

Regional Water Quality Control Board
Central Valley Region

Response to Written Comments for
Tentative Waste Discharge Requirements
for
Liquid Waste Management, Inc.
McKittrick Waste Treatment Site, Kern County

This document contains the responses to written comments received from interested parties regarding the proposed tentative Waste Discharge Requirements (WDRs) for Liquid Waste Management, Inc. (LWMI), McKittrick Waste Treatment Site (MWTS), Kern County for construction, operation, and closure. The Tentative WDRs, R5-201X-XXXX, were prepared to address expansion of the facility and incorporates construction, operation, and closure requirements. Currently, the facility is regulated by WDRs Order R5-2003-0160.

The Tentative WDRs were circulated on 5 March 2015 for public comment, ending on 6 April 2015. A total of one letter/email was received and these comments are addressed below.

Comments submitted during the comment period were received from the following:

- A. Fred Paap, LWMI, 6 April 2015

RESPONSE TO COMMENTS

Comment A.1:

Regarding item 12 on Page 4 of the WDRs:

12. The Discharger proposes to discharge treated wood waste in the composite-lined units at the landfill. Title 22 defines "treated wood" to mean wood that has been treated with a chemical preservative for purposes of protecting the wood against attacks from insects, microorganisms, fungi, and other environmental conditions that can lead to decay of the wood and the chemical preservative is registered pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Sec. 136 and following). This may include but is not limited to waste wood that has been treated with chromated copper arsenate (CCA), pentachlorophenol, creosote, acid copper chromate (ACC), ammoniacal copper arsenate (ACA), ammoniacal copper zinc arsenate (ACZA), or chromated zinc chloride (CZC).

This item should be revised to discuss the fact that the MWTS currently discharges treated wood waste and will continue to do so.

Response A.1:

The requested revision has been made.

Comment A.2:

Regarding items 25 and 26 on Page 6 of the WDRs:

25. The *Water Quality Control Plan for the Tulare Lake Basin, Second Edition* (hereafter Basin Plan), designates beneficial uses, establishes water quality objectives, and contains implementation plans and policies for all waters of the Basin.

26. Surface water drainage from the Facility is regulated under the *General Permit to Discharge Storm Water Associated with Industrial Activity* adopted by the State Water Resources Control Board in 1997. Groundwater and spring water within a 0.5 mile radius of the Facility are not suitable, or potentially suitable, for municipal or domestic supply.

It appears that the last sentence of 26 belongs to the end of 25 with the water quality control plan as its referring to groundwater.

Response A.2:

The requested revision has been made. The last sentence of Finding 26 has been moved to the end of Finding 25.

Comment A.3:

Regarding item 31 on Page 7 of the WDRs:

31. The existing surface and groundwater monitoring network consists of two spring locations (SP-1 and SP-1A) and four monitoring wells (M-4, M-5, M-11, M-12R) as shown on Attachment B. Shallow zone groundwater occurs below the eastern and western areas and is monitored for the earliest detection of a release. The deep zone groundwater is not monitored for groundwater quality. Several piezometers are used to assess the groundwater gradient (MD-4, P-15, PD-15, PD-16, P-17, P-21, P-22, P-23, P-24, and P-25).

The last sentence of this item lists the existing piezometers. Piezometer M-7 should also be listed. All but two of the piezometers will be decommissioned as part of the landfill expansion. Piezometers P-15 and M-7 will remain as part of the monitoring program and be used for depth-to-groundwater measurements and groundwater elevation calculations. The remaining piezometers (MD-4, PD-15, PD-16, P-17, P-21, P-22, P-23, P-24, and P-25) need to be decommissioned and should be removed from the WDRs.

Response A.3:

Finding 31 will be revised as follows:

The existing surface and groundwater monitoring network consists of two spring locations (SP-1 and SP-1A), four shallow zone groundwater monitoring wells (M-4, M-5, M-11, M-12R), and two shallow zone piezometers (P-15 and M-7) as shown on Attachment B. Shallow zone groundwater occurs below the eastern and western areas and is monitored for the earliest detection of a release. The deep zone groundwater is not monitored. Several additional piezometers were historically used to assess the groundwater elevation and gradient (MD-4, PD-15, PD-16, P-17, P-21, P-22, P-23, P-24, and P-25). As part of the landfill expansion, these piezometers are being evaluated for decommissioning.

Comment A.4:

Regarding item 35 on Page 8 of the WDRs:

35. The anthropogenic VOCs 1,1-Dichloroethane (1,1-DCA) and methyl tertbutyl ether (MTBE) were released to groundwater beneath the site. No other organic or inorganic constituents were identified as part of this release, which was attributed to former unlined surface impoundments. The Facility was placed into a corrective action program

(CAP) in 2002, which consisted of monitored natural attenuation. The concentrations of 1,1-DCA and MTBE attenuated to background water quality conditions by 2006 and 2009, respectively.

This item discusses the fact that the facility was placed into corrective action in 2002 due to the detections of 1,1-DCA and MTBE. The last sentence states these constituents have not been detected since 2006 and 2009, respectively.

The January 2015 Site-Specific Groundwater Monitoring Plan (SSGWMP) prepared by Amec Foster Wheeler is identified as the “approved” water quality monitoring plan in the first paragraph of Section A of the Monitoring and Reporting Program (MRP). The SSGWMP proposed the site end Corrective Action Monitoring and resume Detection Monitoring for the reasons specified in Section 3.0 of the SSGWMP. Since the SSGWMP has been approved, item 35 should specify that that the site is in Detection Monitoring and not Corrective Action Monitoring for internal consistency with the WDRs.

Response A.4:

Central Valley Water Board staff reviewed and concur with the SSGWMP, which included a proposal to the end the 2002 CAP. As levels of 1,1-DCA and MTBE have naturally attenuated, the SSGWMP will be specifically approved in separate correspondence and can also be considered approved with the adoption of the Tentative WDRs and MRP. For consistency, Finding 35 will be revised as follows:

The anthropogenic VOCs 1,1-Dichloroethane (1,1-DCA) and methyl tertbutyl ether (MTBE) were released to groundwater beneath the site. No other organic or inorganic constituents were identified as part of this release, which was attributed to former unlined surface impoundments. The Facility was placed into a corrective action program (CAP) in 2002, which consisted of monitored natural attenuation. The concentrations of 1,1-DCA and MTBE attenuated to background water quality conditions by 2006 and 2009, respectively. Corrective action for 1,1-DCA and MTBE was deemed complete and the Facility returned to detection monitoring in 2015.

Comment A.5:

Regarding item 36 on Page 8 of the WDRs:

36. In the most recent self-monitoring report (*Second Semiannual and Annual 2014 Groundwater Monitoring Report*), 1,1,2-trichloro-ethane (1,1,2-TCA) was reported at a concentration of 7.3 micrograms per liter (µg/L) in well M-5. The last detection of 1,1,2-TCA was in spring SP-1 in January 2001 and it has not previously been detected in well M-5. Additionally, 1,2-dichloroethane (1,2-DCA) was reported at a concentration of 7.3 µg/L in well M-5. 1,2-DCA was last detected in well M-5 in November 1999 and has not been detected in any other of the site monitoring wells. Confirmation sampling is scheduled.

This item discusses the 1,1,2-TCA and 1,2-DCA both reported at values greater than the PQL in an October 21, 2014 groundwater sample from monitoring well M-5. A QC sample collected from well M-5 on February 9, 2015, did not identify those constituents in the sample. The second semiannual 2014 result seems to be a false positive. We suggest item 36 be removed from the WDRs.

Response A.5:

The requested revisions have been made since the initial detection of 1,1,2-TCA and 1,2-DCA were not confirmed in a subsequent sampling event.

Comment A.6:

Regarding item 42 on Page 9 of the WDRs:

42. The LCRS will drain to a sump where leachate is collected. A leak detection system (LDS) in the form a pan lysimeter will be constructed beneath the western expansion LCRS sump. The Discharger proposes a LDS consisting of the following, from top to bottom:
- a. 12-inch prepared subgrade foundation;
 - b. a 60-mil HDPE geomembrane;
 - c. a double-sided LCRS geocomposite (non-woven geotextile/HDPE geonet bonded on both sides);
 - d. 18-inch minimum thick layer of granular material with a hydraulic conductivity of 1cm/s, in the floor area of the LDS to accommodate the LDS riser pipe;
 - e. a reinforced geotextile carrier type GCL;
 - f. 24-inch compacted clay liner with a hydraulic conductivity of 1×10^{-7} cm/s or less.

We recommend the above item be revised to reflect the current design, as described in Section 6.8.4 of the JTD, of the LDS are listed from bottom to top and should include a reinforced geotextile carrier type GCL between items a and b.

Response A.6:

Section D. DESIGN AND CONSTRUCTION SPECIFICATIONS, Item 3 will be revised accordingly and Finding 42 (now Finding 41) will be revised as follows:

The LCRS will drain to a sump where leachate is collected. A leak detection system (LDS) in the form a pan lysimeter will be constructed beneath the western expansion LCRS sump. The Discharger proposes a LDS consisting of the following, from bottom to top:

- a. 12-inch prepared subgrade foundation;*
- b. a reinforced geotextile carrier type GCL;*
- c. a 60-mil HDPE geomembrane;*
- d. a double-sided LCRS geocomposite (non-woven geotextile/HDPE geonet bonded on both sides);*
- e. 18-inch minimum thick layer of granular material with a hydraulic conductivity of 1cm/s, in the floor area of the LDS to accommodate the LDS riser pipe;*
- f. a reinforced geotextile carrier type GCL;*
- g. 24-inch compacted clay liner with a hydraulic conductivity of 1×10^{-7} cm/s or less.*

Comment A.7:

Regarding item 47 on Page 10 of the WDRs:

47. The Discharger proposes an engineered alternative final cover consisting of, in ascending order, the following layers:

- a. Prepared foundation layer.
- b. 3-foot thick evapotranspirative (ET) soil layer.
- c. Vegetative layer

We recommend the above item be revised to clarify that the “vegetative layer” in the final cover is part of the three foot ET soil layer and not additional material.

Response A.7:

The requested revisions have been made and this finding will be revised as follows:

The Discharger proposes an engineered alternative final cover consisting of, in ascending order, the following layers:

- a. *Prepared foundation layer.*
- b. *3-foot thick evapotranspirative (ET) soil layer.*
- c. *Vegetative layer (included as part of the 3-foot thick ET soil layer).*

Comment A.8:

Regarding item 58 on Page 12 of the WDRs:

58. On 10 December 2013, the Kern County certified the final environmental impact report for the Facility and adopted a Mitigation Monitoring and Reporting Plan for the expansion of the existing Facility into the 40-acre West Parcel.

We recommend the above item be revised to insert “Board of Supervisors” after County.

Response A.8:

The requested revisions have been made.

Comment A.9:

Regarding Item 5 of Section A. PROHIBITIONS on Page 13 of the WDRs:

5. Discharge of municipal solid waste is prohibited.

MWTS currently disposes of dry trash in the landfill so we recommend removal of item 5 or a revision to allow the continued disposal of dry trash similar to the language in the existing WDRs.

Response A.9:

Since the existing WDRs allow for the disposal on-site generated dry trash, the following revision has been made to Item 5, Section A. PROHIBITIONS:

Discharge of municipal solid waste, except on-site generated dry trash, is prohibited.

Comment A.10:

Regarding Item 2 of Section B.DISCHARGE SPECIFICATIONS on Page 14 of the WDRs:

48. Prior to the discharge of waste to a Class II WMU, all wells within 500 feet of the unit shall have sanitary seals or shall be properly abandoned. A record of the sealing and/or

abandonment of such wells shall be sent to the Central Valley Water Board and to the State Department of Water Resources.

We recommend clarifying that all “unused water supply wells” be specified rather than just “all wells.”

Response A.10:

All water wells, whether used or unused, need to have a proper sanitary seal to protect water quality. To eliminate possible confusion regarding oil production wells, this item has been revised to read as follows:

Prior to the discharge of waste to a Class II WMU, all water wells within 500 feet of the unit shall have sanitary seals or shall be properly abandoned. A record of the sealing and/or abandonment of such wells shall be sent to the Central Valley Water Board and to the State Department of Water Resources.

Comment A.11:

Regarding Item 4 of Section B.DISCHARGE SPECIFICATIONS on Page 14 of the WDRs:

4. The Discharger shall manage treated wood waste in accordance with California Health and Safety Code sections 25143.1.5 and 250150.7 and shall comply with all prohibitions listed in Title 22, section 67386.3.

Please correct the citation from 250150.7 to 25150.7.

Response A.11:

The requested revisions have been made.

Comment A.12:

Regarding Item 1 of Section G. MONITORING SPECIFICATIONS on Page 17 of the WDRs:

1. The Discharger shall comply with the detection monitoring program provisions of Title 27 for groundwater, surface water, and the unsaturated zone, and in accordance with Monitoring and Reporting Program (MRP) No. R5-201X-XXXX, and the Standard Monitoring Specifications listed in Section I of the SPRRs.

This item specifies compliance with the MRP and Section 1 of the Standard Provisions and Reporting Requirements. We suggest that this item also specify compliance with the most recently approved version of the SSGWMP.

Response A.12:

The approved SSGWMP is incorporated into the MRP by reference. No revisions will be made.

Comment A.13:

Regarding Item 4 of Section G. MONITORING SPECIFICATIONS on Page 17 of the WDRs:

4. The concentrations of the constituents of concern in waters passing the Point of Compliance (defined pursuant to Title 27, section 20164 as a vertical surface located at the hydraulically downgradient limit of the waste management unit that extends through the uppermost

aquifer underlying the unit) shall not exceed the concentration limits established pursuant to MRP No. R5-201X-XXXX.

A potential release from the MWTS is evaluated using trend analysis of anthropogenic and non-anthropogenic VOCs. Inorganic constituents are not reliable indicators of a release at the MWTS and therefore concentration limits are not calculated and inorganic data are not statistically evaluated. This item should be updated to specify that inorganic COCs are not reliable indicators of a release at the MWTS and are not statistically analyzed. The remaining anthropogenic organic COCs, such as SVOCs, are not naturally occurring and have no history of detection. Their concentration limit could be their respective PQL.

Response A.13:

Staff reviewed this comment and found it to be consistent with requirements in the existing WDRs. Therefore, the following revisions have been made to Item 4, Section G.MONITORING SPECIFICATIONS:

The concentrations of the constituents of concern in waters passing the Point of Compliance (defined pursuant to Title 27, section 20164 as a vertical surface located at the hydraulically downgradient limit of the waste management unit that extends through the uppermost aquifer underlying the unit) shall not exceed the concentration limits established pursuant to MRP No. R5-201X-XXXX. Concentration limits are not prepared for the Facility as inorganic constituents are not reliable indicators of a release and analytical results for inorganic constituents will not be statistically analyzed. Possible releases from the Facility are evaluated statistically using trend analysis of VOC concentrations.

Comment A.14:

Regarding Items 6 and 7 of Section G. MONITORING SPECIFICATIONS on Page 18 of the WDRs:

6. For each monitoring event, the Discharger shall determine whether the waste management unit is in compliance with the Water Quality Protection Standard using procedures specified in MRP No. R5-201X-XXXX and the Standard Monitoring Specifications in Section I of the SPRRs.
7. The Discharger shall comply with all Standard Monitoring Specifications and Response to a Release specifications listed in Sections I and J of the SPRRs.

Because portions of the WDRs, MRP, or SSGWMP may conflict with the SPRRs, we request the above paragraphs refer to “applicable portions of the Standard Monitoring Specifications...” and should also note compliance with the most recently approved SSGWMP.

Response A.14:

The approved SSGWMP is already incorporated into the MRP by reference and no revisions in regards to referencing the SSGWMP will be made. However, the following revisions have been made to Items 6 and 7, Section G.MONITORING SPECIFICATIONS:

6. *For each monitoring event, the Discharger shall determine whether the waste management unit is in compliance with the Water Quality Protection Standard using*

procedures specified in MRP No. R5-201X-XXXX, and the applicable portions of the Standard Monitoring Specifications in Section I of the SPRRs.

- 7. The Discharger shall comply with applicable portions of the Standard Monitoring Specifications and Response to a Release Specifications listed in Sections I and J of the SPRRs.*

Comment A.15:

Regarding Section H. CORRECTIVE ACTION SPECIFICATIONS on Page 18 and 19 of the WDRs:

(Note: the actual text is not repeated)

As proposed in the SSGWMP, which is approved in the MRP, the site should be in detection monitoring. As specified in the SSGWMP and as identified in these tentative WDRs, the constituents identified in corrective action attenuated to less than the PQL at least 6 years ago.

The recent detections of anthropogenic VOCs in monitoring well M-5 were not duplicated in a subsequent sample. The VOCs reported in well M-5 appear to be a false positive. The current language in Section H of the WDRs should be removed.

Response A.15:

The recommended revisions have been made. See Response A.4 for more information.

Comment A.16:

Regarding Item 1 of Section I. PROVISIONS on Page 19 of the WDRs:

1. The Discharger shall comply with the SPRRs. The SPRRs contain important provisions and requirements with which the Discharger must comply. A violation of any of the SPRRs is a violation of these waste discharge requirements.

Because portions of the WDRs, MRP, or the most recently adopted version of the SSGWMP may conflict with the SPRRs, we suggest that the first sentence of this item be revised to state, "The Discharger shall comply with applicable portions of the SPRRs."

Response A.16:

The requested revisions have been made.

Comment A.17:

Regarding Task I.10.G Corrective Action on Page 22 of the WDRs:

If the site is in detection monitoring as proposed in the SSGWMP, then Task G is not needed and should be removed from the WDRs.

Response A.17:

The recommended deletion has been made. See Response A.4 for more information.

Comment A.18:

Regarding the last paragraph on Page 2 of the MRP, which requires quarterly groundwater elevation measurements:

Since semiannual groundwater monitoring was approved more than 10 years ago for the site, water levels have been collected semiannually and reported in the monitoring reports. Figure 4 of the SSGWMP is a hydrograph of shallow groundwater elevations. The hydrographs include quarterly groundwater elevation data that were collected prior to 2008. The hydrographs show no significant change in upgradient versus downgradient position of wells. The upgradient wells have remained the upgradient wells and the downgradient wells have remained the downgradient wells during the period of record since 1991. No groundwater production wells exist within 1 mile of the MWTS to cause seasonal fluctuations in groundwater flow. Monitoring water levels semiannually is just as effective as measuring quarterly water levels for determining groundwater flow direction and gradient below the MWTS.

Response A.18:

Central Valley Water Board staff concur that measuring “water levels semiannually is just as effective as measuring quarterly water levels for determining groundwater flow direction and gradient below the MWTS.” The requested revisions have been made. Additionally, the following will be added as a finding in the WDRs under the “Surface Water and Groundwater Conditions” section:

The Facility currently measures water levels on a semiannual basis. Review of hydrographs submitted with semiannual and annual monitoring reports, which include quarterly groundwater elevation data collected prior to 2008, show no significant change in upgradient versus downgradient position of wells. Additionally, no groundwater production wells exist within a one mile of the MWTS to cause fluctuations in groundwater flow. Semiannual water level measurements are sufficient for determining groundwater flow direction and gradient below the MWTS.

Comment A.19:

Regarding Section 5, Corrective Action Monitoring on Page 6 of the MRP:

5. Corrective Action Monitoring

The Discharger shall conduct corrective action monitoring to demonstrate the effectiveness of corrective action in accordance with Title 27, section 20430 and this MRP. Groundwater monitoring wells and springs shall be monitored in accordance with the groundwater monitoring requirements in part A.1 of this MRP.

If the Facility is in detection monitoring, as proposed in the SSGWMP, this section should be removed.

Response A.19:

The recommended deletion has been made. See Response A.4 for more information

Comment A.20:

Regarding Section B. Reporting on Page 6 of the MRP (reporting due dates of 1 August and 1 February):

The reporting schedule requires preparation and the submittal of the monitoring reports and annual monitoring report 30 days following the end of the monitoring period. We request an extension of the time to about 60 days or 1 September and 1 March for the monitoring reports

and 1 March for the annual monitoring report. If changed, then the report due dates on page 7, Section 1 and page 9, Section 2 should be changed to 1 September and 1 March, respectively.

Response A.20:

The requested revisions have been made.

Comment A.21:

Regarding item c) on page 8 in Required Reports of the MRP:

- c) The estimated quarterly groundwater flow rate and direction in the uppermost aquifer, in any zones of perched water, and in any additional zone of saturation monitored based upon water level elevations taken prior to the collection of the water quality data submitted in the report [Title 27, section 20415(e)(15)].

If changed to semiannual groundwater measurements, this should also state semiannual flow rate and direction

Response A.21:

The requested revisions have been made.

Comment A.22:

Regarding item f) on page 8 in Required Reports of the MRP:

- f) An evaluation of the concentration of each monitoring parameter (or 5-year COC when five year COC sampling is conducted) as compared to the current concentration limits, and the results of any required verification testing for constituents exceeding a concentration limit. Report any actions taken under Section J: Response to a Release for verified exceedances of a concentration limit for wells/constituents not already in corrective action monitoring.

Inorganic COCs are not reliable indicators of a release at the MWTS and are not statistically analyzed. Inorganic COC results are evaluated with regard to consistency with historical data. We request the above statements be inserted into item f) after the first sentence for clarification.

Response A.22:

In accordance with Comment and Response A.13, the following revisions have been made to item f) for clarification:

An evaluation of the concentration of each monitoring parameter (or 5-year COC when five year COC sampling is conducted) as compared to the current concentration limits, and the results of any required verification testing for constituents exceeding a concentration limit. Inorganic COCs are not reliable indicators of a release at the MWTS and are not statistically analyzed. Inorganic COC results are evaluated with regard to consistency with historical data. Report any actions taken under Section J: Response to a Release for verified exceedances of a concentration limit for wells/constituents not already in corrective action monitoring.

Comment A.23:

Regarding item d) on page 9 of the MRP:

- d) Hydrographs of each well showing the elevation of groundwater with respect to the elevations of the top and bottom of the screened interval and the elevation of the pump intake. Hydrographs of each well shall be prepared quarterly and submitted annually.

We request this item be changed to prepare semiannual hydrographs.

Response A.23:

The requested revisions have been made.

Comment A.24:

Regarding item i) on page 9 of the MRP:

- i) Updated concentration limits for each monitoring parameter at each monitoring well based on the new data set.

Inorganic constituents are not reliable indicators of a release from the MWTS and statistically derived concentration limits are not calculated at the MWTS. We request that this item be removed from the MRP.

Response A.24:

The requested deletion has been made.

Comment A.25:

Regarding TABLE I-GROUNDWATER DETECTION MONITORING PROGRAM; TABLE II-UNSATURATED ZONE DETECTION MONITORING PROGRAM; TABLE III- LEACHATE MONITORING AND LCRS TESTING; TABLE IV- MONITORING PARAMETERS FOR DETECTION MONITORING; and TABLE V- 5-YEAR COCs & APPROVED USEPA ANALYTICAL METHODS on Pages 14-25 of the MRP:

Table I lists the constituents tested as part of the Groundwater Detection Monitoring Program. Inorganic constituents and VOCs are listed under Monitoring Parameters in Table I. As identified in the current MRP and the SSGWMP, VOCs are the Monitoring Parameters for the MWTS. The listed inorganic constituents are the Supplemental Hydrochemical Parameters included in Table 3 of the SSGWMP. To prevent potential confusion between monitoring parameters and hydrochemical parameters, we suggest in Table I that VOCs be listed under Monitoring Parameters and the inorganic constituents be listed under Hydrochemical Parameters.

We also request that the Monitoring Parameters and Hydrochemical Parameters in Tables II and III be listed separately.

Table IV lists the monitoring parameters for the MWTS. The Monitoring Parameters are VOCs tested by USEPA method 8260B. The list of VOCs in Table IV of the Tentative MRP is not consistent with the list of VOCs in Table II of the current MRP (R5-2003-0160) or in Table 2 of the SSGWMP. The MWTS is expanding but will continue to receive the same type of waste that it has historically received. To remain consistent with historical monitoring at the MWTS, we

suggest the Monitoring Parameters listed in Table IV be replaced with the list of monitoring parameters in Table II of the current MRP or in Table 2 of the SSGWMP.

Table V lists the constituents of concern (COCs) for the MWTS. Among lists of other constituents, Table V includes lists of VOCs (by USEPA Method 8260B) and SVOCs (by USEPA Method 8270C). The lists of VOCs and SVOCs listed in Table V are not consistent with the lists of VOCs and SVOCs included in Table 1 of the SSGWMP. The MWTS is expanding but will continue to receive the same type of waste that it has historically received. To remain consistent with historical monitoring at the MWTS, we suggest the VOCs and SVOCs listed in Table V be replaced with the list of VOCs and SVOCs in Table 1 of the SSGWMP.

Response A.25:

The requested revisions to Tables I, II, and III have been made for clarification. No changes will be made to the constituent lists in Tables IV and V. Notwithstanding the constituent list in the current Site Specific Groundwater Monitoring Plan, the constituents in the tentative MRP Tables IV and V provide a more effective protection of water quality, are only required for sampling once every five (5) years, and are not significantly different than the current list of monitored constituents to be financially burdensome to the Discharger.