California Regional Water Quality Control Board
Santa Ana Region

October 26, 2012

ITEM: ***10**

SUBJECT: Renewal of Waste Discharge Requirements for Dos Cuadras Offshore RES, L.L.C., Platform Esther, Discharge to the Pacific Ocean, Seal Beach, Orange County - Order No. R8-20012-0023, NPDES No. CA0106828

DISCUSSION:

See attached Fact Sheet

RECOMMENDATIONS:

Adopt Order No. R8-20012-0023, NPDES No. CA0106828 as presented.

COMMENT SOLICITATION:

Comments were solicited from the discharger and the following agencies:

U.S. Environmental Protection Agency (WTR-5) – Peter Kozelka
U.S. Army District, Los Angeles, Corps of Engineers, Regulatory Branch
U.S. Fish and Wildlife Service – Carlsbad
State Water Resources Control Board, Office of the Chief Counsel – David Rice
State Water Resources Control Board, Division of Water Quality – Phil Isorena
State Department of Fish and Game – William Paznokas
Orange County Water District – Nira Yamachika/Greg Woodside
Orange County Public Works - Chris Crompton
Orange County Coastkeeper – Garry Brown
Surfrider Foundation – Joe Geever
Environment Now - Ruby Evans
Lawyers for Clean Water - c/o San Francisco Baykeeper
DCOR LLC – Jay Rao

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Santa Ana Region

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ORDER NO. R8-2012-0023
NPDES NO. CA 0106828

WASTE DISCHARGE REQUIREMENTS
FOR
DOS CUADRAS OFFSHORE RESOURCES, LLC
PLATFORM ESTHER
ORANGE COUNTY

The following Discharger is subject to waste discharge requirements as set forth in this Order:

Table 1. Discharge Information

Discharger	**Dos Cuadras Offshore Resources, LLC**
Facility	**Platform Esther**
Facility Location	**1.5 Miles offshore of the City of Seal Beach, Orange County**
The U.S. Environmental Protection Agency (USEPA) and the Regional Water Quality Control Board have classified this discharge as a **minor** discharge.	

The discharge by Dos Cuadras Offshore Resources, LLC from the discharge points identified below is subject to waste discharge requirements as set forth in this Order:

Table 2. Discharge Locations

Discharge Point	Effluent Description	Discharge Point Latitude	Discharge Point Longitude	Receiving Water
001	Sanitary Wastewater	33° 43’ 8”N	118° 6’ 47”W	Offshore Zone of the Pacific Ocean
002	Produced Water	33° 43’ 8”N	118° 6’ 47”W	Offshore Zone of the Pacific Ocean

Table 3. Administrative Information

This Order was adopted by the Regional Water Quality Control Board on:	**October 26, 2012**
This Order shall become effective on:	**November 1, 2012**
This Order shall expire on:	**November 1, 2017**
The Discharger shall file a Report of Waste Discharge in accordance with title 23, California Code of Regulations, as application for issuance of new waste discharge requirements no later than:	**May 5, 2017**

IT IS HEREBY ORDERED, that this Order supersedes and rescinds Order No. R8-2005-0071 except for enforcement purposes, and, in order to meet the provisions contained in division 7 of the Water Code (commencing with section 13000) and regulations adopted thereunder, and the provisions of the federal Clean Water Act (CWA) and regulations and guidelines adopted thereunder, the Discharger shall comply with the requirements in this Order.

I, Kurt V. Berchtold, Executive Officer, do hereby certify that this Order with all the attachments is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Santa Ana Region, on October 26, 2012.

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Kurt V. Berchtold, Executive Officer

TABLE OF CONTENTS

I. Discharger/Facility Information ..... 4~~2~~
II. Findings ..... 4~~2~~
III. Discharge Prohibitions ..... 9~~2~~
IV. Effluent Limitations and Discharge Specifications ..... 10~~2~~
A. Effluent Limitations – Discharges to DP 001 ..... 10~~2~~
B. Discharges to DP 002 ..... 11~~2~~
C. Stormwater Discharge Specifications ..... 11~~2~~
V. Receiving Water Limitations – Not Applicable ..... 11~~2~~
VI. Provisions ..... 11~~2~~
A. Standard Provisions ..... 11~~2~~
B. Monitoring and Reporting Program Requirements ..... 14~~2~~
C. Special Provisions ..... 14~~2~~
1. Reopener Provisions ..... 14~~2~~
2. Special Studies, Technical Reports and Additional Monitoring Requirements— Not Applicable ..... 14~~2~~
3. Best Management Practices and Pollution Prevention– Not Applicable ..... 14~~2~~
4. Construction, Operation and Maintenance Specifications ..... 15~~2~~
5. Other Special Provisions– Not Applicable ..... 15~~2~~
6. Compliance Schedules – Not Applicable ..... 15~~2~~
VII. Compliance Determination ..... 15~~2~~

LIST OF TABLES

Table 1. Discharge Information 1
Table 2. Discharge Locations 1
Table 3. Administrative Information 2
Table 4. Discharger/Facility Information ..... 4~~2~~
Table 5. Basin Plan Beneficial Uses ..... 6~~2~~
Table 6. Ocean Plan Beneficial Uses ..... 7~~2~~
Table 7. Oil and Grease Effluent Limitation for DP 002 ..... 11~~2~~

LIST OF ATTACHMENTS

Attachment A – Definitions A-1
Attachment B – Facility Location B-1
Attachment C – Photos of Platform Esther C-1
Attachment D – Federal Standard Provisions D-1
Attachment E – Monitoring and Reporting Program (MRP) E-1
Attachment F – Fact Sheet F-1
Attachment G – Minimum Levels G-1

I. DISCHARGER/FACILITY INFORMATION

The following Discharger is subject to waste discharge requirements as set forth in this Order:

Table 4. Discharger/Facility Information

Discharger	Dos Cuadras Offshore Resources LLC
Mailing Address	290 Maple Court, Suite 290, Ventura, CA93003
Facility	Platform Esther
Facility Location	1.5 Miles offshore of the City of Seal Beach, Orange County
Facility Contact, Title, and Phone	Jay Rao, Environmental Coordinator, jrao@dcorllc.com; (805)-535-2078
Type of Facility	Oil and Gas Drilling/Production Platform
Facility Design Flow	Sanitary wastewater: 2,500 gallons per day (gpd); Produced water: 20,000 barrels/day, or 0.84 million gallons per day (mgd)

II. FINDINGS

The California Regional Water Quality Control Board, Santa Ana Region (hereinafter Regional Water Board), finds:

A. Background. Dos Cuadras Offshore Resources, LLC (hereinafter Discharger) is currently discharging wastewater to the Pacific Ocean from Platform Esther under Order No. R8-2005-0071, National Pollutant Discharge Elimination System (NPDES) Permit No. CA 0106828. In January 2012, the Discharger completed a Report of Waste Discharge for renewal of the permit. The Discharger proposes to discharge up to approximately 2,500 gpd of treated sanitary wastewater and up to 0.84 mgd of treated produced water from the oil and gas drilling/production platform.

For the purposes of this Order, references to the “discharger” or “permittee” in applicable federal and State laws, regulations, plans, or policy are held to be equivalent to references to the Discharger herein.

B. Facility Description. The Discharger owns and operates Platform Esther, an oil and gas drilling/production platform located in the Pacific Ocean approximately 1.5 miles offshore of the City of Seal Beach (see Attachments “B and C”) in Orange County. Secondary treated sanitary wastewater and treated produced water is discharged to the Pacific Ocean.

C. Legal Authorities. This Order is issued pursuant to Chapter 5.5, Division 7 of the California Water Code (Section 13370 *et seq.*) and Section 402 of the federal Clean Water Act (CWA) and implementing regulations adopted by the U.S. Environmental Protection Agency (USEPA). This Order serves as Waste Discharge Requirements (WDRs) pursuant to Article 4, Chapter 4 of the CWC (Section 13260 *et seq.*). It shall also serve as a NPDES permit for point source discharges from this facility to surface waters.

D. Background and Rationale for Requirements. The Regional Water Board developed the requirements in this Order based on information submitted as part of the application, through monitoring and reporting programs, and other available environmental information. The Fact Sheet (Attachment F), which contains background information and rationale for Order requirements, is hereby incorporated into this Order and constitutes part of the Findings for this Order. Attachments A through G are also incorporated into this Order.

E. California Environmental Quality Act (CEQA). Under Water Code Section 13389, this action to adopt an NPDES permit is exempt from the provisions of the CEQA, Public Resources Code sections 21100-21177.

F. Technology-based Effluent Limitations. Section 301(b) of the CWA and implementing USEPA permit regulations at section 122.44, title 40 of the Code of Federal Regulations[1] require that permits include conditions meeting applicable technology-based requirements at a minimum, and any more stringent effluent limitations necessary to meet applicable water quality standards.

The discharge authorized by this Order must meet minimum federal technology-based requirements based on Secondary Treatment Standards at 40 CFR 133.

The discharge authorized by this Order must meet minimum federal technology-based requirements based on Effluent Limitations Guidelines and Standards for the Oil and Gas Extraction Point Source Category, for existing and new sources, at 40 CFR 435. On March 4, 1993, the U. S. Environmental Protection Agency (EPA) promulgated new effluent guidelines and standards for the Offshore Subcategory of the Oil and Gas Extraction Point Source Category, amending 40 CFR 435. The new guidelines prohibit the discharge of drilling fluids and cuttings to the waters of the United States within the territorial seas of the state of California, defined as waters within three miles of the shore. All solid and semisolid wastes (drilling muds and cuttings, cement slurry, etc.) from the platform are barged ashore for approved disposal.

A detailed discussion of the technology-based effluent limitations development is included in the Fact Sheet (Attachment F).

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1 *All further statutory references are to title 40 of the Code of Federal Regulations unless otherwise indicated.*

G. Water Quality-Based Effluent Limitations. Section 301(b) of the CWA and 40 CFR 122.44(d) require that permits include limitations more stringent than applicable federal technology-based requirements where necessary to achieve applicable water quality standards.

40 CFR 122.44(d)(1)(i) mandates that permits include effluent limitations for all pollutants that are or may be discharged at levels that have the reasonable potential to cause or contribute to an exceedance of a water quality standard, including numeric and narrative objectives within a standard. Where numeric water quality objectives have not been established for a pollutant, water quality-based effluent limitations (WQBELs) must be established using: (1) USEPA criteria guidance under CWA Section 304(a), supplemented where necessary by other relevant information; (2) an indicator parameter for the pollutant of concern; or (3) a calculated numeric water quality criterion, such as a proposed State criterion or policy interpreting the State's narrative criterion, supplemented with other relevant information, as provided in 40 CFR 122.44(d)(1)(vi). This Order includes water quality-based effluent limitations.

H. Water Quality Control Plans. The Regional Water Board adopted a Water Quality Control Plan for the Santa Ana Region (hereinafter Basin Plan) that became effective on January 24, 1995. The Basin Plan designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for surface and ground waters within the Region. In addition, State Water Resources Control Board (State Water Board) Resolution No. 88-63 requires that, with certain exceptions, the Regional Water Board assign the municipal and domestic supply use to water bodies that do not have beneficial uses listed in the Basin Plan. The Pacific Ocean Offshore Zones are excepted from the municipal and domestic supply beneficial use.

Table 5. Basin Plan Beneficial Uses

Discharge Point	Receiving Water Name	Beneficial Use(s)
001, 002	Pacific Ocean Offshore Zone	Present or Potential: Industrial service supply; navigation; water contact recreation; non-contact water recreation; commercial and sportfishing; wildlife habitat; rare, threatened or endangered species; spawning, reproduction, and development; and marine habitat. Excepted from municipal and domestic supply

The Basin Plan relies primarily on the requirements of the *Water Quality Control Plan for Ocean Waters of California* (Ocean Plan) for protection of the beneficial uses of the State ocean waters.

Requirements of this Order specifically implement the applicable Water Quality Control Plans.

I. **California Ocean Plan.** The State Water Board adopted the Water Quality Control Plan for Ocean Waters of California, California Ocean Plan (Ocean Plan) in 1972 and amended it in 1978, 1983, 1988, 1990, 1997, 2000, and 2005. The State Water Board adopted the latest amendment to the Ocean Plan on September 15, 2009 and it became effective on March 10, 2010. The Ocean Plan is applicable, in its entirety, to point source discharges to the ocean. The Ocean Plan identifies beneficial uses of ocean waters of the State to be protected as summarized below:

Table 6. Ocean Plan Beneficial Uses

Discharge Point	Receiving Water	Beneficial Uses
001, 002	Offshore zone of Pacific Ocean	Industrial water supply; water contact and non-contact recreation, including aesthetic enjoyment; navigation; commercial and sport fishing; mariculture; preservation and enhancement of designated Areas of Special Biological Significance (ASBS); rare and endangered species; marine habitat; fish migration, fish spawning and shellfish harvesting

In order to protect the beneficial uses, the Ocean Plan establishes water quality objectives and a program of implementation. Requirements of this Order implement the Ocean Plan.

J. **Alaska Rule.** On March 30, 2000, USEPA revised its regulation that specifies when new and revised state and tribal water quality standards (WQS) become effective for CWA purposes (40 CFR 131.21; 65 Fed. Reg. 24641; (April 27, 2000).) Under the revised regulation (also known as the Alaska rule), new and revised standards submitted to USEPA after May 30, 2000 must be approved by USEPA before being used for CWA purposes. The final rule also provides that standards already in effect and submitted to USEPA by May 30, 2000, may be used for CWA purposes, whether or not approved by USEPA.

K. **Stringency of Requirements for Individual Pollutants.** This Order contains both technology-based and water quality-based effluent limitations for individual pollutants. The technology-based effluent limitations consist of restrictions on oil and grease**.** Restrictions on these pollutants are discussed in section IV. B. 2. of the Fact Sheet. The technology-based pollutant restrictions in this Order implement the minimum, applicable federal technology-based requirements. In addition, this Order contains effluent limitations more stringent than the minimum, federal technology-based requirements that are necessary to meet water quality standards.

Water quality-based effluent limitations have been scientifically derived to implement water quality objectives that protect beneficial uses. Both the beneficial uses and the water quality objectives have been approved pursuant to

federal law and are the applicable federal water quality standards. All beneficial uses and water quality objectives contained in the Basin Plan and the Ocean Plan were approved under state law and submitted to and approved by USEPA prior to May 30, 2000. Any water quality objectives and beneficial uses submitted to USEPA prior to May 30, 2000, but not approved by USEPA before that date, are nonetheless "applicable water quality standards for purposes of the CWA" pursuant to 40 CFR 131.21(c)(1).

L. Anti-Backsliding Requirements. Sections 402(o)(2) and 303(d)(4) of the CWA and federal regulations at 40 CFR 122.44(l) prohibit backsliding in NPDES permits. These anti-backsliding provisions require effluent limitations in a reissued permit to be as stringent as those in the previous permit, with some exceptions where limitations may be relaxed. All effluent limitations in this Order are at least as stringent as the effluent limitations in the previous Order.

M. Antidegradation Policy. Section 131.12 of 40 CFR requires that State water quality standards include an antidegradation policy consistent with the federal policy. The State Water Board established California's antidegradation policy in State Water Board Resolution No. 68-16. Resolution No. 68-16 incorporates the federal antidegradation policy where the federal policy applies under federal law. Resolution No. 68-16 requires that existing quality of waters be maintained unless degradation is justified based on specific findings. The Regional Water Board's Basin Plan implements, and incorporates by reference, both the State and federal antidegradation policies. As discussed in detail in the Fact Sheet (Attachment F), the permitted discharge is consistent with the antidegradation provisions of 40 CFR 131.12 and State Water Board Resolution No. 68-16.

N. Endangered Species Act. This Order does not authorize any act that results in the taking of a threatened or endangered species or any act that is now prohibited, or becomes prohibited in the future, under either the California Endangered Species Act (Fish and Game Code sections 2050 to 2097) or the Federal Endangered Species Act (16 U.S.C.A. sections 1531 to 1544). This Order requires compliance with effluent limits, receiving water limits, and other requirements to protect the beneficial uses of waters of the state. The discharger is responsible for meeting all requirements of the applicable Endangered Species Act.

O. Monitoring and Reporting. Section 122.48 of 40 CFR requires that all NPDES permits specify requirements for recording and reporting monitoring results. Sections 13267 and 13383 of the CWC authorize the Regional Water Board to require technical and monitoring reports. The Monitoring and Reporting Program establishes monitoring and reporting requirements to implement federal and State requirements. This Monitoring and Reporting Program is provided in Attachment E.

P. Standard and Special Provisions. Standard Provisions, which in accordance with 40 CFR Sections 122.41 and 122.42, apply to all NPDES discharges and must be included in every NPDES permit, are provided in Attachment D. The Regional Water Board has also included in this Order special provisions applicable to the Discharger. A rationale for the special provisions contained in this Order is provided in the attached Fact Sheet (Attachment F).

Q. Provisions and Requirements Implementing State Law. The provisions/requirements in subsections IV.A and VI.C. of this Order are included to implement state law only. These provisions/requirements are not required or authorized under the federal CWA; consequently, violations of these provisions/requirements are not subject to the enforcement remedies that are available for NPDES violations.

R. Notification of Interested Parties. The Regional Water Board has notified the Discharger and interested agencies and persons of its intent to prescribe Waste Discharge Requirements for the discharge and has provided them with an opportunity to submit their written comments and recommendations. Details of notification are provided in the Fact Sheet (Attachment F) of this Order.

S. Consideration of Public Comment. The Regional Water Board, in a public meeting, heard and considered all comments pertaining to the discharge. Details of the Public Hearing are provided in the Fact Sheet of this Order.

III. DISCHARGE PROHIBITIONS

A. The discharge of wastewater at a location or in a manner different from those described in this Order is prohibited.

B. The discharge of oil or any residuary product of petroleum to waters of the State, except in accordance with waste discharge requirements or other provisions of Division 7 of the CWC, is prohibited.

C. The discharge of untreated produced water to the Pacific Ocean is prohibited.

D. The discharge of any radiological, chemical, or biological warfare agent or high-level radioactive waste into the ocean is prohibited.

E. The discharge of waste to Areas of Special Biological Significance[2] is prohibited.

F. The discharge of wastewater shall not cause or threaten to cause pollution or nuisance as defined in the California Water Code.

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2 *See Attachment A - Definitions.*

G. The discharge of any substances in concentrations toxic to animal or plant life is prohibited.

H. The discharge of wastes shall not contain any constituent in concentration that will render the ocean waters unsuitable for the beneficial uses stated above.

I. The discharge of drilling mud, cuttings, and cement slurry into the Ocean within three miles of the shore is prohibited. All waste cuttings, mud, cement slurry, rags and other wastes shall be transferred ashore for disposal at a waste management unit approved by the Executive Officer of the Board.

IV. EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS

A. Effluent Limitations – Discharges to DP 001

The Discharger shall maintain compliance with the following effluent limitations at Discharge Point 001, with compliance measured at Monitoring Location M-001 as described in the attached Monitoring and Reporting Program (Attachment E):

1. The discharge of wastes shall not exceed a monthly average Total Suspended Solids (TSS) concentration of 60 mg/l. Alternatively, the discharge shall remove at least 75% of the TSS (as a monthly average) from the influent stream to the sanitary waste treatment unit before discharging wastewater to the ocean.

2. The chlorine residual concentration in the wastewater discharged at DP 001 shall be maintained between 1 mg/l and 8.8 mg/l at all the times.

3. The waste discharged at DP 001 must be essentially free of:

    a. Material that is floatable or will become floatable upon discharge.
    b. Settleable material or substances that may form sediments, which will degrade benthic communities or other aquatic life.
    c. Substances that will accumulate to toxic levels in marine waters, sediments, or biota.
    d. Substances that significantly decrease the natural light to benthic communities and other marine life.
    e. Materials that result in aesthetically undesirable discoloration of the ocean surface.

B. Discharges to DP 002

1. The discharge of produced water and/or stormwater runoff/ deck drainage at DP 002 shall not exceed oil and grease limits as follows:

Table 7. Oil and Grease Effluent Limitation for DP 002

Parameter	Daily Maximum mg/L	Monthly Average mg/L
Oil and Grease	42	25

2. The discharge of produced wastewater at DP 002 is prohibited, except in the event of an emergency, such as an injection system failure.

C. Stormwater Discharge Specifications

See above section B.1.

V. RECEIVING WATER LIMITATIONS – Not Applicable

VI. PROVISIONS

A. Standard Provisions

1. **Standard Provisions.** The Discharger shall comply with all *State and Federal Standard Provisions* included in Attachment D of this Order.

2. **Regional Water Board Standard Provisions.** The Discharger shall comply with the following provisions:

   a. Failure to comply with provisions or requirements of this Order, or violation of other applicable laws or regulations governing discharges from this facility, may subject the Discharger to administrative or civil liabilities, criminal penalties, and/or other enforcement remedies to ensure compliance. Additionally, certain violations may subject the Discharger to civil or criminal enforcement from appropriate local, state, or federal law enforcement entities.

   b. In the event the Discharger does not comply or will be unable to comply for any reason, with any prohibition, discharge limitations (e.g., maximum daily effluent limitation), or receiving water limitation of this Order, the

Discharger shall notify the Regional Water Board by telephone (951) 782-4130 within 24 hours of having knowledge of such noncompliance, and shall confirm this notification in writing within five days, unless the Regional Board waives confirmation. The written notification shall state the nature, time, duration, and cause of noncompliance, and shall describe the measures being taken to remedy the current noncompliance and, prevent recurrence including, where applicable, a schedule of implementation. Other noncompliance requires written notification as above at the time of the normal monitoring report.

c. Neither the treatment nor the discharge of pollutants shall create a pollution, contamination, or nuisance as defined by Section 13050 of the CWC.

d. The Discharger shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this Order, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the noncomplying discharge.

e. This Order may be modified, revoked and reissued, or terminated for cause including, but not limited to, the following.

   1) Violation of any terms or conditions of this Order;
   2) Obtaining this Order by misrepresentation or failure to disclose fully all relevant facts, or;
   3) A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

f. In addition to any other grounds specified herein, this permit may be modified or revoked at any time if, on the basis of any data, the Regional Water Board determines that continued discharges may cause unreasonable degradation of the marine environment.

g. If an effluent standard or discharge prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307 (a) of the Clean Water Act for a toxic pollutant which is present in the discharge, and such standard or prohibition is more stringent than any limitation for that pollutant in this Order, this Order may be modified or revoked and reissued to conform to the effluent standard or discharge prohibition.

h. This discharge shall not cause a violation of any applicable water quality standard for receiving waters adopted by the Regional Water Board or the State Board as required by the CWA and regulations adopted

thereunder. If more stringent applicable water quality standards are promulgated or approved pursuant to Section 303 of the CWA or amendments thereto, the Regional Water Board may modify this Order in accordance with the more stringent standards.

i. If only one sample is collected during the time period associated with an effluent limitation (e.g., 30-day average or 6-month median), the single measurement shall be used to determine compliance with the effluent limitation for the entire time period.

j. All analytical data shall be reported uncensored with detection limits and quantitation limits identified. For any effluent limitation, compliance shall be determined using appropriate statistical methods to evaluate multiple samples. Sufficient sampling and analysis shall be conducted to determine compliance.

k. The Discharger shall file with the Regional Water Board a Report of Waste Discharge at least 180 days before making any material change in the character, location, or volume of the discharge. A material change includes, but is not limited to, the following:

   1) Adding a major industrial waste discharge to a discharge of essentially domestic sewage, or adding a new process or product by an industrial facility resulting in a change in the character of the waste.
   2) Significantly changing the disposal method or location, such as changing the disposal to another drainage area or water body.
   3) Significantly changing the method of treatment.
   4) Increasing the treatment plant design capacity beyond that specified in this Order.

l. The provisions of this Order are severable, and if any provisions of this Order, or the application of any provision of this Order to any circumstances, is held invalid, the application of such provision to other circumstances, and the remainder of this Order, shall not be affected thereby.

B. Monitoring and Reporting Program Requirements

The Discharger shall comply with the Monitoring and Reporting Program, and future revisions thereto, in Attachment E of this Order. This monitoring and reporting program may be modified by the Executive Officer at any time during the term of this Order, and may include an increase in the number of parameters to be monitored, the frequency of the monitoring or the number and size of samples to be collected. Any increase in the number of parameters to be monitored, the frequency of the monitoring or the number and size of samples to be collected may be reduced back to the levels specified in the original monitoring and reporting program at the discretion of the Executive Officer.

C. Special Provisions

1. Reopener Provisions

a. This Order will be reopened to address any changes in State or federal plans, policies or regulations that would affect the quality requirements for the discharges.

b. This Order may be reopened to include effluent limitations for pollutants determined to be present in the discharge in concentrations that pose a reasonable potential to cause or contribute to violations of water quality objectives.

c. This Order may be reopened and modified in accordance with the requirements set forth at 40 CFR 122 and 124, to include the appropriate conditions or limits to address demonstrated effluent toxicity based on newly available information, or to implement any EPA-approved new State water quality standards applicable to effluent toxicity.

d. This Order may be reopened for modification, or revocation and reissuance, as a result of the detection of a reportable priority pollutant generated by special conditions included in this Order. These special conditions may include, but are not limited to, fish tissue sampling, whole effluent toxicity, monitoring requirements on internal waste stream(s), and monitoring for surrogate parameters. Additional requirements may be included in this Order as a result of the special condition monitoring data.

2. Special Studies, Technical Reports and Additional Monitoring Requirements— Not Applicable

3. Best Management Practices and Pollution Prevention– Not Applicable

4. Construction, Operation and Maintenance Specifications

The Discharger shall develop an "Operation and Maintenance Manual (O&M Manual)" for all treatment systems necessary to maintain compliance with the specifications of this Order. If an O&M Manual has been developed, the Discharger shall update it as necessary to conform with latest plant changes and requirements. The O&M Manual shall be readily available to operating personnel onsite. The O&M Manual shall include the following:

a. Detailed description of safe and effective operation and maintenance of treatment processes, process control instrumentation and equipment.
b. Description of laboratory and quality assurance procedures.
c. Process and equipment inspection and maintenance schedules,
d. Description of safeguards to assure that, should there be reduction, loss, or failure of electric power, the Discharger will be able to comply with the terms and conditions of this Order.
e. Description of preventive (fail-safe) and contingency (cleanup) plans for controlling accidental discharges, and for minimizing the effect of such events. These plans shall identify the possible sources (such as loading and storage areas, power outage, waste treatment unit failure, process equipment failure, tank and piping failure) of accidental discharges, untreated or partially treated waste bypass, and polluted drainage.

5. Other Special Provisions– Not Applicable

6. Compliance Schedules – Not Applicable

VII. COMPLIANCE DETERMINATION

Compliance with the effluent limitations contained in Section IV. of this Order will be determined as specified below:

A. General.

Compliance with effluent limitations for reportable pollutants shall be determined using sample reporting protocols defined in the MRP and Attachment A of this Order. For purposes of reporting and administrative enforcement by the Regional and State Water Boards, the Discharger shall be deemed out of compliance with effluent limitations if the concentration of the reportable pollutant in the monitoring sample is greater than the effluent limitation and greater than or equal to the reported reporting level (RL).

B. Multiple Sample Data.

When determining compliance with a Monthly Average or Daily Maximum Effluent Limitation for priority pollutants and more than one sample result is available, the Discharger shall compute the arithmetic mean unless the data set contains one or more reported determinations of “Detected, but Not Quantified” (DNQ) or “Not Detected” (ND). In those cases, the Discharger shall compute the median in place of the arithmetic mean in accordance with the following procedure:

1. The data set shall be ranked from low to high, ranking the reported ND determinations lowest, DNQ determinations next, followed by quantified values (if any). The order of the individual ND or DNQ determinations is unimportant.

2. The median value of the data set shall be determined. If the data set has an odd number of data points, then the median is the middle value. If the data set has an even number of data points, then the median is the average of the two values around the middle unless one or both of the points are ND or DNQ, in which case the median value shall be the lower of the two data points where DNQ is lower than a value and ND is lower than DNQ.

C. Monthly Average Effluent Limitation

If the average (or when applicable, the median determined by subsection B above for multiple sample data) of daily discharges over a calendar month exceeds the monthly average limit for a given parameter, this will represent a single violation, though the Discharger will be considered out of compliance for each day of that month for that parameter (e.g., resulting in 31 days of non-compliance in a 31-day month). If only a single sample is taken during the calendar month and the analytical result for that sample exceeds the monthly average effluent limitation, the Discharger will be considered out of compliance for that calendar month. The Discharger will only be considered out of compliance for days when the discharge occurs. For any one calendar month during which no sample (daily discharge) is taken, no compliance determination can be made for that calendar month.

D. Daily Maximum Effluent Limitation .

The daily maximum shall apply to flow weighted 24-hour composite samples.

E. Instantaneous Minimum Effluent Limitation.

If the analytical result of a single grab sample is lower than the instantaneous minimum effluent limitation for a parameter, the Discharger will be considered out of compliance for that parameter for that single sample. Non-compliance for each sample will be considered separately (e.g., the results of two grab samples taken within a calendar day that both are lower than the instantaneous minimum effluent limitation would result in two instances of non-compliance with the instantaneous minimum effluent limitation).

F. Instantaneous Maximum Effluent Limitation.

If the analytical result of a single grab sample is higher than the instantaneous maximum effluent limitation for a parameter, the Discharger will be considered out of compliance for that parameter for that single sample. Non-compliance for each sample will be considered separately (e.g., the results of two grab samples taken within a calendar day that both exceed the instantaneous maximum effluent limitation would result in two instances of non-compliance with the instantaneous maximum effluent limitation).

G. Six-month Median Effluent Limitation.

If the median of daily discharges over any 180-day period exceeds the six-month median effluent concentration limitation for a given parameter, the Discharger will be considered out of compliance for each day of that 180-day period for that parameter. The next assessment of compliance will occur after the next sample is taken. If only a single sample is taken during a given 180-day period and the analytical result for that sample exceeds the six-month median, the Discharger will be considered out of compliance for the 180-day period. For any 180-period during which no sample is taken, no compliance determination can be made for the six-month median limitation.

Similarly, compliance with the six-month median mass emissions limit shall be determined by comparing the calculated mass limit with calculated mass discharges. If mass discharges exceed the allowed mass discharges, the Discharger is not in compliance. The calculated mass discharges shall be determined by using the same equation in calculating the mass emission limit and using the allowable six-month median effluent concentration and the observed flow rate in millions of gallons per day.

H. Compliance Determination

Compliance determinations shall be based on available analyses for the time interval associated with the effluent limitation. If only one sample is collected during the time period associated with the water quality objective (e.g., 30-day average or 6-month median), the single measurement shall be used to determine compliance with the effluent limitation for the entire time period.

ATTACHMENT A – DEFINITIONS

Acute Toxicity:

Acute Toxicity (TUa)
Expressed in Toxic Units Acute (TUa)

$$TUa = \frac{100}{96\text{-hr LC}_{50\%}}$$

Lethal Concentration 50% (LC 50)
LC 50 (percent waste giving 50% survival of test organisms) shall be determined by static or continuous flow bioassay techniques using standard marine test species as specified in Appendix III, Chapter II. If specific identifiable substances in wastewater can be demonstrated by the discharger as being rapidly rendered harmless upon discharge to the marine environment, but not as a result of dilution, the LC 50 may be determined after the test samples are adjusted to remove the influence of those substances.

When it is not possible to measure the 96-hour LC 50 due to greater than 50 percent survival of the test species in 100 percent waste, the toxicity concentration shall be calculated by the expression:

$$TUa = \frac{\log (100 - S)}{1.7}$$

where:

S = percentage survival in 100% waste. If S > 99, TUa shall be reported as zero.

Areas of Special Biological Significance (ASBS): are those areas designated by the State Water Board as ocean areas requiring protection of species or biological communities to the extent that alteration of natural water quality is undesirable. All Areas of Special Biological Significance are also classified as a subset of STATE WATER QUALITY PROTECTION AREAS.

Average Monthly Effluent Limitation (AMEL): the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

Chlordane shall mean the sum of chlordane-alpha, chlordane-gamma, chlordene-alpha, chlordene-gamma, nonachlor-alpha, nonachlor-gamma, and oxychlordane.

Chronic Toxicity: This parameter shall be used to measure the acceptability of waters for supporting a healthy marine biota until improved methods are developed to evaluate biological response.

a. Chronic Toxicity (TUc)

   Expressed as Toxic Units Chronic (TUc)

$$TUc = \frac{100}{NOEL}$$

b. No Observed Effect Level (NOEL)

   The NOEL is expressed as the maximum percent effluent or receiving water that causes no observable effect on a test organism, as determined by the result of a critical life stage toxicity test listed in Appendix II.

Composite Sample. A composite sample is a combination of 24 aliquots of at least 100 mL each collected hourly over 24-hour period. Each individual aliquot must consist of 4 samples taken at 15-minute intervals. The composite must be flow proportional; either the time interval between each aliquot or the volume of each aliquot must be proportional to either the stream flow at the time off sampling or the total stream flow since the collection of the previous aliquot. Aliquots may be collected manually or automatically.

Daily Discharge: Daily Discharge is defined as either: (1) the total mass of the constituent discharged over the calendar day (12:00 am through 11:59 pm) or any 24-hour period that reasonably represents a calendar day for purposes of sampling (as specified in the permit), for a constituent with limitations expressed in units of mass or; (2) the unweighted arithmetic mean measurement of the constituent over the day for a constituent with limitations expressed in other units of measurement (e.g., concentration).

The daily discharge may be determined by the analytical results of a composite sample taken over the course of one day (a calendar day or other 24-hour period defined as a day) or by the arithmetic mean of analytical results from one or more grab samples taken over the course of the day.

For composite sampling, if 1 day is defined as a 24-hour period other than a calendar day, the analytical result for the 24-hour period will be considered as the result for the calendar day in which the 24-hour period ends.

DDT shall mean the sum of 4,4’DDT, 2,4’DDT, 4,4’DDE, 2,4’DDE, 4,4’DDD, and 2,4’DDD.

Degrade. Degradation shall be determined by comparison of the waste field and reference site(s) for characteristic species diversity, population density, contamination, growth anomalies, debility, or supplanting of normal species by undesirable plant and animal species. Degradation occurs if there are significant differences in any of three major biotic groups, namely, demersal fish, benthic invertebrates, or attached algae. Other groups may be evaluated where benthic species are not affected, or are not the only ones affected.

Detected, but Not Quantified (DNQ) are those sample results less than the reported Minimum Level, but greater than or equal to the laboratory's MDL.

Dichlorobenzenes shall mean the sum of 1,2- and 1,3-dichlorobenzene.

Downstream Ocean Waters shall mean waters downstream with respect to ocean currents.

Endosulfan shall mean the sum of endosulfan-alpha and -beta and endosulfan sulfate.

Grab Sample. A grab sample is an individual sample of a t least 100 mLs collected at a randomly selected time over a period not exceeding 15 minutes.

Halomethanes shall mean the sum of bromoform, bromomethane (methyl bromide) and chloromethane (methyl chloride).

HCH shall mean the sum of the alpha, beta, gamma (lindane) and delta isomers of hexachlorocyclohexane.

Initial Dilution is the process which results in the rapid and irreversible turbulent mixing of wastewater with ocean water around the point of discharge.

For a submerged buoyant discharge, characteristic of most municipal and industrial wastes that are released from the submarine outfalls, the momentum of the discharge and its initial buoyancy act together to produce turbulent mixing. Initial dilution in this case is completed when the diluting wastewater ceases to rise in the water column and first begins to spread horizontally.

For shallow water submerged discharges, surface discharges, and nonbuoyant discharges, characteristic of cooling water wastes and some individual discharges, turbulent mixing results primarily from the momentum of discharge. Initial dilution, in these cases, is considered to be completed when the momentum induced velocity of the discharge ceases to produce significant mixing of the waste, or the diluting plume reaches a fixed distance from the discharge to be specified by the Regional Board, whichever results in the lower estimate for initial dilution.

Instantaneous Maximum Effluent Limitation: the highest allowable value for any single grab sample or aliquot (i.e., each grab sample or aliquot is independently compared to the instantaneous maximum limitation).

Instantaneous Minimum Effluent Limitation: the lowest allowable value for any single grab sample or aliquot (i.e., each grab sample or aliquot is independently compared to the instantaneous minimum limitation).

Kelp Beds, for purposes of the bacteriological standards of this plan, are significant aggregations of marine algae of the genera Macrocystis and Nereocystis. Kelp beds include the total foliage canopy of Macrocystis and Nereocystis plants throughout the water column.

Mariculture is the culture of plants and animals in marine waters independent of any pollution source.

Material: (a) In common usage: (1) the substance or substances of which a thing is made or composed (2) substantial; (b) For purposes of the California Ocean Plan relating to waste disposal, dredging and the disposal of dredged material and fill, MATERIAL means matter of any kind or description which is subject to regulation as waste, or any material dredged from the navigable waters of the United States.

Maximum Daily Effluent Limitation (MDEL): the highest allowable daily discharge of a pollutant. That shall apply to flow weighted 24-hour composite samples.

MDL (Method Detection Limit) is the minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero, as defined in 40 CFR PART 136 Appendix B.

Minimum Level (ML) is the concentrations at which the entire analytical system must give a recognizable signal and acceptable calibration point. The ML is the concentration in a sample that is equivalent to the concentration of the lowest calibration standard analyzed by a specific analytical procedure, assuming that all the method-specified sample weights, volumes and processing steps have been followed.

Natural Light: Reduction of natural light may be determined by the Regional Water Board by measurement of light transmissivity or total irradiance, or both, according to the monitoring needs of the Regional Water Board.

Ocean Waters are the territorial marine waters of the State as defined by California law to the extent these waters are outside of enclosed bays, estuaries, and coastal lagoons. If a discharge outside the territorial waters of the State could affect the quality of the waters of the State, the discharge may be regulated to assure no violation of the California Ocean Plan will occur in ocean waters.

PAHs (polynuclear aromatic hydrocarbons) shall mean the sum of acenaphthylene, anthracene, 1,2-benzanthracene, 3,4-benzofluoranthene, benzo[k]fluoranthene, 1,12-benzoperylene, benzo[a]pyrene, chrysene, dibenzo[ah]anthracene, fluorene, indeno[1,2,3-cd]pyrene, phenanthrene and pyrene.

PCBs (polychlorinated biphenyls) shall mean the sum of chlorinated biphenyls whose analytical characteristics resemble those of Aroclor-1016, Aroclor-1221, Aroclor-1232, Aroclor-1242, Aroclor-1248, Aroclor-1254 and Aroclor-1260.

Pollutant Minimization Program (PMP) means waste minimization and pollution prevention actions that include, but are not limited to, product substitution, waste stream recycling, alternative waste management methods, and education of the public and businesses. The goal of the PMP shall be to reduce all potential sources of Ocean Plan Table B pollutants through pollutant minimization (control) strategies, including pollution prevention measures as appropriate, to maintain the effluent concentration at or below the water quality-based effluent limitation. Pollution prevention measures may be particularly appropriate for persistent bioaccumulative priority pollutants where there is evidence that beneficial uses are being impacted. The Regional Water Board may consider cost effectiveness when establishing the requirements of a PMP. The completion and implementation of a Pollution Prevention Plan, if

required pursuant to Water Code section 13263.3(d), shall be considered to fulfill the PMP requirements.

Reported Minimum Level is the ML (and its associated analytical method) chosen by the Discharger for reporting and compliance determination from the MLs included in this Order. The MLs included in this Order correspond to approved analytical methods for reporting a sample result that are selected by the Regional Water Board either from Appendix II of the Ocean Plan in accordance with section III.C.5.a. of the Ocean Plan or established in accordance with section III.C.5.b. of the Ocean Plan. The ML is based on the proper application of method-based analytical procedures for sample preparation and the absence of any matrix interferences. Other factors may be applied to the ML depending on the specific sample preparation steps employed. For example, the treatment typically applied in cases where there are matrix-effects is to dilute the sample or sample aliquot by a factor of ten. In such cases, this additional factor must be applied to the ML in the computation of the reported ML.

Shellfish are organisms identified by the California Department of Health Services as shellfish for public health purposes (i.e., mussels, clams and oysters).

Significant Difference is defined as a statistically significant difference in the means of two distributions of sampling results at the 95 percent confidence level.

Six-month Median Effluent Limitation: that apply as a moving median of daily values for any 180-day period in which daily values represent flow weighted average concentrations within a 24-hour period. For intermittent discharges, the daily value shall be considered to equal zero fro days on which no discharge occurred.

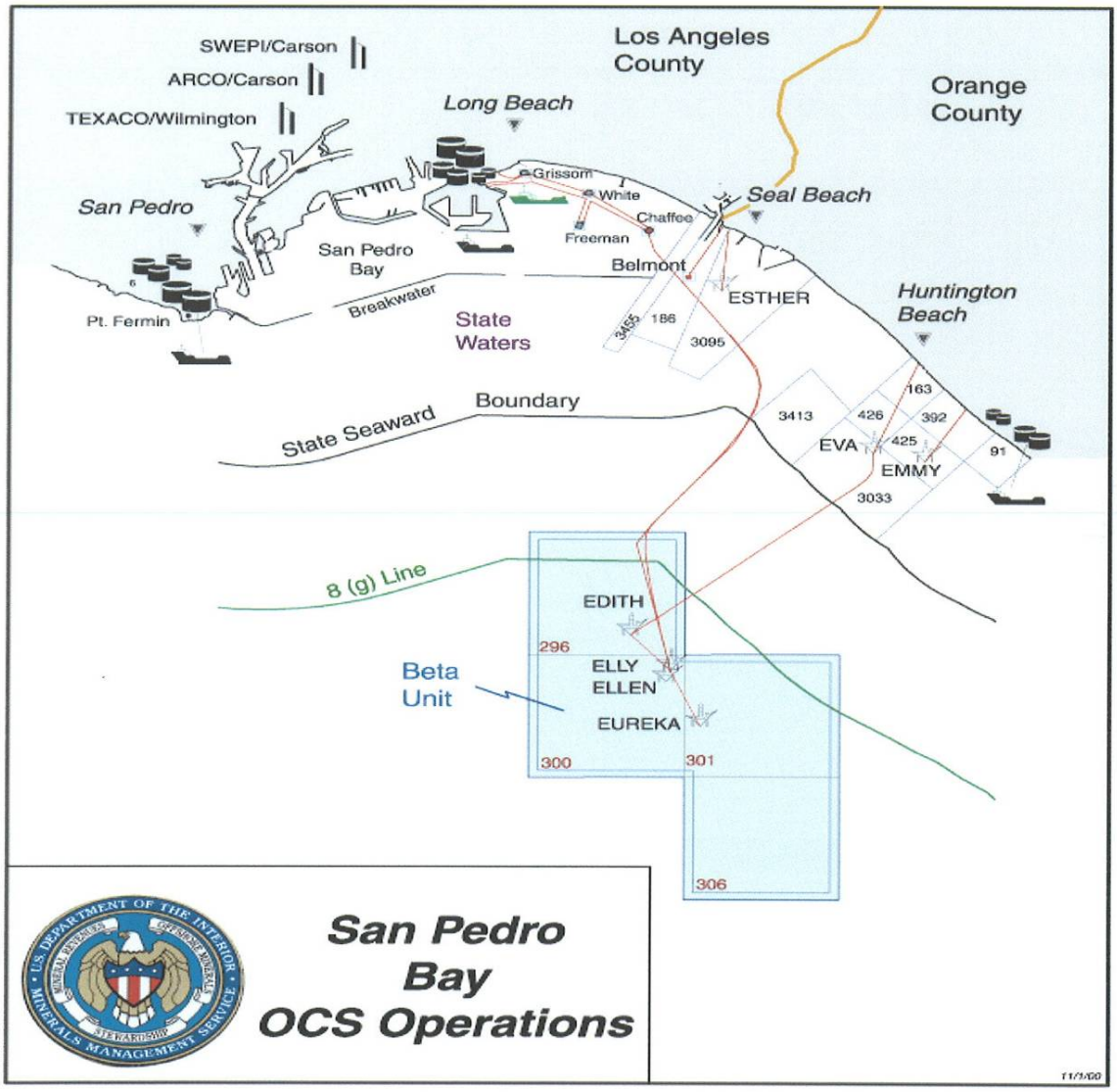
TCDD Equivalents shall mean the sum of the concentrations of chlorinated dibenzodioxins (2,3,7,8-CDDs) and chlorinated dibenzofurans (2,3,7,8-CDFs) multiplied by their respective toxicity factors, as shown in the table below.

Isomer Group	Toxicity Equivalence Factor
2,3,7,8-tetra CDD	1.0
2,3,7,8-penta CDD	0.5
2,3,7,8-hexa CDDs	0.1
2,3,7,8-hepta CDD	0.01
octa CDD	0.001
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
2,3,7,8 hexa CDFs	0.1
2,3,7,8 hepta CDFs	0.01
octa CDF	0.001

Toxicity Reduction Evaluation (TRE) is a study conducted in a step-wise process designed to identify the causative agents of effluent or ambient toxicity, isolate the sources of toxicity, evaluate the effectiveness of toxicity control options, and then confirm the reduction in toxicity. The first steps of the TRE consist of the collection of data relevant to the toxicity, including additional toxicity testing, and an evaluation of facility operations and maintenance practices, and best management practices. A Toxicity Identification Evaluation (TIE) may be required as part of the TRE, if appropriate. (A TIE is a set of procedures to identify the specific chemical(s) responsible for toxicity. These procedures are performed in three phases (characterization, identification, and confirmation) using aquatic organism toxicity tests.)

Waste as used in the California Ocean Plan, waste includes a Discharger's total discharge, of whatever origin, i.e., gross, not net, discharge.

ATTACHMENT B – FACILITY LOCATION MAP



MMS Securing Ocean Energy & Economic Value for America

ATTACHMENT C – PHOTOS OF PLATFORM ESTHER

ATTACHMENT D – STANDARD PROVISIONS

I. STANDARD PROVISIONS – PERMIT COMPLIANCE

A. Duty to Comply

1. The Discharger must comply with all of the conditions of this Order. Any noncompliance constitutes a violation of the Clean Water Act (CWA) and the California Water Code (CWC) and is grounds for enforcement action, for permit termination, revocation and reissuance, or denial of a permit renewal application [*40 CFR §122.41(a)*].

2. The Discharger shall comply with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under Section 405(d) of the CWA within the time provided in the regulations that establish these standards or prohibitions, even if this Order has not been modified to incorporate the requirement [*40 CFR §122.41(a)(1)*].

B. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a Discharger in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Order [*40 CFR §122.41(c)*].

C. Duty to Mitigate

The Discharger shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this Order that has a reasonable likelihood of adversely affecting human health or the environment [*40 CFR §122.41(d)*].

D. Proper Operation and Maintenance

The Discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Discharger to achieve compliance with the conditions of this Order. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems that are installed by a Discharger only when necessary to achieve compliance with the conditions of this Order [*40 CFR §122.41(e)*].

E. Property Rights

1. This Order does not convey any property rights of any sort or any exclusive privileges [*40 CFR §122.41(g)*].

2. The issuance of this Order does not authorize any injury to persons or property or invasion of other private rights, or any infringement of State or local law or regulations [*40 CFR §122.5(c)*].

F. Inspection and Entry

The Discharger shall allow the Regional Water Quality Control Board (RWQCB), State Water Resources Control Board (SWRCB), United States Environmental Protection Agency (USEPA), and/or their authorized representatives (including an authorized contractor acting as their representative), upon the presentation of credentials and other documents, as may be required by law, to [*40 CFR §122.41(i)*] [*CWC 13383(c)*]:

1. Enter upon the Discharger's premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this Order [*40 CFR §122.41(i)(1)*];

2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order [*40 CFR §122.41(i)(2)*];

3. Inspect and photograph, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order [*40 CFR §122.41(i)(3)*];

4. Sample or monitor, at reasonable times, for the purposes of assuring Order compliance or as otherwise authorized by the CWA or the CWC, any substances or parameters at any location [*40 CFR §122.41(i)(4)*].

G. Bypass

1. Definitions

   a. “Bypass” means the intentional diversion of waste streams from any portion of a treatment facility [*40 CFR §122.41(m)(1)(i)*].

   b. “Severe property damage” means substantial physical damage to property, damage to the treatment facilities, which causes them to become inoperable, or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production [*40 CFR §122.41(m)(1)(ii)*].

2. Bypass not exceeding limitations – The Discharger may allow any bypass to occur which does not cause exceedances of effluent limitations, but only if it is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions listed in Standard Provisions – Permit Compliance I.G.3, I.G.4, and I.G.5 below [*40 CFR §122.41(m)(2)*].

3. Prohibition of bypass – Bypass is prohibited, and the Regional Water Board may take enforcement action against a Discharger for bypass, unless [*40 CFR §122.41(m)(4)(i)*]:

    a. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage [*40 CFR §122.41(m)(4)(A)*];

    b. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass that occurred during normal periods of equipment downtime or preventive maintenance [*40 CFR §122.41(m)(4)(B)*]; and

    c. The Discharger submitted notice to the Regional Water Board as required under Standard Provisions – Permit Compliance I.G.5 below [*40 CFR §122.41(m)(4)(C)*].

4. The Regional Water Board may approve an anticipated bypass, after considering its adverse effects, if the Regional Water Board determines that it will meet the three conditions listed in Standard Provisions – Permit Compliance I.G.3 above [*40 CFR §122.41(m)(4)(ii)*].

5. Notice

    a. Anticipated bypass. If the Discharger knows in advance of the need for a bypass, it shall submit a notice, if possible at least 10 days before the date of the bypass [*40 CFR §122.41(m)(3)(i)*].

    b. Unanticipated bypass. The Discharger shall submit notice of an unanticipated bypass as required in Standard Provisions - Reporting V.E below (24-hour notice) [*40 CFR §122.41(m)(3)(ii)*].

H. Upset

Upset means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation [*40 CFR §122.41(n)(1)*].

1. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of Standard Provisions – Permit Compliance I.H.2 below are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review [*40 CFR Section 122.41(n)(2)*].

2. Conditions necessary for a demonstration of upset. A Discharger who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence that [*40 CFR §122.41(n)(3)*]:

    a. An upset occurred and that the Discharger can identify the cause(s) of the upset [*40 CFR §122.41(n)(3)(i)*];

    b. The permitted facility was, at the time, being properly operated [*40 CFR §122.41(n)(3)(i)*];

    c. The Discharger submitted notice of the upset as required in Standard Provisions – Reporting V.E.2.b. below (24-hour notice) [*40 CFR §122.41(n)(3)(iii)*]; and

    d. The Discharger complied with any remedial measures required under Standard Provisions – Permit Compliance I.C above [*40 CFR §122.41(n)(3)(iv)*].

3. Burden of proof. In any enforcement proceeding, the Discharger seeking to establish the occurrence of an upset has the burden of proof [*40 CFR §122.41(n)(4)*].

II. STANDARD PROVISIONS – PERMIT ACTION

A. General

This Order may be modified, revoked and reissued, or terminated for cause. The filing of a request by the Discharger for modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any Order condition [*40 CFR §122.41(f)*].

B. Duty to Reapply

If the Discharger wishes to continue an activity regulated by this Order after the expiration date of this Order, the Discharger must apply for and obtain a new permit [*40 CFR §122.41(b)*].

C. Transfers

This Order is not transferable to any person except after notice to the Regional Water Board. The Regional Water Board may require modification or revocation and reissuance of the Order to change the name of the Discharger and incorporate such other requirements as may be necessary under the CWA and the CWC [*40 CFR §122.41(l)(3)*] [*40 CFR §122.61*].

III. STANDARD PROVISIONS – MONITORING

A. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity [*40 CFR §122.41(j)(1)*].

B. Monitoring results must be conducted according to test procedures under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503 unless other test procedures have been specified in this Order [*40 CFR §122.41(j)(4)*] [*40 CFR §122.44(i)(1)(iv)*].

IV. STANDARD PROVISIONS – RECORDS

A. Except for records of monitoring information required by this Order related to the Discharger's sewage sludge use and disposal activities, which shall be retained for a period of at least five years (or longer as required by 40 CFR Part 503), the Discharger shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Order, and records of all data used to complete the application for this Order, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the Regional Water Board Executive Officer at any time [*40 CFR §122.41(j)(2)*].

B. Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements [*40 CFR §122.41(j)(3)(i)*];

2. The individual(s) who performed the sampling or measurements [*40 CFR §122.41(j)(3)(ii)*];

3. The date(s) analyses were performed [*40 CFR §122.41(j)(3)(iii)*];

4. The individual(s) who performed the analyses [*40 CFR §122.41(j)(3)(iv)*];

5. The analytical techniques or methods used [*40 CFR §122.41(j)(3)(v)*]; and

6. The results of such analyses [*40 CFR §122.41(j)(3)(vi)*].

C. Claims of confidentiality for the following information will be denied [*40 CFR §122.7(b)*]:

1. The name and address of any permit applicant or Discharger [*40 CFR §122.7(b)(1)*]; and

2. Permit applications and attachments, permits and effluent data [*40 CFR §122.7(b)(2)*].

V. STANDARD PROVISIONS – REPORTING

A. Duty to Provide Information

The Discharger shall furnish to the Regional Water Board, SWRCB, or USEPA within a reasonable time, any information which the Regional Water Board, SWRCB, or USEPA may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order or to determine compliance with this Order. Upon request, the Discharger shall also furnish to the Regional Water Board, SWRCB, or USEPA copies of records required to be kept by this Order [*40 CFR §122.41(h)*] [*CWC 13267*].

B. Signatory and Certification Requirements

1. All applications, reports, or information submitted to the Regional Water Board, State Water Board, and/or USEPA shall be signed and certified in accordance with Standard Provisions – Reporting V.B.2, V.B.3, V.B.4, and V.B.5 below [*40 CFR Section 122.41(k)*].

2. All permit applications shall be signed by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures [*40 CFR Section 122.22(a)(1)*].

3. All reports required by this Order and other information requested by the Regional Water Board, State Water Board, or USEPA shall be signed by a person described in Standard Provisions – Reporting V.B.2 above, or by a duly authorized representative of that person. A person is a duly authorized representative only if:

    a. The authorization is made in writing by a person described in Standard Provisions – Reporting V.B.2 above [*40 CFR Section 122.22(b)(1)*];

b. The authorization specified either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company (a duly authorized representative may thus be either a named individual or any individual occupying a named position) [*40 CFR §122.22(b)(2)*]; and

c. The written authorization is submitted to the Regional Water Board, SWRCB, or USEPA [*40 CFR §122.22(b)(3)*].

4. If an authorization under Standard Provisions – Reporting V.B.3 above is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of Standard Provisions – Reporting V.B.3 above must be submitted to the Regional Water Board, State Water Board or USEPA prior to or together with any reports, information, or applications, to be signed by an authorized representative [40 CFR Section 122.22(c)].

5. Any person signing a document under Standard Provisions – Reporting V.B.2 or V.B.3 above shall make the following certification:

   "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, 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 for knowing violations" [*40 CFR §122.22(d)*].

C. Monitoring Reports

1. Monitoring results shall be reported at the intervals specified in the Monitoring and Reporting Program in this Order [*40 CFR §122.41(l)(4)*].

2. Monitoring results must be reported on a Discharge Monitoring Report (DMR) form or forms provided or specified by the Regional Water Board or SWRCB for reporting results of monitoring of sludge use or disposal practices [*40 CFR §122.41(l)(4)(i)*].

3. If the Discharger monitors any pollutant more frequently than required by this Order using test procedures approved under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503, or as specified in this Order, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Regional Water Board [*40 CFR §122.41(l)(4)(ii)*].

4. Calculations for all limitations, which require averaging of measurements, shall utilize an arithmetic mean unless otherwise specified in this Order [*40 CFR §122.41(l)(4)(iii)*].

D. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Order, shall be submitted no later than 14 days following each schedule date [*40 CFR §122.41(l)(5)*].

E. Twenty-Four Hour Reporting

1. The Discharger shall report any noncompliance that may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the Discharger becomes aware of the circumstances. A written submission shall also be provided within five (5) days of the time the Discharger becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance [*40 CFR §122.41(l)(6)(i)*].

2. The following shall be included as information that must be reported within 24 hours under this paragraph [*40 CFR §122.41(l)(6)(ii)*]:

   a. Any unanticipated bypass that exceeds any effluent limitation in this Order [*40 CFR §122.41(l)(6)(ii)(A)*].

   b. Any upset that exceeds any effluent limitation in this Order [*40 CFR §122.41(l)(6)(ii)(B)*].

3. The Regional Water Board may waive the above-required written report under this provision on a case-by-case basis if an oral report has been received within 24 hours [*40 CFR §122.41(l)(6)(iii)*].

F. Planned Changes

The Discharger shall give notice to the Regional Water Board as soon as possible of any planned physical alterations or additions to the permitted facility. Notice is required under this provision only when [*40 CFR §122.41(l)(1)*]:

1. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR §122.29(b) [*40 CFR §122.41(l)(1)(i)*]; or

2. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in this Order nor to notification requirements under 40 CFR Part 122.42(a)(1) (see Additional Provisions—Notification Levels VII.A.1) [*40 CFR §122.41(l)(1)(ii)*].

3. The alteration or addition results in a significant change in the Discharger's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan [*40 CFR §122.41(l)(1)(iii)*].

G. Anticipated Noncompliance

The Discharger shall give advance notice to the Regional Water Board or SWRCB of any planned changes in the permitted facility or activity that may result in noncompliance with General Order requirements [*40 CFR §122.41(l)(2)].*

H. Other Noncompliance

The Discharger shall report all instances of noncompliance not reported under Standard Provisions – Reporting V.C, V.D, and V.E above at the time monitoring reports are submitted. The reports shall contain the information listed in Standard Provision – Reporting V.E above [*40 CFR Section 122.41(l)(7)*].

I. Other Information

When the Discharger becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Regional Water Board, SWRCB, or USEPA, the Discharger shall promptly submit such facts or information [*40 CFR §122.41(l)(8)*].

VI. STANDARD PROVISIONS – ENFORCEMENT

A. The Regional Water Board is authorized to enforce the terms of this permit under several provisions of the CWC, including, but not limited to, sections 13385, 13386, and 13387.

VII. ADDITIONAL PROVISIONS – NOTIFICATION LEVELS

A. Non-Municipal Facilities

Existing manufacturing, commercial, mining, and silvicultural dischargers shall notify the Regional Water Board as soon as they know or have reason to believe [*40 CFR §122.42(a)*]:

1. That any activity has occurred or will occur that would result in the discharge, on a routine or frequent basis, of any toxic pollutant that is not limited in this Order, if that discharge will exceed the highest of the following "notification levels" [*40 CFR §122.42(a)(1)*]:

    a. 100 micrograms per liter (µg/L) [*40 CFR §122.42(a)(1)(i)*];

    b. 200 µg/L for acrolein and acrylonitrile; 500 µg/L for 2,4-dinitrophenol and 2-methyl-4,6-dinitrophenol; and 1 milligram per liter (mg/L) for antimony [*40 CFR §122.42(a)(1)(ii)*];

    c. Five (5) times the maximum concentration value reported for that pollutant in the Report of Waste Discharge [*40 CFR §122.42(a)(1)(iii)*]; or

    d. The level established by the Regional Water Board in accordance with 40 CFR §122.44(f) [*40 CFR §122.42(a)(1)(iv)*].

2. That any activity has occurred or will occur that would result in the discharge, on a non-routine or infrequent basis, of any toxic pollutant that is not limited in this Order, if that discharge will exceed the highest of the following “notification levels" [*40 CFR §122.42(a)(2)*]:

    a. 500 micrograms per liter (µg/L) [*40 CFR §122.42(a)(2)(i)*];

    b. 1 milligram per liter (mg/L) for antimony [*40 CFR §122.42(a)(2)(ii)*];

    c. Ten (10) times the maximum concentration value reported for that pollutant in the Report of Waste Discharge [*40 CFR §122.42(a)(2)(iii)*]; or

    d. The level established by the Regional Water Board in accordance with 40 CFR §122.44(f) [*40 CFR §122.42(a)(2)(iv)*].

B. Publicly-Owned Treatment Works (POTWs) - Not Applicable

Attachment F – Fact Sheet

Table of Contents

I. Permit Information F-3
II. Facility Description F-4
A. Description of Facility F-4
1. Description of Wastewater and Control Systems F-4
B. Discharge Points and Receiving Water F-5
1. Wastewater Discharge Points F-5
2. Receiving Water F-5
C. Summary of Existing Requirements and Self-Monitoring Report (SMR) Data F-6
D. Compliance Summary F-6
E. Planned Changes F-6
III. Applicable Plans, Policies, and Regulations F-7
A. Legal Authorities F-7
B. California Environmental Quality Act (CEQA) F-7
C. State and Federal Regulations, Policies, and Plans F-7
1. Water Quality Control Plans F-7
2. California Ocean Plan F-8
4. Alaska Rule F-8
5. Effluent Limitations Guidelines F-9
6. Antidegradation Policy F-9
7. Anti-Backsliding Requirements. F-9
8. Monitoring and Reporting Requirements F-9
IV. Rationale For Effluent Limitations and Discharge Specifications F-10
A. Discharge Prohibitions F-10
B. Technology-Based Effluent Limitations F-10
1. Scope and Authority F-10
2. Applicable Technology-Based Effluent Limitations F-11
C. Water Quality-Based Effluent Limitations (WQBELs) F-12
1. Scope and Authority F-12
2. Applicable Beneficial Uses F-12
3. Applicable Water Quality Objectives F-13
4. Determining the Need for WQBELs F-13
V. Rationale for Receiving Water Limitations F-14
VI. Rationale for Monitoring and Reporting Requirements F-15
A. Influent Monitoring F-15
B. Effluent Monitoring F-15
VII. Rationale for Provisions F-16
A. Standard Provisions F-16
B. Special Provisions F-16
1. Reopener Provisions F-16
2. Special Studies and Additional Monitoring Requirements – N/A F-16
3. Best Management Practices and Pollution Prevention F-16
4. Construction, Operation, and Maintenance Specifications - N/A F-16

5. Other Special Provisions – N/A F-16
6. Compliance Schedules – N/A F-16
VIII. Public Participation F-16
A. Notification of Interested Parties F-17
B. Written Comments F-17
C. Public Hearing F-17
D. Waste Discharge Requirements Petitions F-18
E. Information and Copying F-18
F. Register of Interested Persons F-18
G. Additional Information F-18

List of Tables

Table 1. Discharge Information F-3
Table 2. Wastewater Discharge Points and Sources F-5
Table 3. Historic Effluent Monitoring Data at M-001 ..... F-6
Table 4. Historic Receiving Water Monitoring Data for Sanitary Waste Water F-6
Table 5. Basin Plan Beneficial Uses F-8
Table 6. Ocean Plan Beneficial Uses F-8
Table 7. Effluent Limitations of Sanitary Waste at DP- 001 ..... F-11
Table 8. 40 CFR 435.15 Oil and Grease Criteria at DP 002 ..... F-11

ATTACHMENT F – Fact Sheet

As described in Section II of this Order, this Fact Sheet includes the legal requirements and technical rationale that serve as the basis for the requirements of this Order.

This Order has been prepared under a standardized format to accommodate a broad range of discharge requirements for dischargers in California. Only those sections or subsections of this Order that are specifically identified as "not applicable" have been determined not to apply to this Discharger. Sections or subsections of this Order not specifically identified as "not applicable" are fully applicable to this Discharger.

I. PERMIT INFORMATION

The following table summarizes administrative information related to the discharge.

Table 1. Discharge Information

Discharger	Dos Cuadras Offshore Resources, LLC
Mailing Address	290 Maple Court, Suite 290, Ventura, CA93003
Billing Address	Same as above
Facility	Platform Esther
Facility Location	1.5 Miles offshore of the City of Seal Beach, Orange County
Facility Contact, Title and Phone	Jay Rao, Environmental Coordinator, jrao@dcorllc.com; (805) 535-2078
Type of Facility	Oil and Gas Drilling/Production Platform
Major or Minor Facility	Minor
Facility Permitted Flow	Sanitary Waste Water - 2,500 gpd Produced Water/Deck Drainage - 20,000 barrels/day, or 0.84 mgd
Facility Design Flow	Sanitary Waste Water - 2,500 gpd Produced Water/Deck Drainage - 20,000 barrels/day, or 0.84 mgd
Watershed	Pacific Ocean
Receiving Water	Offshore Zone of the Pacific Ocean
Receiving Water Type	Ocean Water

A. Dos Cuadras Offshore Resources LLC is the owner and operator of Platform Esther, an oil and gas drilling/production platform located in the offshore zone of the Pacific Ocean approximately 1.5 miles west of the City of Seal Beach, CA.

For the purposes of this Order, references to the "discharger" or "permittee" in applicable federal and State laws, regulations, plans, or policy are held to be equivalent to references to the Discharger herein.

B. The discharges from Platform Esther include secondary treated sanitary wastewater and treated produced water from the extraction of crude oil and natural gas. Deck

drainage/stormwater is directed to the produced water treatment system. These discharges are to the offshore zone of the Pacific Ocean, a water of the United States.

The discharges are currently regulated by Order No. R8-2005-0071, which was adopted on May 27, 2005, and expired on May 1, 2010; however, the terms and conditions of that Order have been automatically continued and remain in effect until new Waste Discharge Requirements and National Pollutant Discharge Elimination System (NPDES) permit are adopted pursuant to this Order.

C. The Discharger completed a report of waste discharge and submitted an application for renewal of its Waste Discharge Requirements (WDRs) and NPDES permit in October 2009.

II. FACILITY DESCRIPTION

A. Description of Facility

1. Description of Wastewater and Control Systems

a. Sanitary Wastewater

Up to approximately 2,500 gallons per day (gpd) of treated sanitary wastewater can be discharged through a pipe at Discharge Point 001 (DP 001) from a packaged treatment plant on the platform. The on-site treatment system is a Marine Sanitation Device (MSD). The MSD is a secondary treatment plant with extended aeration. Dry, soluble chlorine tablets are used to disinfect the effluent. The concentration of chlorine residual in the effluent is always maintained greater than 1 mg/l.

Most of the year Platform Esther has only 5 or 6 people on board. During these periods, the average sanitary waste discharge ranges from 100 to 300 gpd. However, about 3 or 4 months each year, such as during drilling operations and significant maintenance, there are additional crew members on the platform. During those times, the discharge may increase to up to 2500 gpd.

b. Produced Wastewater

The floatation cell at Platform Esther is rated to process about 20,000 barrels of produced water per day. All produced water from the extraction of crude oil and natural gas is treated to remove oil and solids and is normally re-injected into the oil-bearing formation. However, occasionally the injection system may fail to operate properly and/or must be taken offline for repairs. During these periods, up to 20,000 barrels per day, or 840,000 gpd, of treated oil-free wastewater may be discharged to the Pacific Ocean at Discharge Point 002. In the last 5 years, there was no such discharge.

c. Deck Drainage and Stormwater

Deck drainage and/or stormwater runoff, which may be contaminated by oil, is captured by grated troughs located on the periphery of each deck. These flows are combined with the produced water for treatment and disposal.

d. Drilling Mud, Drill Cuttings, and Cement Slurry

The discharge of drilling cuttings and fluids within three miles of the United States shoreline is not permitted by Federal regulation (Oil and Gas Extraction Point Source Category, 40 CFR 435). Accordingly, all semisolid and solid wastes (drilling mud and cuttings, cement slurry, rags, etc.) or other waste materials that are petroleum based or are contaminated with hydrocarbons are transported to an onshore facility for disposal at an approved Treatment, Storage and Disposal Facility.

Although the disposal of cement slurry used for stabilizing the borehole casing is not specifically prohibited in the EPA guidelines, bioassay analyses of various cement slurry mixes in other previous cases have indicated toxicity levels for mysid shrimp (*Mysidopsis bahia*). Physical smothering by disposed solids is more of a concern for benthic life forms. Cement slurry is normally barged ashore. This Order prohibits discharges of cement slurry into the ocean.

B. Discharge Points and Receiving Water

1. Wastewater Discharge Points

Wastewater is discharged from Platform Esther to the Pacific Ocean, 1.5 miles offshore of the City of Seal Beach. Sanitary waste is discharged at Discharge Point 001 (DP 001). Deck drainage, stormwater, and produced water may be discharged from Discharge Point 002 (DP 002).

The following table summarizes wastewater sources and treatment processes.

Table 2. Wastewater Discharge Points and Sources

Discharge Point	Latitude/ Longitude	Wastewater Discharged	Treatment Process	Flow, mgd
001	33°43’8”N/ 118°6’47”W	Treated sanitary wastewater	Secondary treatment, disinfection	Up to 2,500 gpd
002	33°43’8”N/ 118°6’47”W	Treated produced water and deck drainage/stormwater	Remove oil and solids	Up to 20,000 barrels/day, (0.84 mgd)

2. Receiving Water

The discharge is to the Offshore Zone of the Pacific Ocean.

C. Summary of Existing Requirements and Self-Monitoring Report (SMR) Data

1. Effluent and Receiving Water Limitations specified in Order No. R8-2005-0071 and a summary of representative monitoring data collected at during the term of the previous Order are as follows:

Table 3. Historic Effluent Monitoring Data at M-001

Parameter (units)	Effluent Limitation	Monitoring Data (From 05/2006 – To 2/2012)	
	30-Day Average	Highest 30-day Average Discharge	Highest Daily Discharge
Flow, gpd		647	1230
Total Suspended Solids *(TSS)*, mg/l	60		60

Table 4. Historic Receiving Water Monitoring Data for Sanitary Waste Water

Parameter (units)	Limitation		Monitoring Data (From 05/2006 – To 2/2012)
			Daily Discharge
Down Current, **R-001D**: 20' down current of the sanitary discharge within top 10'of the water column			
Total Coliform, cfu/100ml	Median <70/100ml	<10% of samples exceed 230/100ml	Highest: >2420 cfu/100ml
Fecal Coliform, cfu/100ml	30-day geometric mean <200/100ml	<10% of samples exceed 400/100ml over 60 days	Highest: 816 cfu/100ml
Total Chlorine Residual, µg/l	6-month median 2 µg/l; max daily 8 µg/l; instantaneous max 60 µg/l		Highest: <20 µg/l
Dissolved Oxygen, mg/l			Lowest: 8.86 mg/l
pH, SU			Lowest: 6.39
Up Current, R-001U: 100' up current of the sanitary discharge within top 10' of the water column			
Total Coliform, cfu/100ml			Highest: >2420
Fecal Coliform, cfu/100ml			Highest: 866
Dissolved Oxygen, mg/l			Lowest: 9.1
pH, SU			Lowest: 6.39

2. No produced waste water has been discharged during last 6 years.

D. Compliance Summary

No violations of Order No. R8-2005-0007 have been reported.

E. Planned Changes

At this time, there are no planned changes to the facility during this Order term that may impact Order development.

III. APPLICABLE PLANS, POLICIES, AND REGULATIONS

The requirements contained in the proposed Order are based on the requirements and authorities described in this section.

A. Legal Authorities

This Order is issued pursuant to Section 402 of the Federal Clean Water Act (CWA) and implementing regulations adopted by the U.S. Environmental Protection Agency (USEPA) and Chapter 5.5, Division 7 of the California Water Code (Section 13370 *et seq.*). It shall serve as a NPDES permit for point source discharges from this facility to surface waters. This Order also serves as Waste Discharge Requirements (WDRs) pursuant to Article 4, Chapter 4, Division 7 of the CWC (Section 13260 *et seq.*).

B. California Environmental Quality Act (CEQA)

Under Water Code Section 13389, this action to adopt an NPDES permit is exempt from the provisions of CEQA, Public Resources Code Section 21100 through 21177.

C. State and Federal Regulations, Policies, and Plans

1. Water Quality Control Plans

The Regional Water Quality Control Board adopted a Water Quality Control Plan for the Santa Ana Region (hereinafter Basin Plan) that became effective on January 24, 1995 and designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives. In addition, State Water Resources Control Board (State Water Board) Resolution No. 88-63 requires that, with certain exceptions, the Regional Water Board assign the municipal and domestic supply use to water bodies that do not have beneficial uses listed in the Basin Plan. For the protection and enhancement of ocean water quality, the Basin Plan incorporates by reference the provisions of the State Board's *Water Quality Control Plan for Ocean Waters of California* (Ocean Plan 2005).

Beneficial uses applicable to the offshore zone of the Pacific Ocean are as follows:

Table 5. Basin Plan Beneficial Uses

Discharge Point	Receiving Water Name	Beneficial Use(s)
001 and 002	Pacific Ocean Offshore Zone	Present or Potential Beneficial Uses: a. Industrial service supply, b. Navigation, c. Water contact recreation, d. Non-contact water recreation, e. Commercial and sportfishing, f. Wildlife habitat, g. Rare, threatened or endangered species, h. Spawning, reproduction, and development, i. Marine habitat, and j. Shellfish harvesting.

Requirements of this Order implement the Basin Plan.

2. California Ocean Plan

The State Water Board adopted the Water Quality Control Plan for Ocean Waters of California, California Ocean Plan (Ocean Plan) in 1972 and amended it in 1978, 1983, 1988, 1990, 1997, 2000, and 2005. The State Water Board adopted the latest amendment to the Ocean Plan on April 21, 2005 and it became effective on February 14, 2006. The Ocean Plan is applicable, in its entirety, to point source discharges to the ocean. The Ocean Plan identifies beneficial uses of ocean waters of the State to be protected, as summarized below.

Table 6. Ocean Plan Beneficial Uses

Discharge Point	Receiving Water	Beneficial Uses
001 and 002	Offshore Zone of Pacific Ocean	Industrial water supply; water contact and non-contact recreation, including aesthetic enjoyment; navigation; commercial and sport fishing; mariculture; preservation and enhancement of designated Areas of Special Biological Significance (ASBS); rare and endangered species; marine habitat; fish migration, fish spawning and shellfish harvesting.

In order to protect the beneficial uses, the Ocean Plan establishes water quality objectives and a program of implementation. Requirements of this Order implement the Ocean Plan.

4. Alaska Rule

On March 30, 2000, USEPA revised its regulation that specifies when new and revised State and Tribal water quality standards (WQS) become effective for CWA purposes (40 CFR 131.21, 65 FR 24641, April 27, 2000). Under the revised

regulation (also known as the Alaska rule), new and revised standards submitted to USEPA after May 30, 2000, must be approved by USEPA before being used for CWA purposes. The final rule also provides that standards already in effect and submitted to USEPA by May 30, 2000, may be used for CWA purposes, whether or not approved by USEPA.

5. Effluent Limitations Guidelines

The Environmental Protection Agency (EPA) promulgated Effluent Guidelines and Standards for the "Oil and Gas Extraction Point Source Category". These regulations are contained in 40 CFR Part 435 and became effective on April 13, 1979. These regulations established effluent limitation guidelines for existing and new source performance standards for various in plant waste streams. These regulations apply to discharges from the Facility.

6. Antidegradation Policy

Section 131.12 of 40 CFR requires that State water quality standards include an antidegradation policy consistent with the federal policy. The State Water Board established California's antidegradation policy in State Water Board Resolution No. 68-16, which incorporates the requirements of the federal antidegradation policy. Resolution No. 68-16 requires that existing water quality be maintained unless degradation is justified based on specific findings. The permitted discharge is consistent with the antidegradation provision of 40 CFR 131.12 and State Water Board Resolution No. 68-16. The Regional Water Board finds that the discharges would have no adverse impacts on the beneficial uses of the receiving waters.

7. Anti-Backsliding Requirements.

Sections 402(o)(2) and 303(d)(4) of the CWA and federal regulations at 40CFR 122.44(l) prohibit backsliding in NPDES permits. These anti-backsliding provisions require that effluent limitations in a reissued permit must be as stringent as those in the previous permit, with some exceptions in which limitations may be relaxed. All effluent limitations in this Order are at least as stringent as the effluent limitations in the previous Order No. R8-2005-0071.

8. Monitoring and Reporting Requirements

Section 122.48 of 40 CFR requires that all NPDES permits specify requirements for recording and reporting monitoring results. Sections 13267 and 13383 of the CWC authorize the Regional Water Board to require technical and monitoring reports. The Monitoring and Reporting Program (MRP) establishes monitoring and reporting requirements to implement federal and State requirements. This MRP is provided in Attachment E.

IV. RATIONALE FOR EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS

The CWA requires point source discharges to control the amount of conventional, non-conventional, and toxic pollutants that are discharged into the waters of the United States. The control of pollutants discharged is established through effluent limitations and other requirements in NPDES permits. There are two principal bases for effluent limitations: 40 CFR 122.44(a) requires that permits include applicable technology-based limitations and standards; and 40 CFR 122.44(d) requires that permits include water quality-based effluent limitations to attain and maintain applicable numeric and narrative water quality criteria to protect the beneficial uses of the receiving water.

A. Discharge Prohibitions

Discharge Prohibitions in this Board Order are based on the Federal Clean Water Act, Basin Plan, State Water Resources Control Board's plans and policies, California Ocean Plan, and U.S. Environmental Protection Agency guidance and regulations, and previous permit Order No. R8-2005-0071 provisions. The prohibitions are consistent with the requirements set for other discharges regulated by waste discharge requirements adopted by the Regional Water Board.

B. Technology-Based Effluent Limitations

1. Scope and Authority

Section 301(b) of the CWA and implementing USEPA permit regulations at 40 CFR 122.44 require that permits include conditions meeting applicable technology-based requirements at a minimum, and any more stringent effluent limitations necessary to meet applicable water quality standards.

The discharge authorized by this Order must meet minimum federal technology-based requirements based on secondary treatment standards at 40 CFR 133 and /or Best Professional Judgment (BPJ) in accordance with 40 CFR 125.3.
The discharge authorized by this Order must meet minimum federal technology-based requirements based on Effluent Limitations Guidelines and Standards for the Oil and Gas Extraction Point Source Category, for existing and new sources, at 40 CFR 435.

The CWA requires USEPA to develop effluent limitations, guidelines and standards (ELGs) representing application of BPT, BAT, BCT, and NSPS. Section 402(a)(1) of the CWA and 40 CFR 125.3 of the NPDES regulations authorize the use of best professional judgment (BPJ) to derive technology-based effluent limitations on a case-by-case basis where ELGs are not available for certain industrial categories and/or pollutants of concern. Where BPJ is used, the permit writer must consider specific factors outlined in 40 CFR 125.3.

2. Applicable Technology-Based Effluent Limitations

a. Platform Esther utilizes a secondary treatment system to remove suspended solids, which meets the technology-based regulations for the minimum level of effluent quality attained by secondary treatment in terms of total suspended solids and removal rate. The following effluent limitation is specified in this Order for DP 001, which is based on Table A in Section III. B. of the Ocean Plan.

Table 7. Effluent Limitations of Sanitary Waste at DP- 001

Parameters	Limiting Concentrations		
	Units of Measurement	Removal Rate	Daily Maximum
Suspended solids	mg/L	75%	60

b. U.S. EPA has established standards of performance for the Oil and Gas Extraction Point Source Category, for existing and new sources, at 40 CFR Part 435. Effluent limitations guidelines contained in “Subpart A – Offshore Subcategory“ apply to Platform Esther. Standards for performance for new sources (NSPS) are applicable to Platform Esther because construction of the platform was commenced in 1984, after the publication of regulations on April 13, 1979, which proposed standards of performance for the industry. The following effluent guidelines, which are based on 40 CFR 435.15, are applicable to Platform Esther:

(1) Effluent Limits applicable to DP 001 - sanitary wastewater.

40 CFR 435.15 specifies that the chlorine residual concentration in the effluent of marine sanitary devise shall be all the time great than 1 mg/l. This Order requires a chlorine residual concentration of at least 1 mg/l to be maintained in the discharge at DP 001 at all times.

(2) Effluent limits applicable to DP 002 - produced water, deck drainage, and stormwater.

40 CFR 435.15 specifies that the oil and grease limits of produced wastewater, deck wastewater, and stormwater discharged to the ocean shall be as following:

Table 8. 40 CFR 435.15 Oil and Grease Criteria at DP 002

Waste Source	Daily Max. (mg/L)	30-Day Avg (mg/L)
Produced Water	42	29

This Order contains a daily maximum Oil and Grease effluent limit for the discharge of produced water and deck drainage/stormwater at DP 002 based on the above federal regulation. However, the monthly average effluent limitation specified in this order (25 mg/l) is based on Table A of the Ocean Plan, as it is more stringent than the federal regulation.

(3) Effluent limits applicable to other wastes.

40 CFR 435.15 also specifies that discharge of drilling mud, cuttings, and cement slurry into the Ocean within three miles of the shore is prohibited. This Order prohibits the discharge of these wastes to the Pacific Ocean.

C. Water Quality-Based Effluent Limitations (WQBELs)

1. Scope and Authority

Section 301(b) of the CWA and section 122.44(d) require that permits include limitations more stringent than applicable federal technology-based requirements where necessary to achieve applicable water quality standards.

Section 122.44(d)(1)(i) mandates that permits include effluent limitations for all pollutants that are or may be discharged at levels that have the reasonable potential to cause or contribute to an exceedance of a water quality standard, including numeric and narrative objectives within a standard. Where reasonable potential has been established for a pollutant, but there is no numeric criterion or objective for the pollutant, water quality-based effluent limitations (WQBELs) must be established using: (1) USEPA criteria guidance under CWA section 304(a), supplemented where necessary by other relevant information; (2) an indicator parameter for the pollutant of concern; or (3) a calculated numeric water quality criterion, such as a proposed state criterion or policy interpreting the state's narrative criterion, supplemented with other relevant information, as provided in section 122.44(d)(1)(vi).

The process for determining reasonable potential and calculating WQBELs when necessary is intended to protect the designated uses of the receiving water as specified in the Basin Plan and the Ocean Plan, and achieve applicable water quality objectives and criteria that are contained in other State plans and policies, or any applicable water quality criteria contained in the Ocean Plan.

2. Applicable Beneficial Uses

All applicable beneficial uses are listed in Section III.C.1., above.

3. Applicable Water Quality Objectives

a. The platform structure creates an artificial reef that supports shellfish. As such, previous permits required the discharge to be regulated so as to protect shellfish harvesting activities. However, due to safety and operational concerns, fishing and harvesting of shellfish within 200 feet of Platform Esther is prohibited by the discharger. Consequently, the Ocean Plan bacterial standards listed in Section II.B.2.a.(1) are not applicable to this discharge.

b. Water Quality Objectives specified in Table B of the Ocean Plan are applicable for produced water discharged from DP 002.

4. Determining the Need for WQBELs

a. Coliform. The total residual chlorine concentration is constantly maintained between 2 mg/l and 5 mg/l in the treated sanitary waste effluent. However, receiving water samples collected down current of the point of discharge have shown the presence of coliform bacteria. Studies have shown that this is not an indication of poor disinfection of the wastewater; but rather, the bacteria found in the waters around Platform Esther is likely due to seals frequenting the area.

   Order No. R8-2005-0071 established total coliform limits for the receiving water for sanitary wastewater discharged from DP-001 that required the median total coliform density not to exceed 70 per 100 ml and not more than 10 percent of the samples not to exceed 230 per 100 ml outside the Zone of Initial Dilution (ZID). The discharger was required to take representative samples of the receiving water from a point of 20 feet down current of the sanitary waste discharge within the top 10 feet of the water column. The samples were then analyzed for total coliform organisms, fecal coliform concentration, and total chlorine residual. The discharger voluntary collected samples from a point of 100 feet up-current of DP-001 and analyzed them for total coliform organisms and fecal coliform concentration.

   A review of the monitoring data collected in 2009 and 2010 show that most of the time, the coliform results for up-current samples were as high, and occasionally higher, than the down-current sample results. These data indicated that coliform density is elevated in the background receiving water. The Discharger concluded that the high coliform in the background receiving water is caused by seals and other marine animals in the vicinity of the platform. Therefore, the coliform data collected in the receiving water are not representative of the impact of treated sanitary waste discharge on the receiving water.

   The Discharger recently conducted a study comparing the chlorine residual concentration to the coliform density in the treated sanitary wastewater. The study showed that as long as the chlorine residual concentration in the effluent is maintained greater than 1 mg/l, the coliform density will be less than 1 CFU/100ml in the effluent.

As discussed above in Section IV.B.2.b.(1), this Order requires a chlorine residual concentration of at least 1 mg/l to be maintained in the discharge at DP 001 at all times. Based on the above mentioned study, this will insure that the coliform densities in the effluent are at levels that are protective of the beneficial uses of the receiving waters. Consequently, the chlorine residual limit will be used in lieu of a WQBEL for coliform organisms.

b. Chlorine Residual. Current Order No. R8-2005-0071 established chlorine residual limits in the receiving water outside the ZID not to exceed a 6-month median of 2 µg/L; a maximum daily of 8 µg/L; nor an instantaneous maximum of 60 µg/L. These limits are based on the water quality objectives specified in the Ocean Plan.

   The Discharger has routinely monitored the receiving water for chlorine residual down-current of the point of discharge and has been unable to detect any amount in the Ocean waters. However, the Discharger must use a potable meter to measure chlorine residual in the receiving water and the meter can detect concentrations down to only 20 µg/L, which is greater than two of the limits. The Discharger claims that this is the most sensitive field instrument that is currently available.

   The Discharger has recently conducted a study comparing the chlorine residual concentrations in the treated sanitary waste stream and the receiving water, which found that with concentrations in the effluent as high as 8.8 mg/l, the concentration in the receiving water was still found to be less than 20 µg/l. Therefore, in lieu of continuing with the use of receiving water limits for chlorine residual, this Order establishes an upper limit for chlorine residual in the treated sanitary wastewater discharged at DP 001 of 8.8 mg/l.

c. Ocean Plan Table B constituents. As noted above, water quality objectives specified in Table B of the Ocean Plan are applicable for produced water discharging from DP 002 to the ocean. However, since there have not been any recent discharges of produced water, there is no data available to determine if there is a reasonable potential for the discharge to cause or contribute to an exceedance of those objectives. Consequently, no effluent limits for those constituents are proposed in this Order. Nevertheless, the Discharger will be required to monitor for those constituents whenever there is a discharge. This Order may be reopened to include appropriate WQBELs for Table B constituents, should the monitoring data indicate that such limits are necessary.

V. RATIONALE FOR RECEIVING WATER LIMITATIONS

As discussed above, effluent limits for chlorine residual in this Order replace the coliform and chlorine residual receiving water limits that were specified in Order No. R8-2005-0071.

VI. RATIONALE FOR MONITORING AND REPORTING REQUIREMENTS

40 CFR 122.48 requires all NPDES permits to specify recording and reporting of monitoring results. Sections 13267 and 13383 of the California Water Code authorize the Regional Water Board to require technical and monitoring reports. The Monitoring and Reporting Program, Attachment E of this Order, establishes monitoring and reporting requirements to implement federal and state requirements. The Discharger is required to conduct monitoring of the permitted discharges in order to evaluate compliance with permit conditions.

The following provides the rationale for the monitoring and reporting requirements contained in the Monitoring and Reporting Program (MRP) for this Facility.

A. Influent Monitoring

This Order requires the sanitary waste treatment system to remove at least 75% of the total suspended solids (TSS) entering the system. Consequently, the MRP requires influent samples on the same day as the effluent samples are taken and analyzed for TSS[1].

B. Effluent Monitoring

1. The Discharger is required to maintain the concentration of chlorine residual in the effluent discharged at DP 001 between 1 mg/l and 8.8 mg/l. This Order also requires that the TSS concentration not exceed 60 mg/l. The Discharger is required to sample the discharge at DP 001 on a monthly basis and analyze the samples for chlorine residual and TSS to assess compliance with those limits.

2. The Discharger is also required to make visual observations of the area near DP 001 for floatable or settleable materials to assess compliance with the narrative effluent limits specified in this Order.

3. In the event of a discharge at DP 002, the Discharger is required to grab a representative sample of the wastewater during the first day of discharge and analyze the sample for Oil and Grease to assess compliance with the limits specified in this Order.

4. Although this Order does not specify any limits based on Table B of the Ocean Plan, the Discharger is required to also analyze all samples of the discharge at DP 002 for those constituents.

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[1] *Sampling is not necessary if the effluent total suspended solids concentration has not been recently higher than 60 mg/l.*

VII. RATIONALE FOR PROVISIONS

A. Standard Provisions

Standard Provisions, which apply to all NPDES permits in accordance with section 40 CFR 122.41, and additional conditions applicable to specified categories of permits in accordance with 40 CFR 122.42, are provided in Attachment D to the order.

40 CFR 122.41(a)(1) and (b) through (n) establish conditions that apply to all State-issued NPDES permits. These conditions must be incorporated into the permits either expressly or by reference. If incorporated by reference, a specific citation to the regulations must be included in the Order. 40 CFR 123.25(a)(12) allows the State to omit or modify conditions to impose more stringent requirements. In accordance with 40 CFR 123.25, this Order omits federal conditions that address enforcement authority specified in 40 CFR 122.41(j)(5) and (k)(2) because the enforcement authority under the CWC is more stringent. In lieu of these conditions, this Order incorporates by reference CWC Section 13387(e).

B. Special Provisions

1. Reopener Provisions

   The reopener provisions in this Order are based on 40 CFR 123. The Regional Water Board may reopen the permit to modify permit conditions and requirements. Causes for modifications include the promulgation of new regulations, or adoption of new regulations by the State Board or Regional Water Board, including revisions to the Basin Plan, the Ocean Plan and Statewide Policy on Clean Water Act Regulations.

2. Special Studies and Additional Monitoring Requirements – N/A

3. Best Management Practices and Pollution Prevention – N/A

4. Construction, Operation, and Maintenance Specifications - N/A

5. Other Special Provisions – N/A

6. Compliance Schedules – N/A

VIII. PUBLIC PARTICIPATION

The California Regional Water Quality Control Board, Santa Ana Region (Regional Water Board) is considering the issuance of waste discharge requirements (WDRs) that will serve as a National Pollutant Discharge Elimination System (NPDES) permit for discharges from Platform Esther. As a step in the WDR adoption process, the Regional Water Board staff

has developed tentative WDRs. The Regional Water Board encourages public participation in the WDR adoption process.

A. Notification of Interested Parties

The Regional Water Board has notified the Discharger and interested agencies and persons of its intent to prescribe waste discharge requirements for the discharge and has provided them with an opportunity to submit their written comments and recommendations. Notification was provided through the posting of Notice of Public Hearing in the area of the discharge and at the Regional Water Board website: http://www.waterboards.ca.gov/santaana/board_decisions/tentative_orders/index.shtml on or before September 7, 2012.

B. Written Comments

The staff determinations are tentative. Interested persons are invited to submit written comments concerning these tentative WDRs. Comments should be submitted either in person or by mail to the Executive Officer at the Regional Water Board at the address above on the cover page of this Order.

To be fully responded to by staff and considered by the Regional Water Board, written comments should be received at the Regional Water Board offices by 5:00 p.m. on August 17, 2012.

C. Public Hearing

The Regional Water Board will hold a public hearing on the tentative WDRs during its regular Board meeting on the following date and time and at the following location:

Date:	October 26, 2012
Time:	9:00 A.M.
Location:	Irvine Ranch Water District 15600 Sand Canyon Avenue Irvine, CA

Interested persons are invited to attend. At the public hearing, the Regional Water Board will hear testimony, if any, pertinent to the discharge, WDRs, and permit. Oral testimony will be heard; however, for accuracy of the record, important testimony should be in writing.

Please be aware that dates and venues may change. You can access our web address at: http://www.waterboards.ca.gov/santaana/board_info/agendas/, where the agenda will be posted noting any possible changes with the date and/or location.

D. Waste Discharge Requirements Petitions

Any aggrieved person may petition the State Water Board to review the decision of the Regional Water Board regarding the final WDRs. The petition must be submitted within 30 days of the Regional Water Board's action to the following address:

State Water Resources Control Board
Office of Chief Counsel
P.O. Box 100, 1001 I Street
Sacramento, CA 95812-0100

E. Information and Copying

The Report of Waste Discharge (RWD), related documents, tentative effluent limitations and special provisions, comments received, and other information are on file and may be inspected at the Regional Water Board's office at any time between 9:00 a.m. and 3:00 p.m. Monday through Friday. Copying of documents may be arranged through the Regional Water Board by calling (951) 782-4130.

F. Register of Interested Persons

Any person interested in being placed on the mailing list for information regarding the WDRs and NPDES permit should contact the Regional Water Board, reference this facility, and provide a name, address, and phone number.

G. Additional Information

Requests for additional information or questions regarding this Order should be directed to Gary Stewart at (951) 782-4379.

ATTACHMENT G– MINIMUM LEVELS

The Minimum* Levels identified in this appendix represent the lowest concentration of a pollutant that can be quantitatively measured in a sample given the current state of performance in analytical chemistry methods in California. These Minimum* Levels were derived from data provided by state-certified analytical laboratories in 1997 and 1998 for pollutants regulated by the California Ocean Plan and shall be used until new values are adopted by the SWRCB. There are four major chemical groupings: volatile chemicals, semi-volatile chemicals, inorganics, pesticides & PCB's. "No Data" is indicated by "--".

TABLE II-1
MINIMUM* LEVELS – VOLATILE CHEMICALS

		Minimum* Level (ug/L)	
Volatile Chemicals	**CAS Number**	**GC Method [a]**	**GCMS Method [b]**
Acrolein	107028	2.	5
Acrylonitrile	107131	2.	2
Benzene	71432	0.5	2
Bromoform	75252	0.5	2
Carbon Tetrachloride	56235	0.5	2
Chlorobenzene	108907	0.5	2
Chlorodibromomethane	124481	0.5	2
Chloroform	67663	0.5	2
1,2-Dichlorobenzene (volatile)	95501	0.5	2
1,3-Dichlorobenzene (volatile)	541731	0.5	2
1,4-Dichlorobenzene (volatile)	106467	0.5	2
Dichlorobromomethane	75274	0.5	2
1,1-Dichloroethane	75343	0.5	1
1,2-Dichloroethane	107062	0.5	2
1,1-Dichloroethylene	75354	0.5	2
Dichloromethane	75092	0.5	2
1,3-Dichloropropene (volatile)	542756	0.5	2
Ethyl benzene	100414	0.5	2
Methyl Bromide	74839	1.	2
Methyl Chloride	74873	0.5	2
1,1,2,2-Tetrachloroethane	79345	0.5	2
Tetrachloroethylene	127184	0.5	2
Toluene	108883	0.5	2
1,1,1-Trichloroethane	71556	0.5	2
1,1,2-Trichloroethane	79005	0.5	2
Trichloroethylene	79016	0.5	2
Vinyl Chloride	75014	0.5	2

Table II-1 Notes

a) GC Method = Gas Chromatography
b) GCMS Method = Gas Chromatography / Mass Spectrometry
* To determine the lowest standard concentration in an instrument calibration curve for these techniques, use the given ML (see Chapter III, "Use of Minimum* Levels").

TABLE II-2
MINIMUM* LEVELS – SEMI VOLATILE CHEMICALS

		Minimum* Level (ug/L)			
Semi-Volatile Chemicals	**CAS Number**	**GC Method [a, *]**	**GCMS Method [b, *]**	**HPLC Method [c,*]**	**COLOR Method [d]**
Acenapthylene	208968	--	10	0.2	--
Anthracene	120127	--	10	2	--
Benzidine	92875	--	5	--	--
Benzo(a)anthracene	56553	--	10	2	--
Benzo(a)pyrene	50328	--	10	2	--
Benzo(b)fluoranthene	205992	--	10	10	--
Benzo(g,h,i)perylene	191242	--	5	0.1	--
Benzo(k)floranthene	207089	--	10	2	--
Bis 2-(1-Chloroethoxy) methane	111911	--	5	--	--
Bis(2-Chloroethyl)ether	111444	10	1	--	--
Bis(2-Chloroisopropyl)ether	39638329	10	2	--	--
Bis(2-Ethylhexyl) phthalate	117817	10	5	--	--
2-Chlorophenol	95578	2	5	--	--
Chrysene	218019	--	10	5	--
Di-n-butyl phthalate	84742	--	10	--	--
Dibenzo(a,h)anthracene	53703	--	10	0.1	--
1,2-Dichlorobenzene (semivolatile)	95504	2	2	--	--
1,3-Dichlorobenzene (semivolatile)	541731	2	1	--	--
1,4-Dichlorobenzene (semivolatile)	106467	2	1	--	--
3,3-Dichlorobenzidine	91941	--	5	--	--
2,4-Dichlorophenol	120832	1	5	--	--
1,3-Dichloropropene	542756	--	5	--	
Diethyl phthalate	84662	10	2	--	--
Dimethyl phthalate	131113	10	2	--	--
2,4-Dimethylphenol	105679	1	2	--	--
2,4-Dinitrophenol	51285	5	5	--	--
2,4-Dinitrotoluene	121142	10	5	--	--
1,2-Diphenylhydrazine	122667	--	1	--	--
Fluoranthene	206440	10	1	0.05	--
Fluorene	86737	--	10	0.1	--
Hexachlorobenzene	118741	5	1	--	--
Hexachlorobutadiene	87683	5	1	--	--
Hexachlorocyclopentadiene	77474	5	5	--	--

Semi-Volatile Chemicals	CAS Number	GC Method [a, *]	GCMS Method [b, *]	HPLC Method [c,*]	COLOR Method [d]
Hexachloroethane	67721	5	1	--	--
Indeno(1,2,3-cd)pyrene	193395	--	10	0.05	--
Isophorone	78591	10	1	--	--
2-methyl-4,6-dinitrophenol	534521	10	5	--	--
3-methyl-4-chlorophenol	59507	5	1	--	--
N-nitrosodi-n-propylamine	621647	10	5	--	--
N-nitrosodimethylamine	62759	10	5	--	--
N-nitrosodiphenylamine	86306	10	1	--	--
Nitrobenzene	98953	10	1	--	--
2-Nitrophenol	88755	--	10	--	--
4-Nitrophenol	100027	5	10	--	--
Pentachlorophenol	87865	1	5	--	--
Phenanthrene	85018	--	5	0.05	--
Phenol	108952	1	1	--	50
Pyrene	129000	--	10	0.05	--
2,4,6-Trichlorophenol	88062	10	10	--	--

Table II-2 Notes:

a) GC Method = Gas Chromatography
b) GCMS Method = Gas Chromatography / Mass Spectrometry
c) HPLC Method = High Pressure Liquid Chromatography
d) COLOR Method= Colorimetric

* To determine the lowest standard concentration in an instrument calibration curve for this technique, multiply the given ML by 1000 (see Chapter III, “Use of Minimum* Levels”).

Inorganic Substances	CAS Number	COLOR Method[a]	DCP Method[b]	FAA Method[c]	GFAA Method[d]	HYDRIDE Method[e]	ICP Method[f]	ICPMS Method[g]	SPGFAA Method[h]	CVAA Method[i]
Antimony	7440360	--	1000.	10.	5.	0.5	50.	0.5	5.	--
Arsenic	7440382	20.	1000.	--	2.	1.	10.	2.	2.	--
Beryllium	7440417	--	1000.	20.	0.5	--	2.	0.5	1.	--
Cadmium	7440439	--	1000.	10.	0.5	--	10.	0.2	0.5	--
Chromium (total)	--	--	1000.	50.	2.	--	10.	0.5	1.	--
Chromium (VI)	18540299	10.	--	5.	--	--	--	--	--	--
Copper	7440508	--	1000.	20.	5.	--	10.	0.5	2.	--
Cyanide	57125	5.	--	--	--	--	--	--	--	--
Lead	7439921	--	10000.	20.	5.	--	5.	0.5	2.	--
Mercury	7439976	--	--	--	--	--	--	0.5	--	0.2
Nickel	7440020	--	1000.	50.	5.	--	20.	1.	5.	--
Selenium	7782492	--	1000.	--	5.	1.	10.	2.	5.	--
Silver	7440224	--	1000.	10.	1.	--	10.	0.2	2.	--
Thallium	7440280	--	1000.	10.	2.	--	10.	1.	5.	--
Zinc	7440666	--	1000.	20.	--	--	20.	1.	10.	--

Table II-3 Notes

a) COLOR Method = Colorimetric
b) DCP Method = Direct Current Plasma
c) FAA Method = Flame Atomic Absorption
d) GFAA Method = Graphite Furnace Atomic Absorption
e) HYDRIDE Method = Gaseous Hydride Atomic Absorption
f) ICP Method = Inductively Coupled Plasma
g) ICPMS Method = Inductively Coupled Plasma / Mass Spectrometry
h) SPGFAA Method = Stabilized Platform Graphite Furnace Atomic Absorption (i.e., US EPA 200.9)
i) CVAA Method = Cold Vapor Atomic Absorption

* To determine the lowest standard concentration in an instrument calibration curve for these techniques, use the given ML (see Chapter III, "Use of Minimum* Levels").

TABLE II-4
MINIMUM* LEVELS – PESTICIDES AND PCBs

Pesticides – PCB's	CAS Number	Minimum* Level (ug/L) GC Method[a,*]
Aldrin	309002	0.005
Chlordane	57749	0.1
4,4'-DDD	72548	0.05
4,4'-DDE	72559	0.05
4,4'-DDT	50293	0.01
Dieldrin	60571	0.01
a-Endosulfan	959988	0.02
b-Endosulfan	33213659	0.01
Endosulfan Sulfate	1031078	0.05
Endrin	72208	0.01
Heptachlor	76448	0.01
Heptachlor Epoxide	1024573	0.01
a-Hexachlorocyclohexane	319846	0.01
b-Hexachlorocyclohexane	319857	0.005
d-Hexachlorocyclohexane	319868	0.005
g-Hexachlorocyclohexane (Lindane)	58899	0.02
PCB 1016	--	0.5
PCB 1221	--	0.5
PCB 1232	--	0.5
PCB 1242	--	0.5
PCB 1248	--	0.5
PCB 1254	--	0.5
PCB 1260	--	0.5
Toxaphene	8001352	0.5

Table II-4 Notes

a) GC Method = Gas Chromatography

* To determine the lowest standard concentration in an instrument calibration curve for this technique, multiply the given ML by 100 (see Chapter III, "Use of Minimum* Levels").