

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 84-76
NPDES NO. CA0006246

REISSUING WASTE DISCHARGE REQUIREMENTS FOR:

GENERAL ELECTRIC COMPANY
VALLECITOS NUCLEAR CENTER
PLEASANTON, ALAMEDA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region, (hereinafter called the Board) finds that:

1. General Electric Company, Vallecitos Center (GE-VNC), hereinafter called the discharger, submitted an application (Consolidated Permits-Form 2C) dated November 9, 1983 for reissuance of NPDES Permit No. CA0006246.
2. GE-VNC is located in Vallecitos Valley about five miles southeasterly from the City of Pleasanton. The primary functions of GE-VNC are nuclear fuel research and production of radio-isotopes for medical and other uses. Facilities on site (see Attachment 1) include a (50 MW) test reactor known as GETR, which has been shut down since October 27, 1977; a small (100 KW) graphite moderated nuclear test reactor known as NTR; laboratories for studies in radiochemistry, metallurgy, and nuclear fuels; shops; and support facilities. There are also two other nuclear reactors on site, which have been shut down since the mid-1960's. GE has no present plans for reactivating either of these two reactors.
3. The discharger generates both sanitary and industrial wastewaters which are separately collected, treated and discharged. Sanitary wastes are treated in an Imhoff tank, filtered through sand beds, chlorinated, and held briefly in one of four retention basins until disposed of on GE property by sprinkler irrigation on land. Average dry weather disposal of treated sanitary wastewater in 1984 was 4,000 gpd and average wet weather disposal was 6,040 gpd.
4. Industrial wastewater consists of non-contact equipment cooling water and of wastewaters from photochemical lab, machine shops, support facilities (e.g. cafeteria and administrative facilities), air conditioner and cooling water wastes from the waste evaporator, and secondary cooling water from NTR. Waste evaporator distillate is no longer disposed of as industrial wastes.
5. Industrial wastewaters are pH-adjusted, flows to three 60,000-gallon retention basins and tested for compliance with the Regional Board's nonradioactive waste discharge requirements and the Nuclear Regulatory Commission's (NRC) radioactivity release limits before batch discharge to an unnamed drainage ditch tributary to Vallecitos Creek. Radioactive industrial wastewaters are disposed of in an NRC-approved manner and there is no discharge to surface or ground waters. The discharge point is located at latitude 37°31' and longitude 121°49'.

Average dry weather discharge of industrial wastewaters in 1984 was 60,500 gpd and average wet weather discharge was 63,800 gpd. Flows were approximately 0.23 mgd when GETR was operating. Vallecitos Creek joins Arroyo de la Laguna and Alameda Creek about two miles further downstream. Vallecitos Creek, Arroyo de la Laguna, and Alameda Creek are all nontidal waters of the United States.

6. The discharge is presently governed by Orders Nos. 80-28, 81-27, and 81-28. Order No. 81-27 reissued and amended the NPDES permit contained in Order No. 80-28 and made four findings: a) the GE contingency plan for liquid hazardous materials (i.e. non-radioactive liquids) was adequate, b) the discharger voluntarily ceased discharge of industrial wastewater which contains site-generated radioactive substances (e.g. tritium) to Vallecitos Creek, c) the discharger's report documenting net environmental benefits from dry weather discharge was considered in relation to the Board's discharge prohibition to the Alameda Creek watershed above Niles during dry weather as contained in the 1975 Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan), and d) the radioactive substance regulatory activities of the California Department of Health Services (DOHS) and the U.S. Nuclear Regulatory Commission (NRC). Order No. 81-27 required submittal of annual updates of the contingency plan and reaffirmed the Board's Resolution No. 80-3 which requested DOHS and NRC to require the discharger to implement a Board recommended radiological monitoring program, increase surveillance, and limit discharge of tritium.

Order No. 81-28 deferred Board consideration of an exemption from the 1975 Basin Plan dry weather discharge prohibition to the Alameda Creek watershed above Niles until after the Basin Plan was revised. The Basin Plan was subsequently amended on July 21, 1982.

7. Previous waste discharge requirements for GE-VNC include Orders Nos. 74-201, 76-127, and 79-168.
8. The Regional Board adopted a revised Water Quality Control Plan for the San Francisco Bay Region (Basin Plan) on July 21, 1982. The Basin Plan contains water quality objectives for Vallecitos Creek, Arroyo de la Laguna, Alameda Creek and contiguous waters.
9. The beneficial uses of Vallecitos Creek and contiguous bodies are:

- Water Contact Recreation
- Non-Contact Water Recreation
- Wildlife Habitat
- Warm Fresh Water and Cold Fresh Water Habitat
- Fish Migration and Spawning
- Industrial Service and Process Supply
- Municipal and Domestic Supply
- Agricultural Supply
- Groundwater Supply

10. The discharger submitted its annual updated Contingency Plan for Liquid Hazardous Materials on June 25, 1984 which was found by the staff to be adequate.

11. The discharger voluntarily ceased discharge of industrial wastewaters containing site generated radioactive substances to surface waters in May 1980.
12. The discharger has previously requested to discharge to Vallecitos Creek year-round. In accordance with the July 1982 amended Basin Plan, the Board may allow dry weather discharge to the Alameda Creek watershed above Niles when the Board finds that the discharge does not contain characteristics of concern to beneficial uses in Alameda Creek. The discharger has submitted the following information to support their request for a dry weather discharge:
 - a. The discharger has cited that the high quality of its industrial wastewater, primarily Hetch-Hetchy cooling water, is better than most surface waters of the area and with minor exception better than South Bay Aqueduct water used to recharge the downstream Niles cone. Self-monitoring data indicates that the discharger's claim appears justified and the discharge has consistently met Board effluent limits and Basin Plan criteria including total dissolved solids, chloride, total suspended matter, heavy metals, stable organics, and other pollutants.
 - b. The discharger has submitted a report documenting net environmental benefits from the dry weather discharge. California Department of Fish and Game concurs that there are positive net environmental benefits to dry weather discharge which meet strict effluent limits.

Based on the above information the discharge as permitted in these requirements does not contain particular characteristics of concern to beneficial uses of the Alameda Creek watershed above Niles when no natural flow occurs and net environmental benefits are present from the discharge.

13. Source, byproduct, and special nuclear materials of the type regulated by the Atomic Energy Act (AEA) are not "pollutants" under the Federal Clean Water Act (CWA) and, therefore not subject to control by EPA or the States, under the NPDES program. The NRC has sole authority to regulate possession and use of such materials and to adopt and enforce effluent standards for radioactivity. GE-VNC operates under license from NRC for possession, use and discharges of the above described materials regulated under the AEA. Consequently, the Regional Board has no jurisdiction, under the CWA, to regulate radioactivity in the effluent discharged from this facility. The DOHS has been delegated certain regulatory powers by Federal-State agreement, and GE-VNC has a license from DOHS for possession and all activities involving "source" (non-enriched uranium) and "by-products" nuclear materials (after separation from reactor fuel). NRC and DOHS have jurisdiction, expertise and responsibility to monitor and enforce their licensing provisions and regulations.
14. Effluent radiological release limits are prescribed by the NRC for regulation of such constituents in wastewater discharges pursuant to the Code of Federal Regulations-Energy, Title 10, Chapter 1, Part 20

(Table B, Column II). Self-monitoring data submitted by GE-VNC on a quarterly basis show that radioactive substances measured in the industrial discharges are significantly below the NRC release limits, but also considerably below the California Administrative Code-Title 22 limits for natural and man-made radioactivity in drinking water supplies for those constituents measured by GE-VNC.

15. Specific radiological effluent and receiving water limits are not included in this NPDES permit because the NRC and DOHS have primary responsibility for regulation of such constituents in wastewater discharges pursuant to the Code of Federal Regulations-Energy, Title 10, Chapter 1, Part 20 et seq. and in the California Administrative Code Titles 17 and 22 (Regulations for Radiation Control and for Domestic Water Quality and Monitoring, respectively).
16. The Basin Plan provides that ground and surface waters designated for domestic or municipal drinking water supply, such as the Alameda Creek watershed, shall not contain concentrations of radionuclides in excess of the following objectives: 5 pCi/l (pico-curies per liter) of Combined Radium-226 and Radium-228, 15 pCi/l of Gross Alpha Particle Activity, 20,000 pCi/l of Tritium, 8 pCi/l of Strontium-90, and 50 pCi/l of Gross Beta Particle Activity. These objectives conform with the Maximum Contaminant Levels contained in Title 22 of the California Administrative Code administered by DOHS and with the Primary Drinking Water Limits specified by the Environmental Protection Agency.
17. Although self-monitoring data on GE-VNC's industrial wastewater discharges show that they have always complied with radiological limits recommended by this Board, they have contained tritium. GE-VNC no longer discharges waste evaporator distillate to the industrial wastewater system. Distillate is now reprocessed in the waste evaporator (which does not concentrate tritium well) and this potential source of tritium and other radioactive substances has been eliminated from the industrial wastewater stream.
18. The NRC has provided reports and information to the Board stating that GE-VNC was relicensed on May 10, 1984 for non-reactor radioactive activities with a 5-year expiration date. The NRC reviewed and approved GE-VNC's radiological materials emergency plans (i.e. onsite contingency plans, offsite agency coordination, and tests and drills) as part of the relicensing. In its most recent inspection of GE-VNC in October 1983, the NRC found no violations of the areas inspected. In particular, the NRC was satisfied with GE-VNC's environmental surveillance program, radioactive waste management, and facility operations. Under the environmental surveillance program, GE-VNC voluntarily implemented most but not all of the Board's proposed radiological monitoring program recommended in 1981. The NRC further stated that they believe they have conducted inspections and audits satisfactorily and that future audits and sampling will account for the Board's concerns.
19. DOHS has previously indicated that they have not required the discharger to adopt the Board's recommended radiological monitoring program nor increased their surveillance because of staff shortages.

20. Staff will continue to pursue the provisions contained in Resolution No. 80-3 with NRC and DOHS staff to assure that the Board's concerns are addressed.
21. GE-VNC has installed a new onsite groundwater monitoring well (G-10A1, see Attachment 2) in accordance with the U.S. Geological Survey (USGS) recommendations based on a joint GE-VNC, Regional Board, and USGS sponsored report on ground water monitoring in Vallecitos Valley. Since this well should provide early-warning detection of groundwater contamination, GE-VNC requested in a May 4, 1984 letter that inoperable and fringe-area monitoring wells be deleted from their self-monitoring program. Staff review finds the request justified with two exceptions (Wells G-10P3 and G-10H1) since the wells to be deleted provide minimal information.
22. The discharger also requested in its May 4, 1984 letter, reduction in receiving water monitoring at stations that do not properly reflect GE-VNC's site drainage. Staff review finds the request justified with one exception (a downstream receiving water monitoring station). The discharger has stated it will be responsible for determining its contribution to any downstream water quality problems. The Executive Officer may increase monitoring requirements if he so finds reason.
23. Effluent limitation, toxic effluent standards, established pursuant to Section 301, 304, and 307 of the Clean Water Act and amendments thereto are applicable to the discharge.
24. Effluent limitation guidelines requiring the application of best available technology economically achievable (BAT) for this point source category have not been promulgated by the U.S. Environmental Protection Agency. Effluent limitations of this Order are based on the Basin Plan, State Plans and policies, current plant performance, and best engineering judgment. The limitations are considered to be those attainable by BAT, in the judgment of the Board.
25. The issuance of waste discharge requirements for this discharge is exempt from the provisions of Chapter 3 (commencing with Section 21000 of Division 13) of the Public Resources Code (CEQA) pursuant to Section 13389 of the California Water Code.
26. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED THAT GENERAL ELECTRIC, VALLECITOS NUCLEAR CENTER in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, and the provisions of the Clean Water Act and regulations and guidelines adopted thereunder, shall comply with the following:

A. Prohibitions

1. No wastewater containing sewage shall be allowed to escape from the discharger's property, either by surface flow or by airborne spray.

B. Effluent Limitations - Industrial Waste

1. The discharge of an effluent containing constituents in excess of the following limits is prohibited:

<u>Constituent</u>	<u>Units</u>	<u>30-Day Average</u>	<u>Maximum Daily</u>	<u>90-Day 90th Percentile</u>	<u>90-Day Average</u>
a) Total Suspended Matter	mg/l	5.0	10.0	-	-
b) Oil & Grease	mg/l	5.0	10.0	-	-
c) Copper, Dissolved	mg/l	.02	.05	-	-
d) Temperature	F	-	90	-	-
e) Mercury	mg/l	0.001	0.002	-	-
f) Total Dissolved Solids	mg/l	-	500	360	250
g) Chloride	mg/l	-	250	100	60

2. The discharge of pH shall not be less than 6.5 nor greater than 8.5.

3. In any representative set of samples the waste as discharged shall meet the following limit of quality:

TOXICITY:

The survival of test fishes in 96-hour bioassays of the effluent shall achieve a median of 90% survival for three consecutive samples and a 90 percentile value of not less than 70% survival for 10 consecutive samples.

C. Receiving Water Limitations

1. The discharge of waste shall not cause the following conditions to exist in waters of the State at any place:

- Floating, suspended, or deposited macroscopic particulate matter or foam of waste origin;
- Bottom deposits or aquatic growths;
- Alteration of temperature, turbidity, or apparent color beyond present natural background levels;

- d. Visible, floating, suspended or deposited oil or other products of petroleum origin;
 - e. Toxic or other deleterious substances to be present in concentrations or quantities which will cause deleterious effects on aquatic biota, wildlife or waterfowl, or which render any of these unfit for human consumption either at levels created in the receiving waters or as a result of biological concentration.
2. The discharge of waste shall not cause the following limits to be exceeded in waters of the State at any place:
- a. Dissolved oxygen 7.0 mg/l minimum. Median of any three consecutive months shall not be less than 80% saturation. When natural factors cause lesser concentration(s) than those specified above, then this discharge shall not cause further reduction in the concentration of dissolved oxygen.
 - b. pH Variation from natural ambient pH by more than 0.5 pH units.
 - c. Un-ionized ammonia 0.025 mg/l as N Annual Median
 0.4 mg/l as N Maximum
3. The discharge shall not cause a violation of any applicable water quality standard for receiving waters adopted by the Board or the State Water Resources Control Board as required by the Clean Water Act and regulations adopted thereunder. If more stringent applicable water quality standards are promulgated or approved pursuant to Section 303 of the Clean Water Act, or amendments thereto, the Board will revise and modify this Order in accordance with such more stringent standards.

D. Provisions

- 1. The requirements prescribed by this Order supersede the requirements prescribed by Orders Nos. 80-28, 81-27, and 81-28 which are hereby rescinded.
- 2. Where concentration limitations in mg/l are contained in this permit, the following mass emission limitations shall also apply as follows:

$$\text{Mass Emission Limit in kgs/day} = \text{Concentration limit in mg/l} \times 3.79 \times \text{Actual Release Volume in mgd averaged over the month.}$$
- 3. The discharger shall manage the discharge to provide the greatest environmental benefit feasible to beneficial uses in receiving waters.

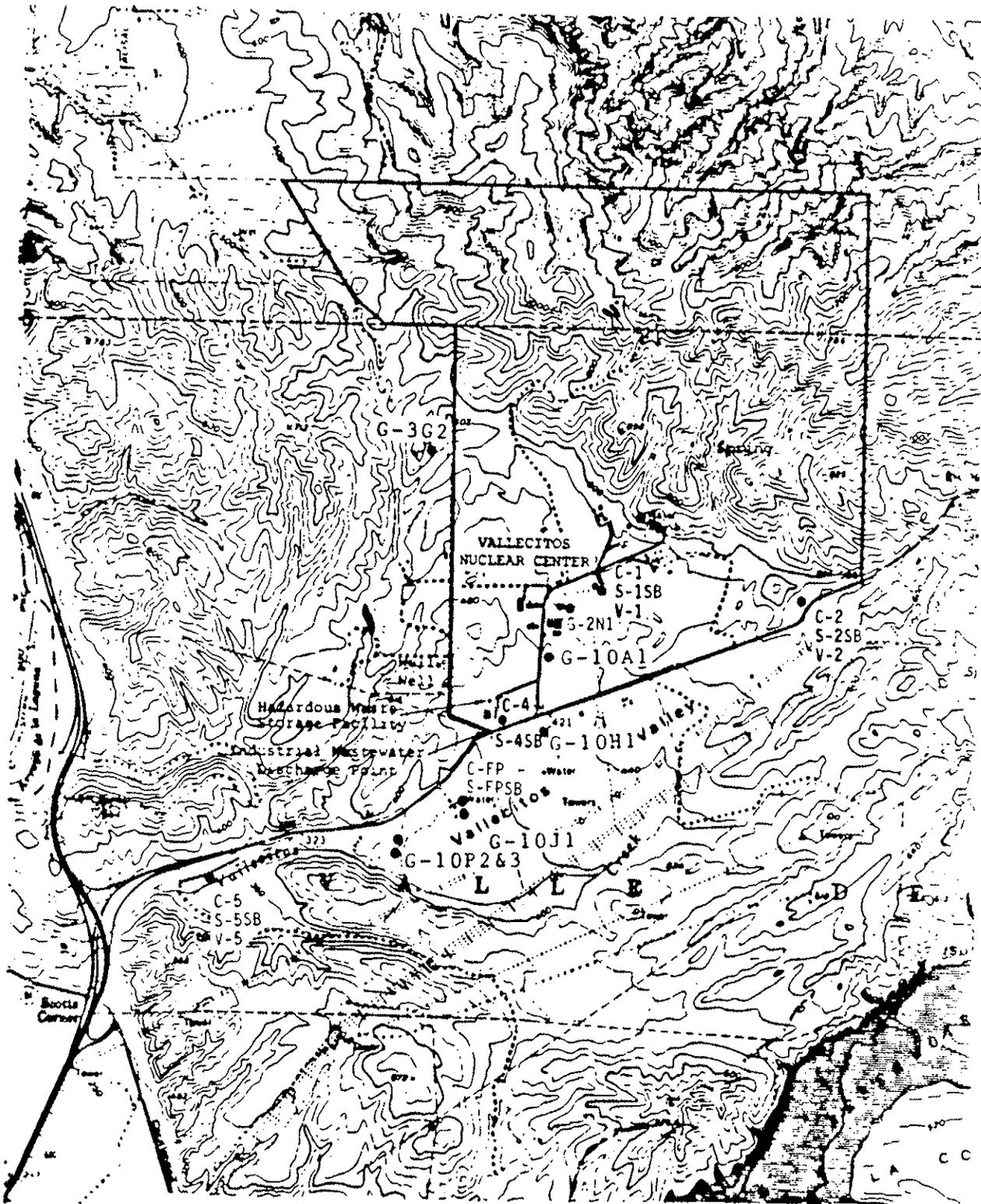
4. The discharger shall notify this Board in writing as soon as the discharger has been relicensed for reactor activity (i.e. GETR) by the NRC.
5. The discharger shall comply with all sections of this Order immediately upon adoption.
6. The discharger shall review and update annually its contingency plan as required by Board Resolution No. 74-10. The discharge of pollutants in violation of this Order where the discharger has failed to develop and/or implement a contingency plan will be basis for considering such discharge a willful and negligent violation of this Order pursuant to Section 13387 of the California Water Code.
7. The discharger shall comply with all items of the self-monitoring program as adopted by the Board and as may be amended by the Executive Officer.
8. The discharger shall comply with all items of the attached "Standard Provisions, Reporting Requirements and Definitions" dated April 1977, except items A.5, A.12, A.16, B.1, B.2, B.3 & B.5.
9. All applications, reports, or information submitted to the Regional Board shall be signed and certified pursuant to Environmental Protection Agency regulations [40 CFR 122.41K].
10. Pursuant to Environmental Protection Agency regulations [40 CFR 122.42(a)] the Discharger must notify the Regional Board as soon as it knows or has reason to believe (1) that they have begun or expect to begin, use or manufacture of a pollutant not reported in the permit application, or (2) a discharge of a toxic pollutant or radioactive material not limited by this permit has occurred, or will occur, in concentrations that exceed the specified limits.
11. This Order expires October 17, 1989. The discharger must file a report of waste discharge in accordance with Title 23, Chapter 3, Subchapter 9 of the California Administrative Code not later than 120 days in advance of such expiration date as application for reissuance of waste discharge requirements.
12. This Order shall serve as a National Pollutant Discharge Elimination System Permit pursuant to Section 402 of the Clean Water Act or amendments thereto, and shall become effective 10 days after date of its adoption provided the Regional Administrator, Environmental Protection Agency, has no objection. If the Regional Administrator objects to its issuance, the permit shall not become effective until such objection is withdrawn.

I, Roger B. James, Executive Officer do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region on October 17, 1984.

ROGER B. JAMES
Executive Officer

Attachments:

GE-Vallecitos Nuclear Center-Plot Plan and Sample Well and Stations
GE-Vallecitos Nuclear Center-Well Locations
Standard Provisions & Reportion Requirements, April 1977
Self-Monitoring Program
Resolution No. 74-10



DOTTED LINES REPRESENT 10 FOOT CONTOURS
 DATUM IS MEAN SEA LEVEL

UNITED STATES
 DEPARTMENT OF THE INTERIOR
 GEOLOGICAL SURVEY

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM
FOR

General Electric Company - Vallecitos Nuclear Center
Pleasanton, Alameda County

NPDES NO. CA0006246

ORDER NO. 84-76

CONSISTS OF

PART A (dated January 1978)

AND

PART B (self-monitoring program dated October 17, 1984)

TABLE I
SCHEDULE FOR SAMPLING, MEASUREMENTS, AND ANALYSIS

NPDES NO. CA0006246

Sampling Station	B		All C	All G											
	C-G	G	G	G											
Flow Volume (mgd)		E ⁽¹⁾													
Total Dissolved Solids (mg/l & kg/day)	M		M	3M											
Chloride (mg/l & kg/day)	M		M	3M											
Settleable Matter (ml/1-hr. & cu. ft./day)															
Total Suspended Matter (mg/l & kg/day)		W													
Oil & Grease (mg/l & kg/day)		M ⁽²⁾													
Coliform (Total or Fecal) (MPN/100 ml) per req't															
Fish Toxicity, 96-hr. TL ₅₀ % Survival in undiluted waste		M													
Ammonia Nitrogen (mg/l & kg/day)		3M													
Nitrate Nitrogen (mg/l & kg/day)		3M													
Nitrite Nitrogen (mg/l & kg/day)															
Total Organic Nitrogen (mg/l & kg/day)															
Total Phosphate (mg/l & kg/day)															
Turbidity (Jackson Turbidity Units)		M	M												
pH (units)		M	M	3M											
Dissolved Oxygen (mg/l and % Saturation)		M	M												
Temperature (°C)		W	M												
Apparent Color (color units)															
Secchi Disc (inches)															
Sulfides (if DO < 5.0 mg/l) Total & Dissolved (mg/l)															
Arsenic (mg/l & kg/day)															
Cadmium (mg/l & kg/day)															
Chromium, Total (mg/l & kg/day)	M														
Copper, Dissolved (mg/l & kg/day)		M	M												
Cyanide (mg/l & kg/day)															
Silver (mg/l & kg/day)	3M														
Lead (mg/l & kg/day)	M														

TABLE I (continued)
SCHEDULE FOR SAMPLING, MEASUREMENTS, AND ANALYSIS

NPDES NO. CA0006246

Sampling Station	B		All C	All G									
	C-G	G	G	G									
Mercury (mg/l & kg/day)	M												
Nickel (mg/l & kg/day)													
Zinc (mg/l & kg/day)	M												
PHENOLIC COMPOUNDS (mg/l & kg/day)													
All Applicable Standard Observations		W	M	3M									
Unionized Ammonia as N (mg/l & Kg/day)			3M (3)										
Total Identifiable Chlorinated Hydrocarbons (mg/l & kg/day)													

NOTES

- (1) - The volume of each basin discharge shall be recorded. Total volume discharged and the minimum, maximum, and average daily volumes discharged shall be reported.
- (2) - Oil and grease sampling shall consist of 3 grab samples taken at different locations within the basin, with each grab being collected in a glass container and analyzed separately. Results shall be expressed as a weighted average of the 3 values.
- (3) - Unionized ammonia shall be sampled at C-6 only. During periods when no natural flow is present in Vallecitos Creek at C-6, unionized ammonia concentrations shall be demonstrated at Station B.

LEGEND FOR TABLE

TYPES OF SAMPLES

- G = grab sample
- C-24 = composite sample - 24-hour
- C-G = composite sample of all grabs collected for the month; one grab per each basin discharge
- Cont = continuous sampling
- DI = depth-integrated sample
- BS = bottom sediment sample
- O = observation

TYPES OF STATIONS

- I = intake and/or water supply stations
- A = treatment facility influent stations
- E = waste effluent stations
- C = receiving water stations
- P = treatment facilities perimeter stations
- L = basin and/or pond levee stations
- B = waste effluent station
- G = groundwater stations

FREQUENCY OF SAMPLING

- E = each batch discharge
- H = once each hour
- D = once each day
- W = once each week
- M = once each month
- Y = once each year
- 2/H = twice per hour
- 2/W = 2 days per week
- 5/W = 5 days per week
- 2/M = 2 days per month
- 2/Y = once in March and once in September
- Q = quarterly, once in March, June, Sept. and December
- 2H = every 2 hours
- 2D = every 2 days
- 2W = every 2 weeks
- 3M = every 3 months
- Cont = continuous

I. DESCRIPTION OF SAMPLING STATIONS

A. Effluent

Station	Description
B	At any point in the outfall from the treatment facilities between the point of discharge and the point at which all waste tributary to that outfall is present (formerly called Station E).

B. Receiving Waters

Station	Description
C-4	Located in the intermittent unnamed stream crossing the southern boundary of the site above the point where effluent enters the stream.
C-6	At a point in Vallecitos Creek downstream from the site before dilution by the South Bay Aqueduct waters. The exact location shall be reported within 30 days of adoption of this Order and approved by the Executed Officer.

Receiving water stations shall be sampled when flow is present in the stream other than from the discharge.

C. Groundwaters

Station	Description
G-10A1	Well on site south of buildings. (California State Well No. 4S/1E-10A1).
G-10J1	Well on private property south of the site. (California State Well No. 4S/1E10J1).
G-10P3	Well on private property southwest of the site which perforates both the alluvium and the Livermore gravels. (California State Well No. 4S/1E-10P3).
G-10H1	Well on private property south of site entrance to be sampled when the well is made operational again. (California State Well No. 4S/1E-10H1).

Well G-10H1 shall be sampled only when the well is in operation.

D. Miscellaneous Reporting

The discharger shall submit the following quarterly: The location and quantity of the disposal of all sewage sludge removed from the site during the previous quarter.

II. SCHEDULE OF SAMPLING AND ANALYSES

The schedule of sampling and analyses shall be that given as Table I.

III. MODIFICATION OF PART "A" DATED JANUARY 1978

A. Exclusions: Paragraphs C.1, C.3, C.4, C.5a.4, C.5a.5, C.5a.6, C.5.c, C.5.d, C.5.e, D.1, D.2, D.3.b, D.4, E.2.b, E.4, F.3.e, and F.3.g.

B. Modifications:

1. Paragraph F.3: "Written reports shall be filed quarterly by the 30th day of the month following the end of the calendar quarter."
2. Paragraph F.3.h shall be added to read: "A copy of any routine or special self-monitoring reports done for the State Department of Health Services or Nuclear Regulatory Commission of the effects of radioactive substances on the discharger's effluent, receiving waters, and groundwaters, on-site or off-site, shall be sent to this Regional Board.

I, Roger B. James, Executive Officer, hereby certify that the foregoing Self-Monitoring Program:

1. Has been developed in accordance with the procedure set forth in this Regional Board's Resolution No. 73-16 in order to obtain data and document compliance with waste discharge requirements established in Regional Board Order No. 84-76.
2. Has been ordered by the Executive Officer on the date shown below.
3. May be reviewed at any time subsequent to the effective date upon written notice from the Executive Officer or request from the discharger, and revision will be ordered by the Executive Officer.

Date Ordered

ROGER B. JAMES
Executive Officer

Attachment:
Table I