

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER NO. 00-130  
NPDES NO. CA0005002

WASTE DISCHARGE REQUIREMENTS FOR:

USS-POSCO INDUSTRIES  
PITTSBURG PLANT  
PITTSBURG, CONTRA COSTA COUNTY

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

1. USS-POSCO Industries (hereinafter the Discharger), submitted an application for the reissuance of National Pollutant Discharge Elimination System (NPDES) Permit No. CA0005002. The application, referred to as Report of Waste Discharge, consists of: a completed U.S. Environmental Protection Agency (USEPA) Form 3510 (Form 1 – General Facility Information); Form 2C (Wastewater Discharge Information); and Form 200.

**FACILITY DESCRIPTION**

2. The Discharger owns and operates a steel finishing plant. Final products include cold-rolled steel, galvanized steel, and tin or chrome plated steel strip. Processes used in finishing include electrolytic tinning and chroming, pickling with hydrochloric and sulfuric acid, hot coat galvanizing, cold rolling, alkaline cleaning, and annealing.

**EXISTING PERMIT**

3. Wastewater discharged from the Pittsburg facility is currently regulated by Waste Discharge Requirements specified in Order No. 93-107.

**MAJOR DISCHARGER**

4. The State and the USEPA have classified the discharger as a major discharger.

**WASTEWATER DISCHARGES**

5. The Report of Waste Discharge, recent self-monitoring reports, and other relevant available information describe the discharges as follows:
  - a. **Waste 001** averages 11.1 million gallons per day (mgd), and consists of combined process waste, cooling waters, and stormwater runoff. In addition, W001 may receive a maximum of 5 million gallons per year of waste from impoundments and monitoring well sampling. Treatment of this waste occurs at the facility's terminal wastewater treatment plant (TWTP), and includes oil separation, lime addition, settling, and neutralization prior to discharge (lat. 38°01'48", long. 121°51'32") to New York Slough, a shallow water body tributary of Suisun Bay, about 1000 feet easterly of the Discharger's ship dock.

- b. **Waste 002** consists of excess stormwater runoff, which may be contaminated. Discharge of this waste only occurs during rainfall intensities greater than a 2-year, 24-hour storm event, which cannot be handled by the TWTP. Waste 002 is discharged (lat. 38°01'51", long. 121°51'58") at about 1100 feet west of the Discharger's ship dock. Up to 2550 gallons per minute of Waste 002 can be pumped to the TWTP.
6. In 1990 the Discharger completed a major modernization of its facility, which included the construction of continuous pickling, cold rolling, and annealing lines. This modernization resulted in substantial reductions in wastewater discharges from the TWTP and water usage at the facility.

#### REGIONAL MONITORING PROGRAM

7. On April 15, 1992, the Board adopted Resolution No. 92-043 directing the Executive Officer to implement the Regional Monitoring Program (RMP) for the San Francisco Bay. Subsequent to a public hearing and various meetings, Board staff requested major permit holders in this region, under authority of section 13267 of California Water Code, to report on the water quality of the estuary. These permit holders, including the Discharger, responded to this request by participating in a collaborative effort, through the San Francisco Estuary Institute (formerly the Aquatic Habitat Institute). This effort has come to be known as the San Francisco Bay Regional Monitoring Program for Trace Substances. This Order specifies that the Discharger shall continue to participate in the RMP, which involves collection of data on pollutants and toxicity in water, sediment and biota of the estuary. Annual reports from the RMP are referenced elsewhere in this Order.

#### APPLICABLE PLANS, POLICIES AND REGULATIONS

8. On June 21, 1995, the Board adopted a revised Water Quality Control Plan for the San Francisco Bay Region (Basin Plan), which was subsequently approved by the State Water Resources Control Board (State Board) and the Office of Administrative Law on July 20, and November 13, respectively, of 1995. The Basin Plan identifies beneficial uses and water quality objectives for surface waters in the region, as well as effluent limitations and discharge prohibitions intended to protect those uses. This Order implements the plans, policies, and provisions of the Board's Basin Plan.
9. California Toxic Rule: On May 18, 2000, the US EPA published the *Water Quality Standards; Establishment of Numeric Criteria for Priority Toxic Pollutants for the State of California* (Federal Register, Volume 65, Number 97, 18 May 2000). These standards are generally referred to as the California Toxics Rule (CTR). The CTR specified water quality standards for numerous pollutant, of which some are applicable to the Discharger's effluent discharges.
10. State Implementation Policy: on March 2, 2000, the State Water Resources Control Board (State Board) adopted the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bay and Estuaries of California*. This policy prescribes the plans for implementing the water quality standards in the CTR. This policy is generally referred to as the State Implementation Plan (SIP). The SIP was subsequently adopted by the Office of Administrative Law on April 28, 2000.
11. The beneficial uses of New York Slough, Suisun Bay, and their tributaries are, in part or in

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entirety:

- a. Industrial Service Supply
  - b. Navigation
  - c. Water Contact Recreation
  - d. Non-Contact Recreation
  - e. Ocean Commercial and Sport Fishing
  - f. Wildlife Habitat
  - g. Preservation of Rare and Endangered Species
  - h. Fish Migration and Spawning
  - i. Estuarine Habitat
  - j. Municipal and Domestic Supply
12. The reissuance of waste discharge requirements for these discharges is exempt from the provisions of Chapter 3 (commencing with section 21100 of Division 13) of the Public Resources Code (CEQA) pursuant to section 13389 of the California Water Code.
13. Under 40 CFR 122.44, "Establishing Limitations, Standards, and Other Permit Conditions", NPDES permits should also include toxic pollutant limitations if the Discharger uses or manufactures a toxic pollutant as an intermediate or final product or byproduct.
14. Effluent limitations and toxic effluent standards established pursuant to sections 301, 304, 306, and 307 of the Federal Water Pollution Control Act and amendments thereto are applicable to the discharges herein

**Basis for Effluent Limitations:**

**General Basis**

15. Water Quality Objectives (WQOs) and Effluent Limits: WQOs and effluent limitations in this permit are based on the SIP; the plans, policies and water quality objectives and criteria of the 1995 Basin Plan, CTR (Federal Register Volume 65, No. 97), Quality Criteria for Water (EPA 440/5-86-001, 1986 and subsequent amendments "Gold Book"), applicable Federal Regulations (40 CFR Parts 122 and 131), National Toxics Rule (57 FR 60848, 22 December 1992; 40 CFR Part 131.36(b), "NTR"), National Toxics Rule Amendment (Federal Register Vol. 60, No. 86, 4 May 1995 pg. 22229-22237), and best professional judgment (BPJ) as defined in the Basin Plan. Where numeric effluent limitations have not been established in the Basin Plan, 40CFR122.44(d) specifies that water quality based effluent limits may be set based on USEPA criteria and supplemented where necessary by other relevant information to attain and maintain narrative water quality criteria to fully protect designated beneficial uses.
16. BPJ Guidance: U.S EPA guidance documents upon which BPJ was developed may include in parts:
- Technical Support Document for Water Quality Based Toxics Control March 1991,
  - USEPA Region 9 Guidance For NPDES Permit Issuance February 1994,
  - Policy and Technical Guidance on Interpretation and Implementation of Aquatic Life Metals Criteria October 1, 1993,
  - Whole Effluent Toxicity (WET) Control Policy July 1994,
  - Draft National Guidance for the Permitting, Monitoring, and Enforcement of Water Quality-

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- based Effluent Limitations set Below Analytical Detection/Quantitation Levels March 18, 1994,
- National Policy Regarding Whole Effluent Toxicity Enforcement, August 14, 1995,
  - Clarifications Regarding Flexibility in 40 CFR Part 136 Whole Effluent Toxicity (WET) Test Methods, April 10, 1996,
  - Interim Guidance for Performance - Based Reductions of NPDES Permit Monitoring Frequencies April 19, 1996,
  - USEPA Regions 9 & 10 Guidance for Implementing Whole Effluent Toxicity Programs Final May 31, 1996,
  - Draft Whole Effluent Toxicity (WET) Implementation Strategy February 19, 1997.
17. Applicable Water Quality Objectives: The Basin Plan contains numeric water quality objectives (WQOs) as well as a narrative objective for toxicity in order to protect beneficial uses and states: "All waters shall be maintained free of toxic substances in concentrations that are lethal to or produce other detrimental responses in aquatic organisms". The Basin Plan also directs that ambient conditions shall be maintained until site-specific objectives are developed. Effluent limitations and provisions contained in this Order are designed to implement these objectives, based on available information. The CTR promulgates numeric aquatic life criteria for toxic pollutants, numeric human health criteria for many toxic pollutants and a compliance schedule which authorizes the State to issue schedules of compliance for new or revised NPDES permit limits based on the federal criteria when certain conditions are met. This Order also includes effluent limits for pollutants listed in the latest 303(d) report as impairing the quality of waters due, in part, to municipal and industrial point source discharges.
18. CTR Receiving Water Salinity Policy: The CTR states that the salinity characteristics (i.e., fresh water vs. marine water) of the receiving water shall be considered in establishing water quality objectives. Freshwater effluent limitations shall apply to discharges to waters with salinities equal to or less than one parts per thousand (ppt) at least 95 percent of the time. Marine (saltwater) effluent limitations shall apply to discharges to waters with salinities equal to or greater than 10 ppt at least 95 percent of the time in a normal water year. For discharges to water with salinities in between these two categories, or tidally-influenced fresh waters that support estuarine beneficial uses, effluent limitations shall be the lower of the marine or freshwater effluent limitation, based on ambient hardness, for each substance.
19. Receiving Water Salinity: The information submitted by Delta Diablo Sanitation District (see attachment A), shows that most of the time the receiving water (New York Slough) salinity is between 1 ppt and 10 ppt. Thus, the receiving water is estuarine in character.
20. The Board adopted Resolution No. 76-16 on November 16, 1976 granting the Discharger exemptions regarding maximum temperature of discharge. The State Water Resources Control Board adopted Regulation No. 79-108 on December 20, 1979 concurring with the Regional Board Resolution No. 76-16, and finding that maximum discharge temperature of 93 °F would not compromise the protection and propagation of a balance indigenous population of shellfish, fish, and wildlife.
21. The San Francisco Bay Basin Water Quality Control Plan (Basin Plan) prohibits the discharge of wastewater which has characteristics of concern to beneficial uses at any point at which the wastewater does not receive a minimum initial dilution of at least 10:1, or into any non-tidal water, dead-end slough, similar confined waters, or any immediate tributaries thereof. Discharge of treated wastewater to New York Slough is contrary to this prohibition

because it does not provide a minimum initial dilution of at least 10:1.

22. Exceptions will be considered by the Regional Board where a discharger meets the following requirements: (1) completion of a source identification study, (2) development and implementation of a source reduction plan, and (3) commitment of resources to fully implement the source control and reduction plan.
23. In a report dated November 6, 1996, the Discharger demonstrated that it has met the above requirements. Thus, the Board finds that an exception to the discharge prohibition is warranted for the shallow water discharge to New York Slough.
24. Effluent limitation guidelines requiring the application of best practicable control technology currently available (BPT), best conventional pollutant control technology (BCT), and best available technology economically achievable (BAT) were promulgated by the USEPA for some of the pollutants in this discharge. Effluent limitations for pollutants not subject to the USEPA effluent limitation guidelines are based on one of the following: best professional judgment (BPJ) of BPT, BCT or BAT; current plant performance; or, they are water quality-based effluent limitations (WQBELs). The WQBELs are based on the Basin Plan, other State Plans and policies, or USEPA water quality criteria. The attached fact sheet for this Order includes the specific basis for each effluent limitation.

#### **303(d)-LISTED POLLUTANTS**

25. On May 12, 1999, the USEPA approved a revised list of impaired waterbodies prepared by the State. The list (hereinafter referred to as the 303(d) list) was prepared in accordance with section 303(d) of the federal Clean Water Act to identify specific water bodies where water quality standards are not expected to be met after implementation of technology-based effluent limitations on point sources. Suisun Bay is listed as one of these impaired water bodies. The pollutants impairing Suisun Bay include copper, mercury, nickel, selenium, exotic species, PCBs total, dioxin and furan compounds, chlordane, DDT, Dieldrin, Diazinon, and dioxin-like PCBs.

#### **TOTAL MAXIMUM DAILY LOADS and WASTE LOAD ALLOCATIONS**

26. Based on the 303(d) list of pollutants impairing Suisun Bay, the Board plans to adopt Total Maximum Daily Loads (TMDLs) for these pollutants no later than 2010. However, future review of the 303(d) list for Suisun Bay may result in revision of the schedules and/or provide schedules for other pollutants.
27. The TMDLs will establish waste load allocations (WLAs) and load allocations for point sources and non-point sources, respectively, and will result in achieving the water quality standards for the waterbody. The final effluent limitations for this discharge will be based on WLAs that are derived from the TMDLs.
28. The following summarizes the Board's strategy to collect water quality data and to develop TMDLs:
  - a. Data collection – The Board will request dischargers collectively assist in developing and implementing analytical techniques capable of detecting 303(d)-listed pollutants to at least their respective levels of concern or water quality objectives. The Board will require dischargers to characterize the pollutant loads from their facilities into the water-

quality limited waterbodies. The results will be used in the development of TMDLs, but may also be used to update/revise the 303(d) list and/or change the water quality objectives for the impaired waterbodies including Suisun Bay.

- b. Funding mechanism – The Board has received, and anticipates continuation to receive, resources from federal and state agencies for the development of TMDLs. To ensure timely development of TMDLs, the Board intends to supplement these resources by allocating development costs among dischargers through the RMP or other appropriate funding mechanisms.

#### **REASONABLE POTENTIAL (RP)**

29. When a discharge causes, has the reasonable potential to cause, or contributes to a receiving water excursion above a narrative or numeric criteria within a State water quality standard, federal law and regulations, as specified in 40 CFR 122.44(d) (1) (i), require the establishment of WQBELs that will protect water quality. Pollutants exhibiting RP in the discharge authorized by this Order are identified below. The Board plans to adopt TMDLs that will include WLAs for the 303(d)-listed pollutants, except dioxins and furans to be completed by USEPA. When each TMDL is complete, the Board will adopt a WQBEL consistent with the corresponding WLA. If authorized, a time schedule may be included in the revised permit to require compliance with the final WQBELs.

#### **Interim Limits**

30. In an interim, until final WQBELs are adopted by the Board, state and federal antibacksliding and antidegradation policies require that the Board retain effluent concentration limits from the Previous Order (or plant performance, whichever is more stringent) to ensure that the waterbody will not become further degraded. In addition to these interim concentration limits, interim performance-based mass limits are required to limit discharge of 303(d)-listed pollutants' mass loads to their current levels. These interim mass limits are based on recent discharge data. Where pollutants have existing high detection limits (such as for PCBs total, Chlordane, DDT, Dieldrin, Dioxins and Furans, etc.), interim mass limits are not required because meaningful performance-based limits cannot be calculated for those pollutants with non-detectable concentrations. However, the dischargers, are required to investigate alternative analytical procedures that result in lower detection limits. This may occur either through participation in new RMP special studies or through equivalent studies conducted jointly with other dischargers. One exception to this is dioxin and furans. In the event that a TMDL is not adopted by this Regional Board by 2010, and an extension of the schedule has not been granted by the USEPA, the Board will impose one of the following alternative final limits after the Discharger has had a reasonable time period to come into compliance with the alternative final limits:

- a) For a 303(d)-listed bioaccumulative pollutant, the final alternative limit will be no net loading. No net loading means that the actual loading from the discharge must be offset by at least equivalent loading of the same pollutant achieved through mass offset. In the absence of a TMDL, any loading to the impaired waterbody has the reasonable potential to cause or contribute to an excursion of the narrative toxicity criterion. Additionally, the existing numeric objective may not be adequate to ensure safe levels of the pollutant in sediment and/or fish. This is because in the case of fish tissue, the bioconcentration factor (BCF), on which the criterion was based, was measured in the laboratory and, therefore, reflects uptake from the water only. Bioaccumulative factors (BAFs) on the other hand, are measured in the field where the uptake in fish is through both food and

water. Thus, the bioaccumulation rate in the system may be greater than the bioconcentration rate used to calculate the national water quality criteria. Another reason that the existing water quality objectives may not be adequate is that the criteria they are based on do not always account for routes of exposure, for site-specific circumstances that may render the pollutant more bioavailable, for accumulation in sediment, or for concentrating effects resulting from evaporation.

- b) For 303 (d) listed non-bioaccumulative pollutants, the alternative final mass limit will be based on water quality objectives applied at the end of the discharge pipe (i.e., without a dilution factor used to calculate the limit).

### Reasonable Potential Analysis

31. As specified in Section 1.3 of the SIP, permits are required to include WQBELs for all pollutants discharges "which may 1) cause, 2) have the reasonable potential to cause, or 3) contribute to an excursion above any applicable priority pollutant criterion or objective." Using the method prescribed in the Section 1.3 of the SIP, Board staff has analyzed the effluent data to determine if the discharges which are the subject of this Permit and Order have a reasonable potential to cause or contribute to an excursion above any applicable priority pollutant criterion or objective ("Reasonable Potential Analysis" or "RPA").
  - a. Reasonable Potential Determination: The RPA involves identifying the observed maximum effluent concentration (MEC) for each constituent based on effluent concentration data. There are two triggers in determining reasonable potential. First trigger, the MEC is compared with the lowest applicable WQO, which has been adjusted for pH, hardness, and translator data, if appropriate. If the MEC is greater than the (adjusted) WQO, then there is reasonable potential for that constituent to cause or contribute to an excursion above the WQO and a water-quality based effluent limitation (WQBEL) is required. The second trigger is activated, if the MEC is less than the adjusted WQO, then the observed maximum ambient concentration (B) for the pollutant is compared with the adjusted WQO. If B is greater than the adjusted WQO, then WQBEL is required. If B is less than the WQO, then a limit is only required under certain circumstances to protect beneficial uses. If a pollutant was not detected in any of the effluent samples and all of the detection levels are greater than or equal to the adjusted WQO, then the background concentration is compared with the adjusted WQO. For all parameters that have reasonable potential to cause or contribute to an exceedance of a WQO, numeric water quality-based effluent limitations (WQBELs) are required. WQBELs are based on USEPA water quality criteria and the Basin Plan objectives. The RPA compares the effluent data with numeric and narrative WQOs in the Basin Plan and numeric WQOs from the USEPA Gold Book, NTR, and CTR.
  - b. RPA Data: The RPA was based on effluent monitoring data for the past three years for metals, semi volatile organic, dioxin, and organic compounds.
  - c. Discharges to New York Slough
    - Reasonable Potential: Based on the following constituents found to have reasonable potential to cause or contribute to an excursion above water quality objectives: chromium (VI), copper, lead, mercury, nickel, and zinc.
    - No Reasonable Potential: Based on the RPA, the following constituents have been found to not show reasonable potential to cause or contribute to excursion

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above applicable water quality objectives: antimony, arsenic, beryllium, cadmium, silver, cyanide, and all the constituents under EPA methods 8270, 8240 and 8080. Based on the RPA and continued consistent plant performance, effluent limits for these constituents are not needed and are not included in this permit.

Summary of Reasonable Potential Analysis (RPA) Determinations: The WQOs, Maximum Observed Effluent Concentration and reasonable potential conclusions from the RPA are listed in the following table for each constituent analyzed. All the data are in  $\mu\text{g/L}$

CONSTITUENT	Water Quality Objective	Maximum Observed Concentration	Reasonable Potential ?
Antimony	14	2	no
Arsenic	36	7.4	no
Beryllium	No Obj.	1	CD
Cadmium	1.13	1	no
Chromium (VI)	11	530	yes
Copper	3.7	4.9	yes
Lead	2.5	2.9	yes
Mercury	0.0125	0.8	yes
Nickel	7.1	7.1	yes
Selenium	5	2	no
Silver	2.24	0.2	no
Thallium	1.7	1	no
Zinc	58	270	yes
Cyanide	1	5	DL
2,3,7,8-TCDD (Dioxin)	0.00000013	0.0000026	DL
Acrolein	320	50	no
Acrylonitrile	0.059	50	DL
Benzene	1.2	1	no
Bromoform	4.3	1.3	no
Carbon Tetrachloride	0.25	1	DL
Chlorobenzene	680	1	no
Chlorodibromomethane	0.401	2.5	DL
Chloroethane	No Obj.	1	CD
2-Chloroethylvinyl Ether	No Obj.	5	CD
Chloroform	No Obj.	1.4	CD
Dichlorobromomethane	0.056	1.7	DL
1,1-Dichloroethane	No Obj.	1	CD
1,2-Dichloroethane	0.38	1	DL
1,1-Dichloroethylene	0.057	1	DL
1,2-Dichloropropane	0.52	1	DL
1,3-Dichloropropylene	10	1	no

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CONSTITUENT	Water Quality Objective	Maximum Observed Concentration	Reasonable Potential ?
Ethylbenzene	3100	1	no
Methyl Bromide	48	1	no
Methyl Chloride	No Obj.	1	CD
Methylene Chloride	4.7	1	no
1,1,2,2-Tetrachloroethane	0.17	1	DL
Tetrachloroethylene	0.8	0.5	no
Toluene	6800	1	no
1,2-Trans-Dichloroethylene	700	1	no
1,1,1-Trichloroethane	No Obj.	1	CD
1,1,2-Trichloroethane	0.6	1	DL
Trichloroethylene	2.7	1	no
Vinyl Chloride	2	1	no
2-Chlorophenol	120	10	no
2,4-Dichlorophenol	93	10	no
2,4-Dimethylphenol	540	10	no
2-Methyl-4,6-Dinitrophenol	13.4	50	DL
2,4-Dinitrophenol	70	50	no
2-Nitrophenol	No Obj.	10	CD
4-Nitrophenol	No Obj.	50	CD
3-Methyl-4-Chlorophenol	No Obj.	10	CD
Pentachlorophenol	0.28	50	DL
Phenol	500	18	no
2,4,6-Trichlorophenol	2.1	10	DL
Acenaphthene	1200	2	no
Acenaphthylene	No Obj.	1	CD
Anthracene	9600	0.04	no
Benzidine	0.00012	100	DL
Benzo(a)Anthracene	0.0044	0.08	DL
Benzo(a)Pyrene	0.0044	0.05	DL
Benzo(b)Fluoranthene	0.0044	0.02	DL
Benzo(ghi)Perylene	No Obj.	0.08	DL
Benzo(k)Fluoranthene	0.0044	0.02	DL
Bis(2-Chloroethoxy)Methane	No Obj.	10	CD
Bis(2-Chloroethyl)Ether	0.031	10	DL
Bis(2-Chloroisopropyl)Ether	1400	15	no
Bis(2-Ethylhexyl)Phthalate	1.8	10	DL
4-Bromophenyl Phenyl Ether	No Obj.	10	CD
Butylbenzyl Phthalate	3000	10	no
2-Chloronaphthalene	1700	10	no

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CONSTITUENT	Water Quality Objective	Maximum Observed Concentration	Reasonable Potential ?
4-Chlorophenyl Phenyl Ether	No Obj.	10	no
Chrysene	0.0044	0.1	DL
Dibenzo(a,h)Anthracene	0.0044	0.2	DL
1,2 Dichlorobenzene	2700	1	no
1,3 Dichlorobenzene	400	1	no
1,4 Dichlorobenzene	400	1	no
3,3'-Dichlorobenzidine	0.04	20	DL
Diethyl Phthalate	23000	10	no
Dimethyl Phthalate	313000	10	no
Di-n-Butyl Phthalate	2700	10	no
2,4-Dinitrotoluene	0.11	10	DL
2,6-Dinitrotoluene	No Obj.	10	CD
Di-n-Octyl Phthalate	No Obj.	10	CD
1,2-Diphenylhydrazine	0.04	10	DL
Fluoranthene	300	0.1	no
Fluorene	1300	0.2	no
Hexachlorobenzene	0.00075	10	DL
Hexachlorobutadiene	0.44	1	DL
Hexachlorocyclopentadiene	240	1	no
Hexachloroethane	1.9	10	DL
Indeno(1,2,3-cd) Pyrene	0.0044	0.1	DL
Isophorone	8.4	10	DL
naphthalene	No Obj.	1	CD
Nitrobenzene	17	10	no
N-Nitrosodimethylamine	0.00069	10	DL
N-Nitrosodi-n-Propylamine	0.005	10	DL
N-Nitrosodiphenylamine	5	10	DL
Phenanthrene	No Obj.	0.08	DL
Pyrene	960	0.2	no
1,2,4-Trichlorobenzene	No Obj.	1	CD
Aldrin	0.00013	0.05	DL
alpha-BHC	0.0039	0.05	DL
beta-BHC	0.014	0.05	DL
gamma-BHC	0.019	0.05	DL
delta-BHC	No Obj.	0.05	CD
Chlordane	0.00057	1	DL
4,4-DDT	0.00059	0.1	DL
4,4-DDE	0.00059	0.1	DL
4,4-DDD	0.00083	0.1	DL

CONSTITUENT	Water Quality Objective	Maximum Observed Concentration	Reasonable Potential ?
Dieldrin	0.00014	0.1	DL
alpha-Endosulfan	0.0087	0.05	DL
beta-Endosulfan	0.0087	0.1	DL
Endosulfan Sulfate	110	0.1	no
Endrin	0.0023	0.1	DL
Endrin Aldehyde	0.76	0.1	DL
Heptachlor	0.00021	0.05	DL
Heptchlor Epoxide	0.0001	0.05	DL
PCBs	0.00017	0.5	DL
Toxaphene	0.0002	1	DL

Table Definitions:

- CD = Cannot determine reasonable potential due to the absence of data  
DL = Detection limit above water quality objective  
no = No reasonable potential  
No Obj. = No water quality objective available  
yes = Reasonable potential

- e. **Constituents with limited Data:** Reasonable Potential cannot be determined for various constituents because estimations are not possible for a majority of the constituents due to water quality objectives or effluent limitations that are lower than current analytical techniques can measure. The Discharger shall continue to monitor for these constituents using analytical methods that provide the best detection limits reasonably feasible. If detection limits improve to the point where it is feasible to evaluate compliance with applicable water quality criteria, a reasonable potential analysis will be conducted to determine whether there is need to add numeric effluent limits to the permit or to continue monitoring.
- f. **Monitoring.** For constituents that do not show a reasonable potential to cause or contribute to exceedance of applicable water quality objectives, effluent limits are not included in the permit but continued monitoring is required as identified in the self-monitoring program of the permit. If significant increases occur in the concentrations of these constituents, the Discharger shall be required to investigate the source of the increases and establish remedial measures if the increases pose a threat to water quality.
- g. **Permit Reopener.** The permit includes a reopener provision to allow numeric effluent limits to be added for any constituent that in the future exhibits reasonable potential to cause or contribute to exceedance of a water quality objective. This determination, based on monitoring results, shall be made by the Board.

32. Mercury

- a. **Mercury Water Quality Objectives and TMDL.** For mercury, the national chronic criterion is based on protection of human health. The criterion is intended to limit the bioaccumulation of methyl-mercury in fish and shellfish to levels that are safe for human

consumption. As described in the Gold Book, the fresh water criterion is based on the Final Residual Value of 0.012 µg/L derived from the bioconcentration factor (BCF) of 81,700 for methyl mercury with the fathead minnow, which assumes that essentially all discharged mercury is methylmercury. The saltwater criterion of 0.025 µg/L was similarly derived using the BCF of 40,000 obtained for methylmercury with the eastern oyster and the criterion is listed in the 1986 Basin Plan. The CTR adopted a dissolved mercury water quality objective of 0.05 µg/L for protection of human health. However, according to Footnote b in the CTR's Table of Criteria for Priority Toxic Pollutants, "criteria apply to California water except for those waters subject to objectives in Table III-2A and III-2B of the San Francisco Regional Water Quality Control Board's (SFRWQCB) 1986 Basin Plan, that were adopted by the SFRWQCB and the State Water Resources Control Board, approved by USEPA, and which continue to apply". Although ambient background concentrations are below WQOs for protection of both fresh and salt-water aquatic species, Suisun Bay is listed as impaired for mercury because of fish tissue level exceedances. These WQOs were meant to limit bioaccumulation of methylmercury in fish and shellfish, they have clearly not succeeded in accomplishing this. The Board intends to work toward the derivation of a TMDL that will lead towards overall reduction of mercury mass loadings in the watershed. Based on these studies, the final limit will be derived based on a TMDL/WLA.

- b. *Mercury as a Persistent, Bioaccumulative Pollutant.* Mercury is listed on the 303(d) list for impairing Suisun Bay due to fish tissue level exceedances. For pollutants that cause impairment due to accumulations in the sediment or food chain, and for which a TMDL has not been established, the final effluent limitation will be no net loading. This would mean, that if a TMDL is not established by the scheduled date or that date has not been extended, the Discharger will have the option of proposing a Mass Offset program that would offset their mercury loads with source reductions which are not already required elsewhere in the system.

The rationale for this is that there is no acceptable level of loading for bioaccumulative pollutants which have fish tissue and/or sediment as the basis for impairment, regardless of the concentration of that pollutant. Any loading of bioaccumulative pollutants has the reasonable potential to cause or contribute to an excursion of the narrative criteria, and is, therefore, unacceptable. Additionally, the narrative criterion, which for mercury is based on the existing numeric objective, may not be adequate to ensure safe levels of the pollutant in sediment and/or fish tissue. One reason for this is that, in the case of fish tissue, the bioconcentration factor (BCF), on which the criterion was based, was measured in the laboratory and, therefore, reflects uptake from the water only. Bioaccumulation factors (BAFs), on the other hand, are measured in the field where the uptake in fish is through both food and water. Thus, the bioaccumulation rate in the system may be greater than the bioconcentration rate used to calculate the national water quality criteria, which is based on a laboratory-derived bioconcentration factor (BCF). Another reason that the water quality criteria may not be adequate is that the criteria do not always account for routes of exposure, for site-specific circumstances that may render the pollutant more bioavailable (such as biomethylating estuarine and wetland environments), for accumulation in sediment, or for concentrating effects resulting from evaporation. Mass based limits should be derived as the result of a TMDL analysis. In the absence of this analysis, however, the only WQBEL that would assure that the discharge does not cause or contribute to an exceedance of the narrative criteria is a net loading of zero.

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- c. *Mercury Strategy.* Board staff is in the process of developing a plan to address control of mercury levels in San Francisco Bay including development of a TMDL. At present, it appears that the most appropriate course of action is to apply interim mass loading limits to these discharges, and focus mercury reduction efforts on more significant and controllable sources. While site-specific objectives and Total Maximum Daily Loads (TMDLs) are being developed, the Discharger will be held accountable for maintaining ambient conditions to the receiving water by complying with performance-based mass emission limits for mercury. This permit includes interim concentration and mass emission loading limits. The Discharger is required to maximize control over influent mercury sources, with consideration of relative costs and benefits.
  - d. *Effluent Concentration Limit.* This Order establishes an interim daily maximum limit, which, shall apply to the discharge until a TMDL and WLA for mercury are approved by the Board. The final limit will be based on the WLA derived from the TMDL.
  - e. *Mass Emission Limit.* A mass-based loading limit (mass emission limit) for mercury is established in this Order. This limit is the average value of calculated total mercury mass loading from the discharge, based on effluent data from past three years. This mass limit is designed to hold the Discharger to current loadings until a TMDL is established and is intended to address anti-degradation concerns. The final effluent limit will be based on the WLA derived from the mercury TMDL. When a final WLA is approved for the Discharger, the permit may be reopened. If a TMDL is not established by 2010, and the date for completion is not extended, then the final WLA for mercury as a bioaccumulative substance is required to be no net loading, according to the above rationale.
33. RPA for Diazinon: Although diazinon is on the 303(d) list for Suisan Bay, no effluent limit is required for the Discharger for the reason that currently there is no approved WQO for diazinon.
34. Ambient Water Quality Monitoring: Ambient, background data, upstream from the facility, is required, according to the SIP in order to complete the RP analysis and to determine final effluent limits. Where applicable. Dischargers are required to investigate alternative analytical procedures that result in lower detection limits. This may occur either through participation in new RMP special studies or through equivalent studies conducted jointly with other dischargers.
35. The CTR specified water quality standard for numerous pollutants. The following are pertinent to dioxins and furans:
- a. The CTR establishes a standard for 2,3,7,8-tetrachlorinated dibenzo-p-dioxin (2,3,7,8-TCDD) of 0.014 picograms per liter (pg/l) for the protection of human health from consumption of aquatic organisms.
  - b. Although the CTR establishes a numeric standard for just one of the dioxin-like compounds, the preamble of the CTR states that California should use toxicity equivalents or TEQs in NPDES Permits where there is reasonable potential for dioxin-like compounds to cause or contribute to violation of a narrative criterion.
  - c. The SIP establishes the implementation policy for dioxins and furans. The SIP requires a limit for 2,3,7,8-TCDD if a limit is necessary, and requires monitoring for a minimum of 3

years by all major NPDES dischargers for the other sixteen dioxin and furan compounds.

- d. Since the discharger has not detected dioxins and furans in its effluent and, there is no detected effluent data to conduct a RPA or calculate an interim limit. Pursuant to the SIP, the Discharger is required to monitor for dioxins and furans. If there is RP based on sufficient effluent data, a performance-based interim limit will be established based on TEQs. For bioaccumulative priority pollutants for which the receiving water has been included on the 303(d) list, the SIP suggests that the Board should limit mass loading at representative, current levels pending TMDL development in order to implement the applicable water quality standard.

### **POLLUTANT MIMIZATION/POLLUTION PREVENTION**

#### **36. Pollution Prevention Program:**

- a. The discharger has established a Pollution Prevention Program under the requirements specified by the Regional Board.
- b. The discharger's Pollution Prevention Program has resulted in a significant reduction of toxic pollutants discharged to the treatment plant and to the receiving waters.
- c. Section 2.4.5 of the SIP specifies under what situations and on which priority pollutant(s) (i.e., reportable priority pollutant(s)) the discharger shall be required to conduct a Pollutant Minimization Program in accordance with Section 2.4.5.1.
- d. There will be some redundancy between the Pollution Prevention Program and the Pollutant Minimization Program, if required.
- e. To the extent where the requirements of the two programs overlap, the discharger is allowed to continue/modify/expand its existing Pollution Prevention Program to satisfy the Pollutant Minimization Program requirements.

### **OPTIONAL MASS OFFSET**

37. This Order contains requirements to prevent further degradation of the impaired waterbody. Such requirements include the adoption of mass limits that are based on the treatment plant performance, provisions for aggressive source control and waste minimization, feasibility studies for wastewater reclamation, and treatment plant optimization. After implementing these efforts, the Discharger may find that further net reductions of the total mass loadings of the 303(d)-listed pollutants to the receiving water can be achieved through a mass offset program. This Order includes an optional provision for a mass offset program.

### **EFFLUENT TOXICITY CONTROL PROGRAM**

38. The Basin Plan adopts an Effluent Toxicity Control Program (ETCP) that requires certain permit holders, including the Discharger, to monitor the toxicity of their effluent using critical life stage toxicity tests. The Board implements the water quality objective for toxicity through the ETCP and by monitoring the toxicity of waters at or near discharge sites. The long-term goal of the ETCP is to develop water quality based effluent limits using information about the acute and chronic toxicity of each discharge and resulting toxicity in the receiving water. This Order specifies that the Discharger shall continue its effluent

toxicity monitoring efforts as part of the compliance requirements.

### CHRONIC TOXICITY

39. For the previous permit, an effluent chronic toxicity testing screening program was conducted with final effluent from the Discharger to identify the most sensitive species. The result of the study indicated that abalone (*Haliotis Rufescens*) was the most sensitive species. There were violations of the chronic toxicity effluent limitation. As a result, the Discharger is conducting a toxicity identification evaluation (TIE). The Discharger has taken reasonable steps to reduce toxicity to required level. The Discharger has submitted a revised TIE "Toxicity Identification Evaluation Study Plan" dated September 28, 2000. The TIE outlines the method and frequency of additional monitoring in case of non-compliance. The TIE is approved and the Discharger is required to implement it as proposed. The Board recognizes that identification of causes of chronic toxicity may not be successful in all cases. This order requires the Discharger to continue to use abalone as chronic toxicity compliance species.
40. The Discharger has requested for exception to the assigned dilution ratio of D=0 (and thus to shallow water effluent limitations) regarding its chronic toxicity effluent limitation.
41. The Basin plan allows for exceptions to the assigned dilution ratio of D=0 based on demonstration of compliance with water quality objectives in the receiving waters. Exceptions will only be considered on a pollutant-by-pollutant basis when the following conditions are met:
  - a. An aggressive pretreatment and source control program is in place;
  - b. A demonstration that the proposed effluent limitation will result in compliance with the water quality objectives (in the receiving waters). Such demonstration shall be based on ambient monitoring at a frequency equal to that typically required for effluent monitoring; and
  - c. An evaluation of worst-case conditions (in terms of tidal cycle, currents) through monitoring and /or modeling to demonstrate that water quality objectives will continue to be met.

The Discharger has an aggressive pretreatment and source control program in place. In addition, the Discharger has submitted a TIE study addendum "Evaluation of USS-POSCO Industries Receiving Water Toxicity to Red Abalone (*Haliotis rufescens*)", dated November 10, 2000. The study will evaluate impact of the Discharger's effluent on the receiving waters (including worst-case conditions). If all of the above conditions are met, the Regional Board may consider either granting an exception to the assigned dilution ratio of D=0 or establishing a performance based effluent limitation regarding chronic toxicity.

### NOTIFICATION

42. The Board notified the Discharger and interested agencies and persons of its intent to re-issue waste discharge requirements for the discharge, and has provided them with an opportunity for a public hearing and to submit their written views and recommendations.
43. The Board, in a public hearing, heard and considered all comments pertaining to the discharge.

**IT IS HEREBY ORDERED** that the Discharger, in order to meet the provisions of 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. Discharges of water, materials, thermal wastes, elevated temperature wastes, toxic wastes, deleterious substances, or wastes other than those authorized by this Order, to a storm drain system, tributaries of Suisun Bay, or waters of the State are prohibited.

B. Effluent Limitations

1. The discharge of Waste 001 shall not have a pH value less than 6.5 nor greater than 8.5.
2. The maximum temperature of Waste 001 shall not exceed 93 °F.
3. The discharge of Waste 001 shall meet the following toxicity limitations:

a. Acute Toxicity:

The survival of test fishes in parallel 96-hour flow-through bioassays of Waste 001 as discharged shall be an eleven-sample<sup>1</sup> median value of not less than 90-percent survival, and an eleven-sample 90-percentile<sup>2</sup> value of not less than 70-percent survival. Test fishes shall be specified in the Self-Monitoring Program. Parallel tests with two species of fish are considered two separate tests.

b. Chronic Toxicity:

An eleven-sample median value<sup>3</sup> of 1 TUc<sup>4</sup>, and a 90-percentile value of 2 TUc<sup>5</sup>.

4. The discharge of Waste 001 containing constituents in excess of the following limit is prohibited:

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<sup>1</sup> A bioassay test showing survival of less than 90-percent represents a violation of this effluent limitation, if five or more of the past ten or less bioassay tests show less than 90-percent survival.

<sup>2</sup> A bioassay test showing survival of less than 70-percent represents a violation of this effluent limit, if one or more of the past ten or less tests shows less than 70-percent survival.

<sup>3</sup> A test sample showing chronic toxicity greater than 1 TUc represents consistent toxicity and a violation of this limitation, if five or more of the past ten or less tests show toxicity greater than 1 TUc.

<sup>4</sup> A TUc equals 100/NOEL. The NOEL is the no observable effect level, determined from IC, EC, or NOEC values. These terms and their usage in determining compliance with the limitations are defined in the **Attachment B** of this Order. The NOEL shall be based on a critical life stage test using the most sensitive test species as specified by the Executive Officer. The Executive Officer may specify two compliance species if test data indicate that there is alternating sensitivity between the two species. If two compliance test species are specified; compliance shall be based on the maximum TUc value for the discharge sample based on a comparison of TUc values obtained through concurrent testing of the two species.

<sup>5</sup> A test sample showing chronic toxicity greater than 2 TUc represents consistent toxicity and a violation of this limitation if one or more of the past ten or less samples shows toxicity greater than 2 TUc.

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<u>Constituent</u>	<u>Unit</u>	<u>Monthly Average</u>	<u>Daily Maximum</u>
TSS	lb/day	2,021	4,434
	Kg/day	919	2,015
Oil & Grease	lb/day	951	2,361
	Kg/day	432	1,073
Phenolic compounds	lb/day	18	37
	Kg/day	8.2	16.8
Total Chromium	lb/day	33	55
	Kg/day	15	25
Lead	lb/day	11.3	23.4
	Kg/day	5.1	10.6
Nickel	lb/day	54.2	75.9
	Kg/day	24.6	34.5
Zinc	lb/day	31.1	61
	Kg/day	14.1	27.7
Iron (dissolved)	lb/day	6.6	19.8
	Kg/day	3.0	9.0
Naphthalene	lb/day		0.62
	Kg/day		0.28
Tetrachloro- Ethylene	lb/day		0.93
	Kg/day		0.42
Settleable Solids	ml/l/hr	0.1	0.2

5. The discharge of Waste 001 containing constituents in excess of the following limitations is prohibited:

<u>Constituent</u>	<u>Unit</u>	<u>Monthly Average</u>	<u>Daily Maximum</u>
Chromium (VI) <sup>6</sup>	µg/l	5.5	11
Lead	µg/l	1.6	3.2
Zinc	µg/l	18	58

<sup>6</sup> The Discharger may demonstrate compliance with this limitation by measurement of total Chromium.

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6. The discharge of Waste 001 containing constituents in excess of the following interim limitations is prohibited:

<u>Constituent</u>	<u>Unit</u>	<u>Daily Maximum</u>
Copper	µg/l	4.9
Mercury	µg/l	0.68
Nickel	µg/l	7.1
		<u>Running Annual Average<sup>7</sup></u>
Mercury	lb/month	0.738

7. The discharge of Wastes 002 containing constituents in excess of the following limits is prohibited:

<u>Constituent</u>	<u>Units</u>	<u>Limitation</u>
Oil & Grease	mg/l	daily maximum of 15
pH	---	6.5 to 8.5
Visible oil	---	none observed
Visible color	---	none observed

C. Receiving Water Limitations

1. The discharge shall not cause the following conditions to exist in waters of the State at any place:
  - a. floating, suspended or deposited macroscopic particulate matter or foam;
  - b. alteration of temperature, turbidity or apparent color beyond present natural background levels;
  - c. visible, floating, suspended or deposited oil or other products of petroleum origin;
  - d. bottom deposits or aquatic growths; and
  - e. toxic or other deleterious substances to be present in concentrations or quantities

<sup>7</sup> These mass limits are based on running annual average monthly mass loadings. To determine the running annual average monthly mass loading, The Discharger shall take the arithmetic average of the current monthly mass loading value (see sample calculation below) and the previous 11-month' values.

Sample Calculation:

For pollutant Y, the monthly average daily mass loading (lb) is given by  
 =Monthly average daily flow rate (MGD) x monthly average concentration (µg/l) x 0.00834 x total number of discharge day in that calendar month

And the running annual average monthly mass loading is given by  
 =1/12 x (current monthly average mass loading + preceding 11-month monthly average mass loadings)

Compliance of these mass limits will be required starting from the next calendar month upon the adoption of this Order.

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which will cause deleterious effects on aquatic biota, wildlife, or waterfowl or 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 shall not cause nuisance, or adversely affect beneficial uses of the receiving water.
3. The discharge shall not cause the following limits to be exceeded in waters of the State at any place within one foot of the water surface:
  - a. pH: the pH shall not be depressed below 6.5 nor raised above 8.5, nor caused to vary from normal ambient pH levels by more than 0.5 units.
  - b. Dissolved Oxygen: the concentration of dissolved oxygen shall not be less than 7.0 mg/l any time, and the median dissolved oxygen concentration for any three consecutive months shall not be less than 80 percent of the dissolved oxygen content at saturation.
  - c. Dissolved sulfide: 0.1 mg/l maximum.
  - d. Unionized ammonia (as N): annual median 0.025 mg/l  
maximum at any time 0.16 mg/l
4. The discharge shall not cause a violation of any applicable water quality standards for receiving waters adopted by the Board or State Board. 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 standards.

D. Provisions

1. Effective Date of Permit

This Order shall serve as a NPDES permit pursuant to section 402 of the Federal Water Pollution Control Act, or amendments thereto, and shall take effect at the end of ten days from the date of hearing provided that the Regional Administrator of the USEPA has no objections. If the Regional Administrator objects to its issuance, this Order shall not become effective until such objection is withdrawn.

2. Permit Modification

Pursuant to USEPA regulations 40 CFR 122.44, 122.62, and 124.5, this Order may be modified prior to the expiration date to include effluent limits for other toxic or pollutants if monitoring results of these pollutants indicate that either reasonable potentials of exceeding the corresponding site-specific water quality objectives or significant amount of these pollutants exist in the discharge resulting in a threat of impacts to the water quality or beneficial uses of Suisun Bay exist.

3. Self-Monitoring Program

This Order includes all items of the attached Self-Monitoring Program as adopted by the Board and as may be amended pursuant to USEPA regulations 40 CFR 122.62, 122.63, and 124.5.

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4. Standard Provisions and Reporting

This Order includes all items, except as mentioned; otherwise, of the "Standard Provisions and Reporting Requirements" of August 1993.

5. Nuisance

Neither the discharge nor its treatment shall create a nuisance or pollution as defined in Section 13050 of the California Water Code.

6. Compliance with Acute Toxicity Effluent Limitations

Compliance with the acute toxicity limitations in Effluent Limitations B.2.a of this Order shall be evaluated by measuring the survival rate of both fish species of fathead minnow and rainbow trout in a flow through 96-hour bioassay. Each test consists of exposing a minimum of ten fish of each species to undiluted effluent for 96 hours, and each fish represents a single sample. The two fish species shall be tested concurrently. Toxicity tests shall be performed according to protocols approved by the USEPA or equivalent alternatives acceptable to the Executive Officer.

7. Compliance with Chronic Toxicity Limitations

Definitions of terms used in the chronic toxicity effluent limitations are included in **Attachment B** of this Order. Compliance with chronic toxicity in Effluent Limitation B.2.b of this Order shall be evaluated by measuring the critical life stage toxicity tests for aquatic species as specified in the attached Self-Monitoring Report. **Attachment C** of this Order identifies the Critical Life Stage Toxicity Tests used in the chronic toxicity monitoring.

8. Toxicity Identification Evaluation / Toxicity Reduction Evaluation

If a violation of the chronic toxicity effluent limitation occurs, the Discharger shall conduct a chronic toxicity reduction evaluation (TRE), which shall initially involve a toxic identification evaluation (TIE). The TIE shall be in accordance with a work plan acceptable to the Executive Officer. The TIE shall be initiated within 30 days of the date of violation. The objective of the TIE shall be to identify the chemical or combination of chemicals that are causing the observed toxicity. The Discharger shall use currently available TIE methodologies. As toxic constituents are identified or characterized, the Discharger shall continue the TRE and take all reasonable steps to determine the source(s) of the toxic constituent(s) and evaluate alternative strategies for reducing or eliminating the constituent(s) from the discharge, and reduce toxicity to the required level. The Board recognizes that chronic toxicity may be episodic, and that identification of causes of chronic toxicity may not be successful in all cases. Consideration of enforcement action by the Board will be based in part on the Discharger's actions in identifying and reducing sources of consistent toxicity.

In year 2000, there were violations of the chronic toxicity effluent limitation. As a result, the Discharger is conducting a toxicity identification evaluation (TIE). The Discharger has taken reasonable steps to reduce toxicity to required level. The Discharger has submitted a revised TIE "Toxicity Identification Evaluation Study Plan" dated September 28, 2000. On November 10, 2000, The TIE was amended to evaluate the impacts of the Discharger's effluent on the receiving waters. The TIE outlines the method and frequency of additional monitoring in case of non-compliance. While the TIE is in progress no increase in the frequency of the chronic toxicity monitoring will be required. The TIE is approved and the Discharger is required to implement it as proposed.

9. Regional Monitoring Program

The Discharger shall continue to participate in the Regional Monitoring Program (RMP) for trace substances in San Francisco Bay in lieu of more extensive effluent and receiving water self-monitoring requirements that may be imposed.

10. Screening Phase Compliance Monitoring

The Discharger shall conduct screening phase compliance monitoring in accordance with a proposal submitted to and acceptable to the Executive Officer, as part of its ETCP. The proposal shall contain, at a minimum, the elements specified in **Attachment C** of this Order. The purpose of the screening is to determine the most sensitive test species for subsequent compliance monitoring for chronic toxicity. Screening phase compliance monitoring shall be conducted under either of the following conditions:

- a. Subsequent to any significant change in the nature of the treatment plant effluent through changes in sources or treatment, except those changes resulting from reduction in pollutant concentrations attributable to pretreatment, source control, and waste minimization efforts; or,
- b. Prior to permit reissuance, except when the Discharger is conducting a TIE/TRE, screening phase monitoring data shall be included in the NPDES permit application for reissuance. The information shall be as recent as possible, but may be based on screening phase monitoring conducted within 5 years before the permit expiration date.

11. Submittal of Updated Plans

The discharger shall update and implement Storm Water Pollution Prevention Plans (SWPPP) acceptable to the Executive Officer. A SWPPP shall cover the entire facility owned and operated by each discharger. It shall describe the management and handling of storm water runoff from the facility, and measures taken to prevent contamination of storm water or discharge of pollutants with the storm water. As part of the SWPPP, the discharger shall 1) identify on a map of appropriate scale the areas which contribute runoff to the permitted discharge points, 2) describe the activities on each area and the potential for contamination of the runoff, and 3) address the feasibility for containment and/or treatment of the storm water. The Discharger shall submit the SWPPP acceptable to the Executive Officer by June 1, 2001, and within 30 days shall implement the SWPPP.

The annual update shall be timed with the preparation and submittal of the annual storm water report required in the Self-Monitoring Program. The Dischargers shall submit revisions to the Executive Officer by August 1 of each year.

12. Contingency Plan Update

The Discharger shall submit no later than June 1, 2001 an updated contingency plan to the Executive Officer for approval. The Contingency Plan shall be consistent with the requirements of Board Resolution No. 74-10. The Discharger shall begin implementing the Contingency Plan within 10 calendar days of approval, unless otherwise directed. The contingency plan shall be reviewed at the same time with the SWPPP. Updated information shall be submitted within 30 days of revision. Discharging pollutants in violation of this Order where the Discharger failed to develop and implement an approved contingency plan will be the basis for considering such discharge a willful and negligent violation of this Order pursuant to Section 13387 of the California Water Code.

13. Submittal and Implementation of Pollutant Minimization Plan (PMP)

- (a) The discharger shall continue to implement and improve its existing Pollution Prevention Program in order to reduce pollutant loadings to the treatment plant and therefore to the receiving waters.
- (b) The discharger shall submit an annual report, acceptable to the Executive Officer, no later than August 30th of each calendar year. Annual reports shall cover July of the preceding year through June of the current year.

Annual report shall include at least the following information:

- (i) *A brief description of its treatment plant, treatment plant processes.*
  - (ii) *A discussion of the current pollutants of concern.* Periodically, the discharger shall analyze its own situation to determine which pollutants are currently a problem and/or which pollutants may be potential future problems. This discussion shall include the reasons why the pollutants were chosen.
  - (iii) *Identification of sources for the pollutants of concern.* This discussion shall include how the discharger intends to estimate and identify sources of the pollutants. The discharger should also identify sources or potential sources not directly within the ability or authority of the discharger to control such as pollutants in the potable water supply and air deposition.
  - (iv) *Identification of tasks to reduce the sources of the pollutants of concern.* This discussion shall identify and prioritize tasks to address the discharger's pollutants of concern. The discharger may implement tasks themselves or participate in group, regional, or national tasks that will address its pollutants of concern. The discharger is strongly encouraged to participate in group, regional, or national tasks that will address its pollutants of concern whenever it is efficient and appropriate to do so. A time line shall be included for the implementation of each task.
  - (v) *Discussion of criteria used to measure Program's and tasks' effectiveness.* The discharger shall establish criteria to evaluate the effectiveness of its Pollution Prevention Program.
  - (vi) *Documentation of efforts and progress.* This discussion shall detail all of the discharger's activities in the Pollution Prevention Program during the reporting year.
  - (vii) *Evaluation of Program's and tasks' effectiveness.* This discharger shall utilize the criteria to evaluate the Program's and tasks' effectiveness
  - (viii) *Identification of specific tasks and time schedules for future efforts.* Based on the evaluation, the discharger shall detail how it intends to continue or change its tasks in order to more effectively reduce the amount of pollutants to the treatment plant, and subsequently in its effluent.
- (c) According to Section 2.4.5 of the SIP, when there is evidence that a priority pollutant is present in the effluent above an effluent limitation and either:
    - (i) A sample result is reported as detected, but not quantified (less than the Minimum Level) and the effluent limitation is less than the reported Minimum Level; or

- (ii) A sample result is reported as not detected (less than the Method Detection Limit) and the effluent limitation is less than the Method Detection Limit,  
the discharger shall be required to expand its existing Pollution Prevention Program to include the reportable priority pollutant. A priority pollutant becomes a reportable priority pollutant when (1) there is evidence that it is present in the effluent above an effluent limitation and either (c)(i) or (c)(ii) is triggered or (2) if the concentration of the priority pollutant in the monitoring sample is greater than the effluent limitation and greater than or equal to the reported Minimum Level.
- (d) If triggered by the reasons in Provision 13.c. and notified by the Executive Officer, the discharger's Pollution Prevention Program shall, within 6 months, also include:
  - (i) An annual review and semi-annual monitoring of potential sources of the reportable priority pollutant(s), which may include fish tissue monitoring and other bio-uptake sampling, or alternative measures approved by the Executive Officer when it is demonstrated that source monitoring is unlikely to produce useful analytical data;
  - (ii) Quarterly monitoring for the reportable priority pollutant(s) in the influent to the wastewater treatment system, or alternative measures approved by the Executive Officer when it is demonstrated that influent monitoring is unlikely to produce useful analytical data;
  - (iv) Submittal of a control strategy designed to proceed toward the goal of maintaining concentrations of the reportable priority pollutant(s) in the effluent at or below the effluent limitation;
  - (v) Implementation of appropriate cost-effective control measures for the reportable priority pollutant(s), consistent with the control strategy; and
  - (vi) An annual status report that shall be sent to the RWQCB including:
    - (1) All Pollution Prevention monitoring results for the previous year;
    - (2) A list of potential sources of the reportable priority pollutant(s);
    - (3) A summary of all actions undertaken pursuant to the control strategy; and
    - (4) A description of actions to be taken in the following year
- (e) To the extent where the requirements of the Pollution Prevention Program and the Pollutant Minimization Program overlap, the discharger is allowed to continue/modify/expand its existing Pollution Prevention Program to satisfy the Pollutant Minimization Program requirements.
- (f) These Pollution Prevention/Pollutant Minimization Program requirements are not intended to fulfill the requirements in The Clean Water Enforcement and Pollution Prevention Act of 1999 (Senate Bill 709).

14. Optional Mass Offset

If the Discharger wishes to pursue a mass offset program, a mass offset plan for reducing 303(d)-listed pollutants to the same receiving waterbody needs to be submitted for Board approval. This Order may be modified by the Board to allow an acceptable mass offset program.

15. Special Study-Dioxin Study:

In accordance with the SIP, the Discharger shall conduct effluent monitoring for the seventeen 2, 3, 7, 8-TCDD congeners listed below. The purpose of the monitoring is to assess the presence and amounts of the congeners being discharged to inland surface waters, enclosed bays, and estuaries for the development of a strategy to control these chemicals in a future multi-media approach. The Discharger is required to monitor the effluent once during the dry season and once during the wet season for a period of three consecutive years.

<u>Isomer Group</u>	<u>Toxicity Equivalence Factor</u>
2,3,7,8-tetra CDD	1.0
1, 2,3,7,8-penta CDD	1.0
1, 2, 3, 4, 7, 8-HexaCDD	0.1
1, 2, 3, 6, 7, 8-HexaCDD	0.1
1, 2, 3, 7, 8,9-HexaCDD	0.1
1, 2, 3, 4, 6, 7, 8-HeptaCDD	0.01
octa CDD	0.0001
2,3,7,8-Tetra CDF	0.1
1,2,3,7,8-Penta CDF	0.05
2,3,4,7,8-Penta CDF	0.5
1, 2, 3, 4, 7, 8-HexaCDF	0.1
1, 2, 3, 6, 7, 8-HexaCDF	0.1
1, 2, 3, 7, 8, 9-HexaCDF	0.1
2, 3, 4, 6, 7, 8-HexaCDF	0.1
1, 2, 3, 4, 6, 7, 8-HeptaCDF	0.01
1, 2, 3, 4, 7, 8,9-HeptaCDF	0.01
octa CDF	0.0001

<u>Task</u>	<u>Compliance Date</u>
a. <b>Sampling Plan</b>	March 1, 2001

Submit a proposed sampling plan, acceptable to the Executive Officer, to sample the effluent for seventeen congeners. This submittal shall include a proposed plan and time schedule for performing the work.

b. <b>Implement Plan</b>	30 days after approval of study
--------------------------	---------------------------------

Following approval by the Executive Officer, commence work in a timely fashion in accordance with the sampling plan.

c. <b>Annual Report</b>	Annually for 3 years
-------------------------	----------------------

Submit a report, to the Board, documenting the work performed in the sampling plan for the seventeen congeners.

16. Permit Reopener

Pursuant to USEPA regulations 40 CFR 122.44, 122.62, and 124.5, this permit may be modified prior to the expiration date to

- reflect any changes in the progress of TMDL development.
- reflect updated water quality objectives. Adoption of effluent limitations contained in this

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permit is not intended to restrict in any way future modifications based on legally adopted water quality objectives.

17. Signatory and Certification

All applications, reports, or information submitted to the Board shall be signed and certified pursuant to USEPA regulation 40 CFR 122.41(k).

18. Change of Ownership/Business Operation

In the event of any change in control or ownership of the site, business operation, or waste, the Discharger shall notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be forwarded to this office. Requirements established in Standard Provisions E.4 of August 1993 shall be complied by the Discharger and the succeeding site owner or operator.

19. Notification of Changes

Pursuant to USEPA regulation 40 CFR 122.42(a) the Discharger must notify the Board as soon as it knows or has reason to believe (1) that it has begun or expect to begin, use or manufacture a toxic pollutant not reported in the permit application, or (2) a discharge of toxic pollutant not limited by this Order has occurred, or will occur, in concentrations that exceed the specified limits in 40 CFR 122.42(a).

20. Consistent Use of Lowest Detection Limits

The Discharger shall consistently use the lowest possible detection limits commercially available to analyze all required chemical parameters in its waste discharges.

21. Rescission of Previous Order

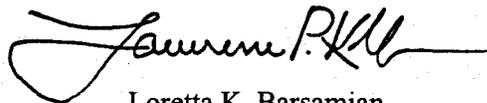
The requirements prescribed by this Order supersede the requirements specified by previous Order Nos. 93-107. Order No. 93-107 is hereby rescinded.

22. Permit Expiration

This Order expires on November 29, 2005, and the Discharger must file a Report of Waste Discharge in accordance with Title 23 of the California Administrative Code, not later than 180 days in advance of such date as application for the reissuance of new waste discharge requirements.

The Discharger shall immediately comply with all limitations, prohibitions, and other provisions of this Order upon its adoption by the Board.

I, Loretta K. Barsamian, Executive Officer, do hereby certify that 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 November 29, 2000.



Loretta K. Barsamian  
Executive Officer

Attachments:

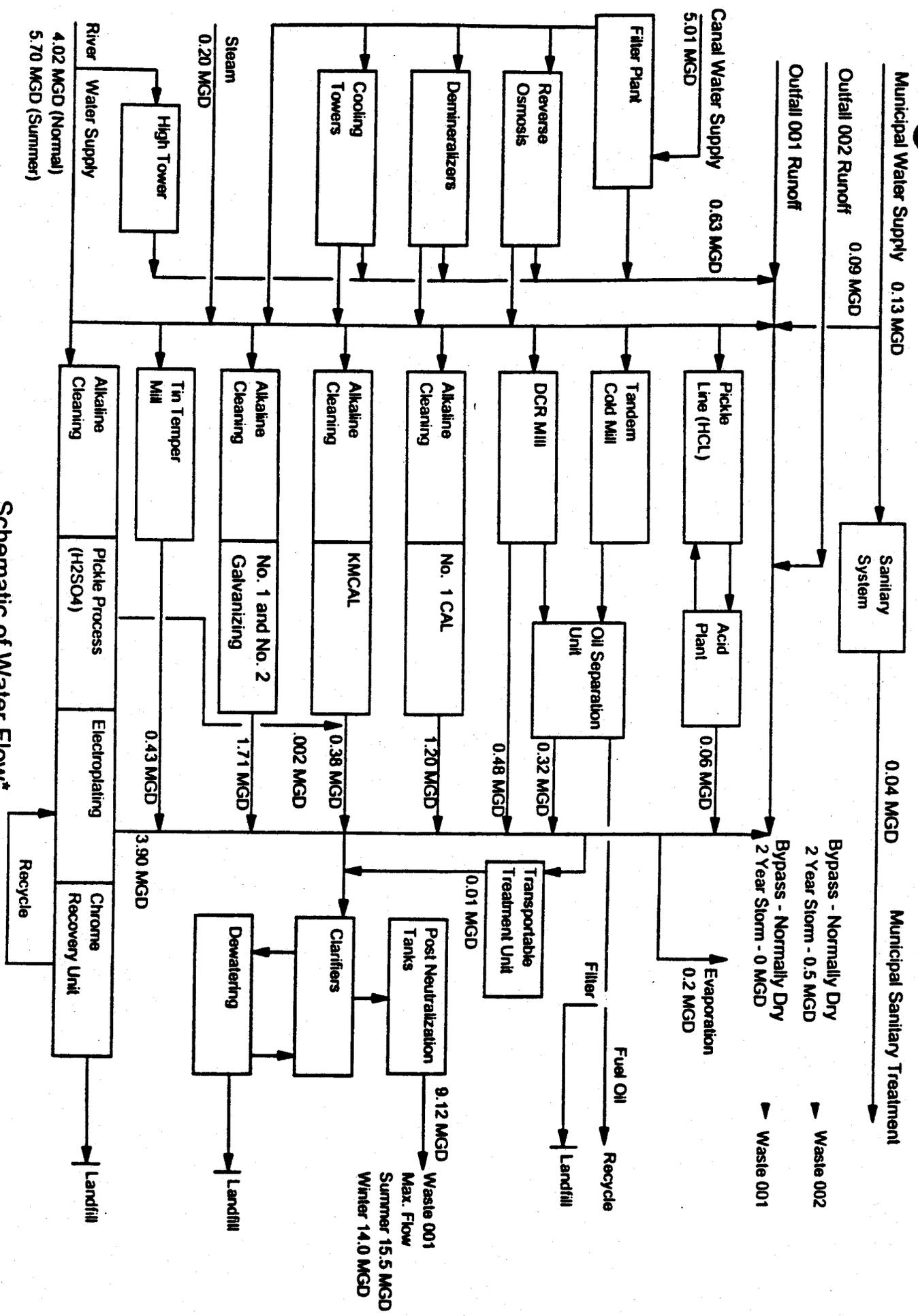
Figure 1. Site Map

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Figure 2. Water Flow Schematic

- A. Salinity of Receiving Water
- B. Chronic Toxicity Definition of Terms
- C. Chronic Toxicity Screening Phase Monitoring Requirements
- D. Self-Monitoring Program, Parts A (August 1993) and B
- E. Standard Provisions, and Reporting Requirements dated August 1993





\* Million Gallons Per Day (MGD)

Schematic of Water Flow\*  
 USS - POSCO Industries  
 CAD 009150194

Figure 2

**ATTACHMENT A**

**TABLE 20  
RECEIVING WATER SALINITY  
DELTA DIABLO SANITATION DISTRICT**

Date	Salinity, parts per thousand				
	C-1	C-2A	C-2B	C-R1	C-R2
	at diffuser	100' upstream	100' downstream	1000' upstream	1000' downstream
January 1990	0.5	1.5	1.0	1.0	-
February 1990	2.5	2.5	2.5	2.5	-
March 1990	3.5	3.5	3.5	5.0	-
April 1990	3.0	4.0	3.0	3.0	-
May 1990	3.0	4.0	2.5	4.0	-
June 1990	0.5	0.5	0.5	0.5	-
July 1990	3.0	3.0	3.0	3.0	-
August 1990	4.0	2.0	4.0	2.0	-
September 1990	2.0	2.0	5.5	2.0	-
October 1990	6.0	6.0	6.0	6.0	-
November 1990	5.0	5.0	5.0	5.0	-
December 1990	4.5	5.0	5.0	5.5	-
January 1991	0.5	0.5	0.5	0.5	0.5
February 1991	0.5	0.5	0.5	0.5	0.5
March 1991	0.5	0.5	0.5	0.5	0.5
April 1991	0.5	0.5	0.5	0.5	0.5
May 1991	0.5	0.5	0.5	0.5	0.5
June 1991	3.0	2.5	2.5	2.5	2.5
July 1991	3.0	3.0	3.0	3.0	3.0
August 1991	2.0	2.5	2.5	2.5	2.5
September 1991	2.0	2.0	2.0	2.0	2.0
October 1991	4.0	4.0	4.0	4.0	4.0
November 1991	4.0	4.7	4.5	5.0	4.0
December 1991	4.0	4.5	4.5	4.5	4.5
January 1992	3.0	3.0	3.0	3.0	3.5
February 1992	ND	ND	ND	ND	ND
March 1992	ND	ND	ND	ND	ND
April 1992	0.5	0.5	0.5	0.5	0.5
May 1992	4.5	5.0	5.0	5.0	5.0
June 1992	3.5	3.5	3.5	3.5	3.5
July 1992	2.5	2.5	2.5	2.5	2.5
August 1992	4.0	4.0	4.5	4.5	4.5
September 1992	4.0	3.5	3.5	3.5	3.5
October 1992	5.0	5.1	5.1	5.0	5.0
November 1992	5.0	5.0	5.0	5.0	5.0
December 1992	8.0	8.0	7.5	8.0	8.0
January 1993	ND	ND	ND	ND	ND
February 1993	ND	ND	ND	ND	ND
March 1993	ND	ND	ND	ND	ND
April 1993	ND	ND	ND	ND	ND
May 1993	ND	ND	ND	ND	ND
June 1993	ND	ND	ND	ND	ND
July 1993	0.5	0.5	0.5	0.5	0.5
August 1993	ND	ND	ND	ND	ND
September 1993	2.0	2.0	2.0	2.0	2.0
November 1993	2.5	3.4	3.0	3.4	3.5
March 1994	0.5	0.5	0.5	0.5	0.5
June 1994	1.5	1.5	1.0	1.5	1.0
September 1994	30.0	35.0	30.0	30.0	35.0
December 1994	20.0	20.0	20.0	20.0	20.0
March 1995	ND	ND	ND	ND	ND

**TABLE 20  
RECEIVING WATER SALINITY  
DELTA DIABLO SANITATION DISTRICT**

Date	Salinity, parts per thousand				
	C-1	C-2A	C-2B	C-R1	C-R2
	at diffuser	100' upstream	100' downstream	1000' upstream	1000' downstream
June 1995	ND	ND	ND	ND	ND
September 1995	ND	ND	ND	ND	ND
November 1995	ND	ND	ND	ND	ND
March 1996	ND	ND	ND	ND	ND
June 1996	ND	ND	ND	ND	ND
September 1996	ND	ND	ND	ND	ND
March 1997	ND	ND	ND	ND	ND
June 1997	1.8	1.8	2.0	1.8	2.0
December 1997	1.5	1.5	1.5	1.5	-
February 1998	ND	ND	ND	ND	-
<b>Total Observations</b>	<b>61</b>	<b>61</b>	<b>61</b>	<b>61</b>	<b>47</b>
<b># Observations ≤ 5.0</b>	<b>57</b>	<b>56</b>	<b>55</b>	<b>56</b>	<b>44</b>
<b>% Observations ≤ 5.0</b>	<b>93.4%</b>	<b>91.8%</b>	<b>90.2%</b>	<b>91.8%</b>	<b>93.6%</b>

## ATTACHMENT B

### DEFINITION OF NO OBSERVED EFFECT LEVEL

No observed effect level (NOEL) for compliance determination is equal to  $IC_{25}$  or  $EC_{25}$ . If the  $IC_{25}$  or  $EC_{25}$  cannot be statistically determined, the NOEL shall be equal to the NOEC derived using hypothesis testing.

Effective concentration (EC) is a point estimate of the toxicant concentration that would cause an adverse effect on a quantal, "all or nothing", response (such as death, immobilization, or serious incapacitation) in a given percent of the test organisms. If the effect is death or immobility, the term lethal concentration (LC) may be used. EC values may be calculated using point estimation techniques such as probit, logit, and Spearman-Kärber.  $EC_{25}$  is the concentration of toxicant (in percent effluent) that causes a response in 25% of the test organisms.

Inhibition concentration (IC) is a point estimate of the toxicant concentration that would cause a given percent reduction in a non-lethal, non-quantal biological measurement, such as growth. For example, an  $IC_{25}$  is the estimated concentration of toxicant that would cause a 25% reduction in average young per female or growth. IC values may be calculated using a linear interpolation method such as USEPA's Bootstrap Procedure.

No observed effect concentration (NOEC) is the highest tested concentration of an effluent or a toxicant at which no adverse effects are observed on the aquatic test organisms at a specific time of observation. It is determined using hypothesis testing.

**ATTACHMENT C**  
**SCREENING PHASE MONITORING**  
**REQUIREMENTS**

- A. The discharger shall perform screening phase compliance monitoring:
1. Subsequent to any significant change in the nature of the effluent discharged through changes in sources or treatment, except those changes resulting from reductions in pollutant concentrations attributable to pretreatment, source control, and waste minimization efforts; or
  2. Prior to permit reissuance. Screening phase monitoring data shall be included in the NPDES permit application for re-issuance. The information shall be as recent as possible, but may be based on screening phase monitoring conducted within 5 years before the permit's expiration date.
- B. Design of the screening phase shall, at a minimum, consist of the following elements:
- Use of test species specified in Table C-1 and C-2 (attached), and use of the protocols referenced in those tables, or as approved by the Executive Officer;
  - Two stages:
    - Stage 1 shall consist of a minimum of one battery of tests conducted concurrently. Selection of the type of test species and minimum number of tests shall be based on Table C-3 (attached); and
    - Stage 2 shall consist of a minimum of two test batteries conducted at a monthly frequency using the three most sensitive species based on the Stage 1 test results and as approved by the Executive Officer.
  - Appropriate controls; and
  - Concurrent reference toxicant tests.
- C. The Discharger shall submit a screening phase proposal to the Executive Officer for approval. The proposal shall address each of the elements listed above.

TABLE C-1  
CRITICAL LIFE STAGE TOXICITY TESTS FOR ESTUARINE WATERS

SPECIEIS	EFFECT	TEST	DURATION	REFERENCE
alga ( <u>Skeletonema Costatum</u> ) ( <u>Thalassiosira pseudonana</u> )	growth rate		4 days	1
red alga ( <u>Champia parvula</u> )	number of cystocarps		7-9 days	3
giant kelp ( <u>Macrocystis pyrifera</u> )	percent germination; germ tube length		48 hours	2
abalone ( <u>Haliotis rufescens</u> )	abnormal shell development		48 hours	2
oyster ( <u>Crassostrea gigas</u> ) mussel ( <u>Mytilus edulis</u> )	abnormal shell development; percent survival		48 hours	2
Echinoderms (urchins - <u>Strongylocentrotus</u> <u>purpuratus</u> , <u>S. franciscanus</u> ); (sand dollar - <u>Dendraster</u> <u>excentricus</u> )	percent fertilization		1 hour	2
shrimp ( <u>Mysidopsis bahia</u> )	percent survival; growth		7 days	3
shrimp ( <u>Holmesimysis bahia</u> )	percent survival; growth		7 days	2
topsmelt ( <u>Atherinops affinis</u> )	percent survival; growth		7 days	2
silversides ( <u>Menidia berylina</u> )	larval growth rate; percent survival		7 days	3

TOXICITY TEST REFERENCES

1. American Society for Testing Materials (ASTM). 1990. Standard Guide for conducting static 96-hour toxicity tests with microalgae. Procedure E 1218-90. ASTM, Philadelphia, PA.
2. Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to West Coast Marine and Estuarine Organisms. USEPA/600/R-95/136. August 1995
3. Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms. USEPA-600/4-90/003. July 1994

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM

FOR

USS-POSCO INDUSTRIES  
PITTSBURG PLANT  
PITTSBURG, CONTRA COSTA COUNTY

NPDES NO. CA0005002

ORDER NO. 00-130

CONSISTS OF

PART A (dated August 1993)

AND

PART B

**PART B**

I. **DESCRIPTION OF SAMPLING STATIONS**

A. EFFLUENT

<u>Station</u>	<u>Description</u>
E-001	At any point in the outfall from the treatment facilities of Waste 001 between the point of discharge and at which all waste tributary to that outfall is present.
E-002	At any point in the outfall of Waste 002 between the point of discharge and at which all waste tributary to that outfall is present.

B. RECEIVING WATERS

<u>Station</u>	<u>Description</u>
C-105W	At a point in New York Slough located within 20 feet of shore, 105 feet westerly of E-001
C-105N	At a point in New York Slough, located 105 feet northerly of E-001.
C-300N	At a point in New York Slough, located 300 feet northerly of E-001.
C-105E	At a point in New York Slough, located within 20 feet of shore, 105 feet easterly of E-001.
C-0	At a point in New York Slough, located at the point of discharge near the intersection of the property line and the center of the discharge channel of Waste 001.
CR-1	At a point in New York Slough, located 100 feet off shore, and at a midpoint between the ship dock and the Pittsburg Marina.

C. RAINFALL

<u>Station</u>	<u>Description</u>
R-1	The nearest official National Weather Service rainfall station or other station acceptable to the Executive Officer.

TABLE C-2  
CRITICAL LIFE STAGE TOXICITY TESTS FOR FRESH WATERS

SPECIES	EFFECT	TEST DURATION	REFERENCE
fathead minnow ( <i>Pimephales promelas</i> )	survival; growth rate	7 days	4
water flea ( <i>Ceriodaphnia dubia</i> )	survival; number of young	7 days	4
alga ( <i>Selenastrum capricornutum</i> )	cell divisions rate	4 days	4

TOXICITY TEST REFERENCE

4. Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms. Third edition. USEPA/600/4-91/002. July 1994

TABLE C-3  
TOXICITY TEST REQUIREMENTS FOR STAGE ONE SCREENING PHASE

REQUIREMENTS	RECEIVING WATER CHARACTERISTICS		
	DISCHARGES TO COAST	DISCHARGES TO SAN FRANCISCO BAY <sup>2</sup>	
	Ocean	Marine	Freshwater
Taxonomic Diversity	1 plant 1 invertebrate 1 fish	1 plant 1 invertebrate 1 fish	1 plant 1 invertebrate 1 fish
Number of tests of each salinity type			
Freshwater <sup>1</sup>	0	1 or 2	3
Marine	4	3 or 4	0
Total number of tests	4	5	3

<sup>1</sup> The fresh water species may be substituted with marine species if:

- 1) the salinity of the effluent is above 10 parts per thousand (ppt) greater than 95% of the time, or
- 2) the ionic strength (TDS or conductivity) of the effluent at the test concentration used to determine compliance is documented to be toxic to the test species.

<sup>2</sup> Marine refers to receiving water salinities greater than 10 ppt at least 95% of the time during a normal water year.  
Fresh refers to receiving water with salinities less than 1 ppt at least 95% of the time during a normal water year.

**LEGEND FOR TABLE 1**

Sampling Stations::

E = treatment facility effluent	C-24 = composite sample, 24 hours (includes continuous sampling and flow through, such as for flows)
OV = overflow and bypass points	C-X = composite sample, X hours
P = treatment facility perimeter points	G = grab sample
O = observation	
Cont. = continuous	BOD <sub>5</sub> , 20°C = Biochemical Oxygen Demand, 5-day, at 20 °C
Cont/D = continuous monitoring & daily reporting	D.O. = Dissolved Oxygen
D = once each day	
EA = each occurrence	PAHs = Polynuclear Aromatic Hydrocarbons; See SMP Section VI.H.
H = once each hour (at about hourly intervals)	TSS = Total Suspended Solids
M = once each month	mgd = million gallons per day
Q = once each calendar quarter (at about three month intervals)	mg/L = milligrams per liter
W = once each week	ml/L-hr = milliliters per liter, per hour
Y = once each calendar year	µg/L = micrograms per liter
2/Y = twice each calendar year (at about 6 months intervals)	kg/d = kilograms per day
3/W = three times each calendar week (on separate days)	kg/mo = kilograms per month
5/W = five times each calendar week (on separate days)	MPN/100 ml = Most Probable Number per 100 milliliters
SP = Special Study (Provision D. 15 of the permit)	

**FOOTNOTES FOR TABLE 1**

- |     |   |                         |
|-----|---|-------------------------|
| [1] | Additional details regarding sampling, analyses and observations are given in Section IV of this SMP, <i>Specifications for Sampling, Analyses and Observations</i> . |                         |
| [2] | Flow Monitoring.  | See SMP Section: III. A |
| [3] | Oil & Grease Monitoring.  | See SMP Section: III. B |
| [4] | Chromium (VI) Monitoring.   | See SMP Section: III. C |
| [5] | Acute Toxicity Monitoring.  | See SMP Section: III. D |
| [6] | Chronic Toxicity Monitoring.  | See SMP Section: III. E |
| [7] | Dioxin  | See SMP Section: III. F |
| [8] | Table 2 Selected Constituents   | See SMP Section: V.     |

### III. SPECIFICATIONS for SAMPLING, ANALYSES and OBSERVATIONS

Sampling, analyses and observations, and recording and reporting of results shall be conducted in accordance with the schedule given in Table 1 of this SMP, and in accordance with the following specifications, as well as all other applicable requirements given in this SMP. All analyses shall be conducted using analytical methods that are commercially and reasonably available, and that provide quantification of sampling parameters and constituents sufficient to evaluate compliance with applicable effluent limits.

#### A. Flow Monitoring.

Flow monitoring indicated as continuous monitoring in Table 1 shall be conducted by continuous measurement of flows, and reporting of the following measurements:

##### 1. Effluent (E-001):

###### a. Daily:

- (1) Average Daily Flow (mgd)
- (2) Maximum Daily Flow (mgd)

b. Monthly: The same values as given in a. above, for the calendar month.

#### B. Oil & Grease Monitoring.

Each Oil & Grease sample event shall consist of a composite sample comprised of three grab samples taken at equal intervals during the sampling date, with each grab sample being collected in a glass container. The grab samples shall be mixed in proportion to the instantaneous flow rates occurring at the time of each grab sample. Each glass container used for sample collection or mixing shall be thoroughly rinsed with solvent rinsing as soon as possible after use, and the solvent rinsing shall be added to the composite sample for extraction and analysis.

#### C. Chromium (VI) Monitoring

The Discharger may analyze for total chromium instead of Chromium VI.

#### D. Acute Toxicity Monitoring (Flow-through bioassay tests).

The following parameters shall be monitored on the sample stream used for the acute toxicity bioassays, at the start of the bioassay test and daily for the duration of the bioassay test, and the results reported: pH, temperature, dissolved oxygen, and ammonia nitrogen.

#### E. Chronic Toxicity Monitoring:

Critical Life Stage Toxicity Test shall be performed and reported in accordance with Chronic Toxicity Requirements. Abalone (*Haliotis Rufescens*) is to be tested pursuant to Effluent limitation B.3.b. The Discharger has submitted a revised TIE "Toxicity Identification Evaluation Study Plan" dated September 28, 2000. The TIE outlines the method and frequency of additional monitoring in case of non-compliance.

See also, Provision D.7 and Self Monitoring Program - Attachment 1 of this Order.

#### F. Dioxin and Furan:

In accordance with the SIP, major dischargers shall conduct effluent monitoring for the seventeen 2, 3, 7, 8-TCDD congeners listed below. The purpose of the monitoring is to assess the presence and amounts of the congeners being discharged to inland surface

**II. SCHEDULE OF SAMPLING, ANALYSES AND OBSERVATIONS**

The schedule of sampling, analysis and observation shall be that given in Table 1 below.

**Table 1**  
**SCHEDULE of SAMPLING, ANALYSES and OBSERVATIONS [1]**

Sampling Station			E-002	E-001		All C and CR
Type of Sample			G	G	C-24	G
Parameter	Units	Notes	[1]	[1]	[1]	[1]
Flow Rate	mgd	[2]			Cont/D	
PH	pH units		EA		Cont/D	Y
Temperature	°F				Cont/D	Y
Dissolved Oxygen	mg/L					Y
TSS	mg/L				M	
Oil & Grease	mg/L	[3]	EA	M		
Settleable Matter	ml/l-hr			M		
Phenolic Compound	mg/l kg/day				M	
Total Chromium	kg/day				M	
Hexavalent Chromium	µg/l	[4]			M	
Total Iron	kg/day				M	
Dissolved Iron	µg/l				M	
Lead	µg/l kg/day				M	
Nickel	µg/l kg/day				M	
Zinc	µg/l kg/day				M	
Naphthalene	µg/l kg/day				M	
Tetrachloroethylene	µg/l kg/day				M	
Sulfides	mg/L					Y
Unionized Ammonia	mg/L					Y
Acute Toxicity	% Survival	[5]			W	
Chronic Toxicity	TUc	[6]			Q	
Arsenic	µg/l				M	
Cadmium	µg/l				M	
Copper	µg/l & kg/mo				M	
Cyanide	µg/l				M	
Mercury	µg/L & lb/mo				M	
Selenium	µg/l				M	

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Sampling Station			E-002	E-001		All C and CR
Type of Sample			G	G	C-24	G
Parameter	Units	Notes	[1]	[1]	[1]	[1]
Silver					M	
Dioxin	µg/L	[7]			SP	
Table 2 Constituents	µg/L	[8]			Y	

waters, enclosed bays, and estuaries for the development of a strategy to control these chemicals in a future multi-media approach. Major dischargers are required to monitor the effluent once during the dry season and once during the wet season for a period of three consecutive years.

SELECTED CONSTITUENTS MONITORING

- A. Analyses shall be conducted using the lowest commercially available and reasonably achievable detection levels. The objective is to provide quantification of constituents sufficient to allow evaluation of observed concentrations with respect to respective Levels of Concern given below.

Monitoring Methods and Minimum Detection Levels

- A. The Discharger may use the methods listed in the Table 2 below or alternate test procedures that have been approved by the U.S. EPA Regional Administrator pursuant to 40 CFR 136.4 and 40 CFR 136.5 (revised as of May 14, 1999); or
- B. Where no methods are specified for a given pollutant in the Table 2 below, the Discharger shall use methods approved by the SWRCB or RWQCB.

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A. Table 2

CTR #	Constituent (a)	Minimum Level (µg/L) (b)											
		GC	GCMS	LC	Color	FAA	GFAA	ICP	ICP MS	SPGF AA	HYD RIDE	CVAA	DCP
1.	Antimony					10	5	50	0.5	5	0.5		1000
2.	Arsenic				20		2	10	2	2	1		1000
3.	Beryllium					20	0.5	2	0.5	1			1000
4.	Cadmium				10	0.5	10	0.25	0.5				1000
5a.	Chromium (III) (c)												
5b.	Chromium (VI)				10	5							1000
6.	Copper (d)					25	5	10	0.5	2			1000
7.	Lead					20	5	5	0.5	2			10,000
8.	Mercury (e)								0.5			0.2	
9.	Nickel					50	5	20	1	5			1000
10.	Selenium						5	10	2	5	1		1000
11.	Silver					10	1	10	0.25	2			1000
12.	Thallium					10	2	10	1	5			1000
13.	Zinc					20		20	1	10			
14.	Cyanide				5								
15.	Asbestos (c, f)												
16.	2, 3, 7, 8-TCDD (Dioxin) (c, h)												
17.	Acrolein	2.0	5										
18.	Acrylonitrile	2.0	2										
19.	Benzene	0.5	2										
20.	Bromoform	0.5	2										
21.	Carbon Tetrachloride	0.5	2										
22.	Chlorobenzene	0.5	2										
23.	Chlorodibromomethane	0.5	2										
24.	Chloroethane	0.5	2										
25.	2-Chloroethylvinyl Ether	1	1										
26.	Chloroform	0.5	2										
27.	Dichlorobromomethane	0.5	2										
28.	1,1-Dichloroethane	0.5	1										
29.	1,2-Dichloroethane	0.5	2										
30.	1, 1-Dichloroethylene or 1,1 Dichloroethene	0.5	2										
31.	1, 2-Dichloropropane	0.5	1										
32.	1, 3 -Dichloropropylene or 1,3-Dichloropropene	0.5	2										
33.	Ethylbenzene	0.5	2										
34.	Methyl Bromide	1.0	2										
35.	Methyl Chloride or Chloromethane	0.5	2										
36.	Methylene Chloride or Dichloromethane	0.5	2										
37.	1,1, 2,2-Tetrachloroethane	0.5	1										
38.	Tetrachloroethylene	0.5	2										
39.	Toluene	0.5	2										
40.	1,2-Trans- Dichloroethylene	0.5	1										
41.	1,1,1-Trichloroethane	0.5	2										
42.	1,1,2-Trichloroethane	0.5	2										
43.	Trichloroethylene or	0.5	2										

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CTR #	Constituent (a)	Minimum Level (µg/L) (b)											
		GC	GCMS	LC	Color	FAA	GFAA	ICP	ICP MS	SPGF AA	HYD RIDE	CVAA	DCP
	Trichloroethene												
44.	Vinyl Chloride	0.5	2										
45.	2-Chlorophenol	2	5										
46.	2, 4 Dichlorophenol	1	5										
47.	2,4-Dimethylphenol	1	2										
48.	2-Methyl-4,6-Dinitrophenol or Dinitro-2-methylphenol	10	5										
49.	2,4-Dinitrophenol	5	5										
50.	2-Nitrophenol		10										
51.	4-Nitrophenol	5	10										
52.	4-chloro-3-methylphenol	5	1										
53.	Pentachlorophenol	1	5										
54.	Phenol	1	1		50								
55.	2, 4, 6 Trichlorophenol	10	10										
56.	Acenaphthene	1	1	0.5									
57.	Acenaphthylene		10	0.2									
58.	Anthracene		10	2									
59.	Benzidine		5										
60.	Benzo(a)Anthracene or 1,2 Benzanthracene	10	5										
61.	Benzo(a)Pyrene		10	2									
62.	Benzo(b)Fluoranthene or 3,4 Benzofluoranthene		10	10									
63.	Benzo(ghi)Perylene		5	0.1									
64.	Benzo(k)Fluoranthene		10	2									
65.	Bis(2-Chloroethoxy) Methane		5										
66.	Bis(2-Chloroethyl) Ether	10	1										
67.	Bis(2-Chloroisopropyl) Ether	10	2										
68.	Bis(2-Ethylhexyl) Phthalate	10	5										
69.	4-Bromophenyl Phenyl Ether	10	5										
70.	Butylbenzyl Phthalate	10	10										
71.	2-Chloronaphthalene		10										
72.	4-Chlorophenyl Phenyl Ether		5										
73.	Chrysene		10	5									
74.	Dibenzo(a,h) Anthracene		10	0.1									
75.	1, 2 Dichlorobenzene (volatile)	0.5	2										
	1, 2 Dichlorobenzene (semi-volatile)	2	2										
76.	1, 3 Dichlorobenzene (volatile)	0.5	2										
	1, 3 Dichlorobenzene (semi-volatile)	2	1										
77.	1, 4 Dichlorobenzene (volatile)	0.5	2										
	1, 4 Dichlorobenzene (semi-volatile)	2	1										

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CTR #	Constituent (a)	Minimum Level (µg/L) (b)											
		GC	GCMS	LC	Color	FAA	GFAA	ICP	ICP MS	SPGF AA	HYD RIDE	CVAA	DCP
78.	3,3'-Dichlorobenzidine		5										
79.	Diethyl Phthalate	10	2										
80.	Dimethyl Phthalate	10	2										
81.	Di-n-Butyl Phthalate		10										
82.	2,4-Dinitrotoluene	10	5										
83.	2,6-Dinitrotoluene		5										
84.	Di-n-Octyl Phthalate		10										
85.	1,2-Diphenylhydrazine		1										
86.	Fluoranthene	10	1	0.05									
87.	Fluorene		10	0.1									
88.	Hexachlorobenzene	5	1										
89.	Hexachlorobutadiene	5	1										
90.	Hexachlorocyclopentadiene	5	5										
91.	Hexachloroethane	5	1										
92.	Indeno(1,2,3-cd)Pyrene		10	0.05									
93.	Isophorone	10	1										
94.	Naphthalene	10	1	0.2									
95.	Nitrobenzene	10	1										
96.	N-Nitrosodimethylamine	10	5										
97.	N-Nitrosodi-n-Propylamine	10	5										
98.	N-Nitrosodiphenylamine	10	1										
99.	Phenanthrene		5	0.05									
100.	Pyrene		10	0.05									
101.	1,2,4-Trichlorobenzene	1	5										
102.	Aldrin	0.005											
103.	α-BHC	0.01											
104.	β-BHC	0.005											
105.	γ-BHC (Lindane)	0.02											
106.	δ-BHC	0.005											
107.	Chlordane	0.1											
108.	4,4'-DDT	0.01											
109.	4,4'-DDE	0.05											
110.	4,4'-DDD	0.05											
111.	Dieldrin	0.01											
112.	Endosulfan (alpha)	0.02											
113.	Endosulfan (beta)	0.01											
114.	Endosulfan Sulfate	0.05											
115.	Endrin	0.01											
116.	Endrin Aldehyde	0.01											
117.	Heptachlor	0.01											
118.	Heptachlor Epoxide	0.01											
119-125	PCBs (g)	0.5											
126.	Toxaphene	0.5											
	Tributyltin (c)												
	Chlorpyrifos (c, i)												
	Diazinon (c, i)												

**Notes:**

a.) Factors may be applied to the ML depending on the specific sample preparation steps

- employed. Dischargers are to instruct laboratories to establish calibration standards so that the ML value is the lowest calibration. At no time is the Discharger to use analytical data derived from extrapolation beyond the lowest point of the calibration curve.
- b.) Laboratory techniques are defined as follows: GC = Gas Chromatography; GCMS = Gas Chromatography/Mass Spectrometry; LC = High Pressure Liquid Chromatography; Color = Colorimetric; FAA = Flame Atomic Absorption; GFAA = Graphite Furnace Atomic Absorption; Hydride = Gaseous Hydride Atomic Absorption; CVAA = Cold Vapor Atomic Absorption; ICP = Inductively Coupled Plasma; ICPMS = Inductively Coupled Plasma/Mass Spectrometry; SPGFAA = Stabilized Platform Graphite Furnace Atomic Absorption (i.e. EPA 200.9); DCP = Direct Current Plasma.
  - c.) The SIP does not contain an ML for this constituent.
  - d.) For copper, the Discharger may also use the following laboratory techniques with the relevant minimum level: GFAA with a minimum level of 5 µg/L and SPGFAA with a minimum level of 2 µg/L.
  - e.) Use ultra-clean sampling and analytical methods for mercury monitoring per 13267 letter issued to Discharger. ML for compliance purposes is as listed in table above until the SWRCB adopts alternative minimum level.
  - f.) The Discharger does not need to be sample for this constituent because sampling is not required for receiving waters with a municipal beneficial use designation.
  - g.) PCBs refer to PCB 1016, 1221, 1232, 1242, 1248, 1254 and 1260.
  - h.) Use Method 1613 for TCDD analysis and test for seventeen congeners.
  - i.) The detection limit goals for these constituents are 0.03 µg/L.

#### IV. REPORTING REQUIREMENTS

- A. General Reporting Requirements are described in Section E of the Board's "*Standard Provisions and Reporting Requirements for NPDES Surface Water Discharge Permits*", dated August 1993.
- B. Monthly Self-Monitoring Report (SMR) Requirements are described in Section F.4 of the attached *Self-Monitoring Program, Part A*, dated August 1993.
- C. Modification of Self-Monitoring Program, Part A (Part A):
  1. Section E.1 of Part A shall be modified as follows:
    - a. Written reports, electronic records, strip charts, equipment calibration and maintenance records, and other records pertinent to demonstrating compliance with waste discharge requirements including self-monitoring program requirements, shall be maintained by the Discharger in a manner and at a location (e.g., wastewater treatment plant or Discharger offices) such that the records are accessible to Board staff. These records shall be retained by the Discharger for a minimum of three years. The minimum period of retention shall be extended during the course of any unresolved litigation regarding the subject discharges, or when requested by the Board or by the Regional Administrator of the US EPA, Region IX. Records to be maintained shall include the following:
      - (1) Parameter Sampling and Analyses, and Observations.  
For each sample, analysis or observation conducted, records shall include the following:

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- (i) Parameter
- (ii) Identity of sampling or observation station, consistent with the station descriptions given in this SMP.
- (iii) Date and time of sampling or observation.
- (iv) Method of sampling (grab, composite, other method)
- (v) Date and time analysis started and completed, and name of personnel or contract laboratory performing the analysis.
- (vi) Reference or description of procedure(s) used for sample preservation and handling, and analytical method(s) used.
- (vii) Calculations of results.
- (viii) Analytical method detection limits and related quantitation parameters.
- (ix) Results of analyses or observations.

(2) Flow Monitoring Data.

For all required flow monitoring (e.g., influent and effluent flows), records shall include the following:

- (i) Total flow or volume, for each day.
- (ii) Maximum, minimum and average daily flows for each calendar month.

2. Section F.1 of Part A shall be modified as follows:

- a. A report shall be made of any spill of oil or other hazardous material.
- b. The spill shall be reported by telephone as soon as possible and no later than 24 hours following occurrence or Discharger's knowledge of occurrence. Spills shall be reported by telephone as follows:
  - (1) During weekdays, during office hours of 8 am to 5 pm, to the Regional Board:  
Current phone number: (510) 622 - 2300.  
Current Fax number: (510) 622 - 2460
  - (2) During non-office hours, to the State Office of Emergency Services:  
Current phone number: (800) 852 - 7550.
- c. A written report shall be submitted to the Regional Board within five (5) working days following telephone notification, unless directed otherwise by Board staff. A report submitted by facsimile transmission is acceptable for this reporting. The written report shall include the following:
  - (1) Date and time of spill, and duration if known.
  - (2) Location of spill (street address or description of location).
  - (3) Nature of material spilled.

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- (4) Quantity of material involved.
- (5) Receiving water body affected.
- (6) Cause of spill.
- (7) Observed impacts to receiving waters (e.g., discoloration, oil sheen, fish kill).
- (8) Corrective actions that were taken to contain, minimize or cleanup the spill.
- (9) Future corrective actions planned to be taken in order to prevent recurrence, and time schedule of implementation.
- (10) Persons or agencies contacted.

3. Section F.4 of Part A shall be modified as follows:

For each calendar month, a self-monitoring report (SMR) shall be submitted to the Board in accordance with the following:

- a. The report shall be submitted to the Board no later than 30 days from the last day of the reporting month.

b. *Letter of Transmittal*

Each report shall be submitted with a letter of transmittal. This letter shall include the following:

- (1) Identification of all violations of effluent limits or other discharge requirements found during the monitoring period;
- (2) Details of the violations: parameters, magnitude, test results, frequency, and dates;
- (3) The cause of the violations;
- (4) Discussion of corrective actions taken or planned to resolve violations and prevent recurrence, and dates or time schedule of action implementation. If previous reports have been submitted that address corrective actions, reference to such reports is satisfactory.
- (5) Signature: The letter of transmittal shall be signed by the Discharger's principal executive officer or ranking elected official, or duly authorized representative, and shall include the following certification statement:

"I certify under penalty of law that this document and all attachments have been prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

c. *Compliance Evaluation Summary*

Each report shall include a compliance evaluation summary. This summary shall include, for each parameter for which effluent limits are specified in the Permit, the number of samples taken during the monitoring period, and the number of samples in violation of applicable effluent limits.

d. *Results of Analyses and Observations.*

- (1) Tabulations of all required analyses and observations, including parameter, sample date and time, sample station, and test result.
- (2) If any parameter is monitored more frequently than required by this permit and SMP, the results of this additional monitoring shall be included in the monitoring report, and the data shall be included in data calculations and compliance evaluations for the monitoring period.
- (3) Calculations for all effluent limits that require averaging of measurements shall utilize an arithmetic mean, unless specified otherwise in this permit or SMP.

e. *Data Reporting for Results Not Yet Available.*

The Discharger shall make all reasonable efforts to obtain analytical data for required parameter sampling in timely manner. The Board recognizes that certain analyses require additional time in order to complete analytical processes and result reporting. For cases where required monitoring parameters require additional time to complete analytical processes and reporting, and results are not available in time to be included in the SMR for the subject monitoring period, such cases shall be described in the SMR. Data for these parameters, and relevant discussions of any observed violations, shall be included in the next following SMR.

D. Reporting Data in Electronic Format.

The Discharger has the option to submit all monitoring results in electronic reporting format approved by the Executive Officer. If the Discharger chooses to submit the SMRs electronically, the following shall apply:

1. *Reporting Method:* The Discharger shall submit SMRs electronically via the process approved by the Executive Officer in a letter dated December 17, 1999, Official Implementation of Electronic Reporting System (ERS).
2. *Modification of reporting requirements:* Reporting requirements F.4. in the attached *Self-Monitoring program, Part A*, dated August 1993, shall be modified as follows. In the future, the Board intends to modify Part A to reflect these changes.

a. Monthly Report Requirements:

Monthly Reporting Requirements: For each calendar month, a self-monitoring report (SMR) shall be submitted to the Board in accordance with the following:

- (1) The report shall be submitted to the Board no later than 30 days from the last day of the reporting month.
- (2) *Letter of Transmittal*  
Each report shall be submitted with a letter of transmittal. This letter shall include the following:

- (i) Identification of all violations of effluent limits or other discharge requirements found during the monitoring period;
- (ii) Details of the violations: parameters, magnitude, test results, frequency, and dates;
- (iii) The cause of the violations;
- (iv) Discussion of corrective actions taken or planned to resolve violations and prevent recurrence, and dates or time schedule of action implementation. If previous reports have been submitted that address corrective actions, reference to such reports is satisfactory.
- (v) Signature: The letter of transmittal shall be signed by the Discharger's principal executive officer or ranking elected official, or duly authorized representative, and shall include the following certification statement:  
"I certify under penalty of law that this document and all attachments have been prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

(3) *Compliance Evaluation Summary*

Each report shall include a compliance evaluation summary. This summary shall include, the number of samples in violation of applicable effluent limits.

(4) *Results of Analyses and Observations.*

- (i) Tabulations of all required analyses and observations, including parameter, sample date, sample station, and test result.
- (ii) If any parameter is monitored more frequently than required by this permit and SMP, the results of this additional monitoring shall be included in the monitoring report, and the data shall be included in data calculations and compliance evaluations for the monitoring period.
- (iii) Calculations for all effluent limits that require averaging of measurements shall utilize an arithmetic mean, unless specified otherwise in this permit or SMP.

(5) *Data Reporting for Results Not Yet Available.*

The Discharger shall make all reasonable efforts to obtain analytical data for required parameter sampling in timely manner. The Board recognizes that certain analyses require additional time in order to complete analytical processes and result reporting. For cases where required monitoring parameters require additional time to complete analytical processes and reporting, and results are not available in time to be included in the SMR for the subject monitoring period, such cases shall be described in the SMR. Data for these parameters, and relevant discussions of any observed violations, shall be included in the next following SMR.

b. Annual Report Requirements:

An Annual Report shall be submitted for each calendar year. The report shall be submitted to the Board by February 15 of the following year. This report shall

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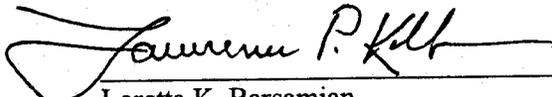
include the following:

- (1) Summaries of monitoring data collected during the calendar year that characterizes treatment plant performance and compliance with waste discharge requirements.
- (2) A comprehensive discussion of treatment plant performance and compliance with waste discharge requirements.

**V. SELF-MONITORING PROGRAM CERTIFICATION**

I, Loretta K. Barsamian, Executive Officer, hereby certify that the foregoing Self-Monitoring Program:

- A. Has been developed in accordance with the procedure set forth in this Board's Resolution No. 73-16 in order to obtain data and document compliance with waste discharge requirements established in Board Order No. 00-130
- B. May be reviewed at any time subsequent to the effective date upon written notice from the Executive Officer or request from the Discharger, and revisions will be ordered by the Executive Officer.
- C. Is effective as of November 29, 2000.

  
\_\_\_\_\_  
Loretta K. Barsamian  
Executive Officer