California Regional Water Quality Control Board
Santa Ana Region

June 4, 2004

STAFF REPORT

ITEM: 8

SUBJECT: Revised Waste Discharge Requirements for Access Business Group LLC, Nutrilite Facility, Order No. R8-2004-0017

DISCUSSION:

The Access Business Group LLC (hereinafter discharger) owns and operates two liquid waste disposal ponds (Ponds) at its Nutrilite facility located at 19600 Sixth Street in the Lakeview area of Riverside County. The discharger is currently operating under Waste Discharge Requirements (WDR), Order No. 78-180.

In order to protect the quality of the waters of the State, the discharger has constructed two lined disposal ponds with leachate collection and removal systems at the facility. These Ponds will receive and store mixed liquid wastes from facility operations, and all stormwater flows from the site. Regional Board staff believes that the Ponds should not result in any adverse impacts to the present or potential beneficial uses of the receiving waters, if conducted in accordance with the terms and conditions of this order.

Order No. 78-180 is being revised to:

a. Ensure compliance with the requirements specified in the California Code of Regulations, Title 27(Title 27);

b. Reflect changes in State and Regional Boards policies and plans, including the Basin Plan; and

c. Incorporate the newly constructed Ponds and other changes to the site layout into the facility's WDR.

The order requires the discharger to maintain the structural integrity of, and monitor discharges to, the Ponds; monitor groundwater on a quarterly basis; and investigate and address any contamination determined to originate from the Ponds.

This order contains waste discharge requirements that implement the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan). A revised Basin Plan was adopted by the Regional Board on March 11, 1994 and became effective on January 24, 1995. The Basin Plan specifies water quality objectives and beneficial uses for the groundwater and surface waters within the Region.

The requirements stipulated in this order implement the Basin Plan and are expected to be protective of water quality in the Region.

RECOMMENDATION:

Adopt Order No. R8-2004-0017 as presented.

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SANTA ANA REGION

WASTE DISCHARGE REQUIREMENTS
ORDER NO. R8-2004-0017

FOR
ACCESS BUSINESS GROUP LLC
NUTRILITE FACILITY
LIQUID WASTE DISPOSAL PONDS
LAKEVIEW, RIVERSIDE COUNTY

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

1. The Access Business Group LLC (hereinafter discharger) owns and operates two surface impoundments used for the disposal of mixed liquid wastes at its Nutrilite facility located at 19600 Sixth Street in the Lakeview area of Riverside County. The facility is located at latitude 33°50'14" and longitude -117°06'12", in portions of Section 8, Township 4S, Range 2W, San Bernardino Baseline & Meridian, as shown on Attachments A and B, which are hereby made a part of this Order.

2. On October 20, 1978, the Board adopted Waste Discharge Requirements (WDR) Order No. 78-180, to regulate the discharges of process wastewater to an unlined evaporation pond; boiler blowdown and water softener wastewater to a lined pond; and sanitary wastes to a subsurface septic tank system.

3. In 2003, the discharger replaced both the lined and unlined evaporation ponds with two lined surface impoundments that comply with the new California Code of Regulations, Title 27 (Title 27), which regulates disposal of wastes to land, including surface impoundments. The discharge of sanitary wastes to the subsurface-septic tank system has been determined to pose an insignificant threat to water quality; accordingly, the issuance of waste discharge requirements for sanitary wastes to subsurface disposal systems has been waived under Resolution R8-2002-0044. Therefore, the septic tank-subsurface disposal systems are no longer regulated under a WDR. Order No. 78-180 is being updated to reflect these changes, and to:

   a. Ensure compliance with the requirements specified in Title 27;

   b. Reflect changes in State and Regional Boards policies and plans, including the Basin Plan; and

   c. Incorporate changes to the surface impoundments and site layout into the facility's WDR.

   The facility layout is shown on Attachment C, which is hereby made a part of this Order.

4. The property is approximately 600 acres in size and consists of a farming operation and a manufacturing facility where many of the crops used to produce the organic ingredients (vegetables, fruits, etc.) are cultivated, harvested, and processed into concentrates for use in Nutrilite's nutrition and wellness product lines.

5. The manufacturing facility includes the following departments and utilities:

a. Natural Concentrate Operation: In the Natural Concentrate Operation, various types of crops are processed into a powdered concentrate to be used in the production of tablets and powdered drinks.

b. Powdered Drink Operation: In this process, the concentrated powder is turned into granules for use in powdered drink and protein supplements.

c. Plant Utilities Operation: Plant utilities include five large boilers, two cooling towers, water conditioning and pretreatment systems, and water softeners located throughout the facility.

6. Historically, the wastewater associated with the operations at the manufacturing facility was discharged to an onsite unlined surface impoundment for retention, percolation and evaporation. Additionally, wastewater from boiler blowdown, cooling towers, water conditioners, and water softener brine were discharged to an onsite lined pond known as the Brine Pond. The pond lining included a leachate collection and removal system (LCRS). Monitoring of this pond indicated that it was leaking into the LCRS. Repairs to the LCRS system did not completely stop the leak. In order to comply with the requirements outlined in Title 27, both the unlined pond and the lined pond were properly abandoned and two new lined surface impoundments were constructed in their place.

7. The two newly constructed lined ponds are of sufficient capacity to contain all flows that were formerly directed to the two closed ponds as well as any storm water runoff from within the facility.

8. The surface impoundments are identified as Evaporation Pond 1 and Evaporation Pond 2 (Ponds 1 and 2).

   The design for Ponds 1 and 2 are shown on Attachment D, which is hereby made a part of this Order, and include, from the bottom up:

   a. A smooth, compacted subgrade soil,

   b. A Geosynthetic Clay Liner, used only under the LCRS sump area,

   c. A 40-mil smooth high density polyethylene (HDPE) secondary liner covering the subgrade,

   d. A Geonet drainage layer serving as the LCRS, and

   e. A 60-mil smooth HDPE primary liner.

9. Pond 1 covers approximately 3 acres of land with a capacity of 42 acre-feet, and Pond 2 covers approximately 6 acres of land with a capacity of 84 acre-feet.

10. Title 27, §20340(c) indicates that the depth of fluid in the LCRS collection sump shall be kept at a minimum in order to minimize the head on the secondary liner. Therefore, the discharger shall install an automated pump in the LCRS sump that will be activated when the leachate in the sump reaches a depth of 1 foot or less. This leachate shall be returned to the pond for disposal.

11. A revised Water Quality Control Plan (Basin Plan) became effective on January 24, 1995. The Basin Plan contains water quality objectives and beneficial uses for waters in the Santa Ana Region.

12. The requirements contained in this Order are necessary to implement the Basin Plan.

13. The facility is located within the Lakeview Groundwater Subbasin, the beneficial uses of which are:

    a. Municipal and Domestic Supply,
    b. Agricultural Supply,
    c. Industrial Service Supply, and
    d. Industrial Process Supply.

14. As required under Title 27, the discharger installed two monitoring wells on site; attempts to install a third monitoring well downgradient of the site were not successful. Therefore, the discharger is proposing to use an existing onsite production well as the third monitoring well to monitor the groundwater for any sign of releases from the ponds. The production well will be allowed to recover for 72 hours before being sampled. The location of the monitoring wells is shown on Attachment C.

15. The project involves the continued operation of an existing facility and as such, is exempt from provisions of the California Environmental Quality Act (Public Resources Code, §21000 et seq.) in accordance with §15301, Chapter 3, Title 14 of the California Code of Regulations.

16. The Board has notified the discharger and interested agencies and parties of its intent to update waste discharge requirements for the facility, and has provided them with an opportunity to submit their written views and recommendations.

17. The Regional Board, in a public meeting, heard and considered all comments pertaining to the adoption of this Order.

18. This Order rescinds Order No. 78-180.

IT IS HEREBY ORDERED that the discharger, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted there under, shall comply with the following:

A. WASTE DISCHARGE SPECIFICATIONS

1. The discharge of wastewater to the ponds shall not cause or threaten to cause a nuisance or pollution as defined in §13050 of the California Water Code.

2. A minimum of 24 inches of freeboard, measured vertically from the water surface to the lowest point on the top edge of the pond liner, must be maintained at all times in Ponds 1 and 2. If the wastewater level in the ponds threatens to exceed the freeboard specification, water shall be removed from the ponds and properly disposed of at a location or facility approved by the Executive Officer of the Regional Board (Executive Officer).

3. Discharges to the ponds shall not cause the concentration of any Constituent of Concern (COC)[1] or monitoring parameter to exceed its respective background value in the upgradient monitoring wells.

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[1] **"Constituents of Concern"** are those constituents that are likely to be in the waste or which are likely to be derived from waste constituents in the event of a release.

4. Any proposed modifications to the disposal ponds, or any proposed change in the operation of the ponds, must be submitted in writing, along with supporting documentation, to the Executive Officer for review and approval before the proposed modifications or changes are implemented.

B. PROVISIONS

1. The discharger shall comply with all waste discharge specifications, provisions, and monitoring and reporting requirements of this Order immediately upon its adoption.

2. The discharger shall implement the attached Monitoring and Reporting Program (M&RP) No. R8-2004-0017 in order to detect, at the earliest opportunity, any unauthorized discharge of wastes from the ponds, or any unreasonable impairment of beneficial uses associated with or caused by the discharge of wastes.

3. Compliance with the requirements of this Order shall be evaluated based on the following:

   a. Periodic inspection by Board staff;

   b. Evaluation of monitoring reports submitted in accordance with the attached M&RP; and

   c. Any other relevant information.

4. The discharger shall maintain a copy of this Order at the site so as to be available at all times to site operations personnel.

5. The discharger shall comply with all federal, state, and local laws and regulations pertaining to surface impoundment operations.

6. If an indication of a release from the pond is detected through the Detection Monitoring Program (DMP), the discharger shall verify that the release is measurably significant in accordance with requirements outlined under Title 27, §20420(i) and (j).

7. Upon confirmation that the release has occurred, the discharger shall submit an Evaluation Monitoring Program and an initial Engineering Feasibility Study (EFS) for a corrective action in accordance with Title 27, §20420(k). When the EMP has been reviewed and approved, the Board shall direct the discharger to implement the EMP.

8. Once the EMP establishes the nature and extent of the contaminant plume, the discharger shall update the EFS, and shall submit a Corrective Action Program (CAP) to address the release. Upon review and approval, the Board shall direct the discharger to implement the CAP Program in accordance with §20430 of Title 27.

9. The LCRS sump shall be equipped with an automatic pump to remove any collected liquids within the sump back to the pond. A flow meter shall be installed to record the amount of liquids returned to the pond from the LCRS sump.

10. For this facility, the three applicable parts of the Water Quality Protection Standards of Title 27, §20390 are as follows:

a. COCs (§ 20395) - The list of COCs for the pond water and the monitoring wells consists of constituents included in general minerals, Attachment E; EPA Priority Pollutants, Attachment F; and total petroleum hydrocarbons (TPH, by 8015M). Attachments E and F are hereby made a part of this Order. After the first 4 quarters of sampling, the discharger shall then propose a data analysis method for review and approval. During the second year of monitoring, the COCs shall be reduced to those general minerals, TPH, and other constituents discovered during the first 4 quarters. Every five years thereafter, the discharger shall test the pond water and monitoring wells for all constituents listed in Attachments E and F, and for TPH, unless instructed otherwise by the Executive Officer.

b. Concentration Limits (§ 20400) - The Concentration Limit for each COC or Monitoring Parameter shall be its background value in the upgradient monitoring wells. These values shall be established during the first 4 quarters of monitoring.

c. Compliance Period (§ 20410) - The estimated duration of the Compliance Period for the ponds, in case of a release, is 25 years.

11. The discharger shall permit Board staff:

    a. Entry upon the premises for inspection of the facilities;

    b. To copy any records required to be kept by the discharger under the terms and conditions of this Order;

    c. To sample any discharge; and

    d. To take photographs and videotapes at the facility.

12. The discharger shall notify Board Staff by telephone within 24 hours of any discharge of facility wastewater outside the ponds. This notification shall be followed within 5 days by a written report, which must include the following information:

    a. The approximate date and time of the discharge;

    b. The flow rate and duration of the discharge;

    c. The type and source of the discharge;

    d. A map indicating the location(s) where the discharge(s) occurred;

    e. Identification of water or soil sample collection points, and chain of custody records;

    f. The cause of the discharge; and

    g. A description of corrective actions implemented.

    A summary report of all accidental discharges shall be included in the annual report.

13. Any proposed change in the character or location of the discharge, including any change to the boundaries of the ponds, or any proposed significant increase in the volume of wastewater to be discharged, must be submitted in writing to the Executive Officer for review and approval.

14. The discharger shall notify the Executive Officer in writing of any proposed change in ownership or responsibility for construction, operation, closure, or post-closure maintenance of this disposal facility. This notification shall be given prior to the effective date of the change and shall include a statement by the new discharger that construction, operation, closure, and post-closure maintenance shall comply with any existing waste discharge requirements and any revisions thereof.

15. In the event of any change in control or ownership of land or waste discharge facilities presently controlled by the discharger, the discharger shall notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be immediately forwarded to this office.

16. Ninety days prior to the cessation of operations at the facility, the discharger shall submit a workplan, subject to approval by the Executive Officer, for assessing the extent, if any, of contamination of natural geologic materials beneath the liner, surface waters (including ephemeral stream channels), and groundwater by waste discharges from the facility. Within 120 days following workplan approval, the discharger shall submit an engineering report presenting results of the contamination assessment. A California registered civil engineer or certified engineering geologist must prepare the workplan, contamination assessment results, and engineering report.

17. The discharger shall obtain and maintain Financial Assurance for any potential corrective actions and for final closure of the ponds. Financial Assurance must be maintained until the end of the Post-Closure Maintenance Period in accordance with Title 27, §§ 22200 et seq. The discharger shall submit an annual report that validates the maintenance of the financial assurance mechanism or proposes and substantiates any needed changes.

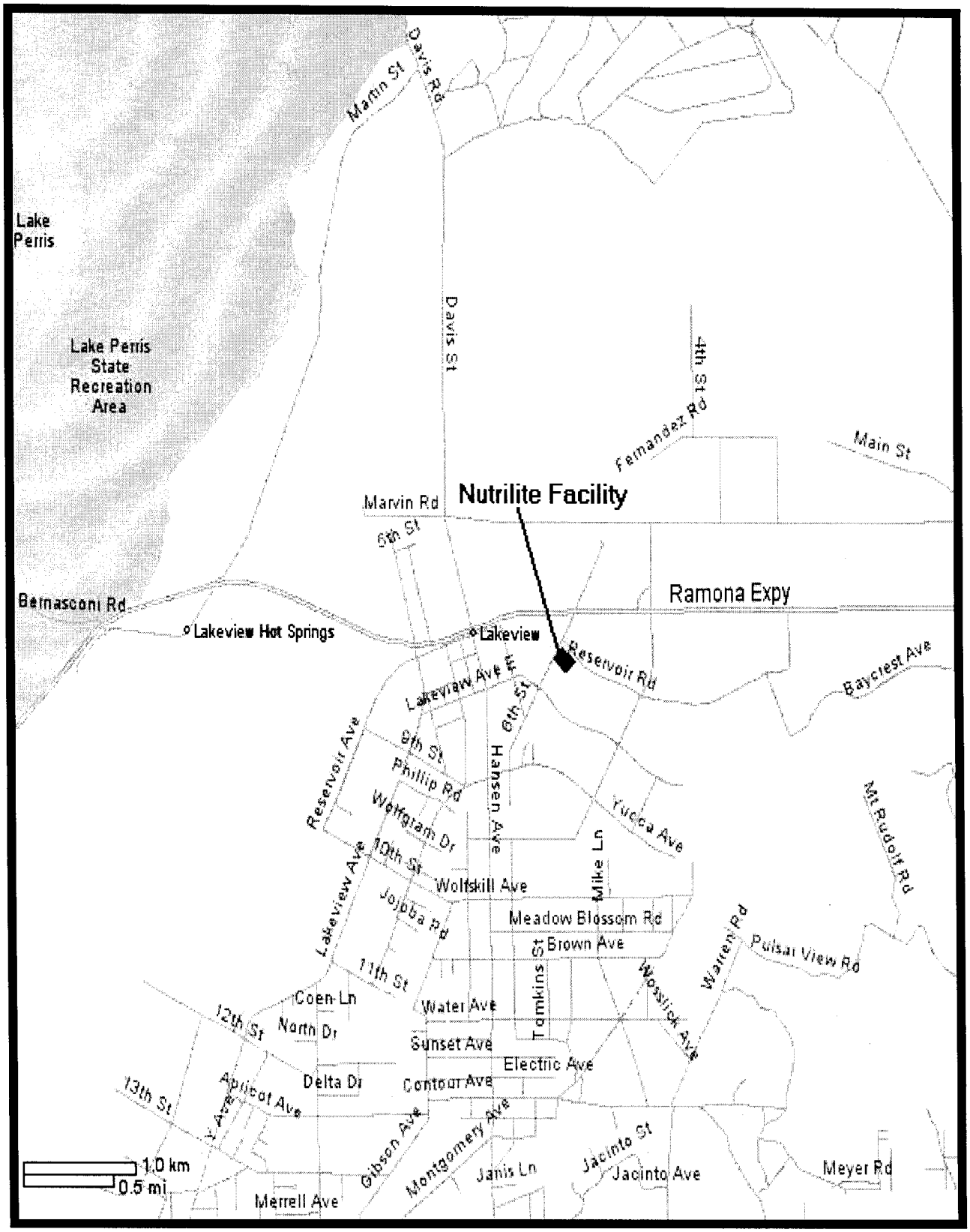
18. Order No. 78-180 is hereby rescinded.

I, Gerard J. Thibeault, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Santa Ana Region, on June 4, 2004.

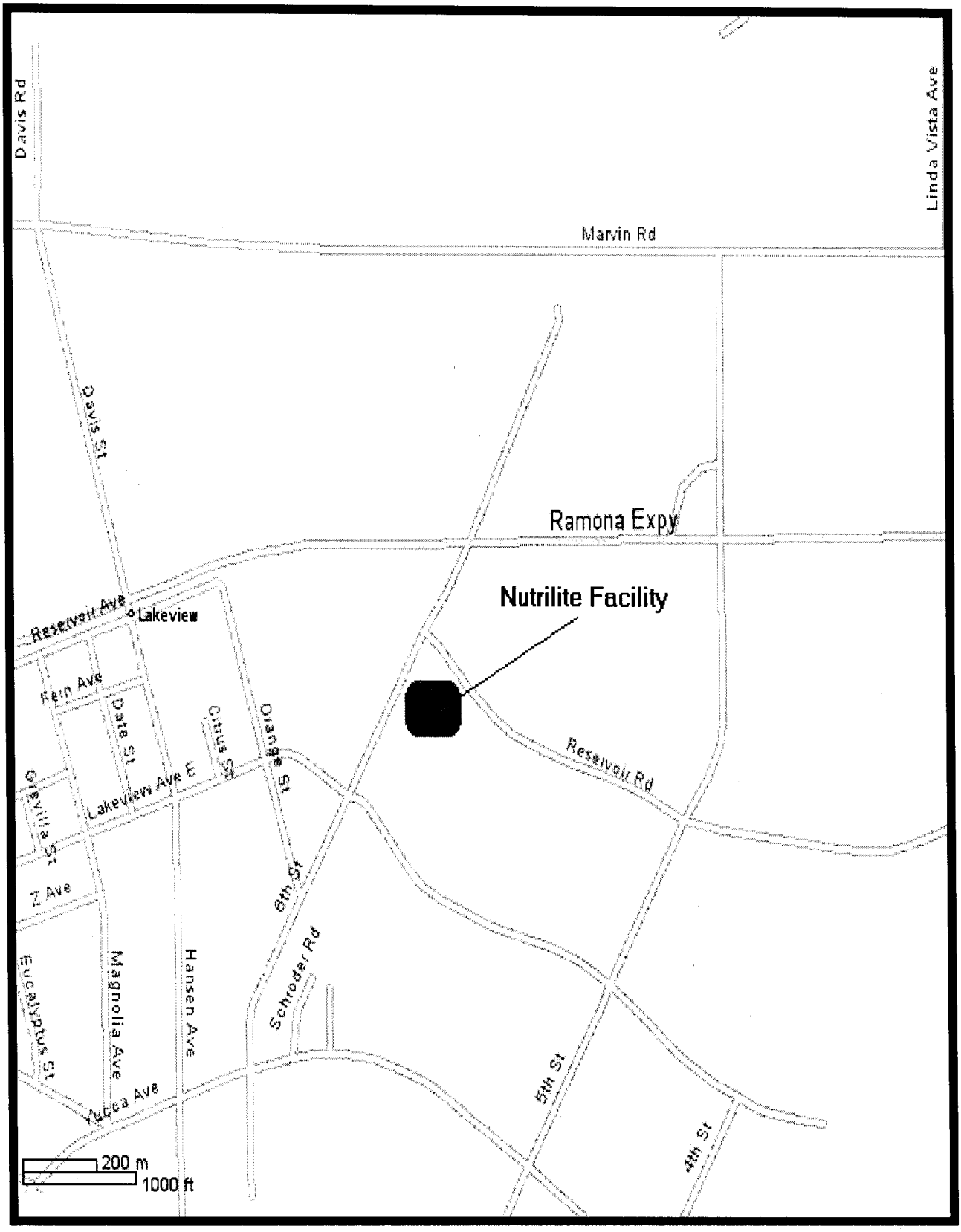
_____

Gerard J. Thibeault
Executive Officer

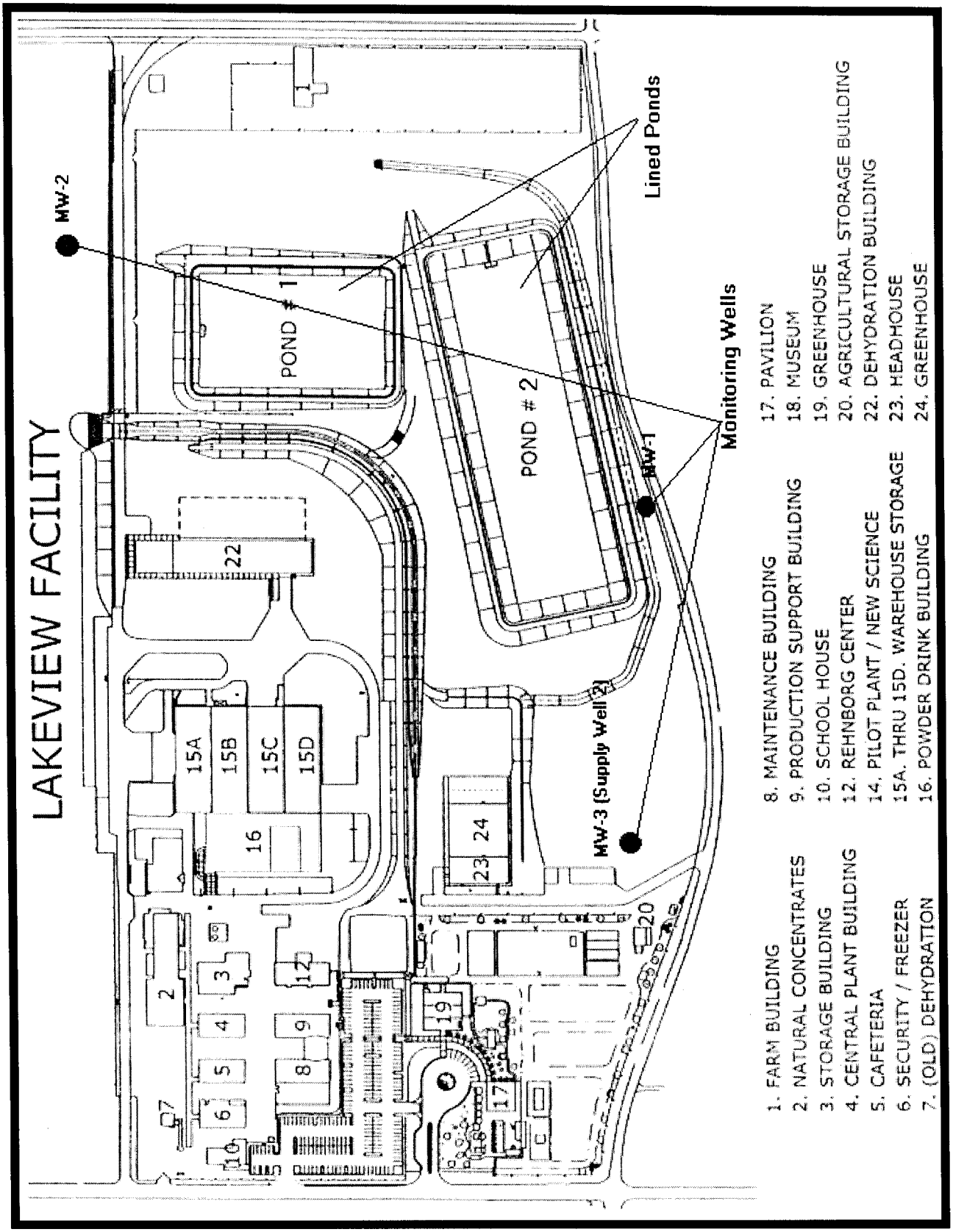
Attachment A- General location of the facility



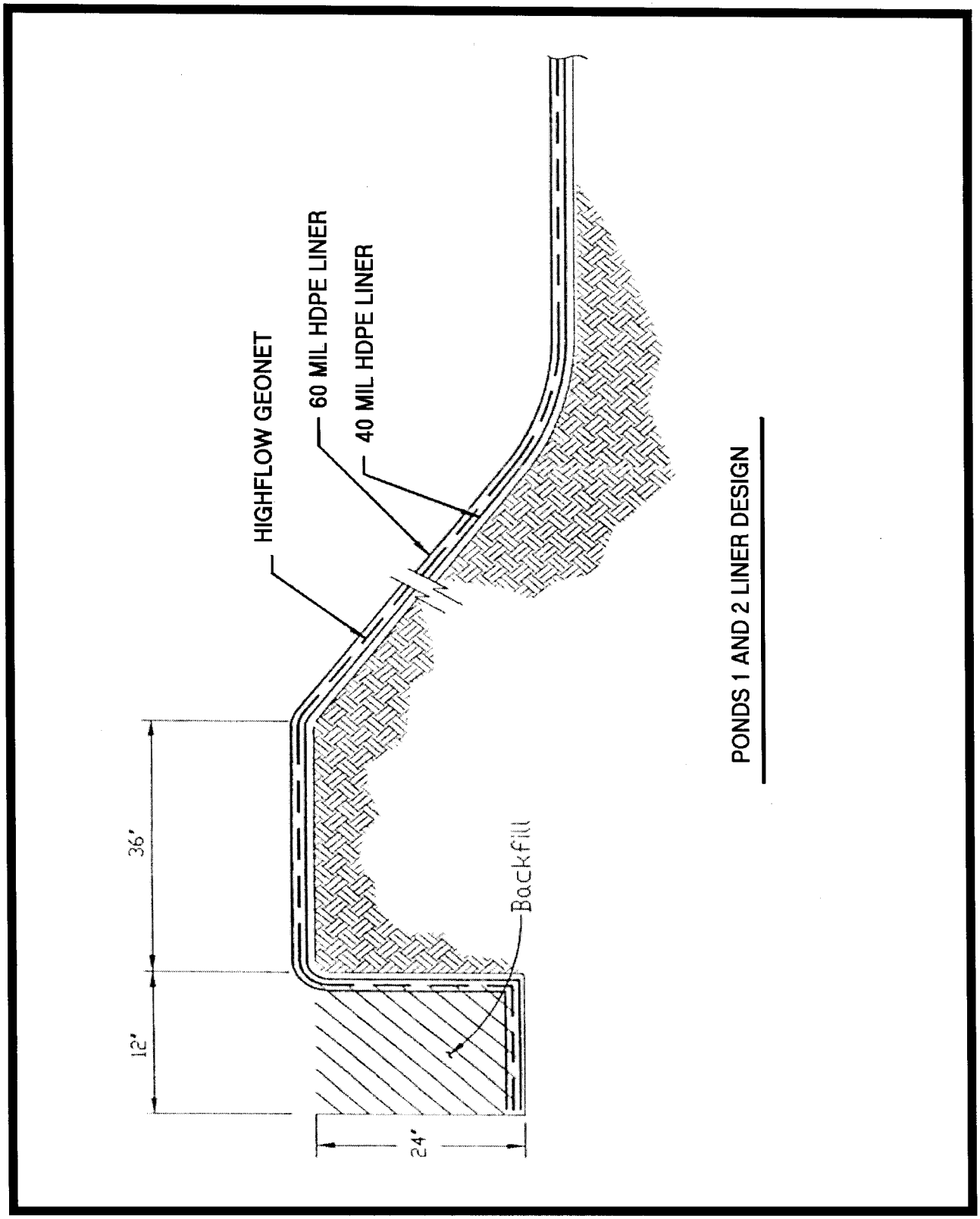
Attachment B – Facility location



Attachment C - Facility map



Attachment D – north and south pond design



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SANTA ANA REGION

MONITORING AND REPORTING PROGRAM ORDER NO. R8-2004-0017

FOR
ACCESS BUSINESS GROUP LLC
LIQUID WASTE DISPOSAL PONDS
LAKEVIEW, RIVERSIDE COUNTY

A. GENERAL

1. This Monitoring and Reporting Program (M&RP) establishes the requirements for disposal, monitoring, and reporting associated with lined liquid waste disposal ponds (Ponds) 1 and 2, used for the disposal of mixed liquid wastes, and groundwater monitoring wells at the Access Business Group's facility located in the Lakeview area of Riverside County.

2. The discharger shall perform the monitoring activities in compliance with the established water quality protection standards and the requirements of Title 27, § 20380 et seq.

3. Sample collection, storage, and analysis shall be performed according to the most recent version of U.S. EPA Standard Methods (U.S. EPA Publication SW-846 and 40 CFR Part 136).

4. Pursuant to Section 13176, Article 4, Chapter 3, Division 7 of the California Water Code, a certified laboratory registered by the State Department of Health Services shall perform all analyses. Specific methods of analysis used must be identified in the facility monitoring reports.

5. All reports shall be signed by a responsible officer or a duly authorized representative of the discharger and shall be submitted under penalty of perjury to:

   California Regional Water Quality Control Board
   Santa Ana Region
   3737 Main Street, Suite 500
   Riverside, CA 92501-3348
   Attention: Land Disposal Section

6. All reports shall be maintained by the discharger and shall be retained for a minimum of five years.

7. Revisions to the M&RP may be made at the discretion of the Executive Officer of the Regional Board (Executive Officer) at any time to address a change in the monitoring frequency, the monitoring parameters, the monitoring points, etc.

B. LIQUID WASTE PONDS MONITORING

1. The freeboard in each pond shall be monitored weekly and recorded in a permanent log. This information shall be incorporated into the facility's quarterly monitoring reports. The permanent log for the facility shall be retained on site at a centralized location, and made available to Board staff upon request during normal business hours.

2. Each pond's liner shall be visually inspected monthly for damage or failure, and the findings recorded in the permanent log. For any damage or failure noted, repairs must be made immediately and a summary detailing such repairs shall be submitted with the subsequent monitoring report.

3. The total volume of wastewater discharged to each pond shall be measured on a weekly basis and a daily average shall be calculated. This information shall be recorded in the permanent log and copies incorporated into the facility's quarterly monitoring reports.

4. If liquid is discovered in the leachate collection and removal system (LCRS), the total volume of wastewater pumped back to the pond from each pond's LCRS sump shall be monitored on a weekly basis and a daily average shall be calculated for each pond. This information shall be recorded in a permanent log, and copies incorporated into the facility's quarterly monitoring reports.

5. Wastewater samples shall be collected quarterly from each of the onsite ponds, and the samples shall be analyzed for general minerals, COCs developed under Provision B.10.a of this Order, and total petroleum hydrocarbons (Method 8015 M). The analytical results shall be submitted with the quarterly monitoring reports.

6. If the total petroleum hydrocarbon analyses indicate the presence of hydrocarbons in the C_6 to C_{23} range, the samples shall be analyzed for volatile and semi-volatile organic compounds as well. The analytical results shall be incorporated in the quarterly monitoring report.

C. WATER QUALITY MONITORING

1. The discharger shall conduct groundwater monitoring in accordance with 27 CCR, §20415 and §20420. In accordance with 27 CCR, §20420(d), the following Water Quality Protection Standard are established for groundwater monitoring:

   a. **Constituents of Concern (COCs):** COCs consist of general minerals, Attachment E; EPA Priority Pollutants, Attachment F; and total petroleum hydrocarbons (TPH, by 8015M). After the first 4 quarters of sampling and background data collection, the COCs shall be reduced to the general minerals list, TPH, and other constituents discovered during the first 4 quarters of monitoring. Every five years, the discharger shall test the ponds water and monitoring wells for all constituents listed in Attachments E and F, and for TPH, unless instructed otherwise by the Executive Officer. .

   b. **Concentration Limits:** The concentration limits for the COCs shall be derived from a pool of background well (Wells MW-1 and 3) data from the first 4 quarters of monitoring, and subsequently, shall include all more-recent data from the two background wells.

   c. **Point of Compliance:** MW-2 (See Attachment D of this Order).

   d. **Monitoring Points:** MW-1, MW-2 and MW-3 (See Attachment D of this Order).

2. One of the three onsite groundwater monitoring wells, MW-3, is a water supply well for the facility, and therefore the pump must be shut down for a minimum of 72 hours prior to the sampling event. Pump tests indicate that this time is sufficient to allow the groundwater level to stabilize and rise to its static level.

3. All groundwater samples shall be collected using equipment, procedures, and practices that minimize contamination, and in accordance with Section A.1. of this M&RP.

4. Groundwater elevations in all monitoring wells shall be measured and recorded before purging the wells for sampling.

D. REPORTING

1. MONITORING REPORTS

a. Written monitoring reports shall be submitted quarterly in accordance with Attachment G, which is hereby made a part of this Order.

b. The discharger shall propose and implement a data analysis method meeting the requirements of 27 CCR, §20415(e)(7-12) to evaluate the groundwater quality monitoring data and to determine measurably significant evidence of any release from the Ponds. After the first 4 quarters of monitoring, the discharger shall submit a proposed data analysis method, including the rationale for selecting the proposed method for all monitoring parameters, for approval by the Executive Officer.

c. The discharger shall continue the groundwater monitoring program through the compliance period for the site in accordance with 27 CCR, §20410. The compliance period is the minimum period of time during which the discharger shall conduct a water quality monitoring program subsequent to a release from the Unit, which is 25 years for this site The compliance period begins anew each time the discharger initiates an evaluation monitoring program (under §20425).

d. The monitoring reports shall include, at a minimum, the following:

i. A summary and discussion of all violations that occurred during the past monitoring period, and all actions taken or planned for correcting these violations.

ii. A summary and interpretation of all monitoring data collected from the onsite groundwater monitoring wells, including a statistical analysis of the monitoring data; wastewater ponds, and each pond's LCRS sump during the past monitoring period;

iii. A map showing the locations of observation stations and monitoring points;

iv. Tabulated results of all analyses performed to demonstrate compliance with the requirements of this Order;

v. An evaluation of the effectiveness of the monitoring and containment facilities; and

vi. A summary and certification of completion of all visual monitoring and observations for the ponds.

2. **ANNUAL REPORT**

On April 30 of each year, the discharger shall submit an annual report to the Regional Board covering the previous year's monitoring. This report may be submitted along with the April 30 quarterly monitoring report. The annual report shall contain:

a. A summary of the previous year's activities, including a summary of any violations of the requirements contained in this Order, and measures taken to correct these violations.

b. A summary and interpretation of the analytical results of groundwater samples and wastewater chemistry. Include an evaluation of the existing groundwater monitoring array, and whether additional monitoring wells are required;

c. A summary of the status of the ponds, including estimated volumes of wastewater discharged to the ponds and a summary of all repairs and maintenance;

d. A summary of the observations noted during routine surface impoundment inspections;

e. A summary of any changes made to the design or operation of the ponds since the previous annual report; and

f. A report that validates the maintenance of the financial assurance mechanism, or proposes and substantiates any needed changes.

3. **CONTINGENCY REPORTING**

Upon discovery of any seepage or overflow from the ponds, as well as any leakage into the LCRS sump that exceeds the allowable leakage rates of 10,250 gallons/day for Pond 1 and 20,500 gallons/day for Pond 2, as outlined in Finding 10 of the WDR the discharger shall notify Board staff by telephone within 24 hours, followed by a written report within seven days of the initial report, containing at least the following information:

a. A map showing the location(s) of seepage or discharge, if known;

b. An estimate of the flow rate;

c. A description of the nature of the discharge (i.e., all pertinent observations and analyses); and

d. Corrective action measures underway or proposed, along with a time schedule for their implementation, if necessary.

Ordered by: _____

Gerard J. Thibeault
Executive Officer

Date: June 4, 2004

Attachment E – General Minerals List

Parameter	EPA Method	Parameter	EPA Method
GENERAL		**GENERAL - CONT'D**	
Total Hardness	130	Total Dissolved Solids	160.1
Bicarbonate (HCO_3)	310.2	Chemical Oxygen Demand	410
Carbonate ($CaCO_3$)	310.2	Phenols	420.1
Total Alkalinity	310.1	Total Organic Carbon	415
Total Cations	[2]	Total Organic Halogens	450.1
Total Anions	[1]	Calcium (Ca)	200.7/215
Hydroxide (OH)	[3]	Magnesium (Mg)	200.7/242.1
Chloride (Cl)	325	Manganese (Mn)	200.7/243.1
Fluoride (F)	340	Potassium (K)	200.7/258.1
Nitrate (NO_3)	353.2	Sodium	200.7/273.1
Sulfate (SO_4)	375	Iron (Fe)	200.7/236.1
Phosphate (PO_4)	365.2	Zinc (Zn)	200.7/289.1
Total Phosphorus	365.1/365.2	**VOLATILE ORGANICS**	8260
Boron (B)	212.3/200.7		
Specific Conductance	120.1		
pH	150.1		

[2] **Total cations and anions are determined by the summation of all cations and anions, respectively, in the sample analyzed.**

[3] **The standard method, SM 2330B, in the "Standard Methods for the Examination of Water and Wastewater" for hydroxide ion analysis shall be used.**

Attachment F – EPA Priority Pollutant List

EPA PRIORITY POLLUTANT LIST

Metals	Method
Antimony	ICP
Arsenic	GF/AA
Beryllium	ICP
Cadmium	ICP
Chromium	ICP
Copper	GF/AA
Lead	GF/AA
Mercury	CV/AA
Nickel	ICP
Selenium	GF/HYDRIDE
Silver	ICP
Thallium	ICP
Zinc	ICP

Miscellaneous	Method
~~Cyanide~~	Not Required
~~Asbestos (not required unless requested)~~	Not Required
~~2,3,7,8 Tetrachlorodibenzo-P-Dioxin (TCDD)~~	Not Required

Pesticides	Method
Aldrin	8080
Chlordane	"
Dieldrin	"
4, 4' - DDT	"
4, 4' - DDE	"
4, 4' - DDD	"
Alpha Endosulfan	"
Beta Endosulfan	"
Endosulfan Sulfate	"
Endrin	"
Endrin Aldehyde	"
Heptachlor	"
Heptachlor Epoxide	"
Alpha BHC	"
Beta BHC	"
Delta BHC	"
Gamma BHC	"
Toxaphene	"
PCB 1016	"
PCB 1221	"
PCB 1232	"
PCB 1242	"
PCB 1248	"
PCB 1254	"
PCB 1260	"

Base/Neutral Extractables	Method
Acenaphthene	8270
Acenaphthylene	"
Anthracene	"
Benzidine	"
Benzo (a) Anthracene	"
Benzo (a) Pyrene	"
Benzo (b) Fluoranthene	"
Benzo (g,h,i) Perylene	"
Benzo (k) Fluoranthene	"
Bis (2-Chloroethoxy) Methane	"
Bis (2-Chloroethyl) Ether	"
Bis (2-Chloroisopropyl) Ether	"
Bis (2-Ethylhexyl) Phthalate	"
4-Bromophenyl Phenyl Ether	"
Butyl Benzyl Phthalate	"
2-Chloronaphthalene	"
Chrysene	"
Dibenzo (a,h) Anthracene	"
4-Chlorophenyl Phenyl Ether	"
1,2-Dichlorobenzene	"
1,3-Dichlorobenzene	"
1,4-Dichlorobenzene	"
3,3-Dichlorobenzidine	"
Diethyl Phthalate	"
Dimethyl Phthalate	"
Di-N-Butyl Phthalate	"
2,4-Dinitrotoluene	"
2-6-Dinitrotoluene	"
1,2-Dipenylhydrazine (as Azobenzene)	"
Di-N-Octyl Phthalate	"
Fluoranthene	"
Fluorene	"
Hexachlorobenzene	"
Hexachlorobutadiene	"
Hexachlorocyclopentadiene	"
Hexachloroethane	"
Indeno (1,2,3-cd) Pyrene	"
Isophorone	"
Naphthalene	"
Nitrobenzene	"
N-Nitrosodimethylamine	"
N-Nitrosodi-N-Propylamine	"
N-Nitrosodiphenylamine	"
Phenanthrene	"
Pyrene	"
1,2,4-Trichlorobenzene	"

Acid Extractables	Method
2-Chlorophenol	8270
2,4-Dichlorophenol	"
2,4-Dimethylphenol	"
4,6-Dinitro-O-Cresol	"
2,4-Dinitrophenol	"
2-Nitrophenol	"
4-Nitrophenol	"
P-Chloro-M-Cresol	"
Pentachlorophenol	"
Phenol	"
2, 4, 6 - Trichlorophenol	"

Volatile Organics	Method
Acrolein	8030
Acrylonitrile	"
Benzene	8010/8020
Bromoform	"
Carbon Tetrachloride	"
Chlorobenzene	"
Chlorodibromomethane	"
Chloroethane	"
2-Chloroethyl Vinyl Ether	"
Chloroform	"
Dichlorobromomethane	"
1,1-Dichloroethane	"
1,2-Dichloroethane	"
1,1-Dichloroethylene	"
1,2-Dichloropropane	"
1,3-Dichloropropylene	"
Ethylbenzene	"
Methyl Bromide	"
Methyl Chloride	"
Methylene Chloride	"
1,1,2,2-Tetrachloroethane	"
Tetrachloroethylene	"
Toluene	"
1,2-Trans-Dichloroethylene	"
1,1,1-Trichloroethane	"
1,1,2-Trichloroethane	"
Trichloroethylene	"
Vinyl Chloride	"

Attachment G – Monitoring & Reporting Schedules

Task Description	Monitoring Period	Report Due Date
Quarterly water quality monitoring	January 1 – March 31	April 30 of each year
	April 1 – June 30	July 31 of each year
	July 1 – September 30	October 31 of each year
	October 1 – December 31	January 31 of each year
Annual summary	April 1 of previous year – March 31	April 30 of each year
COC analysis	July 1 – September 30	October 31, 2004
	October 1 – December 31	January 31, 2005
	January 1 – March 31	April 30, 2005
	April 1 – June 30	July 31, 2005
	July 1 – September 30, 2010	October 31, 2010 and every fifth year thereafter, alternately in the Spring (April 30) and Fall (October 31).