

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM R5-2018-XXXX

FOR

CITY OF NEWMAN  
NEWMAN WASTEWATER TREATMENT PLANT  
STANISLAUS COUNTY

This monitoring and reporting program (MRP) incorporates requirements for monitoring of the wastewater influent, wastewater effluent, wastewater treatment and storage ponds, land application areas, solid waste, and groundwater. This MRP is issued pursuant to Water Code Section 13267. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Executive Officer.

All wastewater samples should be representative of the volume and nature of the discharge. The time, date, and location of each grab sample shall be recorded on the sample chain of custody form. Wastewater flow monitoring shall be conducted continuously using a flow meter and shall be reported in cumulative gallons per day.

Field test instruments (such as pH and dissolved oxygen) may be used if:

1. The operator is trained in the proper use of the instrument;
2. The instruments are field calibrated prior to each use;
3. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
4. Field calibration reports are submitted as described in the "Reporting" section of this MRP.

Analytical procedures shall comply with the methods and holding times specified in the following: Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater (EPA); Test Methods for Evaluating Solid Waste (EPA); Methods for Chemical Analysis of Water and Wastes (EPA); Methods for Determination of Inorganic Substances in Environmental Samples (EPA); Standard Methods for the Examination of Water and Wastewater (APHA/AWWA/WEF); and Soil, Plant and Water Reference Methods for the Western Region (WREP 125). Approved editions shall be those that are approved for use by the United States Environmental Protection Agency or the California Department of Public Health's Environmental Laboratory Accreditation Program. The Discharger may propose alternative methods for approval by the Executive Officer. Where technically feasible, laboratory reporting limits shall be lower than the applicable water quality objectives for the constituents to be analyzed.

## INFLUENT FLOW MONITORING

The monitoring shall be performed at the headworks. Influent monitoring shall include the following:

Constituents	Units	Type of Sample	Sampling Frequency	Reporting Frequency
Daily Flow	gallons	Continuous	Daily <sup>1</sup>	Quarterly
Total Monthly Flow	MG	Calculated	Monthly	Quarterly
Average Monthly Flow	gpd	Calculated	Monthly	Quarterly
BOD <sup>2</sup>	mg/L	Grab	Weekly	Quarterly
Suspended Solid	mg/L	Grab	Weekly	Quarterly
Total Suspended Solids	mg/L	Grab	Monthly	Quarterly
Electrical Conductivity	µmhos/cm	Grab	Twice Monthly	Quarterly

<sup>1</sup> Continuous monitoring requires daily meter reading or automated data collection.

<sup>2</sup> 5-day biochemical oxygen demand.

MG – million gallons

### Influent Trigger Concentration

The following trigger concentration is intended to serve as a means of assessing whether the Dischargers salinity source control BMPs are effective and whether additional salinity source control is necessary.

Constituent	Trigger
Electrical Conductivity	Increasing concentration trend for 3 consecutive years

If the annual evaluation of the influent EC concentration performed pursuant to the Annual Monitoring Report section of this MRP shows a statistically significant increasing trend for three consecutive years, the Discharger shall submit one or both of the following technical reports, as applicable, by **1 May of the following calendar year** (e.g., if the influent EC concentration shows an increasing trend during compliance years 2020, 2021, and 2022, the appropriate report is due by 1 May 2023):

1. A technical evaluation of the reason[s] for the concentration increase and a technical demonstration that although the concentration has increased more than expected, the source control BMPs are effective at reducing overall salinity loading.
2. A *Salinity Evaluation and Implementation Plan* that addresses the sources of salinity discharged to the wastewater treatment system, determines whether additional source control is feasible, and proposes a schedule to complete feasible additional source control. The plan shall meet the requirements outlined in Water Code section 13263.3(d)(3).

### POND MONITORING

Freeboard shall be measured vertically from the surface of the pond water to the lowest elevation of the surrounding berm and shall be measured to the nearest 0.1 foot.

The Discharger shall monitor each of the basins, ponds, or reservoirs as specified below:

Constituent	Units	Type of Sample	Sampling Frequency	Reporting Frequency
Dissolved Oxygen <sup>1</sup>	mg/L	Grab	Weekly	Quarterly
Oxygen Reduction Potential <sup>1</sup>	mV	Grab	Weekly	Quarterly
Freeboard	feet ( $\pm 0.1$ )	Measurement	Weekly	Quarterly
pH	Std.	Grab	Weekly	Quarterly
Berm Condition <sup>2</sup>	--	Observation	Weekly	Quarterly
Odors	--	Observation	Weekly	Quarterly

<sup>1</sup> Samples shall be collected at a depth of one foot, opposite the inlet.

<sup>2</sup> Pond berms shall be observed for signs of seepage or surfacing water along the exterior toe.

### EFFLUENT MONITORING

Effluent samples should be representative of the volume and nature of the discharge. Effluent monitoring shall include at least the following:

The following constituent samples shall be collected immediately prior to effluent being discharged to a storage reservoir.

Constituents	Units	Type of Sample	Sampling Frequency	Reporting Frequency
Electrical Conductivity	$\mu$ mhos/cm	Grab	Twice Monthly	Quarterly
Total Dissolved Solids	mg/L	Grab	Monthly	Quarterly

The following constituent samples shall be collected from the storage pond just prior to discharge to the land application areas.

Constituents	Units	Type of Sample	Sampling Frequency	Reporting Frequency
pH	Std.	Grab	Weekly	Quarterly
BOD <sub>5</sub> <sup>1</sup>	mg/L	Grab	Weekly	Quarterly
Electrical Conductivity	$\mu$ mhos/cm	Grab	Twice Monthly	Quarterly
Total Dissolved Solids	mg/L	Grab	Monthly	Quarterly
Chloride	mg/L	Grab	Monthly	Quarterly
Sodium	mg/L	Grab	Monthly	Quarterly
Nitrate as Nitrogen	mg/L	Grab	Monthly	Quarterly
Total Kjeldahl Nitrogen	mg/L	Grab	Monthly	Quarterly
Total Nitrogen	mg/L	Calculated	Monthly	Quarterly
Standard Minerals <sup>2,3</sup>	mg/L	Grab	Annually	Annually

<sup>1</sup> Five-day, 20° Celsius Biochemical Oxygen Demand.

<sup>2</sup> Standard Minerals shall include at least the following compounds: arsenic, boron, calcium, iron, manganese, magnesium, potassium, sulfate, total alkalinity (including alkalinity series), and hardness.

<sup>3</sup> Samples shall be filtered prior to preservation using a 0.45 $\mu$  filter.

### WATER SUPPLY MONITORING

The Discharger shall establish a sampling station where a representative sample of the municipal water supply can be obtained. Monitoring shall include, at a minimum, the following. As an alternative to sampling for standard metals, the Discharger may submit a copy of the most current Department of Public Health Consumer Confidence Report or analytical results submitted to the County Environmental Health Department or California Department of Public Health, as applicable.

<b>Constituent</b>	<b>Units</b>	<b>Type of Sample</b>	<b>Sampling Frequency</b>	<b>Reporting Frequency</b>
Total Dissolved Solids	mg/L	Grab	Monthly	Quarterly
Electrical Conductivity	µmhos/cm	Grab	Monthly	Quarterly
Nitrate as Nitrogen	mg/L	Grab	Monthly	Quarterly
Total Kjeldahl Nitrogen	mg/L	Grab	Monthly	Quarterly
Total Nitrogen	mg/L	Calculated	Monthly	Quarterly
Standard Minerals <sup>1</sup>	mg/L	Grab	Annually	Annually

<sup>1</sup> If the Discharger samples for Standard Minerals, sampling shall include, at a minimum, the following: boron, calcium, chloride, iron, magnesium, manganese, potassium, sodium, sulfate, total alkalinity (including alkalinity series), and hardness.

### SUPPLEMENTAL IRRIGATION WATER MONITORING

The Discharger shall monitor the supplemental water used to irrigate LAAs. Monitoring shall include, at a minimum, the following:

<b>Constituent</b>	<b>Units</b>	<b>Type of Sample</b>	<b>Sampling Frequency</b>	<b>Reporting Frequency</b>
Total Dissolved Solids	mg/L	Grab	Monthly	Quarterly
Electrical Conductivity	µmhos/cm	Grab	Monthly	Quarterly
Nitrate as Nitrogen	mg/L	Grab	Monthly	Quarterly
Total Kjeldahl Nitrogen	mg/L	Grab	Monthly	Quarterly
Total Nitrogen	mg/L	Calculated	Monthly	Quarterly

### LAND APPLICATION AREA MONITORING

#### Daily Pre-Application Inspections

The Discharger shall inspect LAA1 through LAA6 at least once daily prior to and during irrigation events, and observations from those inspections shall be documented for inclusion in the monthly monitoring reports. The following items shall be documented for each check or field to be irrigated on that day:

- a. Evidence of erosion;
- b. Containment berm condition;
- c. Condition of above-ground pipes, flow control valves, sprinklers, and/or drip emitters (as applicable);
- d. Proper use of valves;

- e. Soil saturation;
- f. Ponding;
- g. Irrigation supply and tailwater ditch condition and potential for runoff to off-site areas;
- h. Potential and actual discharge of waste to surface water;
- i. Odors that have the potential to be objectionable at or beyond the property boundary; and
- j. Insects (e.g., flies, mosquitoes).
- k. Any corrective actions taken based on observations made.

A copy of entries made in the log during each month shall be submitted as part of the Quarterly Monitoring Report. If no irrigation with wastewater takes place during a given month, then the monitoring report shall so state.

### Land Application Monitoring

The Discharger shall perform the following routine monitoring and loading calculations for LAA1 through LAA6 each day when water is applied.

Constituent	Units	Type of Sample	Sampling Frequency	Reporting Frequency
Precipitation	0.1 in.	Rain Gauge <sup>1</sup>	Daily	Quarterly
LAAs and individual checks receiving effluent	--	Observation	Daily	Quarterly
Hydraulic loading rate				
Effluent	in.	Calculated	Daily	Quarterly
Supplemental irrigation water	in.	Calculated	Daily	Quarterly
Total	in.	Calculated	Daily	Quarterly
Daily BOD loading rate	lb/ac/day	Calculated <sup>2</sup>	Daily	Quarterly
Cycle average BOD loading rate	lb/ac/day	Calculated <sup>2</sup>	Cycle	Quarterly
Nitrogen loading rate	lb/ac/year	Calculated <sup>2</sup>	Daily	Quarterly
Total dissolved solids loading rate (effluent plus irrigation water)	lb/ac/year	Calculated <sup>2</sup>	Monthly	Quarterly

<sup>1</sup> Data obtained from the nearest National Weather Service rain gauge is acceptable.

<sup>2</sup> Loading rates shall be calculated using the method specified in the Reporting Section of this MRP.

### GROUNDWATER MONITORING

Prior to construction and/or sampling of any groundwater monitoring wells, the Discharger shall submit plans and specifications to the Board for review and approval. Once installed, all new wells shall be added to the MRP and shall be sampled and analyzed according to the schedule below. All samples shall be collected using EPA approved methods and water table elevations shall be calculated and used to determine groundwater gradient and direction of flow.

Prior to land application of wastewater to the proposed LAA5, compliance wells are designated as follows:

MW-2, MW-3, MW-5

After land application of wastewater to the proposed LAA5, compliance wells are designated as follows:

MW-2, MW-3, MW-5, MW-7

The Groundwater Limitations set forth in Section E of the WDRs shall apply to the compliance monitoring wells as specified above.

Prior to sampling, depth to groundwater elevations shall be measure and the wells shall be purged at least three well volumes until temperature, pH, and electrical conductivity have stabilized. Low or no-purge sampling methods are acceptable, if described in an approved Sampling and Analysis Plan. Depth to groundwater shall be measured to the nearest 0.01 feet. Groundwater monitoring for all monitoring wells shall include, at a minimum, the following:

Constituent	Units	Type of Sample	Sampling and Reporting Frequency
Depth to Groundwater	±0.01 feet	Measurement	Quarterly
Groundwater Elevation <sup>1</sup>	±0.01 feet	Calculated	Quarterly
Gradient	feet/feet	Calculated	Quarterly
Electrical Conductivity	µmhos/cm	Grab	Quarterly
Total Dissolved Solids	mg/L	Grab	Quarterly
Nitrate as Nitrogen	mg/L	Grab	Quarterly
pH	mg/L	Grab	Quarterly
Chloride	mg/L	Grab	Quarterly
Sodium	mg/L	Grab	Quarterly
Dissolved Iron <sup>2</sup>	µg/L	Grab	Quarterly
Dissolved Manganese <sup>2</sup>	µg/L	Grab	Quarterly
Standard Minerals <sup>2,3</sup>	mg/L	Grab	Annually

<sup>1</sup> Groundwater elevation shall be determined based on depth-to-water measurements from a surveyed measuring point elevation on the well.

<sup>2</sup> Samples shall be filtered prior to preservation using a 0.45µ filter.

<sup>3</sup> Standard Minerals shall include at least the following compounds: arsenic, boron, calcium, magnesium, potassium, sulfate, total alkalinity (including alkalinity series), and hardness.

### SLUDGE AND/OR BIOSOLIDS MONITORING

Sludge and/or biosolids samples shall be analyzed to determine the total concentration in mg/Kg for the following constituents each time sludge is removed from any pond:

Arsenic	Lead	Nickel
Cadmium	Mercury	Selenium
Copper	Molybdenum	Zinc
Total Nitrogen	Total Solids	

Sludge and/or biosolids monitoring records shall be retained for a minimum of five years in accordance with 40 CFR, Part 503.17. A log shall be kept of sludge quantities generated and of

handling, application, and disposal activities. The frequency of entries is discretionary; however, the log should be complete enough to serve as a basis to report sludge monitoring.

## REPORTING

The Central Valley Water Board has gone to a paperless office system. All regulatory documents, submissions, materials, data, monitoring reports, and correspondence should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to:  
*centralvalleysacramento@waterboards.ca.gov*

Documents that are 50 MB or larger should be transferred to a CD, DVD, or flash drive and mailed to the following address:

Central Valley Regional Water Quality Control Board  
ECM Mailroom  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, California 95670

To ensure that your submittal is routed to the appropriate staff person, the following information should be included in the body of the email or transmittal sheet:

Attention: Compliance/Enforcement Section  
City of Newman WWTF  
Stanislaus County  
Place ID: 244250

**A transmittal letter shall accompany each monitoring report.** The letter shall include a discussion of all violations of the WDRs and this MRP during the reporting period and actions taken or planned for correcting each violation. If the Discharger has previously submitted a report describing corrective actions taken and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. Pursuant to Section B.3 of the Standard Provisions and General Reporting Requirements, the transmittal letter shall contain a statement by the Discharger or the Discharger's authorized agent certifying under penalty of perjury that the report is true, accurate and complete to the best of the signer's knowledge.

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, pond, etc.), and reported analytical result for each sample are readily discernible. The data shall be summarized in such a manner to clearly illustrate compliance with waste discharge requirements and spatial or temporal trends, as applicable. The results of any monitoring done more frequently than required at the locations specified in the Monitoring and Reporting Program shall be reported in the next scheduled monitoring report.

Laboratory analysis reports do not need to be included in the monitoring reports; however, all laboratory reports must be retained for a minimum of three years in accordance with Standard Provision C.3. For a Discharger conducting any of its own analyses, reports must also be signed and certified by the chief of the laboratory.

In addition to the requirements of Standard Provision C.3, monitoring information shall include the method detection limit (MDL) and the Reporting limit (RL) or practical quantitation limit (PQL). If the regulatory limit for a given constituent is less than the RL (or PQL), then any analytical results for that constituent that are below the RL (or PQL) but above the MDL shall be reported and flagged as estimated.

All monitoring reports that involve planning, investigation, evaluation or design, or other work requiring interpretation and proper application of engineering or geologic sciences, shall be prepared by or under the direction of persons registered to practice in California pursuant to California Business and Professions Code sections 6735, 7835, and 7835.1.

In the future, the State Water Board or Central Valley Regional Water Board may require electronic submittal of monitoring reports using the State Water Board's California Integrated Water Quality System (CIWQS) Program Web site (<http://www.waterboards.ca.gov/ciwqs/index.html>) or similar system. Electronic submittal to CIWQS, when implemented, will meet the requirements of our Paperless Office System.

#### A. Quarterly Monitoring Reports

Quarterly monitoring reports shall be submitted to the Central Valley Water Board by the **1st day of the second month after the quarter** (e.g. the January-March quarterly report is due by **May 1<sup>st</sup>**). Each Quarterly Monitoring Report shall include the following:

1. Results of Influent Monitoring, including calculated values for total annual flow to date.
2. Results of Pond Monitoring.
3. Results of Effluent Monitoring, including the flow-weighted annual average concentration for EC ( $\mu\text{mhos/cm}$ ) and flow-weighted annual and quarterly average concentration for BOD ( $\text{mg/L}$ ), as collected from the storage pond just prior to discharge, shall be calculated using the following formula. The cumulative flow-weighted annual average concentration of EC and BOD shall be calculated from the start of the year through the current reporting quarter.

$$C_a = \frac{\sum_{i=1}^n (C_i \cdot V_i)}{\sum_{i=1}^n (V_i)}$$

Where  $C_a$  = Flow-weighted average annual ( $\mu\text{mhos/cm}$  or  $\text{mg/L}$ ) or quarterly ( $\text{mg/L}$ ) concentration

$n$  = Total number of samples to be averaged for month or calendar year

$i$  = The sample number out of  $n$  total samples taken during the month or year

$C_i$  = Concentration of  $i^{\text{th}}$  EC or BOD sample in  $\mu\text{mhos/cm}$  or  $\text{mg/L}$ , respectively

$V_i$  = Volume of wastewater applied to the LAA during  $i^{\text{th}}$  sample in million gallons

4. Results of Water Supply Monitoring.
5. Results of Supplemental Irrigation Watering.



6. Results of Land Application Area Monitoring, including:

- a. The mass loading rate of BOD applied to each LAA on a daily basis shall be calculated using the following formula:

$$M = \frac{8.345(C \cdot V)}{A}$$

Where  $M$  = Mass of BOD applied to an LAA in lb/ac/day

$C$  = Concentration of BOD in mg/L based on the most recent monitoring result

$V$  = Daily volume of wastewater applied to the LAA in million gallons

$A$  = Area of the LAA irrigated in acres

8.345 = Unit conversion factor

- b. The mass loading rate of BOD applied to each LAA as an irrigation cycle average shall be calculated using the following formula:

$$M = \frac{8.345(C \cdot V)}{A \cdot T}$$

Where  $M$  = Mass of BOD applied to an LAA in lb/ac/day

$C$  = Concentration of BOD in mg/L based on the most recent monitoring result

$V$  = Total volume of wastewater applied to the LAA during the irrigation cycle in million gallons

$A$  = Area of the LAA irrigated in acres

$T$  = Cycle time (i.e., irrigation cycle length from start of irrigation to start of next irrigation event, in days)

8.345 = Unit conversion factor

- c. The cumulative mass loading rate of total nitrogen applied to each LAA from the start of the year through the current reporting quarter shall be calculated using the following formula and compared to published crop demand for the crops actually grown.

$$M = \sum_{i=1}^{12} \frac{(8.345(C_i \cdot V_i) + M_x)}{A}$$

Where  $M$  = Mass of total nitrogen applied to an LAA in lb/ac/year

$i$  = The number of the month (e.g., January = 1, February = 2, etc.)

$C_i$  = Monthly average concentration of total nitrogen for month  $i$  in mg/L

$V_i$  = Volume of wastewater applied to the LAA during calendar month  $i$  in million gallons

$A$  = Area of the LAA irrigated in acres

$M_x$  = Nitrogen mass from other sources (e.g., fertilizer and compost) in pounds

8.345 = Unit conversion factor

- d. For each discrete LAA, a comparison of monitoring data to the loading rate limitations and discharge specifications and an explanation of any violation of

those requirements.

7. Results of Groundwater Monitoring including:
  - a. A narrative description of all preparatory, monitoring, sampling, and sample handling for groundwater monitoring.
  - b. A field log for each well documenting depth to groundwater; method of purging; parameters measured before, during, and after purging; sample preparation (e.g., filtering); and sample preservation.
  - c. Summary data tables of historical and current water table elevations and analytical results.
  - d. A scaled map showing relevant structures and features of the facility, the locations of monitoring wells, surface waters, groundwater elevation contours referenced to an appropriate datum (e.g., NGVD), and indicating direction of the groundwater gradient.
  - e. Copies of laboratory analytical report(s) for groundwater monitoring.
8. Results of Sludge/Biosolids Monitoring completed during the quarter, and (if applicable) verification of classification of biosolids as nonhazardous per 22 CCR, Article 11, Criteria for Identification of Hazardous and Extremely Hazardous Waste (California Assessment Manual procedures).
9. A narrative evaluation of compliance comparing monitoring data to the prohibitions, specifications, and limitations of the WDRs with an explanation of any violation of those requirements.
10. A scaled map showing relevant structures and features of the facility, the locations of monitoring wells, surface water monitoring locations, and any other sampling stations, and groundwater elevation contours referenced to mean sea level datum.
11. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.
12. A copy of equipment maintenance and calibration records verifying calibration of all hand-held monitoring instruments performed during the quarter, as described in Standard Provision No. C.4.

## **B. Annual Monitoring Report**

The Annual Monitoring Report shall be submitted to the Central Valley Water Board by **1 February** each year. The Annual Monitoring Report shall include the following:

1. The calculated average influent dry weather flow, total influent annual volume of wastewater generated during the year, and comparison to the currently approved influent flow limitations. If the approved influent flow limitations have been changed since the adoption of the WDRs, the report shall specify the new limitations. The report shall reference the date of the *Wastewater System Improvements & Expansion Report* that proposed the flow limit increase and date of the Executive Officer letter that approved the flow limit increase.
2. A year-end summary of quarterly monitoring results for influent, pond, effluent, water

supply, supplemental irrigation water, and groundwater. Summaries shall include tabular and concentration versus time graphs representations of all data collected for at least the last two years. Graphs shall show a horizontal line indicating the WDR specified limitation when applicable. Data collected through observation does not need to be graphed (e.g., levee condition and odor).

3. A digital database (e.g., Microsoft Excel workbooks) of historic influent, pond, effluent, water supply, supplemental irrigation water, groundwater, and sludge/biosolids monitoring to date.
4. An evaluation of the influent EC concentration trend using influent monitoring data starting from January 2017 through the current compliance year. The evaluation shall use a statistical trend analysis trend such as the Mann-Kendall test, describe whether the data set satisfies the assumptions of the test (e.g., normality, if applicable), describe the results of the test, and explain whether the Influent Trigger Concentration has been triggered. If the data set does not meet all the assumptions of the test, an explanation of why the test is more appropriate than another statistical trend test shall be provided.
5. A statistical evaluation of groundwater quality and compliance with the Groundwater Limitations of the WDRs in accordance with the approved *Groundwater Limitations Compliance Assessment Plan* submitted pursuant to Provision H.1.a of the WDRs.
6. A narrative annual evaluation summary of compliance comparing monitoring data to the prohibitions, specifications, and limitations of the WDRs with an explanation of any violation of those requirements that occurred during the year. The summary shall include a discussion of the corrective actions taken, as well as any planned or proposed actions needed to bring the discharge into full compliance with the waste discharge requirements.
7. An evaluation of the effectiveness of the year's WWTF operation and wastewater application operation in terms of odor control and groundwater protection, including consideration of application management practices (e.g., waste constituent and hydraulic loadings, application cycles, drying times, and cropping practices), and groundwater monitoring data.
8. A summary of the crops removed from each LAA (ton per acre). The summary shall include planting and harvest dates and crop type.
9. Estimated flows for the next calendar year.
10. A scaled map showing relevant structures and features of the facility, the locations of monitoring wells, surface water monitoring locations, and any other sampling stations, and groundwater elevation contours referenced to mean sea level datum.
11. Copies of laboratory analytical report(s) for groundwater monitoring, if requested by staff.

A transmittal letter shall accompany each self-monitoring report. The letter shall include a discussion of all violations of the WDRs or this MRP during the reporting period and actions taken or planned for correcting each violation. If the Discharger has previously submitted a report describing corrective actions taken and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. Pursuant to Section B.3 of the Standard Provisions and General Reporting Requirements, the transmittal letter shall contain a statement by the Discharger or the Discharger' authorized agent certifying under penalty of perjury that the report is true, accurate and complete to the best of the signer's knowledge.

The Discharger shall implement the above monitoring program as of the date of this Order.

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