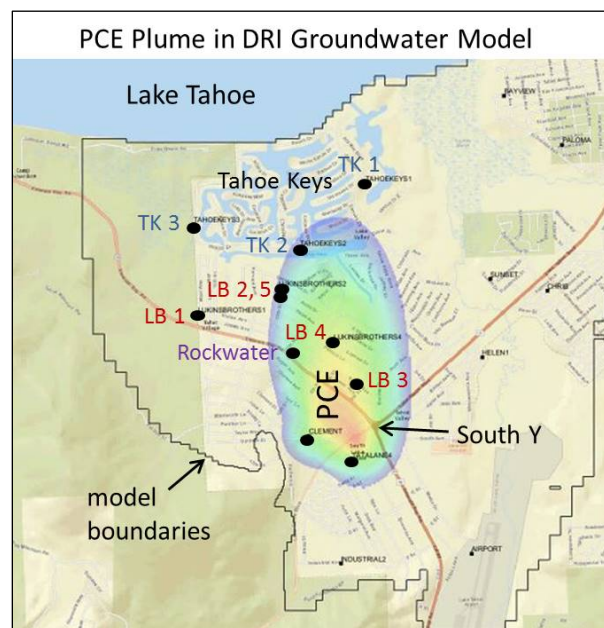
In response to the 2014 Sustainable Groundwater Management Act, the South Tahoe Groundwater Sustainability Agency (Agency) was created by the public and private water purveyors representing the south shore on the California side of Lake Tahoe. In one of its first orders of business, the Agency agreed that tetrachloroethylene (PCE) pollution in the South Y area was the greatest factor in preventing a sustainable groundwater basin. The South Y area is the western portion of the city where Highways 50 and 89 meet.

In March, the South Tahoe Public Utility District (District) was awarded a Proposition 1 Groundwater Grant in the amount of \$294,270 for preparation of a feasibility study that would assess potential cost-effective treatment alternatives for removing PCE from the drinking water aquifer in the South Y area of South Lake Tahoe. The District submitted the application as the lead organization under the Agency and on behalf of the other participating water purveyors.

The grant was issued based upon data obtained by the District's South Y Extraction Well Suitability Investigation document released in June 2016. The Suitability Investigation was implemented to determine the ability of using the Lukins Brothers Water Company (LB) inactive Well #4 as an extraction well for the removal of PCE in groundwater. That investigation included video logging Well #4 and analyzing water samples collected under passive and pumping conditions. The investigation also included a pump test where the results were used to calculate various aquifer parameters and estimated capture zones at different pumping rates.

In addition, the Agency has contracted with Dr. Greg Pohll of the Desert Research Institute (DRI) to construct a fate and transport groundwater model for the western half of the City where PCE impacts to supply wells are most prevalent. The model will be the most comprehensive one to date for evaluating the south shore's groundwater flow patterns both laterally to Lake Tahoe and vertically to bedrock at 400 feet. The model, costing \$70,000, will be used to evaluate PCE occurrence and migration from the 1970s to 50 years from now.

The approved Proposition 1 project, titled "Feasibility Study of Remedial Alternatives to Mitigate PCE Contamination" will use the results of the Suitability Investigation and the groundwater model to evaluate PCE



remediation options for restoring the beneficial uses of the drinking water aquifer. The feasibility study will look at the pros and cons of using the LB Well #4 as a remediation well or for wellhead treatment. It will also evaluate other PCE remediation options, such as installing one or more extraction wells at other locations within the PCE plume. The study should be completed by the end of 2017.

9. **South Shore Fuel Reduction and Healthy Forest Restoration Project, 2017 Annual Operating Plan, Lake Tahoe Basin, El Dorado County – Ed Hancock**

The 2017 Annual Operating Plan (AOP) presents the sixth installment of the South Shore Fuels Reduction Project, a forest fuels reduction initiative undertaken by the U.S Forest Service (USFS), Lake Tahoe Management Unit (LTBMU). The project has operated under a Waste Discharge Requirement (WDR) approved by the Lahontan Region Executive Officer on April 2, 2012, and aims to develop defensible space adjacent to communities in the South Shore area of Lake Tahoe. Project goals also include the restoration of forest health, and the restoration and maintenance of meadows and aspen stands in the project area.

The LTBMU has operated under this WDR for five seasons of an anticipated 7 – 10 years to project completion. To date, 3,954 acres of the 10,000 acre project have been treated (approximately 39% complete); 2,673 acres have been thinned by hand crews, 1,170 acres have been mechanically treated and piles in 498 acres of upland treated areas have been burned. Pile burning in treated stream environment zones (SEZs) has not yet commenced. The plan for 2017 includes treatment of 1,173 acres; 1008 acres will be treated using mechanical methods, while the remaining 705 acres will be treated by hand.

The 2017 AOP was submitted to Water Board staff for review in a timely fashion and addresses many of the comments provided by Water Board staff to LTBMU over previous iterations of the document, illustrating a commitment from the LTBMU to both the South Shore Project and to working collaboratively with Water Board staff. The 2017 plan provides details for best case scenario operating conditions which may or may not be achieved depending on weather conditions over the coming months. Winter 2016/2017 brought record amounts of precipitation to the Tahoe Basin, resulting in uncertainty about the timing of project implementation as much of the proposed work depends on favorable soil moisture conditions. A prolonged snowmelt season will influence when and where the 2017 AOP field season work will commence.

South Lahontan Region

10. **Earth Connections: Community Pathways to Geoscience Careers, San Bernardino Alliance – Christina Guerra and Jeff Fitzsimmons**

On December 15, 2016, Christina Guerra and Jeff Fitzsimmons, both Engineering Geologists from the Water Board’s Victorville office and California State University, San Bernardino (CSUSB) alumni, attended a roundtable event hosted by CSUSB’s Geology Department. The roundtable was the opening event of Earth Connections: Pathways to Geoscience Careers – San Bernardino Alliance (EC San Bernardino Alliance), sponsored by the National Science Foundation.

The goals of the EC San Bernardino Alliance are to capture the interest of local high school and community college students, provide pathways for them to gain exposure to the



Photo 1; Earth Connections San Bernardino Alliance participants at the CSUSB March 25, 2017 field trip event. Photo by Bernadine Judson

educational and career opportunities within the disciplines of geosciences, and generate a student census within the disciplines that closely resembles the diversity of the local communities. Aside from Ms. Guerra and Mr. Fitzsimmons, participants of the roundtable included representatives of CSUSB faculty and alumni; educators from other universities, community colleges, and high schools; California Division of Oil, Gas, and Geothermal Resources; the United States Geological Survey; Southern California Earthquake Center; local municipal government; practitioners in industry; and local earth science related societies. Through the collaborative effort of the participants at the roundtable event, approaches were developed to achieve the goals of the EC San Bernardino Alliance.

On March 25, 2017, the EC San Bernardino Alliance implemented an approach that was developed during the initial roundtable by hosting a field trip to CSUSB for students interested in geology from Etiwanda High School and Chaffey College (photo 1). The field trip included a hike to a local portion of the San Andreas Fault zone, demonstration of drone technology to collect aerial imagery, classroom activity utilizing Google Earth to measure offset along faults, tour of seismically retrofitted buildings at CSUSB, and lunch with a career panel comprised of CSUSB alumni and local professional geologists. Jeff Fitzsimmons participated on the career panel and was able to provide students with suggestions on pursuing their educational interests and career paths in geosciences (photo 2).



Photo 2: Earth Connections San Bernardino Alliance career panelist Jeff Fitzsimmons speaking to Etiwanda High School and Chaffey College students about a career in geology. Photo by Bernadine Judson

EC San Bernardino Alliance will likely be a continually evolving program, and Water Board staff participants, Ms. Guerra and Mr. Fitzsimmons, will be periodically contacted for additional participation and/or input on future activities. More information on the Earth Connections: Pathways to Geoscience Careers – San Bernardino Alliance can be found at <http://serc.carleton.edu/earthconnections/sanbernardino.html>.

11. **Division of Safety of Dams Meets in Crestline to Discuss Lake Gregory Dam Improvements and Scheduling** – *Jan M. Zimmerman*

The Division of Safety of Dams (DSOD) met with the community in Crestline on March 24 to discuss the status of the required seismic retrofit for the Lake Gregory Dam. The meeting was organized and attended by state Assemblyman Jay Obernolte and by members of the Crestline-Lake Gregory Chamber of Commerce, as well as Water Board staff, Jan Zimmerman, Engineering Geologist. About 150 Crestline residents and business owners attended the meeting was held at the San Moritz Lodge located on the south end of Lake Gregory.

In the 1980s, DSOD directed the County of San Bernardino (County) to investigate the structural integrity of the earthen dam due to recent concerns regarding faulting and seismicity. Nearly 20 years had passed with no investigation until the mid-2000s when DSOD staff performed an independent seismic evaluation and determined that a section of the earthen dam could liquefy during a major seismic event along the nearby San Andreas Fault. In 2010, DSOD ordered the County to immediately lower the lake level by 5-feet below the crest of the spillway until a permanent solution to stabilize the dam is put in place. This jump started the County into action, and by late 2015, the County had prepared an Environmental Impact Report (EIR) that evaluated various alternatives to stabilize the dam and mitigate for any liquefaction potential.

The preferred alternative is the construction of an earthen buttress on the downstream side of the dam.

Community members and leaders expressed concern about the amount of time that it has taken since the issue was first recognized in the 1980s until 2017, and the fact that the repairs have still not been completed. Most of this concern stems from Lake Gregory being a destination spot for the San Bernardino Mountains, as the local economy suffers when recreation and swimming in and around the lake declines due to lowered lake levels. The community was heard loud and clear; they want to see the dam fixed *sooner* rather than later so that the economy of this small mountain community can rebound. DSOD staff did reassure the public that the current mandatory lake level lowering of 5-feet below the spillway is sufficient for public safety; additional lowering of the lake is not warranted at this time.

County staff anticipates that construction of the seismic retrofit will take nearly 2 years to complete. Therefore, the community can expect that lake levels will remain at 5-feet below the spillway for at least another 2 years. Unfortunately, it may be longer before Lake Gregory can be filled to the brim again.

12. Los Angeles Department of Water and Power Preparing for Record Runoff in the Eastern Sierra – Jan M. Zimmerman

Since February 2017, the Los Angeles Department of Water and Power (LADWP) has been planning and preparing for a record runoff from this year's above-average snowpack in the Eastern Sierra Nevada. The highest runoff is expected to occur late spring and summer; but as temperatures rise, the potential for a rain-on-snow event increases, which could overwhelm the conveyance systems, damage infrastructure, and impact the public in more urban areas.

Runoff this year is expected to exceed 200,000 acre-feet of water. The Los Angeles Aqueduct System (aqueduct system) is designed to convey 50,000 acre-feet. As such, the excess water expected this year will need to go somewhere aside from in the aqueduct system. To prepare for the record runoff, LADWP has been cleaning and repairing various facilities of the aqueduct system from Lee Vining south to Independence.

Work includes cleaning and mowing vegetation around canals and ponds to increase capacity, activating and repairing diversion structures and irrigation ditches to spread water through the valley and recharge groundwater, and clearing of sediment in sand traps and fore-bays in anticipation of increased sediment being mobilized by the higher than normal runoff.

Water that does not make it into the aqueduct system and that does not recharge local groundwater basins will likely make its way ultimately on to Owens Lake. While flooding of Owens Lake may not seem like a bad thing to some, to LADWP, uncontrolled flooding could jeopardize the integrity of the existing dust control measures that currently cover nearly 50 square miles of lakebed (Figure 1).

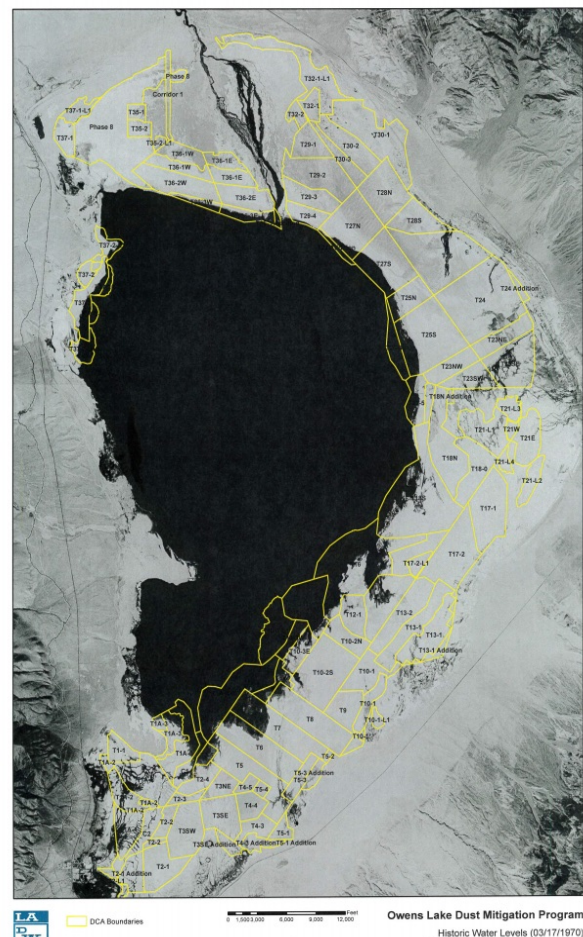


Figure 1 – Extent of LADWP dust control measures on Owens

To protect their infrastructure in place, LADWP plans to direct flows away from critical infrastructure and to use best management practices (BMPs) to protect berms from wave action and erosion. The pump station located at the mouth of the river (delta) will be protected by clearing the Lower Owens River channel of vegetation and debris immediately upstream and downstream, relocation of existing rip-rap to an area where erosion is expected, tamping and removal of cattails, and some sediment removal to widen the flow path through the pump station (Figures 2 and 3).

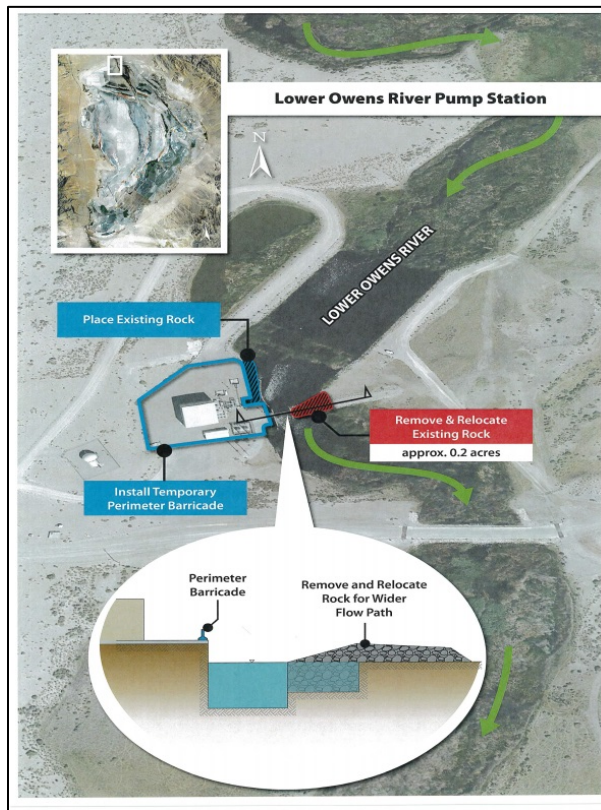


Figure 2 – Conceptual drawing of work to protect pump station in-place.

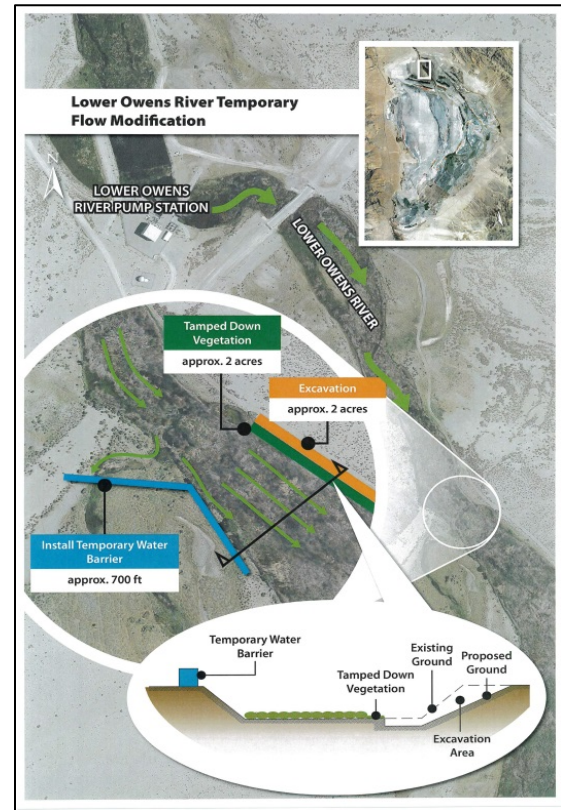


Figure 3 – Conceptual drawing of work to manage vegetation and widen the flow path through and past the pump station.

Other work includes the armoring/rocking of some berms downstream of the pump station (Figure 4), protecting in-place above-ground pipelines (Figure 5), and lining of other berms using high-density polyethylene sheeting in more interior areas to protect from wave erosion. The emergency preparedness work in the Lower Owens River/Owens Lake area was initially expected to begin April 1st, but has been postponed due to equipment mobilization and material acquisition.

LADWP staff has made a concerted effort to keep Water Board staff informed and is coordinating with other local, state, and federal agencies including Inyo County, California Department of Fish and Wildlife, California State Lands Commission, California Department of Transportation, United States Army Corps of Engineers, and Great Basin Unified Air Pollution Control District; in addition, LADWP staff is coordinating with Southern California Edison. Weekly updates documenting all emergency preparedness and response work for the prior week and to forecast for work in the coming week are being provided to our staff. At the conclusion of this work, LADWP will submit a final report documenting the entire emergency response work efforts and actions taken.

Because we anticipate that some areas on Owens Lake may not be restored to pre-emergency conditions following the end of the emergency, LADWP intends to perform an assessment after the emergency is over and determine which areas can be restored to original pre-emergency condition, which should be modified, and which will require full redesign to meet the dust mitigation requirements. Modification and redesign of existing dust control measures on Owens Lake will likely trigger environmental review under the California Environmental Quality Act and issuance of a Clean Water Act Section 401 Water Quality Certification from the Water Board.

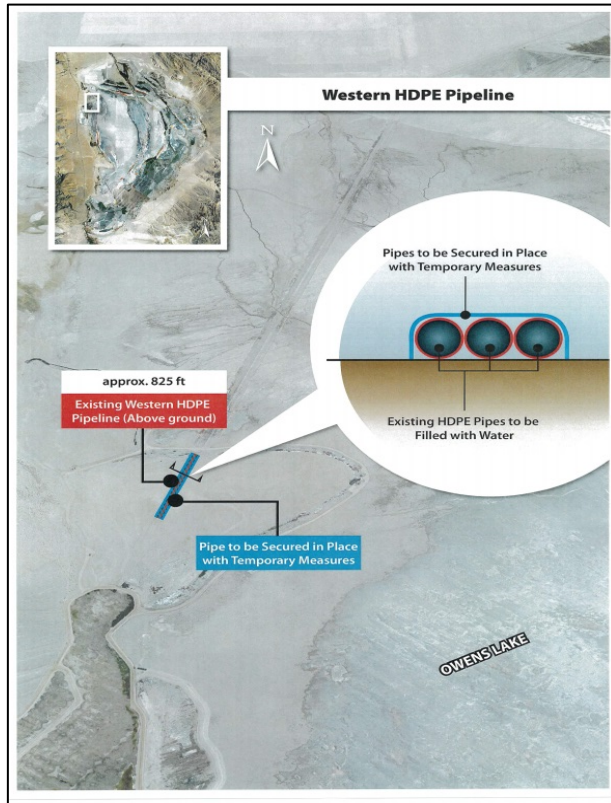


Figure 4 – Conceptual drawing of work to protect above-ground pipelines in-place.

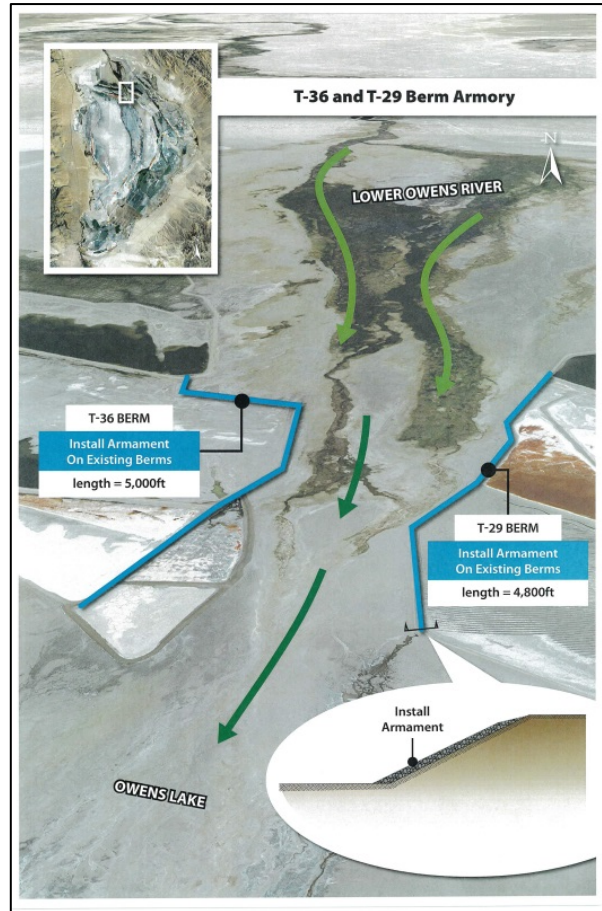


Figure 5 – Conceptual drawing of work to protect interior berms from wave action and erosion.



ATTACHMENT A




EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

TO: Regional Water Board Executive Officers

FROM:  Lola Barba, Manager
Emergency, Abandoned, and Recalcitrant Account
Division of Financial Assistance
State Water Resources Control Board

DATE: April 3, 2017

SUBJECT: REQUEST FOR SITE NOMINATIONS FOR THE EMERGENCY, ABANDONED,
AND RECALCITRANT (EAR) ACCOUNT

This memorandum requests the Regional Water Quality Control Boards' (Regional Water Boards) to identify petroleum underground storage tank (UST) sites they want considered for corrective action funding by the EAR Account. Local Oversight Programs (LOPs) must recommend EAR funding for high-priority abandoned or recalcitrant UST sites through the appropriate Regional Water Board.

As of March 7, 2017, Resolution No. 2017-0009 (attached) delegated authority to the Deputy Director of the Division of Financial Assistance to approve or deny EAR Account expenditures for UST sites on an ongoing basis. Resolutions adopting Annual Site Lists are no longer necessary.

EAR sites under a current Department of General Services (DGS) contract do not need to be re-nominated. However, if a change in the scope of work is needed, an amendment request with a justification must be submitted to your Program Analyst via email. The request should include the current status of the site, summary of corrective action work performed to date, and description of the proposed changes.

To nominate a UST site into the EAR Account, the Regional Water Board must submit the following information to me via email at lola.barba@waterboards.ca.gov:

1. A memorandum from the Regional Water Board Executive Officer that nominates the sites with an attached prioritized list that includes the LOP nominations.
2. The amount of funding requested for each nominated site and why funds are being requested for the site.
3. Name and address of all identified potential RPs (verify that current property owner is also identified as an RP and, if not, provide a reason why).
4. Documentation that the RP is either unable or unwilling to comply with a written order issued by a Regional Water Board or LOP agency, and a description of why the RP(s) cannot or will not cleanup the contamination or abate its effects.

5. Documentation by the oversight agency of a confirmed unauthorized release from an on-site petroleum UST.
6. A copy of the final corrective action order or cleanup and abatement order.
7. Documentation of any disputes between the regulatory agency and the RP(s).
8. A description of the consequences should funding be denied.

The regulatory agency must have evaluated the case, documented any impediments to closure, and prepared a Path to Closure Plan made available on GeoTracker.

After the State Water Board approves the nominated sites for EAR Account Funding, the EAR Account Program staff will notify the Regional Board Program Manager and will provide information about how to access the approved EAR Account funding.

The State Water Board is required to recover costs from the owner or operator of a UST, or from any other RP at a site subject to EAR Account funding. EAR Account funding is available as a measure of last resort to facilitate corrective actions that are necessary to protect human health, safety, and the environment.

If you have any questions, please contact me at lola.barba@waterboards.ca.gov.

cc: Assistance Executive Officers
Regional Water Board Underground Storage Tank Program Managers
Local Oversight Program Managers

Attachment



Fact Sheet

EMERGENCY, ABANDONED, & RECALCITRANT (EAR) ACCOUNT

The EAR Account is a program administered by the State Water Resources Control Board (State Water Board), Underground Storage Tank (UST) Cleanup Fund within the Division of Financial Assistance. The EAR Account receives an annual \$5,000,000 dollar appropriation from the UST Cleanup Fund.

The EAR Account provides funding to Regional Water Quality Control Boards (Regional Water Boards) and local agencies to initiate corrective action at petroleum underground storage tank (UST) sites which have had an unauthorized release and which require either:

- 1) An immediate or prompt action response (emergency site) to protect human health, safety and the environment; or
- 2) Action at a site where a responsible party (RP) cannot be identified or located (abandoned site); or
- 3) Action at a site where an RP is either unable or unwilling to take the required corrective action (recalcitrant site).

RECENT UPDATES:

On September 25, 2015, Senate Bill (SB) 445 (Hill, Chapter 547, Statutes of 2014) reduced the maximum amount available for an eligible occurrence from \$1.5 million to \$1 million as of January 1, 2015. Only EAR Sites nominated and EAR sites active before January 1, 2015 are eligible for the maximum amount of \$1.5 million. Additional information on SB 445 can be found at http://leginfo.ca.gov/pub/13-14/bill/sen/sb_0401-0450/sb_445_bill_20140925_chaptered.pdf.

TYPES of EAR FUNDING

Emergency

Regional Water Board Executive Officers (EOs) and Local Agency (LA) Directors (Requestors) or their designees, may request emergency funds for amounts up to \$100,000 to be used for emergency response for a crisis situation requiring immediate action caused by an unauthorized release of petroleum from a UST to protect human health, safety, or the environment. To request Emergency funding, the requestor may contact the EAR Account Manager or Assistant Deputy Director either verbally or via email and demonstrate the need for emergency funds.



Prompt Action

Regional Water Board EOs, and LA Directors (or their designee), may request up to \$200,000 if prompt action is required to protect human health, safety and the environment, the RP, if any, is either unable or unwilling to comply with a written corrective action order, and where the required corrective action cannot wait until the next EAR Account Annual Site List (ASL) is developed. The request demonstrating the need for prompt action funding is submitted to the EAR Account Manager. If the EAR Account Manager and technical staff determines that the request is eligible for consideration, it will be presented to the State Water Board within 60 calendar days of receipt of the request with a recommendation.

Abandoned & Recalcitrant

Provided there are sufficient funds in the EAR Account, Regional Water Boards and LAs will be surveyed annually to obtain a list of nominated and eligible abandoned and recalcitrant UST sites where corrective action funds are necessary. Up to \$1,000,000 per occurrence may be allocated for payment of corrective action and local agency staff costs, less any amounts previously allocated for emergency or prompt action costs. An EAR ASL is developed to identify sites eligible for EAR Account funding.

Except for funding requested for emergency or abandoned sites, requests for funding will be considered only if the following requirements are met:

1. The regulatory agency has confirmed the existence of an unauthorized release from an on-site petroleum UST and;
2. The RP is either unable or unwilling to comply with a written order issued by a Regional Water Board or LA pursuant to California Health & Safety Code section 25296.10.
3. The regulatory agency has conducted a Low-Threat UST Case Closure evaluation consistent with the Low-Threat UST Case Closure policy adopted under State Water Board Resolution No. 2012-0016 and the impediments to closure have been updated on Geotracker. State Water Board Resolution No. 2012-0016 and the Low-Threat UST Case Closure policy are available for review at the following link:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016.pdf

COST RECOVERY FROM A RESPONSIBLE PARTY:

Whenever costs are incurred from the EAR Account, the State Water Board seeks appropriate cost recovery from the owner or operator of the UST or from any other responsible party. Cost recovery may include attaching a lien to the site or referring the case to the Attorney General's Office to file a civil action. Regional Water Boards and local agencies will be responsible for maintaining accounting and record keeping systems to adequately document all EAR Account expenditures to support cost recovery efforts.

FOR MORE INFORMATION:

PROGRAM CONTACTS:

Lola Barba (Manager)	lola.barba@waterboards.ca.gov
Pearl Cross	pearl.cross@waterboards.ca.gov
Marisa Rodarte	marisa.rodarte@waterboards.ca.gov
Song Her	song.her@waterboards.ca.gov

WEBSITE: http://www.waterboards.ca.gov/water_issues/programs/ustcf/ear.shtml

SUBSCRIBE TO THE OSCF ELECTRONIC MAILING LIST AT:

http://www.waterboards.ca.gov/resources/email_subscriptions/swrcb_subscribe.shtml

Updated 8/19/15

ATTACHMENT C

Salt/Nutrient Management Planning Progress Report Region 6: Lahontan Regional Water Quality Control Board Date: April 12, 2017

Stakeholder Group	Antelope Valley IRWM Group (Major)	Mojave IRWM Group (Major)	Tahoe Sierra IRWM Group (Major)	Inyo Mono IRWM Group (Major)	Indian Wells Valley Group (part of Inyo Mono IRWM) (Major)	Lahontan Basins IRWM Group (Major)	Fremont Basin IRWM Group (Major)	Fort Irwin National Training Center, U.S. Army
Memberships	Antelope Valley State Water Contractors Association, Palmdale Water District	Mojave Water Agency (Note: some areas in Region 7 but Region 6 is lead)	South Tahoe Public Utility District	California Trout	Indian Wells Valley Cooperative Groundwater Management Team -- Indian Wells Valley Water Station, Naval Air Weapons Station, Seartes Valley Minerals, City of Ridgecrest, BLM, Inyokern CSD, Kern Co. Kern Co Water Agency, Eastern Kern Co Airport District	Honey Lake Valley Resource Conservation District	Department of Public Works, California City	Fort Irwin National Training Center
Lead Organization	Antelope Valley State Water Contractors Association	Mojave Water Agency	South Tahoe Public Utility District	California Trout	Indian Wells Valley Water District	Honey Lake Valley Resource Conservation District	Department of Public Works, California City	Department of Public Works, Fort Irwin National Training Center
Lead Group Contact	Matt Knudson (Palmdale Water District) (661) 947-4111x118 mknudson@palmdalewater.org	Kirby Brill (760) 946-7008 kbrill@mojavewater.org	Lynn Nolan (530) 543-6215 lnolan@stpubd.dst.ca.us	Mark Drew (760) 924-1008 mdrew@caltrout.org	Don Zbeda/Indian Wells Water Agency (760) 384-5555 don.zbeda@iwwd.com	Tim Keesev (530) 260-0934 info@honeylakevalleyrccd.us	Michael Bevins (760) 373-7297 pwwdir@californiacity.com	Chris Woodruff (760) 380-3739 www.irwin.army.mil
Basins Covered DWR 118 Bulletins	6-44 Antelope Valley	6-40 Lower Mojave River Valley 6-41 Middle Mojave River Valley 6-5.03 Tahoe Valley North 6-42 Upper Mojave River Valley R7 basins Lucerne Valley, Johnson Valley, and Morongo	6-5 Tahoe Valley 6-5.01 Tahoe Valley South 6-5.02 Tahoe Valley West 6-5.03 Tahoe Valley North 6-47 Maris (Truckee Valley) 6-6 Carson Valley 6-108 Olympic Valley	6-12 Owens Valley	6-54 Indian Wells Valley	6-4 Honey Lake Valley	6-46 Fremont Valley; Tehachapi Valley East 6-45	6-36 Langford Valley 6-36.02 Irwin Subbasin of Langford Valley 6-25 Bicycle Valley
What Group has Done to Date: (including significant milestones)	Salt/nutrient approach/concept presented to and accepted by Lahontan Regional Water Board. Time extension granted. Regional Board accepted completed SNMP in November 2014. The Antelope Valley IRWM group met on October 28, 2015, in Palmdale to discuss the status of IRWM projects and upcoming grant funding proposals. The adjudication is over and an Antelope Valley Watermaster Board. The Board has met several times now and is in the process of selecting a Watermaster Engineer. Once the engineer is selected, the SNMP will be updated accordingly.	Salt/nutrient approach/concept presented to and accepted by Lahontan Regional Water Board. Status on SNMP development presented to the Regional Board at its June 2015 regular meeting. On December 8th, 2015 the Mojave Water Agency submitted its final Salt Nutrient Management Plan (SNMP) to both the Lahontan and Colorado Water Boards. The SNMP covers the agency's service area which includes the Mojave and Morongo groundwater basins located in both regions, respectively. The final SNMP was accepted by the Regional Board as part of its regular meeting in February 2016.	Part of IRWM (planning grant funds to update IRWM plan & includes SNMP plan development). A draft SNMP is completed and is being reviewed by Regional Board staff. A possible status presentation to the Regional Board in late 2017.	Part of IRWM, currently seeking funding to begin SNMP development.	The Indian Wells Valley Cooperative Groundwater Management Team is developing an SNMP as part of the Inyo Mono IRWM group's effort. A draft SNMP is under development. Status of the plan was presented to the Regional Board in January 2017. Water Board members were invited to give input and direction on the final steps for this project.	Part of IRWM (planning funds to update IRWM plan include SNMP). Time extension granted. A draft SNMP is completed and is being reviewed by Regional Board staff. A possible status presentation to the Regional Board in late 2017.	Preliminary draft SNMP plan completed in February 2010; CA Department of Water Resources grant awarded in June 2016 of \$841,030 to support the development of an IRWM plan for the Fremont Basin and revise the draft SNMP plan. The revisions to the SNMP will be completed by December 21, 2017. This completion date will allow for the results of the Salt/Nutrient Management Plan to be incorporated into the IRWM Plan by March 2018.	The Regional Board accepted the final plan as part of its regular meeting in January 2017.
Approx. Date of SNMP Submittal to RWQCB	Regional Board accepted completed SNMP in November 2014.	Regional Board accepted completed SNMP in February 2016.	2018	2018	Fall 2017	2018	2018	The Regional Board accepted the final plan in January 2017.

ENCLOSURE 3

EXECUTIVE OFFICER ACTION ITEMS
MAY 2017 EO REPORT - March 16, 2017 to April 15, 2017
Lahontan Regional Water Quality Control Board

DOCUMENT	DATE SIGNED
NO FURTHER ACTION REQUIRED *	
Lassen County- Heard's Market, 473-525 Market Street, Litchfield, UST Case No. 6T0386A, UST Cleanup Fund NO. 18243	3/22/2017
San Bernardino County - Searles Valley Minerals, Inc., Site 25 – Dredge Staging Area, Geotracker Global Identification # T1000002391	3/28/2017
Mono County - Former Old Silver Lake Texaco, 5580 Highway 158, June Lake, , UST Case #6B2600675T	3/30/2017
San Bernardino County - Bronco Station (Former), 72074 Baker Blvd., Baker, UST Case No 6B3600627T, UST Cleanup Fund No. 9080	3/30/2017
San Bernardino County - Searles Valley Minerals, Inc, Site 9 – Warm Solution Mining Spill, 13200 Main Street, Trona,	3/30/2017
San Bernardino County - Building 755 Tar-Impacted Soil, Former George Air Force Base, 18550 Readiness Street, Victorville, Lahontan UST Case /A, UST Cleanup Fund Claim N/A, GeoTracker Global ID T10000006490	3/30/2017
401 WATER QUALITY CERTIFICATION	
Placer County - Truckee River Interceptor MH 81 to MH 83 Improvements Project	3/16/2017
Mono County - CalTrans District 9 Sheep Ranch Shoulder Project, WDID No 6A261610001	4/6/2017
PERMITS	
El Dorado, Placer Counties, and the City of South Lake Tahoe - Board Order No. R6T-2017-0010 Renewed Waste Discharge Requirements and NPDES Permit for Storm Water/Urban Runoff Discharges	3/22/2017
AGREEMENTS AND CONTRACTS	
San Bernardino County - Amended Cleanup and Abatement Order R6V-2013-0045-A4, Time Extension Request – Cleanup and Abatement Order R6V-2013-0045-A3, City of Barstow	4/4/2017
NOTICE OF APPLICABILITY	
Los Angeles County - General WDR for Small Construction, 84 Lumber Lancaster Store Project, WDID No. 6B191605006	3/22/2017
EXEMPTIONS	
Placer County - Exemption to Waste Discharge Prohibition within the Highwater Rim of Lake Tahoe for the Homewood Shores Association Catwalk Project, Tahoe City,	3/16/2017
REQUEST FOR INFORMATION OR FEEDBACK	
El Dorado County - Request for Information, USFS Meeks Resort Proposed Settlement	4/13/2017
Request for Feedback on Proposed Changes to the Alternatives Analysis Requirements, Draft Dredge and Fill Procedures	3/22/2017

* The Executive Officer finds the release of petroleum products at the following sites poses a low threat to human health, safety, and the environment. Therefore, these cases were closed in accordance with the Water Quality Control Policy for Low-Threat Underground Storage Tank Case Closure (Resolution 2012-016). The Policy recognizes contaminant mass often remains after the investment of reasonable remedial effort and this mass may be difficult to remove regardless of the level of additional effort and resources invested. The establishment of the Policy is an effort to maximize the benefits to the people of the State of California through the judicious application of available resources.

Additional links:

General Policy information: http://www.swrcb.ca.gov/ust/lt_cls_plcy.shtml#policy081712

Copy of Policy: http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/rs2012_0016atta.pdf

http://www.waterboards.ca.gov/board_decisions/adopted_orders/resolutions/2012/110612_6_final_ltcp%20imp%20plan.pdf

ENCLOSURE 4

**Monthly Enforcement Action Report
March 16, 2017 - April 15, 2017**

Facility	County	Enforcement Action	Current Status	Next Step
Water Board Actions				
None at this time				
Executive Officer Actions				
Lakeside Marina	El Dorado	Expedited Payment Letter/ Mandatory Minimum Penalty issued 12/15/2016.	Discharger had two serious effluent limit violations resulting in mandatory minimum penalties of \$6,000. Discharger accepted penalty.	EO to sign and accept the settlement agreement.
Desert View Dairy	San Bernardino	Proposed Amended CAO expanding area for replacement water and monitoring and establishes TDS thresholds to address nitrate and TDS groundwater pollution.	Advisory Team second request for information. Prosecution Team provided a response to Advisory Team. Advisory Team held meeting in January with the parties.	Advisory Team will, recommend EO to sign, reject or revise CAO.
Lake Tahoe Laundry Works CAO for additional cleanup and investigation.	El Dorado	Proposed CAO to conduct additional ground water investigation and remediation activities for PCE groundwater pollution.	Prosecution Team issued Response to Comments and Revised CAO. Advisory Team is reviewing all the information received.	Advisory Team will, recommend EO to sign, reject or revise CAO.
PGE Hinkley, Compressor Station	San Bernardino	CAO R6V-2015-0068 Acceptance of Proposal for Source Area In-Situ Reactive Zone 2017 Basis for Design.	Approved.	
City of Bartow	San Bernardino	CAO R6V-2013-0045-A4 Groundwater clean-up for perchlorate and nitrate. Extension of deadlines granted for design, construction, and as-builts.	Approved.	
Prosecution Team Actions				
City of Victorville	San Bernardino	ACL Complaint issued 7/1/2016	Settlement Negotiations underway. Prosecution Team reviewing latest City submittal.	Prosecution Team will issue a response to the City's latest submittal.
Tahoe Keys Marina	El Dorado	Expedited Payment Letter/ Mandatory Minimum Penalty re-issued 10/27/2016.	Discharger submitted request on 11/16/2016 to dismiss all penalties. Prosecution Team reviewed Discharger's request.	Prosecution Team will issue a response to the Discharger's request.
USFS Meeks Bay Marina	El Dorado	Proposed Stipulated Agreement- Signed 3/24/2017	Lahontan AEO and the USFS Supervisor signed a Stipulated Agreement to maintain BMP's and to develop and implement plans to comply with the Basin Plan.	Public comment period ends May 1, 2017. Advisory Team issued comments on the Stipulated Agreement. Prosecution Team to respond and present Stipulated Agreement at May Board meeting.

ENCLOSURE 5

EO's Monthly Report March 16, 2017 - April 15, 2017
 Unauthorized Waste Discharges*

Discharger/Facility	Location	Basin	Regulated Facility?	Discharge Date	Discharge Volume	Description of Failure	Additional Details	Status
COUNTY: EL DORADO								
South Tahoe Public Utility District/Collection System	Manhole at 1726 Fortune Way, South Lake Tahoe	North	Yes	4/1/2017	1,630 gallons	Manhole blockage caused discharge of 1630 gallons of raw sewage. Surface water affected..	Debris and rags caused blockage in manhole resulting in sewage discharge to drainage channel tributary to Cold Creek.	Restored flow, mitigated affects of spill, cleaned up. Added sewer to preventive maintenance program. Inspected sewer using CCTV to determine cause.
COUNTY: KERN								
US Borax Inc./Borax Mine	14486 Borax Rd., Boron	South	Yes	3/20/2017	2,100 gallons	Equipment failure caused the release of tailings pile process wastewater from the mining facility. No surface water affected.	Pipeline leak caused the discharge of untreated wastewater to unpaved surface.	Discharger vacuumed up as much liquid as possible, returned to system. Confirmation samples taken, affected soil to be removed.
COUNTY: LASSEN								
Susanville Consolidated Sewer District/Susanville Collection System	2950 Main St., Manhole W-10	South	Yes	3/27/2017	105 gallons	Manhole blockage caused 105 gallons of raw sewage to spill to storm drain system. Surface water affected.	Debris and rags caused blockage in manhole resulting in sewage discharge to storm drain system tributary to surface water.	Restored flow returned 20 gallons to system. Cleaned up spill, adjusted preventative maintenance schedule for this manhole.
COUNTY: MONO								
Bridgeport PUD/ Bridgeport Collection System	Intersection of Aurora Canyon Rd and HWY 182	North	Yes	3/17/2017	300,000 gallons	High groundwater caused main gravity line to fail causing discharge of raw sewage to creek. Surface water affected.	High groundwater and spring runoff caused gravity main to collapse restricting flow. Discharge out of manholes to unpaved surface and Aurora Creek, tributary to Walker River.	Discharger contracted with six vac trucks to take sewage to ponds until bypass could be installed. Pipeline had to be replaced to restore flow. Bypass remained in place until flow restored.
COUNTY: SAN BERNARDINO								
American Organics	2005 Shay Road, Victorville	South	Yes	4/3/2017	Unknown	High winds caused compost to catch on fire. Water used to put fire out resulted in unauthorized discharge to unpaved soil. No surface water affected.	Fire fighting water was discharged to soils at the facility, none left the facility perimeter.	San Bernardino Fire Crews used heavy equipment and water to extinguish the fire.

*All discharges to surface waters are included in the report.
 Discharges to land of less than 100 gallons are not included in the report.

EO's Monthly Report March 16, 2017 - April 15, 2017
 Unauthorized Waste Discharges*

Discharger/Facility	Location	Basin	Regulated Facility?	Discharge Date	Discharge Volume	Description of Failure	Additional Details	Status
Molycorp Minerals LLC	Onsite Evaporation Ponds	South	Yes	4/3/2017	Unknown	Recent high winds blew solids off of stockpiled material and also blew mining wastewater onto unpaved surface. No surface water affected.	Violation of Board Order No. R6V-2005-0011, SECTION II.A.4. reported release of contaminated pond solids/salts from pond P-30B, P-30D to unpaved surface.	Samples were taken to characterize the discharge. Cleanup will be conducted based on the sample results.

*All discharges to surface waters are included in the report.
 Discharges to land of less than 100 gallons are not included in the report.