

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION**

ORDER NO. R7-2011-0034

**WASTE DISCHARGE REQUIREMENTS
FOR
SFPP, L.P., OPERATING PARTNERSHIP OF
KINDER MORGAN ENERGY PARTNERS, L.P., OWNER & OPERATOR GROUNDWATER
TREATMENT DISCHARGE SPRINKLER SYSTEM**

City of Imperial - Imperial County

The California Regional Water Quality Control Board, Colorado River Basin Region (Regional Water Board), finds that:

Discharger

1. SFPP, L.P. operating partnership of Kinder Morgan Energy Partners, L.P. (KMEP), (hereinafter referred to as the Discharger), 1100 Town and Country Road, Orange, California, 92868, submitted a Report of Waste Discharge and engineering report on August 4, 2010, to obtain Waste Discharge Requirements (WDRs) for a Groundwater Treatment Discharge Sprinkler System (hereinafter referred to as the Facility) located at 345 West Aten Road, Imperial, California, 92251.
2. The Discharger owns and operates the KMEP Fuels Terminal (the Site), which is an active fuel loading, storage, and transportation facility located adjacent to the Facility. The KMEP Site encompasses approximately 30 acres with 27 aboveground storage tanks containing gasoline and diesel fuels.
3. The Discharger owns and operates the Facility and proposes to discharge treated groundwater onto the ground surface of an unlined and vacant portion of the Site. A site map (Attachment A) is incorporated herein and made a part of this Order.

Background

4. Past fuel releases on the KMEP Site have resulted in three areas of concern for total petroleum hydrocarbon (TPH) plumes that have been described as the North Plume, the South Plume, and the Tank 21 Plume. Groundwater monitoring was performed at the Site on a quarterly basis from March 1995 through December 2006. Since January 2007, groundwater monitoring and reporting events have been conducted semiannually.
5. According to the second semiannual 2010 groundwater monitoring report, the estimated plume size of liquid-phase hydrocarbon (LPH) for the three areas of concern were approximately: 3.1 acres for the North Plume; 0.4 acres for the South Plume; and 0.06 acres for the Tank 21 Plume.
6. The Discharger has constructed a Product Barrier Trench (PBT) and Groundwater Treatment System (GWTS) at the KMEP Site to prevent off-site migration of LPH. The trench has been backfilled with highly permeable materials to allow liquid to be extracted without the trench being open. The PBT/GWTS is considered to be one component of an

overall remediation project. The PBT/GWTS consists of three product recovery wells in a semi-permeable product recovery trench along the western property boundary of the KMEP Site. Two piezometers are used to gauge recovered product levels in the trench.

7. Groundwater remediation by the PBT/GWTS consists of total fluids extraction (product and groundwater), treatment with an oil/water separator (OWS) followed by liquid-phase granular activated carbon (LGAC) treatment, and the proposed on-site discharge of treated groundwater to soil through a sprinkler system. LPH is periodically recovered from the OWS by a licensed transportation and disposal provider and is recycled offsite in accordance with applicable state and federal regulations.

Facility

8. The Facility will be used to dispose of groundwater that has been treated by the PBT/GWTS to remove LPH.
9. Treated groundwater from the PBT/GWTS will be discharged at an average rate of approximately 1 gallon per minute (gpm) into a 5,000 gallon Baker tank. A high level switch inside the tank will periodically activate a low-profile sprinkler system that will discharge the effluent stored in the tank onto the ground surface. The sprinkler system is capable of operating at rates of 15 to 25 gpm.
10. The proposed project area where the sprinkler system will be installed is a vacant, previously disturbed portion of the KMEP Site, approximately 3 acres in size.. This parcel of land was historically used for agricultural purposes, but all agricultural activity ceased as of 1987.

Site Characteristics

11. The Site is bordered on the north by Central Drain No. 7, which is located along the south side of Aten Road. The Date Canal is located near the east border of the Site where the Facility is located.
12. The Discharger reports that the soil type at the Site is generally sandy silts and clays.

Groundwater

13. The Discharger reports that groundwater at the Site is located approximately 8 to 11 feet below ground surface (bgs) and that the predominant groundwater flow direction is north to northeast, towards the regional low at the Salton Sea.
14. The Discharger collected background groundwater samples from two different locations at the Site. The results of the groundwater monitoring analysis follows in Table 1:

Table 1 – Results of groundwater analysis performed by Discharger

| Constituent | Units | Monitoring Well 17 | Monitoring Well 08 |
|-------------|-------|--------------------|--------------------|
| TDS | mg/l | 38,000 | 41,000 |
| Chloride | mg/l | 24,000 | 28,000 |
| Selenium | mg/l | 0.16 | 0.16 |

15. The Water Quality Control Plan for the Colorado River Basin Region of California (Basin Plan), adopted on November 17, 1993, and updated through December 2006, designates the beneficial uses of ground and surface waters in this Region.
16. The Facility is located in the Imperial Hydrologic Unit. The designated beneficial uses of groundwater in the Imperial Hydrologic Unit are:
 - a. Municipal Supply (MUN)
 - b. Industrial Supply (IND)
17. Within the Imperial Valley area of the Imperial Hydrologic Unit, much of the groundwater is too saline for municipal use.
18. Groundwater within the Imperial Valley and in the vicinity of the Site generally contains elevated selenium levels that are above California drinking water maximum contaminant levels (MCLs).

Regional Characteristics

19. The Facility is located in the Imperial Valley portion of the Salton Trough physiographic province. The Salton Trough is a topographic and geologic structural depression resulting from large scale regional faulting. The trough is bounded on the northeast by the San Andreas Fault and Chocolate Mountains, and on the southwest by the Peninsular Range and faults of the San Jacinto Fault Zone. The Salton Trough represents the northward extension of the Gulf of California, containing both marine and non-marine sediments since the Miocene Epoch. Tectonic activity that formed the trough is a continuing process as evidenced by deformed recent sedimentary deposits and high levels of seismicity.
20. The Imperial Valley is directly underlain by lacustrine deposits, which consist of interbedded lenticular and tabular silt, sand, and clay. The Late Pleistocene to Holocene lake deposits are probably less than 100 feet thick and derived from periodic flooding of the Colorado River, which intermittently formed a fresh water lake (Lake Cahuilla). Older deposits consist of Miocene to Pleistocene non-marine and marine sediments deposited during intrusions of the Gulf of California. Basement rock consisting of Mesozoic granite and Paleozoic metamorphic rocks are estimated to exist at depths between 15,000 and 20,000 feet.

21. The average annual rainfall in the area, averaged over a 90-year period from 1914 – 2004, is 2.88 inches per year.
22. The average annual pan evaporation in the area, averaged over a 78-year period from 1927 – 2005 is 105.25 inches (8.77 feet) per year.

Anti-degradation Policy

23. State Water Resources Control Board (State Water Board) Resolution No. 68-16 (“Policy with Respect to Maintaining High Quality Waters of the State”; hereafter Resolution No. 68-16) requires a Regional Water Board, in regulating the discharge of waste, to maintain high quality waters of the state (i.e., background water quality) until it is demonstrated that any change in quality will be consistent with maximum benefit to the people of the State, will not unreasonably affect beneficial uses, and will not result in water quality less than that described in plans and policies (e.g., violation of any water quality objective). The discharge is required to meet WDRs that result in the best practicable treatment or control (BPTC) of the discharge necessary to assure pollution or nuisance will not occur, and that the highest water quality consistent with maximum benefit to the people will be maintained.
24. Some degradation of groundwater from the discharge of treated groundwater to the land surface consistent with Resolution No. 68-16, provided that the degradation:
 - a. Is confined to a reasonable area;
 - b. Is minimized by means of full implementation, regular maintenance, and optimal operation of BPTC measures; and
 - c. Does not result in water quality less than that prescribed in the applicable basin plan, including violation of any water quality objective.
25. The discharge of treated groundwater to the ground surface, as permitted herein, reflects BPTC. The BPTC measures assure that the discharge does not create a condition of pollution or nuisance, and that the highest water quality defined by the physical and chemical nature of the local groundwater will be maintained, which is consistent with the anti-degradation provisions of Resolution No. 68-16.
26. The constituents in the treated groundwater that present the greatest risk to groundwater are petroleum hydrocarbons and dissolved solids. Because the PBT/GWTS is expected to remove the petroleum hydrocarbons to negligible levels, the WDRs contained in this Order minimize the risk of degradation to areal groundwater.
27. The Facility treats groundwater to prevent the offsite migration of LPH. A reasonable increase in dissolved solids from the Facility, as a result of evaporation during the treatment process, is consistent with maximum benefit to the people of the State. Accordingly, the discharge, as authorized, is consistent with the anti-degradation provisions of Resolution 68-16.

28. Pursuant to California Water Code Section 13263(g), the discharge of waste is a privilege, not a right, and adoption of this Order does not create a vested right to continue the discharge.

California Environmental Quality Act

29. In accordance with the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.) and implementing Guidelines (California Code of Regulations, Title 14, Section 15000 et seq.), the Regional Water Board, acting as the Lead Agency, prepared an Initial Study and Negative Declaration for the adoption of Board Order No. R7-2011-0034, which would allow for the discharge of treated water from the existing groundwater treatment system onto the ground surface. Based on the Initial Study, the Regional Water Board determined that the proposed discharge could not have a significant effect on the environment. The Regional Water Board's determination is reflected in the finding made in the proposed Negative Declaration. The Regional Water Board circulated the Initial Study and proposed Negative Declaration (SCH 2011051044) for a public comment period beginning on May 18, 2011 and ending on June 17, 2011. On June 23, 2011, the Regional Water Board filed a Notice of Determination (NOD), with the State Clearinghouse regarding its adoption of resolutions approving the proposed Negative Declaration and Board Order No. R7-2011-0034 at its regularly scheduled meeting held on June 23, 2011. The Regional Water Board concludes in the NOD, based on the whole record (including the Initial Study and any comments received), that there is no substantial evidence that the proposed project will have a significant effect on the environment. The Negative Declaration reflects the Regional Water Board's independent judgment and analysis.
30. The Board has notified the Discharger and all known interested agencies and persons of its intent to issue WDRs for this Facility, and has provided them with an opportunity for a public meeting and an opportunity to submit comments.
31. The Board, in a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, that in order to meet the provisions contained in Division 7 of the CWC and regulations adopted thereunder, the Discharger shall comply with the following:

A. Effluent Limitations

1. The Daily Maximum numerical effluent limits listed below are based on established water quality standards that are protective of beneficial uses of ground and surface waters in the Region.
2. The discharge of an effluent in excess of the following limits is prohibited:

| <u>Constituent</u> | <u>Daily Maximum</u> * ($\mu\text{g/l}$) |
|---|--|
| Total petroleum hydrocarbons (C ₂ -C ₄₆) | 100 |
| Benzene | 1.0 |
| Toluene | 150 |
| Ethlybenzene | 300 |
| Total Xylenes | 1,750 |
| Total Lead | 15.0 |
| Naphthalene | 20 |
| MTBE | 13 |
| TBA | 12 |
| EDB | 0.05 |
| 1,2 DCA | 0.50 |
| 1,1,1 TCA | 200 |
| PCE | 5.0 |
| TCE | 5.0 |
| Trans-1,2 DCE | 10 |
| Cis-1,2 DCE | 6 |
| 1,1 DCE | 6 |
| 1,1 DCA | 5 |
| 1,1,2 TCA | 32 |
| Vinyl chloride | 0.50 |

* If constituent is detected in excess of 50% of its daily maximum limit during the monthly monitoring event, the sampling frequency will increase to weekly and continue at that increased frequency until two consecutive weekly events do not detect any concentrations greater than 50% of the daily max limits

- The discharged effluent shall not have a pH of less than 6.5 nor greater than 8.5.
- The average daily wastewater flow to the ground surface shall not exceed 15,000 gpd.

B. Specifications

- The treatment or disposal of wastes at this facility shall not cause pollution or nuisance as defined in Sections 13050 of Division 7 of the CWC.
- The ground surface to which the treated groundwater is being discharged shall be protected from any washout, erosion, or inundation which could occur as a result of floods having a predicted frequency of once in 100 years.
- The discharge shall not cause degradation of any ground or surface water.
- Discharge onto the ground surface shall cease in event of any failure in the system that threatens the beneficial water uses.

9. The discharge of wastes shall not cause the concentrations of chemical constituents of the receiving groundwater designated for use as domestic or municipal supply at the compliance point, downgradient outside the application area, in excess of the Maximum Contaminate Levels (MCLs) specified in the following provisions of Title 22 of the California Code of Regulations which are incorporated by reference into the Basin Plan. This incorporation by reference is prospective including future changes to the incorporated provisions as the changes take effect.

C. Prohibitions

10. The direct discharge of any wastewater to any surface water or surface drainage courses is prohibited.
11. The intentional discharge of process wastewater to a location or in a manner different from that described in Findings No. 8 through 10 above is prohibited.
12. The discharge or deposit of hazardous waste (as defined in Title 27 of the California Code of Regulations), and other wastes that pose a potential threat to water quality at this facility is prohibited.

D. Provisions

13. The Discharger shall comply with "Monitoring and Reporting Program No. R7-2011-0034 and future revisions thereto, as specified by the Regional Water Board's Executive Officer.
14. Prior to any change in ownership or management of this regulated operation, the Discharger shall transmit a copy of this Board Order to the succeeding owner/operator, and forward a copy of the transmittal letter to the Regional Water Board.
15. Prior to any modifications in this facility, which would result in material change in the quality or quantity of discharge, or any material change in the location of the discharge, the Discharger shall report all pertinent information in writing to the Regional Water Board and obtain revised requirements before any modifications are implemented.
16. The Discharger shall ensure that all site-operating personnel are familiar with the content of this Board Order, and shall maintain a copy of this Board Order at the site.
17. This Board Order does not authorize violation of any federal, state, or local laws or regulations.
18. The Regional Water Board will review this Board Order periodically and may revise requirements when necessary.
19. The Discharger shall allow the Regional Water Board, or an authorized representative, upon presentation of credentials and other documents as may be required by law, to:
 - a. Enter upon the premises regulated by this Board Order, or the place where records must be kept under the conditions of this Board Order;

- b. Have access to and copy, at reasonable times, any records that shall be kept under the conditions of this Board Order;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Board Order; and
 - d. Sample or monitor at reasonable times, for the purpose of assuring compliance with this Board Order or as otherwise authorized by the CWC, any substances or parameters at this location.
20. The Discharger shall comply with all of the conditions of this Board Order. Any noncompliance with this Board Order constitutes a violation of the Porter-Cologne Water Quality Control Act and is grounds for enforcement action.
21. This Board Order does not convey any property rights of any sort or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
22. Unless otherwise approved by the Regional Water Board's Executive Officer, all analyses shall be conducted at a laboratory certified for such analyses by the California Department of Public Health. All analyses shall be conducted in accordance with the latest edition of "Guidelines Establishing Test Procedures for Analysis of Pollutants", promulgated by the United States Environmental Protection Agency.
23. The Discharger is the responsible party for the WDRs, and the monitoring and reporting program for the facility. The Discharger shall comply with all conditions of these WDRs. Violations may result in enforcement actions, including Regional Water Board Orders or court orders, requiring corrective action or imposing civil monetary liability or in modification or revocation of these WDRs by the Regional Water Board.
24. The Discharger shall retain records of all monitoring information including all calibration and maintenance records, copies of all reports required by this Board Order, and records of all data used to complete the application for this Board Order. Records shall be maintained for a minimum of three (3) years from the date of the sample, measurement, report, or application. This period may be extended during the course of any unresolved litigation regarding this discharge or when requested by the Regional Water Board's Executive Officer.
25. Records of monitoring information shall include:
 - a. The date, exact place, and time of sampling and measurements.
 - b. The individual(s) who performed the sampling or measurements.
 - c. The date(s) analyses were performed.
 - d. The individual(s) who performed the analysis.
 - e. The analytical techniques or methods used.
 - f. The result of such analysis.

26. The Discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances), that are installed or used by the Discharger to achieve compliance with conditions of this Board Order.
27. The Discharger shall furnish, under penalty of perjury, technical monitoring program reports, and such reports shall be submitted in accordance with the specifications prepared by the Regional Water Board's Executive Officer. Such specifications are subject to periodic revisions as may be warranted.
28. The Discharger shall report any noncompliance that may endanger human health or the environment. The Discharger shall immediately report orally to the Regional Board Executive Officer and the Office of Emergency Services information of the noncompliance as soon as: (1) the Discharger has knowledge of the discharge, (2) notification is possible, and (3) notification can be provided without substantially impeding cleanup or other emergency measures. During non-business hours, the Discharger shall leave a message on the Regional Board office voice recorder. A written report shall be provided within five (5) business days of the time the Discharger is aware of the incident. The written report shall contain a description of the noncompliance and the cause, the period of noncompliance, the anticipated time to achieve full compliance, and steps taken or planned, to reduce, eliminate, and prevent recurrence of the noncompliance. The Discharger shall report all intentional or unintentional spills occurring within the facility or collection system to the Regional Board office in accordance with the above time limits.

I, Robert Perdue, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, Colorado River Basin Region, on June 23, 2011.

Original signed by

ROBERT PERDUE
Executive Officer

MONITORING AND REPORTING PROGRAM NO. R7-2011-0034

FOR
SFPP, L.P., OWNER
KINDER MORGAN ENERGY PARTNERS, L.P., OPERATOR
GROUNDWATER TREATMENT DISCHARGE SPRINKLER SYSTEM
City of Imperial - Imperial County

Location of Discharge: Northwest ¼ of Section 30, T15S, R14E, SBB&M.

MONITORING AND REPORTING PROGRAM (MRP)

CWC Sections 13267 and 13383 authorize the Colorado River Basin Regional Water Quality Control Board (Regional Water Board) to require technical and monitoring reports. This MRP establishes monitoring and reporting requirements to implement the federal and California regulations.

I. MONITORING PROVISIONS

1. Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring locations specified below. Monitoring locations, sampling frequencies, and monitored constituents shall not be changed without notification to, and having the approval of the Regional Water Board's Executive Officer.
2. Unless otherwise approved by the Regional Water Board's Executive Officer, all analysis shall be conducted at a laboratory certified for such analysis by the State Department of Health Services. All analysis shall be conducted in accordance with the latest edition of "Guidelines Establishing Test Procedures for Analysis of Pollutants", (40 CFR Part 136) or equivalent methods promulgated by the United States Environmental Protection Agency (USEPA).
3. The collection, preservation and holding times of all samples shall be in accordance with USEPA approved procedures.
4. All monitoring instruments and devices used by the Discharger to fulfill the prescribed monitoring program shall be properly maintained and, as applicable, calibrated at least once per year to ensure continued accuracy of the devices.
5. Monitoring results, including noncompliance, shall be reported at intervals and in a manner specified in this Monitoring and Reporting Program.
6. 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 Board Order, and records of all data used to complete the application for this Board Order, for a period of at least 5 years from the date of the sample, measurement, report or application.
7. Records of monitoring information shall include:
 - a. The individual(s) who performed the sampling or measurements.

- b. The date(s) analyses were performed.
- c. The individual(s) who performed the analysis.
- d. The analytical techniques or methods used; and
- e. The results of such analysis.

II. MONITORING LOCATIONS

The Discharger shall monitor the treatment facility influent, effluent and groundwater at the locations described in the following table. Monitoring locations shall not be changed without notification to, and having the approval of, the Regional Water Board’s Executive Officer.

| <u>Location</u> | <u>Description</u> |
|----------------------------|--------------------------|
| Sample Port 1 (SP-1) | Treatment plant influent |
| Sample Port 3 (SP-3) | Treatment plant effluent |
| Monitoring Well 17 (MW-17) | Background Well |
| Monitoring Well 8 (MW-08) | Compliance Well |
| To be determined | Compliance Well |

III. INFLUENT MONITORING REQUIREMENTS

- 8. Treatment plant influent samples shall be collected from an approved sampling location as described in Section II above.
- 9. During the first two months of treatment operation, samples shall be collected on the 1st, 4th, 14th, 28th, and 56th days of operation.
- 10. Thereafter, the sampling frequency shall be every month.
- 11. If the treatment plant is shut down for a continuous time period of greater than sixty (60) days, the sampling schedule described in items 2 and 3 above shall be reinitiated.
- 12. All treatment system Influent samples shall be analyzed for the following constituents:

| <u>Constituent</u> | <u>Units</u> | <u>Type of sample</u> |
|---|--------------|-----------------------|
| Flow | gpd | metered |
| Total petroleum Hydrocarbons (C ₂ -C ₄₆) | ug/l | grab |
| Benzene | ug/l | grab |
| Toluene | ug/l | grab |
| Ethlybenzene | ug/l | grab |

| <u>Constituent</u> | <u>Units</u> | <u>Type of sample</u> |
|--------------------|--------------|-----------------------|
| Total Xylenes | ug/l | grab |
| Total Lead | ug/l | grab |
| Naphthalene | ug/l | grab |
| MTBE | ug/l | grab |
| TBA | ug/l | grab |
| EDB | ug/l | grab |
| 1,2 DCA | ug/l | grab |
| 1,1,1 TCA | ug/l | grab |
| PCE | ug/l | grab |
| TCE | ug/l | grab |
| Trans-1,2 DCE | ug/l | grab |
| Cis-1,2 DCE | ug/l | grab |
| 1,1 DCE | ug/l | grab |
| 1,1 DCA | ug/l | grab |
| 1,1,2 TCA | ug/l | grab |
| Vinyl chloride | ug/l | grab |

IV. EFFLUENT MONITORING REQUIREMENTS

13. Treatment plant effluent samples shall be collected from an approved sampling location as described in Section II above.
14. During the first two months of treatment operation, samples shall be collected on the 1st, 4th, 14th, 28th, and 56th days of operation.
15. Thereafter, the sampling frequency shall be every month.
16. If the treatment plant is shut down for a continuous time period of greater than sixty (60) days, the sampling schedule described in items 2 and 3 above shall be reinitiated.
17. All treatment system Effluent samples shall be analyzed for the following constituents:

| <u>Constituent</u> | <u>Units</u> | <u>Type of sample</u> |
|---|--------------|-----------------------|
| Flow | gpd | metered |
| Total petroleum hydrocarbons (C ₂ -C ₄₆) | ug/l | grab |
| Benzene | ug/l | grab |
| Toluene | ug/l | grab |
| Total Xylenes | ug/l | grab |
| Total Lead | ug/l | grab |
| Naphthalene | ug/l | grab |
| MTBE | ug/l | grab |

| <u>Constituent</u> | <u>Units</u> | <u>Type of sample</u> |
|--------------------|--------------|-----------------------|
| TBA | ug/l | grab |
| EDB | ug/l | grab |
| 1,2 DCA | ug/l | grab |
| 1,1,1 TCA | ug/l | grab |
| PCE | ug/l | grab |
| TCE | ug/l | grab |
| Trans-1,2 DCE | ug/l | grab |
| Cis-1,2 DCE | ug/l | grab |
| 1,1 DCE | ug/l | grab |
| 1,1 DCA | ug/l | grab |
| 1,1,2 TCA | ug/l | grab |
| Vinyl chloride | ug/l | grab |

V. GROUNDWATER MONITORING REQUIREMENTS

18. Groundwater samples shall be collected from approved monitoring well locations as described in Section II above.
19. Groundwater samples shall be collected and analyzed semi-annually in conjunction with the site-wide groundwater monitoring events for the following constituents:

| <u>Constituent</u> | <u>Units</u> | <u>Type of sample</u> |
|---|--------------|-----------------------|
| Total petroleum hydrocarbons (C ₂ -C ₄₆) | ug/l | grab |
| Benzene | ug/l | grab |
| Toluene | ug/l | grab |
| Ethlybenzene | ug/l | grab |
| Total Xylenes | ug/l | grab |
| Total Lead | ug/l | grab |
| Naphthalene | ug/l | grab |
| MTBE | ug/l | grab |
| TBA | ug/l | grab |
| EDB | ug/l | grab |
| 1,2 DCA | ug/l | grab |
| 1,1,1 TCA | ug/l | grab |
| PCE | ug/l | grab |
| TCE | ug/l | grab |
| Trans-1,2 DCE | ug/l | grab |
| Cis-1,2 DCE | ug/l | grab |
| 1,1 DCE | ug/l | grab |
| 1,1 DCA | ug/l | grab |
| 1,1,2 TCA | ug/l | grab |
| Vinyl chloride | ug/l | grab |

VI. REPORTING REQUIREMENTS

20. The results of any analysis taken more frequently than required at the locations specified in this Monitoring and Reporting Program shall be reported to the Regional Water Board.
21. If the facility is not in operation, or there is no discharge during a required reporting period, the Discharger shall forward a letter to the Regional Water Board indicating that there has been no activity during the required reporting period.
22. The Discharger shall inspect and document any operation/maintenance problems by inspecting each unit process. In addition, calibration of flow meters and equipment shall be performed in a timely manner and documented. Operation and maintenance activities shall be summarized and submitted to the Regional Water Board Office quarterly.
23. The Discharger shall submit quarterly monitoring reports including the results of all required monitoring using USEPA-approved test methods or other test methods specified in this Order. Quarterly reports shall be due on January 30th, April 30th, July 30th, and October 30th following each calendar quarter.
24. The Discharger shall report with each sample result the Reporting Limit (RL), applicable Minimum Level (ML) and the current Method Detection Limit (MDL), as determined by the procedure in 40 CFR Part 136.
25. The Discharger shall arrange all reported data in a tabular format. The data shall be summarized to clearly illustrate whether the facility is operating in compliance with discharge specifications.
26. The Discharger shall attach a cover letter to Monitoring Report. The information contained in the cover letter shall clearly identify violations of the WDRs; discuss corrective actions taken or planned; and the proposed time schedule for corrective actions. Identified violations must include a description of the requirement that was violated and a description of the violation.
27. A duly authorized representative of the Discharger may sign the documents if:
 - a. The authorization is made in writing by the Discharger;
 - b. The authorization specified an individual or person having responsibility for the overall operation of the regulated disposal system; and
 - c. The written authorization is submitted to the Regional Water Board's Executive Officer.
28. Each report shall contain the following statement:

“I declare under the penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant

penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations.”

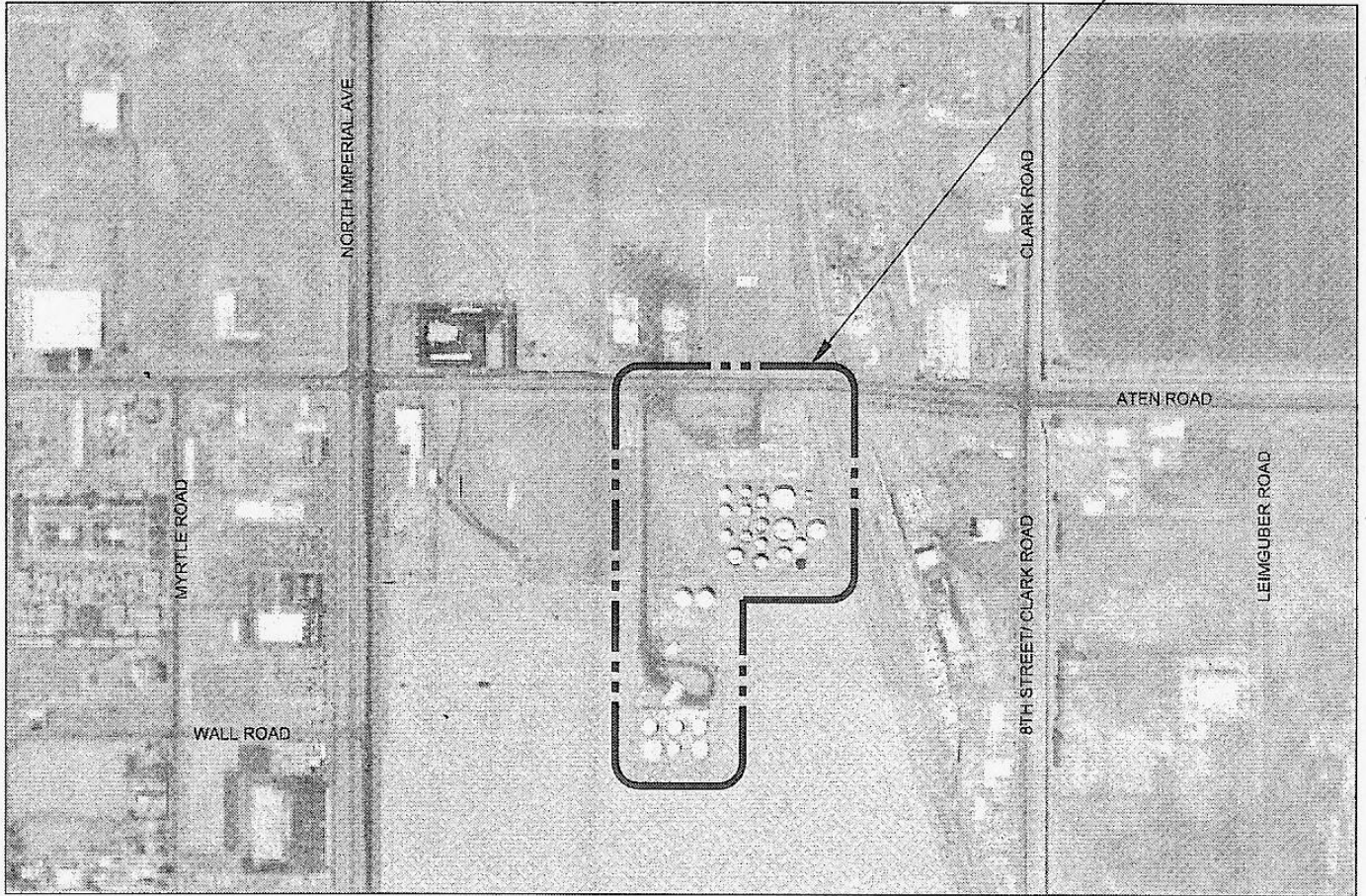
29. Monitoring Reports must be submitted to the Regional Water Board, signed and certified as required in items above to the address listed below:

Submit monitoring reports to:

California Regional Water Quality Control Board
Colorado River Basin Region
73-720 Fred Waring, Suite 100
Palm Desert, CA 92260

California Regional Water Quality Control Board Colorado River Basin Region

345 WEST ATEN ROAD
IMPERIAL, CA 92251



LOCATION MAP
NTS



Attachment A

Groundwater Treatment Discharge Sprinkler System – Site Location
Map Kinder Morgan Energy Partners
Imperial, Imperial County