

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT (Elizabeth Christian)
MEETING DATE: September 14, 2016

- ITEM: **6B**
- SUBJECT: **Napa County Flood Control and Water Conservation District, Upland Dredged Material Rehandling, Napa County** – Updated Waste Discharge Requirements and Rescission of Order No. 97-087
- CHRONOLOGY: July 1997 – Waste Discharge Requirements (WDRs) adopted
- DISCUSSION: The Tentative Order (Appendix A) would update WDRs that regulate the operation of two upland sites that will be used for rehandling (i.e., dewatering and temporarily storing) sediment dredged from the Napa River prior to upland beneficial reuse of the sediment (e.g., construction fill, wetland or terrestrial habitat restoration, or levee construction/maintenance).
- The Napa County Flood Control and Water Conservation District (District) is responsible for providing upland dredged material placement sites for the U.S. Army Corps of Engineers to use when conducting periodic maintenance dredging in the Napa River to maintain safe navigation for both commercial and recreational vessels, and to maintain maximum conveyance of high flows to minimize the potential for flooding in the City of Napa.
- The Tentative Order would rescind and update the 1997 order as follows:
- Removes the John F. Kennedy Memorial Park (JFK Park) site, which was filled to capacity during the most recent (1997) maintenance dredging episode and is no longer accepting dredged material.
 - Retains the Imola Avenue (Imola) site (Figures 1 and 2), which was also used in 1997 but has since been emptied and reconstructed.
 - Adds the Napa Redevelopment Partners, LLC (NRP) site, located about three miles south of the City of Napa along the east bank of the Napa River (Figures 1 and 3), as a reuse site.
 - Updates the decant water discharge effluent limits and the corresponding Self-Monitoring Program to reflect updates to Basin Plan water quality objectives made subsequent to 1997.
- We circulated the Tentative Order to the District, other responsible agencies, and interested parties for 30 days and did not receive any comments. We made minor editorial and formatting changes to the Tentative Order and the Self-Monitoring Program. We expect this item to remain uncontested.
- RECOMMEN-
DATION: Adoption of the Tentative Order
- CIWQS Place: 822161 (Imola)
826577 (NRP)
- APPENDICES: A. Tentative Order

APPENDIX A

Tentative Order

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

REVISED TENTATIVE ORDER

**UPDATED WASTE DISCHARGE REQUIREMENTS AND RESCISSION OF ORDER
No. 97-087 for:**

**NAPA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT
UPLAND DREDGED MATERIAL REHANDLING, NAPA COUNTY**

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

1. Purpose of Order

The Napa County Flood Control and Water Conservation District (District) is responsible for providing upland dredged material placement sites for the United States Army Corps of Engineers (USACE) to use when conducting maintenance dredging of the Napa River federal navigation channel. USACE periodically dredges the Napa River to maintain safe navigation of both commercial and recreational vessels and to maintain maximum conveyance of high flows to minimize the potential for flooding in the City of Napa. This Order applies to the District's operation of two upland sites (Figure 1) that will be used for rehandling (i.e., dewatering and temporarily storing) sediment dredged from the Napa River prior to upland beneficial reuse (e.g., fill for wetland or terrestrial habitat restoration, levee maintenance, or levee construction). This Order updates Order No. 97-087 as follows:

- a. Removes reference to the John F. Kennedy Memorial Park (JFK Park) site, which was filled to capacity during the most recent (1997) maintenance dredging episode in the Napa River and is no longer accepting dredged material;
- b. Retains the Imola Avenue (Imola) site (Figures 1 and 2), which was also used in 1997;
- c. Adds the Napa Redevelopment Partners, LLC, (NRP) site located about three miles south of the City of Napa along the east bank of the Napa River at 1025 Kaiser Road (Figures 1 and 3); and
- d. Updates the decant water discharge effluent limits and the corresponding Self-Monitoring Program attached to this Order to reflect updates to Basin Plan water quality objectives made subsequent to 1997.

2. Regulatory History

Since the early 1980's, dredged material has routinely been placed at three sites along the Napa River: Imola, JFK Park, and Edgerly Island. Dredged material from the 1987-1988 maintenance dredging episode was placed at all three sites, and dredged material from the 1997 maintenance dredging episode was placed at only the Imola and JFK Park sites. The Regional Water Board issued Order No. 97-087 for the 1997 episode. There are no records that any permits were issued by the Regional Water Board prior to 1997.

In 2012, the District applied for an amendment to Order No. 97-087 to add Edgerly Island and remove JFK Park. Edgerly Island is located on the west side of the Napa River immediately north of Pond 8 in the Napa River Salt Marsh Restoration Project. The District purchased the 39-acre Edgerly Island site in 1981 with the intent to use it for dredged material rehandling in perpetuity. The Imola site is relatively small and by itself cannot accommodate most USACE maintenance dredging episodes in the Napa River, which typically remove over 100,000 cubic yards (cy) of sediment. In 2004, the District reconstructed the Edgerly Island site by raising its levees to increase the overall dredged material storage capacity to 330,000 cy. Creating a deeper basin, however, also increased the site's ability to allow rainfall to pond. In 2013, the District completed a wetland delineation for Edgerly Island at the request of Regional Water Board staff. The wetland delineation showed that, despite annual disking, approximately 22 acres of seasonal wetlands had developed. The Regional Water Board cannot issue a permit for dredged material placement at Edgerly Island until the District performs an analysis of environmental impacts and develops a plan for mitigating the impacts of filling the seasonal wetlands. The District has indicated that it cannot perform these tasks within the timeframe necessary to accommodate USACE's 2016 dredge cycle, so it has modified its request to update Order No. 97-087 by replacing Edgerly Island with the NRP site for a one-time use.

Site Description

3. Imola Avenue (Imola)

The Imola dredged material rehandling site is an excavated earthen basin located in the City of Napa on the east bank of the Napa River at the previous location of the Napa Sanitation District's wastewater treatment plant (Figure 2). Historical photos show that the site was previously used for agriculture prior to the District's purchase in 1981. The USACE emptied the Imola site in 2006 as part of the Napa River/Napa Creek Flood Protection Project and reconstructed the earthen containment basin and the outfall weir and associated pipes. The containment basin currently has an approximately 2-acre footprint, including 15-foot high sidewalls (after accounting for a minimum one-foot of freeboard), and provides an overall volume capacity of 55,000 cy. Because the site is set back from the river beyond the reach of mechanical bucket dredges, it can only receive dredged material in the form of a hydraulic slurry. After suspended solids have sufficiently settled, the overlying "decant" water will be discharged into a constructed channel, New Tulucay Creek, about 700 feet from where it joins the Napa River to the west.

4. Napa Redevelopment Partners (NRP)

Napa Redevelopment Partners, LLC, purchased the 150-acre former Napa Pipe Corporation shipbuilding and steel pipe manufacturing site in 2005 after it ceased production. Since 2007, the Regional Water Board has been overseeing implementation of a Remedial Investigation/Feasibility Study/Remedial Action Plan for soil and groundwater contamination related to past industrial activities at the site. Upon completion of the remedial actions, the NRP site will be redeveloped for mixed commercial, residential, and open space uses. To accommodate these uses and account for sea level rise given the close proximity to the tidal portion of the Napa River, a large volume of clean construction fill is needed. The NRP site has a paved area of approximately 14 acres (Figure 3) that can be used for temporary containment, dewatering, and storage of dredged material, which will later be used onsite as

clean construction fill. The District will construct a berm to contain the dredged material using clean stockpiled soil from other areas of the property, compacted to a minimum 80 percent. The berm will be approximately 3,800 linear feet with an average height of 4-5 feet (leveled according to topography) and 2:1 side slopes. Assuming a minimum one-foot freeboard, this area has an overall volume capacity of approximately 67,000 cy. The USACE contractor will prepare and manage water decanting operations using a series of internal weirs/berms to facilitate settling. The contractor may also use the onsite dry docks and Baker tanks, if needed, to meet discharge criteria prior to discharging decant water back to the river. The discharge location will be located to the west of the dredged material storage area.

5. In accordance with the Long Term Management Strategy for the Placement of Dredged Material in the San Francisco Bay Region (LTMS), the Dredged Material Management Office (DMMO) reviews sediment quality testing data for each navigational dredging project and determines the suitability of the dredged material for various disposal or beneficial reuse sites. The objective of the sediment testing requirements is to ensure that disposal or beneficial reuse of dredged material occurs without causing degradation to the surrounding environment. The sediment is typically tested for physical attributes (e.g., grain size), chemical pollutants, and the potential for biological toxicity. Material that is proposed for rehandling at the Imola or NRP sites may require additional evaluation to make a final beneficial reuse or disposal site determination.

6. **Antidegradation Policy**

CFR Title 40, part 131.12, requires that state water quality standards include an anti-degradation policy consistent with federal policy. The State Water Resources Control Board (State Water Board) established California's anti-degradation policy through State Water Board Resolution 68-16, which incorporates the federal anti-degradation policy where federal policy applies. Resolution 68-16 requires that existing water quality be maintained unless degradation is justified based on specific findings. This Order complies with the anti-degradation policy by prohibiting degradation of existing water quality in the vicinity of the operations.

7. **San Francisco Bay Basin Water Quality Control Plan**

California Water Code section 13240 authorizes the Regional Water Board to develop a Water Quality Control Plan for the San Francisco Bay Basin, which is the Regional Water Board's master water quality control planning document (Basin Plan). The Basin Plan designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes implementation programs and policies to achieve those objectives for all waters addressed through the plan. The Basin Plan was duly adopted by the Regional Water Board and approved by the State Water Board, U.S. EPA, and the Office of Administrative Law where required. The latest version can be found on the Regional Water Board's website at http://www.waterboards.ca.gov/sanfranciscobay/basin_planning.shtml. Requirements in this Order implement the Basin Plan.

8. The existing and potential beneficial uses of the tidal portion of the Napa River as set forth in the Basin Plan, are as follows:
 - a. Commercial fishing
 - b. Estuarine habitat
 - c. Fish migration

- d. Preservation of rare and endangered species
- e. Wildlife habitat
- f. Water contact recreation
- g. Non-contact water recreation
- h. Navigation

The New Tulucay Creek constructed channel is not listed in the Basin Plan but due to its close proximity to, and connection with, the tidal portion of the Napa River, its beneficial uses are considered to be the same as those of the river.

9. **Safe Drinking Water Policy**

It is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. This Order promotes that policy by requiring the District to meet effluent limits.

10. **California Environmental Quality Act (CEQA)**

Operation of the Imola site for dredged material rehandling is the continued operation of an existing facility without significant expansion of use and is thus exempt from CEQA (Cal. Code Regs., tit. 14, §15301). The Regional Water Board, as a responsible agency under CEQA, has considered the Categorical Exemption Determination and concurs that the exemption is applicable. The Regional Water Board will file a Notice of Exemption in accordance with the Office of Planning and Research within five days after issuance of this Order (Cal. Code Regs., tit. 14, §§ 15062).

The District has determined that the one-time operation of the NRP site is a minor alteration to land and is thus exempt from CEQA (Cal. Code Regs., tit. 14, §15304). The District, acting as the lead agency for the NRP site, filed a Notice of Exemption with the Office of Planning and Research on June 9, 2016. The Regional Water Board, as a responsible agency under CEQA, has considered the Categorical Exemption Determination and concurs that the exemption is applicable. The Regional Water Board will file a Notice of Determination with the State Clearing House within five days from the issuance of this Order (Cal. Code Regs., tit. 14, §§ 15096, subd. (i), 15075).

11. The Regional Water Board has notified the District and interested agencies and persons of its intent to prescribe waste discharge requirements and has provided them with an opportunity to submit their written comments. The Regional Water Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED, pursuant to the provisions of Division 7 of the California Water Code (CWC) and regulations, and guidelines adopted thereunder, that the District shall comply with the following:

A. PROHIBITIONS

1. The direct discharge of wastes, including dredged sediment material, in quantities sufficient to cause deleterious bottom deposits or turbidity or discoloration in excess of natural background levels in surface waters is prohibited.
2. The discharge shall not cause degradation of any water supply.

3. No material shall be placed in the designated rehandling containment areas prior to a suitability determination by the DMMO and approval by Regional Water Board staff.
4. At no point within the containment areas at the Imola and NRP sites shall the elevation of dredged material exceed that of the containment berms.
5. This Order does not allow for the take, or incidental take, of any special status species. The District shall use appropriate protocols, as approved by the California Department of Fish and Wildlife, the National Marine Fisheries Service, and the U.S. Fish and Wildlife Service, to ensure that dredge rehandling activities do not adversely impact the Preservation of Rare and Endangered Species, a beneficial use of the Napa River and its tributaries set forth in the Basin Plan.
6. The activities subject to this Order shall not cause a condition of pollution or nuisance as defined in CWC sections 13050 (l) and (m), respectively.

B. SPECIFICATIONS

1. Prior to completion of the dewatering process, the top of the dredged material shall be maintained at least one foot below the top of the containment structures at the Imola and NRP sites.
2. The Imola and NRP sites shall be operated to prevent the inundation, washout, or erosion of stored sediments that could occur during a storm event.
3. All of the decant water from the dredged material placed within, and any rainwater that falls into, the containment areas shall be contained within the berms and allowed to evaporate or shall be demonstrated to meet the effluent limits in Table C.1 prior to discharge.

C. EFFLUENT LIMITS

1. All dredged material decant water discharges from the Imola and NRP rehandling sites shall not exceed the following limits:

Conventional Pollutants Constituent	Unit	Instantaneous Minimum	Instantaneous Maximum
Total Suspended Solids (TSS)	mg/L		100
Dissolved Oxygen (D.O.) ¹	mg/L	5.0	
pH	pH	6.5	8.5
Temperature	°C		< 11°C above receiving water temperature

¹ This limitation applies when receiving waters contain at least 5.0 mg/L D.O. In cases where receiving waters do not meet the Basin Plan objective, discharges must be at or above the D.O. level in the receiving water.

Toxic Pollutants Constituent	Maximum Limit (µg/l) ¹
Arsenic ²	69
Cadmium ²	3.9 ⁴
Chromium VI ^{2,3}	16
Copper ²	9.4
Lead ²	65

Toxic Pollutants Constituent	Maximum Limit (µg/l) ¹
Mercury	2.1
Nickel ²	74
Selenium	20
Silver ²	1.9
Zinc ²	90

¹ Limits for discharge to estuarine receiving water (salinity between 1 and 10 ppt) are based on the more stringent of the Basin Plan marine and freshwater acute toxicity-based water quality objectives for toxic pollutants (1-hr average concentrations).

²These objectives for metals are expressed in terms of the dissolved fraction of the metal in the water column.

³This objective may be met as total chromium.

⁴The table value assumes a hardness of 100 mg/l CaCO₃. At other hardness concentrations, the 1-hour average objective for cadmium is $e^{(1.128 H - 3.828)}$ where H = ln (hardness) as CaCO₃ in mg/l.

D. RECEIVING WATER LIMITATIONS

1. Dredged material decant water discharges 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. Bottom deposits or aquatic growths to the extent that such deposits or growths cause nuisance or adversely affect beneficial uses;
 - c. Alteration of temperature, turbidity, or apparent color beyond present natural background levels; or
 - d. Visible, floating, suspended, or deposited oil or other products of petroleum origin toxic or other deleterious substances to be present in concentrations or quantities which will cause deleterious effects on wildlife, waterfowl, or other aquatic biota, or which render any of these unfit for human consumption, either at levels created in the receiving waters or as a result of biological concentration.

2. Dredged material decant water discharges shall not cause the following limits to be exceeded in waters of the State:
 - a. Dissolved Oxygen: 5.0 mg/L, minimum;
 - b. pH: Variation from normal ambient pH by more than 0.5 pH units;
 - c. Un-ionized Ammonia: 0.025 mg/L as N, annual median; and 0.16 mg/L as N, maximum;
 - d. Nutrients: Waters shall not contain bio-stimulatory substances in concentrations that promote aquatic growth to the extent that such growths cause nuisance or adversely affects beneficial uses;
 - e. Temperature: Increase above ambient by more than 2.8°C; and
 - f. Turbidity shall not exceed background of the waters of the State, as measured in NTU, as follows:

<u>Receiving Water Background</u>	<u>Incremental Increase</u>
< 50 units	5 units, maximum
≥ 50 units	10% of background, maximum

The discharge shall not cause a violation of any water quality standard for receiving waters adopted by the Regional Water Board or the State Water Board as required by the CWA and regulations adopted thereunder. If more stringent applicable water quality standards are promulgated or approved pursuant to CWA section 303 or amendments thereto, the Board will revise and modify this Order in accordance with such more stringent standards.

E. PROVISIONS

1. All technical and monitoring reports required by this Order are required pursuant to CWC section 13267. Failure to submit reports in accordance with schedules established by this Order, or failure to submit a report of sufficient technical quality acceptable to the Executive Officer, may subject the District to enforcement action pursuant to CWC section 13268.
2. **Contingency and Corrective Action Reporting**

A report to the Regional Water Board case manager shall be made by telephone and email of any accidental discharge or adverse condition immediately after it is discovered. An adverse condition includes, but is not limited to, a violation or threatened violation of the conditions of this Order, a significant spill of petroleum products or toxic chemicals, or other events that could affect compliance. A written report shall be filed with the Regional Water Board within 15 days thereafter. This report shall contain the following information:

 - a. A qualitative description of the discharge(s) and the circumstances leading to the discharge(s), including date and time of discharge(s), weather conditions, and tide stage (flood, ebb, or slack);
 - b. A map showing the location(s) of discharge(s);
 - c. Approximate flow rate and estimated volume of the discharge(s);
 - d. Laboratory results if, based on the initial notification and nature of the accidental discharge, the Regional Water Board case manager requests sampling and analysis for particular pollutants potentially discharged; and
 - e. Corrective measures underway or proposed.
3. The District shall maintain a copy of this Order at the Imola and NRP sites so as to be available at all times to site operating personnel and dredging contractors.
4. The District shall maintain all devices or design features installed in accordance with this Order, such that they continue to operate as intended without interruption, except as a result of failures that could not have been reasonably foreseen or prevented by the District.
5. The District shall permit the Regional Water Board or its authorized representative, upon presentation of credentials:

- a. Entry upon the premises on which wastes are located or in which any required records are kept;
 - b. Access to copy any records required to be kept under the terms and conditions of this Order; and
 - c. Sampling of any discharge or groundwater covered by this Order.
6. This Order does not authorize commission of any act causing injury to the property of another or of the public; does not convey any property rights; does not remove liability under federal, State or local laws; and does not authorize the discharge of wastes without appropriate permits from other agencies.
 7. The Regional Water Board may modify, or revoke and reissue, this Order if present or future investigations demonstrate that the discharges governed by this Order will cause, have the potential to cause, or will contribute to adverse impacts on water quality or beneficial uses of the receiving waters.
 8. This Order supersedes Order No. 97-087. Order No. 97-087 is hereby rescinded.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that the foregoing is a full, complete, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on XXXXX, 2016.

Bruce H. Wolfe
Executive Officer

Attachments:

- Figure 1 – Location Map
- Figure 2 – Imola Site Plan
- Figure 3 – NRP Site Plan

A: Self-Monitoring Program (SMP)



Figure 1. Location Map

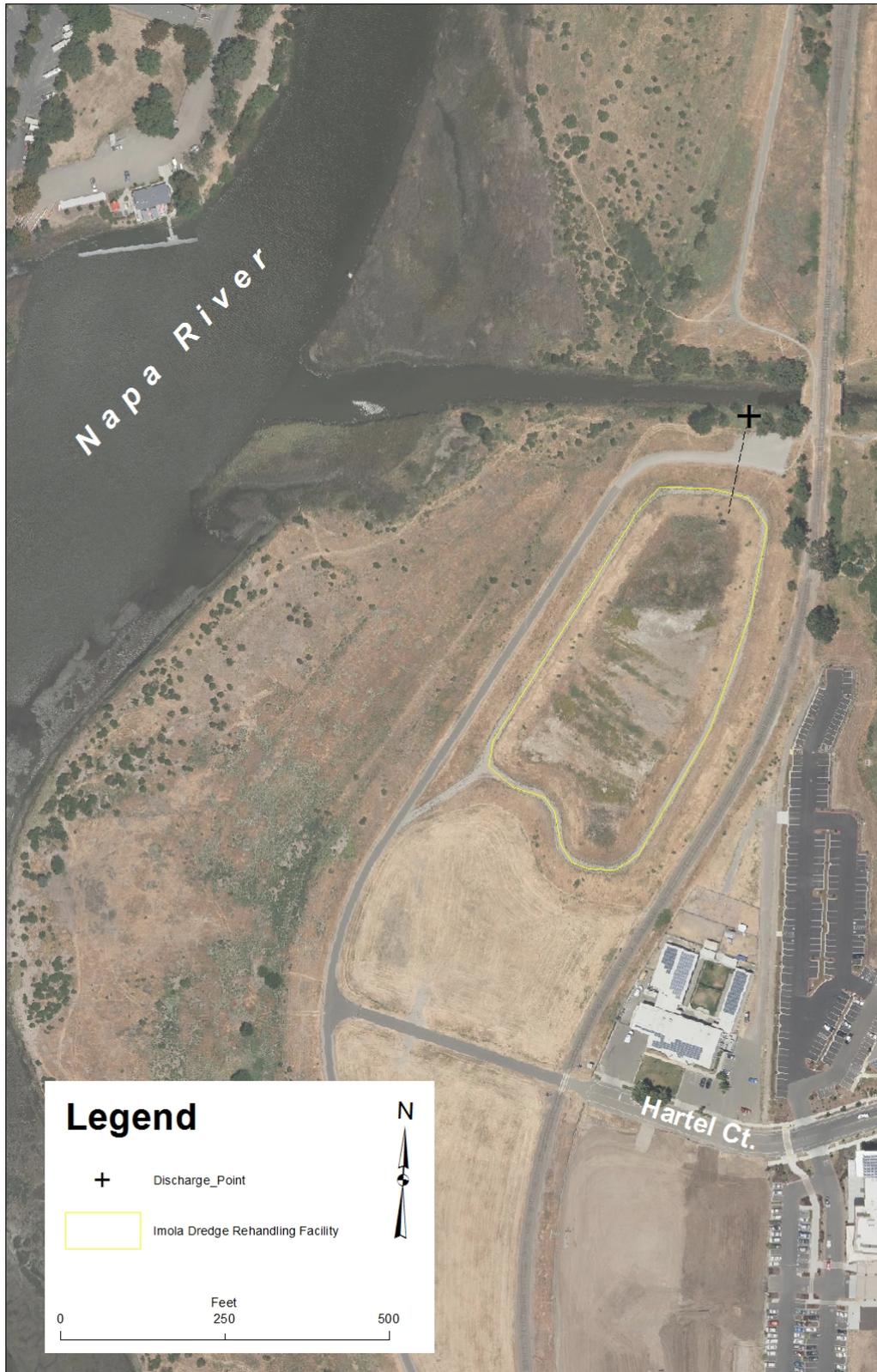


Figure 2. Imola Site Plan



Figure 3. NRP Site Plan

ATTACHMENT A
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM

FOR

NAPA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT
UPLAND DREDGED MATERIAL REHANDLING

ORDER No. R2-2016-_____

A. GENERAL

1. Reporting responsibilities of waste dischargers are specified in sections 13225(a), 13267(b), 13383, and 13387(b) of the California Water Code (Water Code), and in the Regional Water Board's Resolution No. 73-16.
2. The principal purposes of a monitoring program by a waste discharger, also referred to as a self-monitoring program, are: (1) to document compliance with waste discharge requirements and prohibitions established by the Regional Water Board, and (2) to facilitate self-policing by the waste discharger in the prevention and abatement of pollution arising from waste discharge.

B. SAMPLING AND ANALYTICAL METHODS

1. Sample collection, storage, and analyses shall be performed according to Code of Federal Regulations title 40, section 136, or other methods approved and specified by the Executive Officer of the Regional Water Board.
2. Water analyses shall be performed by a laboratory approved for these analyses by the State of California's Environmental Laboratory Accreditation Program (ELAP) administered by the State Water Board.
3. The director of the laboratory whose name appears on the certification, or his/her laboratory supervisor who is directly responsible for the analytical work performed, shall supervise all analytical work including appropriate quality assurance/quality control procedures in his/her laboratory and shall sign all reports of such work submitted to the Regional Water Board.
4. All monitoring instruments and equipment shall be properly calibrated and maintained to ensure accuracy of measurements.

C. DEFINITION OF TERMS

1. A **grab sample** is defined as an individual sample collected in a short period of time not exceeding 15 minutes. It is used primarily in determining compliance with daily maximum limits and instantaneous maximum limits. Grab samples represent only the condition that exists at the time the wastewater is collected.
2. A **discharge event** consists of dredged material decant effluent discharge that does not cease for more than 7 consecutive days. If discharge stops for more than 7 consecutive days and then starts up again, the date of start-up becomes the beginning of a new discharge event for monitoring purposes. Discharges from the two dredged material

rehandling sites [Imola Avenue (Imola) and Napa Redevelopment Partners (NRP)] shall always be treated as separate events even if they are occurring simultaneously.

3. **Receiving waters** refers to any water body that actually receives or potentially could receive surface or groundwater that passes over, through, or under dredged sediment during placement, dewatering, and settling/consolidation activities. For the purpose of discharge episode monitoring, the receiving waters are the New Tulucay Creek constructed channel for the Imola site and the Napa River for the NRP site.
4. **Receiving Waters Standard Observations** refer to:
 - a. Evidence of floating and suspended materials generated by project activities, as recorded by visual observations.
 - b. Discoloration and turbidity: description of color, source, and size of affected area.
 - c. Evidence of odors, presence or absence, characterization, source, and distance of travel from source.
5. **Site Standard Observations** refer to visual inspection of:
 - a. Overall condition and integrity of the sediment placement cell containment berms.
 - b. Location of placed material, amount of freeboard available, and whether any discharge of dredged sediments outside of the containment berms has occurred.
 - c. Overall condition and integrity of the decant effluent discharge weirs and discharge outfall pipelines.

D. SPECIFICATIONS FOR SAMPLING AND ANALYSES

The District shall perform sampling and analyses according to the schedule in **Table 1** and the following conditions:

1. Decant Effluent Discharges
 - a. If analytical results are received showing any daily limit is exceeded for any inorganic constituent, a confirmation sample shall be taken within 24 hours and the results shall be known within 24 hours of the sampling.
 - b. If any instantaneous maximum limit for a constituent is exceeded in the confirmation sample(s), then the preliminary confirmation results shall be reported immediately to the Regional Water Board case manager via email and the discharge shall be restricted to the extent practical, until the cause of the violation can be found and corrected. Within five days of the discharge limit exceedance, the District shall submit a contingency report as described in section H.
 - c. For other violations, the District shall implement procedures that are acceptable to the Executive Officer on a case by case basis.
2. Receiving Waters
 - a. Receiving water sampling shall be conducted on days coincident with discharges from the corresponding rehandling site.
 - b. Samples shall be collected at least one foot below the water surface and at least one foot above the bottom sediment. If less than two feet of water depth is present in New Tulucay Creek at all tide stages, samples shall be collected half way between the water surface and the bottom sediment.

E. DESCRIPTION OF SAMPLING STATIONS

1. Decant Water

D-1 (Imola) and D-2 (NRP): Samples shall be taken at the inboard side of final decant effluent weir.

2. Receiving Water

<u>Station</u>	<u>Description</u>
RW1-D	Within 100 feet down current from the discharge from the Imola site.
RW1-U	At least 100 feet up current from the Imola discharge point.
RW2-D	Within 100 feet down current from the discharge from the NRP site.
RW2-U	At least 100 feet up current from the NRP discharge point.

F. RECORDS TO BE MAINTAINED

Written reports shall be maintained by the District or its laboratory and shall be retained for a minimum of five years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge or when requested by the Regional Water Board. Such records shall show the following for each sample:

1. Identity of the sample and sample station number;
2. Date and time of sampling and the name of the person performing the sampling;
3. Date and time that analyses are started and completed, and name of the personnel performing the analyses;
4. Complete procedure used, including method of preserving the sample, and the identity and volumes of reagents used;
5. Calculation of results; and
6. Results of analyses, and detection limits for each analysis.

G. REPORTING REQUIREMENTS

By the 30th day of each month that follows a month in which discharge occurred, the District shall submit a report to the Regional Water Board covering the previous month's activities. The District shall provide an electronic copy to Regional Water Board staff via email, CD, or FTP site.

Each monthly report shall contain the following:

1. Letter of Transmittal

A letter transmitting the essential points in each report should accompany each report. Such a letter shall include a discussion of any Waste Discharge Requirement violations found during the last report period and actions taken or planned for correcting the violations. If the District has previously submitted a detailed time schedule for correcting requirement violations, a reference to the correspondence transmitting such schedule will be satisfactory. If no violations have occurred in the last annual report period, this shall be stated in the letter of transmittal. Monitoring reports and the letter transmitting the monitoring reports shall be signed by the District's duly authorized representative responsible for the overall operation of the facilities from which the discharges originate.

The letter shall contain a statement by the official, under penalty of perjury, that to the best of the signer's knowledge the report is true, complete, and correct.

2. A map or aerial photograph showing observation and monitoring stations.
3. Tabular and graphical summaries of the monitoring data obtained during the previous year.
4. A description of the compliance record and any corrective actions taken or planned that may be needed to bring the District into full compliance with the Waste Discharge Requirements.
5. Laboratory statements of results of analyses specified in Table 1; the director of the laboratory whose name appears on the laboratory certification shall supervise all analytical work in his/her laboratory and shall sign all reports of such work submitted to the Board.
 - a. The methods of analyses and detection limits must be appropriate for the expected concentrations. Specific methods of analyses must be identified. If methods other than U.S. EPA approved methods or Standard Methods are used, the exact methodology must be submitted for review and approval by the Executive Officer.
 - b. In addition to the results of the analyses, laboratory quality assurance/quality control (QA/QC) information must be included in the monitoring report. The laboratory QA/QC information should include the method, equipment, and analytical detection limits; the recovery rates; an explanation for any recovery rate that is less than the recovery acceptance limits specified in the U.S. EPA method procedures or the laboratory's acceptance limits, if they are more stringent than those in the U.S. EPA method procedures; the results of equipment and method blanks; the results of spiked and surrogate samples; the frequency of quality control analysis; and the name and qualifications of the person(s) performing the analyses.

H. CONTINGENCY REPORTING

Unauthorized Releases: A report to the Regional Water Board case manager shall be made by telephone and email of any accidental discharge of whatever origin immediately after it is discovered. A written report shall be filed with the Regional Water Board within five days thereafter. This report shall contain the following information:

- a. A map showing the location(s) of discharge(s);
- b. Approximate flow rate;
- c. Nature of effects, i.e., all pertinent observations and analyses; and
- d. Corrective measures underway or proposed.

Attachments:

Table 1 - Schedule for Sampling, Measurements, and Analyses

**TABLE 1
SCHEDULE OF SAMPLING, MEASUREMENTS, AND ANALYSIS**

Station	Constituent	Unit	Type of Sample	Frequency of Sampling & Analysis	
Site & Receiving Water Standard Observations	Varies – see Definitions of Terms, C.4 and C.5	Not Applicable	Visual Inspection	Daily during sediment placement operations and continuing until completion of final decant discharge event	
D-1 and D-2	Flow Rate	gpd and monthly total gallons	Weir volume calculation or flow meter measurement	Daily during discharge	
	TSS	mg/L	Grab	Within 7 days prior to the start of each discharge event, then once every 7 days for the remainder of the discharge event	
	Turbidity	NTU	Field	Same as TSS	
	Dissolved Oxygen	mg/L	Field	Same as TSS	
	pH	Std Units	Field	Same as TSS	
	Temperature	°C	Field	Same as TSS	
	Salinity	ppt	Grab	Same as TSS	
	Total and Un-ionized Ammonia	mg/L as Nitrogen	Grab	Same as TSS	
	Metals ¹	µg/L	Grab	Same as TSS	
	RW1-D & RW1-U; RW2-D & RW2-U	Turbidity	NTU	Field	Once every 7 days during each applicable discharge event
		Dissolved Oxygen	mg/L	Field	Once every 7 days during each applicable discharge event
		pH	Std Units	Field	Once every 7 days during each applicable discharge event
		Temperature	°C	Field	Once every 7 days during each applicable discharge event
		Salinity	ppt	Grab	Once every 7 days during each applicable discharge event
		Total and Un-ionized Ammonia	mg/L as Nitrogen	Grab	Once every 7 days during each applicable discharge event
		Inorganics ¹	µg/L	Grab	Once every 7 days during each applicable discharge event

¹Arsenic, cadmium, total chromium, copper, lead, mercury, nickel, selenium, silver, and zinc – reported as dissolved except for mercury and selenium which should be analyzed and reported as total concentrations.

Abbreviations:

- gpd = gallons per day
- mg/L = milligrams per liter
- °C = degrees Celsius
- NTU = Nephelometric Turbidity Unit
- µg/L = micrograms per liter
- ppt = parts per thousand