

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM R5-2017-XXXX

FOR

LEHIGH SOUTHWEST CEMENT COMPANY  
CALAVERAS CEMENT COMPANY  
CALAVERAS CEMENT PLANT  
CALAVERAS COUNTY

This monitoring and reporting program (MRP) is issued to Lehigh Southwest Cement Company and Calaveras Cement Company (Discharger), pursuant to California Water Code section 13267 and incorporates requirements for groundwater and surface water monitoring and reporting; facility monitoring, maintenance, and reporting; and financial assurances reporting contained in California Code of Regulations, Title 27 (hereafter Title 27), Waste Discharge Requirements (WDRs) Order R5-2017-XXXX, and the Standard Provisions and Reporting Requirements dated April 2016 (SPRRs).

Compliance with this MRP is ordered by the WDRs and the Discharger shall not implement any changes to this MRP unless a revised MRP is issued by the Central Valley Water Board or the Executive Officer. Failure to comply with this MRP, or with the SPRRs, constitutes noncompliance with the WDRs and with Water Code Section 13267, which can result in the imposition of civil monetary liability.

**A. MONITORING**

The Discharger shall comply with the detection monitoring program provisions of Title 27 for groundwater and surface water in accordance with Standard Monitoring Specifications in SPRRs.

All compliance monitoring wells established for the detection monitoring program shall constitute the monitoring points for the groundwater Water Quality Protection Standard. All detection monitoring program groundwater monitoring wells, leachate, Quarry Pit water, and surface water monitoring points shall be sampled and analyzed for monitoring parameters and constituents of concern (COCs) as indicated and listed in Tables 1 through 5.

The Discharger shall use USEPA test methods with the lowest achievable detection limit for that constituent taking any matrix interferences into account. The reporting limit shall be no higher than the practical quantitation limit. The Discharger shall report all trace concentrations that are between the detection limit and the practical quantitation limit. All metals analyses shall be for dissolved metals.

The monitoring program of this MRP includes:

<u>Section</u>	<u>Monitoring Program</u>
A.1	Groundwater Monitoring
A.2	Surface Water Monitoring
A.3	LCRS Monitoring and Annual LCRS Testing
A.4	Facility Monitoring

## 1. Groundwater Monitoring

The Discharger shall operate and maintain a groundwater detection monitoring system that complies with the applicable provisions of Title 27, sections 20415 and 20420. The detection monitoring system shall be certified by a California-licensed professional civil engineer or geologist as meeting the requirements of Title 27.

The current groundwater monitoring network consists of the following:

<u>Well</u>	<u>Status</u>	<u>Zone</u>	<u>Units Being Monitored</u>
MW-9	Background	Shallow	CKD-1
MW-4	Detection/Corrective Action	Shallow	CKD-1
MW-6	Detection/Corrective Action	Deep	CKD-1
MW-7	Background	Shallow	CKD-3
MW-8	Detection/Corrective Action	Shallow	CKD-3

Groundwater monitoring well MW-2 near CKD-1 and piezometers PZ-1 through PZ-7 are used to measure groundwater elevation. Groundwater monitoring well MW-3 is not being utilized in the current groundwater monitoring network.

The current groundwater monitoring detection monitoring system does not meet the requirements of Title 27, sections 20415 and 20420. The current groundwater detection monitoring systems for CKD-1 is inadequate to evaluate the distribution of potential contamination in groundwater. The Provisions Section of the WDRs requires the Discharger to install an additional detection groundwater monitoring well in a location that will allow more accurate spatial assessment of groundwater flow, gradient, and water quality. The Discharger shall add all new monitoring points to the site groundwater monitoring network.

Groundwater samples shall be collected semiannually from the background wells, detection monitoring wells, and any additional monitoring points added as part of the approved groundwater monitoring system. The Discharger shall collect, preserve, and transport groundwater samples in accordance with the approved Sample Collection and Analysis Plan. Depth to groundwater shall be

measured to the nearest 0.01 feet.

Samples shall be collected and analyzed for the monitoring parameters in accordance with the methods and frequency specified in the following table:

<b>Table 1: Groundwater Monitoring</b>			
<u>Parameters</u>	<u>Units</u>	<u>Monitoring Frequency</u>	<u>Reporting Frequency</u>
<u>Field Parameters</u>			
Groundwater Elevation	Ft. & hundredths, MSL	Quarterly <sup>1</sup>	Semiannually
Temperature	°F	Semiannually	Semiannually
Electrical Conductivity	umhos/cm	Semiannually	Semiannually
pH	pH units	Semiannually	Semiannually
Turbidity	NTU	Semiannually	Semiannually
<u>Monitoring Parameters</u>			
Lab pH	pH units	Semiannually	Semiannually
Total Dissolved Solids	mg/L	Semiannually	Semiannually
Total Alkalinity	mg/L	Semiannually	Semiannually
Chemical Oxygen Demand	mg/L	Semiannually	Semiannually
Chloride	mg/L	Semiannually	Semiannually
Sulfate	mg/L	Semiannually	Semiannually
Calcium	mg/L	Semiannually	Semiannually
Sodium	mg/L	Semiannually	Semiannually
Magnesium	mg/L	Semiannually	Semiannually
Aluminum	µg/L	Semiannually	Semiannually
Cadmium	µg/L	Semiannually	Semiannually
Chromium, Total	µg/L	Semiannually	Semiannually
Chromium, Hexavalent	µg/L	Semiannually	Semiannually
Copper	µg/L	Semiannually	Semiannually
Iron	µg/L	Semiannually	Semiannually
Lead	µg/L	Semiannually	Semiannually
Mercury	µg/L	Semiannually	Semiannually
Nickel	µg/L	Semiannually	Semiannually
Manganese	µg/L	Semiannually	Semiannually
Molybdenum	µg/L	Semiannually	Semiannually

<sup>1</sup> The Discharger shall measure the groundwater elevation in each well and each piezometer **quarterly**, determine groundwater flow direction, and estimate groundwater flow rates in the uppermost water bearing zone and in any zones of perched water and in any additional portions of the zone of saturation monitored. The results shall be reported semiannually, including the times of expected highest and lowest elevations of the water levels in the wells, pursuant to Title 27, section 20415(e)(15).

## 2. Surface Water Monitoring

The Discharger shall operate a surface water detection monitoring system for any facility where runoff from mining unit areas flows or could flow to waters of the United States. The monitoring system shall comply with the applicable provisions of Title 27, sections 20415 and 20420.

- a. Runoff from CKD-1 areas flows to plunge pools at the base of the unit and periodically discharges into the Calaveritas Creek.
- b. Runoff from CKD-3 flows to a retention basin at the toe of the unit that periodically discharges into the unnamed drainage.

The current surface water monitoring points for the facility are:

<u>Monitoring Points</u>	<u>Status/Location</u>
SW-1	Background/Upstream from the Site
SW-2	Detection/Downstream from CKD-1
SW-3	Detection/Quarry Pit water
SW-4	Detection/Retention Pond at the toe of CKD-3
SW-5	Background/Upstream from CKD3
SW-6	Detection/Calaveritas Creek downstream from CKD-3 and upstream from CKD-1

The discharger shall identify another surface water monitoring point in the unnamed drainage downstream from the Calaveras Material Inc. settling pond and add it to the surface water monitoring network.

For surface water detection monitoring, a sample shall be collected at each monitoring point location and analyzed for the monitoring parameters and constituents in accordance with the methods and frequency specified in Table 3.

<b>Table 3: Surface Water Monitoring</b>			
<u>Parameters</u>	<u>Units</u>	<u>Monitoring Frequency</u>	<u>Reporting Frequency</u>
<u>Field Parameters</u>			
Temperature	°F	Semiannually	Semiannually
Electrical Conductivity	umhos/cm	Semiannually	Semiannually
pH	pH units	Semiannually	Semiannually
Turbidity	NTU	Semiannually	Semiannually
<u>Monitoring Parameters</u>			
Lab pH	pH units	Semiannually	Semiannually
Total Dissolved Solids	mg/L	Semiannually	Semiannually
Total Alkalinity	mg/L	Semiannually	Semiannually
Chemical Oxygen Demand	mg/L	Semiannually	Semiannually
Aluminum	µg/L	Semiannually	Semiannually
Cadmium	µg/L	Semiannually	Semiannually
Chromium, Total	µg/L	Semiannually	Semiannually
Chromium, Hexavalent	µg/L	Semiannually	Semiannually
Copper	µg/L	Semiannually	Semiannually
Iron	µg/L	Semiannually	Semiannually
Lead	µg/L	Semiannually	Semiannually
Mercury	µg/L	Semiannually	Semiannually
Nickel	µg/L	Semiannually	Semiannually
Manganese	µg/L	Semiannually	Semiannually
Molybdenum	µg/L	Semiannually	Semiannually

### 3. LCRS Monitoring and Annual LCRS Testing

**LCRS Monitoring:** The Discharger shall operate and maintain leachate collection and removal system (LCRS) sumps, record removed leachate volumes, and conduct annual testing of each LCRS component in accordance with Title 27 and this monitoring program.

The Discharger will develop an appropriate CKD-1 leachate management strategy to be submitted for Board approval within 180 days after adoption of the WDRs. In the interim period for 180 days after these WDRs are adopted, the Discharger will be required to monitor the level of leachate in the CKD-1 LCRS, but will not be required to pump or transfer the accumulated leachate into containers for disposal.

The current and future LCRS leachate sump monitoring points are:

<u>Monitoring Point</u>	<u>Unit Where Sump is Located</u>
CKD-1 Primary	CKD-1
CKD-3	CKD-3 after closure

All LCRS sumps shall be inspected monthly for the presence of leachate, and flow shall be recorded in accordance with the following table. Leachate shall be analyzed as specified below.

<b>Table 5: LCRS Monitoring</b>			
<u>Parameters</u>	<u>Units</u>	<u>Monitoring Frequency</u>	<u>Reporting Frequency</u>
<b>Field Parameters</b>			
Presence of Leachate	observation	Monthly	Semiannually
Leachate Volume <sup>1</sup>	gallons/day	Monthly	Semiannually
Electrical Conductivity	umhos/cm	Semiannually	Semiannually
pH	pH units	Semiannually	Semiannually
<b>Monitoring Parameters</b>			
Total Dissolved Solids	mg/L	Semiannually	Semiannually
Total Alkalinity	mg/L	Semiannually	Semiannually
Chemical Oxygen Demand	mg/L	Semiannually	Semiannually
Aluminum	µg/L	Semiannually	Semiannually
Cadmium	µg/L	Semiannually	Semiannually
Chromium, Total	µg/L	Semiannually	Semiannually
Chromium, Hexavalent	µg/L	Semiannually	Semiannually
Copper	µg/L	Semiannually	Semiannually
Iron	µg/L	Semiannually	Semiannually
Lead	µg/L	Semiannually	Semiannually
Mercury	µg/L	Semiannually	Semiannually
Nickel	µg/L	Semiannually	Semiannually
Manganese	µg/L	Semiannually	Semiannually
Molybdenum	µg/L	Semiannually	Semiannually

<sup>1</sup> Volume of removed leachate gallons per day from the LCRS.

**Annual LCRS Testing:** All LCRSs shall be tested annually pursuant to Title 27, section 20340(d) to demonstrate proper operation. The Discharger proposes an alternative LCRS inspection and testing approach and will submit it with the CKD-3 design plans. This approach will have the goals of regularly assessing the proper function of an LCRS, identifying any deficiencies, correcting any deficiencies, and reporting this information. The results of these tests shall be reported to the Central Valley Water Board in the Annual Monitoring Report and shall include comparisons with earlier tests made under comparable conditions.

#### 4. Facility Monitoring

##### a. Annual Facility Inspection

Annually, prior to the anticipated rainy season, but no later than **30 September**, the Discharger shall conduct an inspection of the facility. The inspection shall assess repair and maintenance needed for liner systems; LCRS pumps, piping and control systems; drainage control

systems; groundwater monitoring wells; unsaturated zone monitoring systems; and shall assess preparedness for winter conditions including but not limited to the required mining unit capacity and erosion and sedimentation control. The Discharger shall take photos of any problems areas before and after repairs. Any necessary construction, maintenance, or repairs shall be completed by **31 October**. Annual facility inspection reporting shall be submitted as required in Section B.3 of this MRP.

b. **Major Storm Events**

The Discharger shall inspect all precipitation, diversion, and drainage facilities and all mining unit berms for damage **within 7 (seven) days** following major storm events capable of causing damage or significant erosion. The Discharger shall take photos of any problems areas before and after repairs. Necessary repairs shall be completed **within 30 days** of the inspection. Notification and reporting requirements for major storm events shall be conducted as required in Section B.4 of this MRP.

**B. REPORTING**

The Discharger shall submit the following reports in accordance with the required schedule:

**Reporting Schedule**

<u>Section</u>	<u>Report</u>	<u>End of Reporting Period</u>	<u>Due Date</u>
B.1	Semiannual Monitoring Report	30 June, 31 December	<b>1 August, 1 February</b>
B.2	Annual Monitoring Report	31 December	<b>1 February</b>
B.3	Annual Facility Inspection Report	31 October	<b>15 November</b>
B.4	Major Storm Event Reporting	Continuous	<b>7 days from damage discovery</b>
B.5	Financial Assurances Report	31 December	<b>1 June</b>

**Reporting Requirements**

The Discharger shall submit monitoring reports **semiannually** with the data and information as required in this Monitoring and Reporting Program and as required in WDRs Order R5-2017-XXXX and the Standard Provisions and Reporting Requirements (particularly Section I: "Standard Monitoring Specifications" and Section J: "Response to a Release").

In reporting the monitoring data required by this program, the Discharger shall arrange the data in tabular form so that the date, the constituents, the concentrations, and the

units are readily discernible. The data shall be summarized in such a manner so as to illustrate clearly the compliance with waste discharge requirements or the lack thereof. Data shall also be submitted in a digital format.

Field and laboratory tests shall be reported in each monitoring report. Semiannual and annual monitoring reports shall be submitted to the Central Valley Water Board in accordance with the above schedule for the calendar period in which samples were taken or observations made. In addition, the Discharger shall enter all monitoring data and monitoring reports into the online Geotracker database as required by Division 3 of Title 27.

The results of **all monitoring** conducted at the site shall be reported to the Central Valley Water Board in accordance with the reporting schedule above for the calendar period in which samples were taken or observations made.

The Discharger shall retain records of all monitoring information, including all calibration and maintenance records, all original strip chart recordings of continuous monitoring instrumentation, copies of all reports required by this Order, and records of all data used to complete the application for this Order. Records shall be maintained throughout the life of the facility. Such records shall be legible and shall show the following for each sample:

- a) Sample identification and the monitoring point or background monitoring point from which it was taken, along with the identity of the individual who obtained the sample;
- b) Date, time, and manner of sampling;
- c) Date and time that analyses were started and completed, and the name of the personnel and laboratory performing each analysis;
- d) Complete procedure used, including method of preserving the sample, and the identity and volumes of reagents used;
- e) Calculation of results; and
- f) Results of analyses, and the MDL and PQL for each analysis. All peaks shall be reported.

### **Required Reports**

1. **Semiannual Monitoring Report:** Monitoring reports shall be submitted semiannually and are due on **1 August** and **1 February**. Each semiannual monitoring report shall contain at least the following:
  - a) For each groundwater monitoring point addressed by the report, a description of:
    - 1) The time of water level measurement;



- 2) The type of pump - or other device - used for purging and the elevation of the pump intake relative to the elevation of the screened interval;
  - 3) The method of purging used to stabilize water in the well bore before the sample is taken including the pumping rate; the equipment and methods used to monitor field pH, temperature, and conductivity during purging; results of pH, temperature, conductivity, and turbidity testing; and the method of disposing of the purge water;
  - 4) The type of pump - or other device - used for sampling, if different than the pump or device used for purging; and
  - 5) A statement that the sampling procedure was conducted in accordance with the approved Sample Collection and Analysis Plan.
- b) A map or aerial photograph showing the locations of observation stations, monitoring points, and background monitoring points.
  - c) The estimated quarterly groundwater flow rate and direction in the uppermost aquifer, in any zones of perched water, and in any additional zone of saturation monitored based upon water level elevations taken prior to the collection of the water quality data submitted in the report [Title 27, section 20415(e)(15)].
  - d) Cumulative tabulated monitoring data for all monitoring points and constituents for groundwater, LCRS/leachate, surface water, and the Quarry Pit. Concentrations below the laboratory reporting limit shall not be reported as "ND" unless the reporting limit is also given in the table. Otherwise they shall be reported "<" the reporting limit (e.g., <0.10). Units shall be as required in Tables 1 through 5 unless specific justification is given to report in other units. Refer to the SPRRs Section I "Standard Monitoring Specifications" for requirements regarding MDLs and PQLs.
  - e) Laboratory statements of results of all analyses evaluating compliance with requirements.
  - f) An evaluation of the concentration of each monitoring parameter as compared to the current concentration limits, and the results of any required verification testing for constituents exceeding a concentration limit. Report any actions taken under Section J: Response to a Release in the SPRRs for verified exceedances of a concentration limit for wells/constituents not already in corrective action monitoring.
  - g) A summary of all waste discharge monitoring.
  - h) A summary of all Facility Monitoring including rainfall data for the reporting period required in Section A.5. of this MRP. Rainfall data can be obtained from an onsite rain gauge or from a publicly available National Weather Service station or equivalent.
2. **Annual Monitoring Report:** The Discharger shall submit an Annual Monitoring Report to the Central Valley Water Board by **1 February** covering the reporting

period of the previous monitoring year. If desired, the Annual Monitoring Report may be combined with the second semiannual report, but if so, shall clearly state that it is both a semi-annual and annual monitoring report in its title. Each Annual Monitoring Report shall contain the following additional information beyond what is required for semiannual monitoring reports:

- a) All monitoring parameters shall be graphed to show historical trends at each monitoring point and background monitoring point, for all samples taken within at least the previous five calendar years. Each such graph shall plot the concentration of one or more constituents for the period of record for a given monitoring point or background monitoring point, at a scale appropriate to show trends or variations in water quality. The graphs shall plot each datum, rather than plotting mean values. Graphical analysis of monitoring data may be used to provide significant evidence of a release.
  - b) All historical monitoring data for which there are detectable results, including data for the previous year, shall be submitted in tabular form in a digital file format such as a computer disk. The Central Valley Water Board regards the submittal of data in hard copy and in digital format as "...the form necessary for..." statistical analysis [Title 27, section 20420(h)], that facilitates periodic review by the Central Valley Water Board.
  - c) Hydrographs of each well showing the elevation of groundwater with respect to the elevations of the top and bottom of the screened interval and the elevation of the pump intake. Hydrographs of each well shall be prepared quarterly and submitted annually.
  - d) A comprehensive discussion of the compliance record, and the result of any corrective actions taken or planned which may be needed to bring the Discharger into full compliance with the waste discharge requirements.
  - e) A written summary of the monitoring results, indicating any changes made or observed since the previous Annual Monitoring Report.
  - f) The results of the annual testing of the LCRS components.
  - g) Updated concentration limits for each monitoring parameter at each monitoring well based on the new background data set.
3. **Annual Facility Inspection Reporting:** By **15 November** of each year, the Discharger shall submit a report describing the results of the inspection and the repair measures implemented, preparations for winter, and include photographs of any problem areas and the repairs.
4. **Major Storm Event Reporting:** The Discharger shall notify Central Valley Water Board staff within **7 days** after major storm events of any damage or significant erosion and report any needed repairs within **14 days** of completion of the repairs, including photographs of the problem and the repairs.

5. **Financial Assurances Report:** By **1 June** of each year, the Discharger shall submit a report to the Central Valley Water Board that reports the balance of both the closure and corrective action funds or the amounts of the Guarantees and the adjustments to account for inflation in accordance with Title 27 Section 22236. Refer to Financial Assurances Specifications F.1 through F.3 of the WDRs.

## **C. WATER QUALITY PROTECTION STANDARD AND COMPLIANCE PERIOD**

### **1. Water Quality Protection Standard Report**

For each mining unit, the Water Quality Protection Standard shall consist of all COCs, the concentration limit for each constituent of concern, the verification retesting procedure to confirm measurably significant evidence of a release, the point of compliance, and all water quality monitoring points for each monitored medium.

The Water Quality Protection Standard for naturally occurring waste constituents consists of the COCs, the concentration limits, and the point of compliance and all monitoring points. Any proposed changes to the Water Quality Protection Standard other than annual update of the concentration limits shall be submitted in a report for review and approval.

The report shall:

- a. Identify **all distinct bodies of surface and ground water** that could be affected in the event of a release from a mining unit or portion of a unit. This list shall include at least the uppermost aquifer and any permanent or ephemeral zones of perched groundwater underlying the facility.
- b. Include a map showing the monitoring points and background monitoring points for the surface water monitoring program, groundwater monitoring program, and the unsaturated zone monitoring program. The map shall include the point of compliance in accordance with Title 27, section 20405.
- c. Evaluate the perennial direction(s) of groundwater movement within the uppermost groundwater zone(s).
- d. Include a proposed statistical method for calculating concentration limits for monitoring parameters and constituents of concern that are detected in 10% or greater of the background data (naturally-occurring constituents) using a statistical procedure from Title 27, section 20415(e)(8)(A-D)] or section 20415(e)(8)(E).
- e. Include a retesting procedure to confirm or deny measurably significant evidence of a release pursuant to Title 27, section 20415(e)(8)(E) and section 20420(j)(1-3).

The Water Quality Protection Standard shall be certified by a California-registered civil engineer or geologist as meeting the requirements of Title 27. If subsequent sampling of the background monitoring point(s) indicates significant water quality changes due to either seasonal fluctuations or other reasons unrelated to mining activities at the site, the Discharger may request modification of the Water Quality Protection Standard.

The Discharger submitted Water Quality Protection Standard (WQPS) reports on 31 July 2000, 31 March 2005, and 15 September 2006. The Water Quality Protection Standard shall be updated annually for each monitoring well using new and historical monitoring data, and submitted with the annual report.

## **2. Monitoring Parameters**

Monitoring parameters are a select group of constituents that are monitored during each monitoring event that are the waste constituents, reaction products, hazardous constituents, and physical parameters that provide a reliable indication of a release from a mining unit. The monitoring parameters for all mining units are those listed in the tables in Section A of this MRP specified monitored medium.

## **3. Concentration Limits**

For a naturally occurring constituent of concern, the concentration limit for each constituent of concern shall be determined as follows:

- a. By calculation in accordance with a statistical method pursuant to Title 27, section 20415(e)(8); or
- b. By an alternate statistical method meeting the requirements of Title 27, section 20415(e)(8)(E).

The Discharger submitted Water Quality Protection Standard (WQPS) reports on 31 July 2000, 31 March 2005, and 15 September 2006. Data from background wells and surface water locations were used to calculate WQPS as follows: MW-9 for CKD-1, MW-7 for CKD-3 and SW-1 for surface water. These WQPS need to be updated annually. WQPS for COCs which have been added to the monitoring program need to be established using an appropriate statistical method as specified in C.1.d.

The most recent concentration limits for select parameters as reported in the 2016 *Annual Monitoring Report* from background wells and background surface water sampling location were as follows:

Well or surface water sampling point	pH (Std units)	EC (umhos/cm)	COD (mg/L)	TDS (mg/L)	Aluminum (ug/L)	Total Chromium (ug/L)	Hexavalent Chromium (ug/L)
MW-9	6.5 - 8.4	679	11	559	142	3	8
MW-7	6.5 - 8.4	700	16	255	111	2	7
SW-1	6.5 - 8.4	373	9	213	161	5	7

#### 4. Retesting Procedures for Confirming Evidence of a Release

If monitoring results indicate measurably significant evidence of a release, as described in Standard Monitoring Specification I.43 of the SPRRs, then:

- a. For analytes that are detected in less than 10% of the background samples (such as non-naturally occurring constituents), the Discharger shall use the non-statistical retesting procedure required in Standard Monitoring Specification I.44 of the SPRRs.
- b. For analytes that are detected in 10% or greater of the background samples (naturally occurring constituents), the Discharger shall use one of the statistical retesting procedures as required in Standard Monitoring Specification I.45 of the SPRRs.

#### 5. Point of Compliance

The point of compliance for the water standard at each mining unit is a vertical surface located at the hydraulically downgradient limit of the Unit that extends through the uppermost aquifer underlying the unit. The following are monitoring locations at the point of compliance:

<u>Cell or Module</u>	<u>Point of Compliance Monitoring Wells</u>
CKD-1	MW-4
CKD-3	MW-8

MW-8 is completed within CKD material. A new hydraulically downgradient point of compliance for CKD-3 will be proposed in the CKD-3 design report after the limits of CKD-3 are established.

#### 6. Compliance Period

The compliance period for each mining unit shall be the number of years equal to the active life of the unit plus the closure period. The compliance period is the minimum period during which the Discharger shall conduct a water quality monitoring program subsequent to a release from the mining unit. The

compliance period shall begin anew each time the Discharger initiates an evaluation monitoring program [Title 27, section 20410].

## 7. Monitoring Points

A monitoring point is a well, device, or location specified in the waste discharge requirements, which monitoring is conducted and at which the water quality protection standard applies. The monitoring points for each monitored medium are listed in Section A of this MRP.

## D. TRANSMITTAL LETTER FOR ALL REPORTS

A transmittal letter explaining the essential points shall accompany each report. At a minimum, the transmittal letter shall identify any violations found since the last report was submitted, and if the violations were corrected. If no violations have occurred since the last submittal, this shall be stated in the transmittal letter. The transmittal letter shall also state that a discussion of any violations found since the last report was submitted, and a description of the actions taken or planned for correcting those violations, including any references to previously submitted time schedules, is contained in the accompanying report. The transmittal letter shall contain a statement by the discharger, or the discharger's authorized agent, under penalty of perjury, that to the best of the signer's knowledge the report is true, accurate, and complete.

The Discharger shall implement the above monitoring program on the effective date of this Program.

Ordered by: \_\_\_\_\_  
PAMELA C. CREEDON, Executive Officer

\_\_\_\_\_  
(Date)

NJV/WMH