Wylie, Doug@Waterboards

From: Saed, Chris <csaed@dpw.sbcounty.gov>
Sent: Wednesday, May 22, 2019 5:26 PM
To: Wylie, Doug@Waterboards
Cc: Stormo, Scot@Waterboards; Bishop, Sharon
Subject: Draft Response to Tentative MRP R7-2019-0013
Attachments: Landers SLF_MRP Eval.190522.D.xlsx

Follow Up Flag: Follow up
Flag Status: Flagged

Good Evening Doug,

Water quality monitoring performed at the LSL for more than 30 years demonstrates relatively stable to declining trends for COCs in groundwater. In addition, the landfill expansion includes a state of the practice liner system, leachate collection and recovery system (LCRS), landfill gas control system (LFGCS), and drainage features to reduce the potential for future water quality impacts, suggesting less prescriptive and onerous monitoring requirements are warranted. The attached table provides comments and technical justification for suggested changes to the tentative MRP, including references to the specific sections of the MRP where these suggested revisions are located. Our comments are generally focused on overly prescriptive requirements which would result in more onerous monitoring and reporting requirements, and additional unwarranted costs to the County compared to the requirements of existing MRP No. R7-2009-0063, but would not result in a higher level of water quality protection. Where the previous MRP provided general references to applicable sections of Title 27, the tentative order includes unnecessary detail and specification, some of which is typically the responsibility of the registered professional preparing the technical documents.

Thank you.

SAN BERNARDINO COUNTY

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Table 1
Summary of Comments and Recommendations
Review of Tentative Order R7-2019-0013
Landers Sanitary Landfill
San Bernardino County, California

Section	Document Tentative MRP; Order R7-2019-0013	Comments
Part I	**Sampling and Analysis General Requirements**	
Part I.A.1	Sample Collection and Analysis Plan	
	As provided in Section I.3 of the Order, the Discharger shall submit a Sample Collection and Analysis Plan (SCAP) that incorporates the standard monitoring provisions below and describes the sampling and analysis protocols to be used for all monitoring activities, including for the groundwater and vadose zone detection, evaluation, and corrective action programs at the Facility. The SCAP shall also incorporate procedures for drying, testing, and disposal of septage wastes obtained from the surface impoundment IMP-2, which were formerly described in a separate Septage Management Plan. The SCAP must be received by the Regional Water Board within 90 days of adoption of the Order and this MRP.	A Sampling and Analysis Plan for groundwater, surface water, and vadose zone monitoring currently exists and is submitted with each routine monitoring report. A Septage Management Plan also exists. Therefore, we request the RWQCB consider changing the language to allow for the continued use of these existing documents (with amendments, as needed) to satisfy this requirement when changes at the site occur that would warrant updating the existing plans. This comment also applied to WDR Section I.3.
Part I.B.3	30-Day Sample Procurement Limitation.	
	For any given monitored medium, the samples collected from all monitoring points and background monitoring points to satisfy the data analysis requirements for a given reporting period shall all be collected within a span not to exceed 30 days, unless a longer time period is approved by the Regional Water Board's Executive Officer, and shall be collected in a manner that ensures sample independence to the greatest extent feasible.	Request the RWQCB consider revising to indicate the 30 day window is applicable to primary samples and exclude samples that may be collected for discrete re-tests/confirmation sampling. Revise to specify an additional 30 day window for collection of confirmation samples from the date the original samples were collected.
Part I.B.6	QA/QC Data.	
	All quality control / quality assurance (QA/QC) data shall be reported, along with the sample results to which they apply, including the method, equipment, and analytical detection limits, the recovery rates, an explanation of any recovery rate that is less than 80%, the results of equipment and method blanks, the results of spiked and surrogate samples, the frequency of quality control analyses, and the name and qualifications of the person(s) performing the analyses. Sample results shall be reported unadjusted for blank results or spike recovery. In cases where contaminants are detected in QA/QC samples (i.e., field, trip, or lab blanks), the accompanying sample results shall be appropriately flagged, but the analytical results shall not be adjusted.	Laboratory analytical reports are currently signed by the Laboratory Technical Director, and requiring the reports to include the name and qualifications of the person(s) performing the analyses is unwarranted and unnecessary. We request the RWQCB consider revising this section to allow discharger to qualify/adjust data from analytical reports in tabular summaries, but that laboratory analytical reports shall remain unadjusted.
Part I.B.9	Records Retention.	
	The Discharger shall maintain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Order and this MRP throughout the life of the Facility, including....The individual(s) who performed the analyses...A written copy of the laboratory quality assurance plan.	The records retention section is unnecessarily prescriptive compared to similar sections in recent WDRs/MRPs for other solid waste facilities in the Colorado River Region (see R7-2017-0003 and -0012) and other WDRs/MRPs issued by the Santa Ana and San Diego RWQCBs for similar solid waste facilities in southern California. Therefore, we request that the RWQCB consider revising the records retention language to be consistent with the language in the MRPs R7-2017-0003 and -0012.
Part II	**Site Specific Monitoring Requirements**	
Part II.A.1.b	Monitoring Well Locations	
	Quarterly Monitoring/Reporting for all compliance wells	Hydrographs for groundwater elevations for the well network as a whole show very little variation, and based on current time-series plots, there are few historical occurrences where a monitoring parameter/well pair exhibit an abrupt exceedance of an MCL that may have gone unnoticed if semi-annual monitoring was performed. If statistical analysis were performed, it if very likely that these anomalous concentrations would be flagged as outliers and not incorporated into the historical data set. Conversely, site data generally exhibit gradual overall trends, allowing adequate resolution of groundwater quality through semi-annual monitoring. Based on information provided in Title 27, quarterly monitoring is typically reserved for measurement of groundwater elevations/flow direction; whereas the objective of quarterly groundwater sampling is to accelerate the collection of background data for new wells or newly identified COCs and facilitate concentration limit development. We request that the RWQCB modify the monitoring and reporting frequencies from quarterly to semi-annually for wells L-1, L-6, L-7, L-8, L-9, L-13, L-20, L-21, and L-22 to reflect the general stability of groundwater elevations and quality, while acknowledging instances where quarterly monitoring is necessary (i.e. newly installed wells or for development of background data sets for newly identified monitoring parameters). Semi-annual monitoring and reporting would also be consistent with more recent MRPs such as MRPs R7-2017-0003 and -0012.
	Groundwater gradients and flow directions shall be calculated using wells from the same elevation group. Isolated wells, including wells L-9 and former wells L-3 and L-10, shall not be used to evaluate groundwater gradients or flow directions, nor shall gradients be shown to cross the locations of these isolated wells.	This section is unnecessarily prescriptive and inconsistent with current MRPs for other solid waste facilities in southern California. Segregation of monitoring systems/well data is most often implemented when wells were screened in separate aquifers or if wells from different regions of the site were not believed to be hydraulically connected. It is acknowledged that groundwater flow may be affected by faulting underlying the Site, but we request the RWQCB consider removing the requirement prohibiting open interpretation of groundwater elevation and flow. Furthermore, updated groundwater flow evaluations will be performed based on future monitoring events and data to be obtained from future monitoring wells to be installed associated with the expansion. This comment also applies to WDR Section I.4.
Part II.A.1.c	Groundwater Monitoring Wells Workplan	
	As provided in Section I.5 of the Order, the Discharger is required to submit a workplan for the installation of additional monitoring wells within 120 days of adoption of the Order.	To address the installation of additional monitoring wells associated with the expansion and any additional wells which may be necessary in the future, we request that the RWQCB revise the language to state "prior to the installation of additional monitoring wells a workplan shall be submitted to the RWQCB for review and approval at least 90 days prior to installation."
Part II.A.2.b	Routine Monitoring Parameters	
	Four times per year (quarterly), groundwater samples shall be analyzed at a laboratory for the following constituents (at a minimum)...laboratory analysis of pH	We request that the RWQCB revise this section to require semi-annual groundwater sampling and reporting (instead of quarterly sampling and reporting) based on more than 30 years of routine groundwater monitoring which demonstrates relatively stable to declining trends for COCs in groundwater. Furthermore, laboratory analysis of pH is infeasible due to short hold time (15-minute), therefore pH should be retained as a field monitoring parameter, but eliminated as a monitoring parameter analyzed in the laboratory.
Part II.B.3.b	Soil Moisture Monitoring at IMP-2	

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Review of Tentative Order R7-2019-0013
Landers Sanitary Landfill
San Bernardino County, California

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	Tables of the results in monitoring reports shall be as percent moisture and include all of the moisture data obtained to-date at these features. A description of the methods used to derive the values shall be included. Any correction factors applied to the data shall be based on a site-specific calibration event performed at the site, and a description of the calibration method and results shall be included in each quarterly report.	If current moisture data is compared to thresholds based on averages, presenting historical moisture data would appear to be unwarranted. Suggest RWQCB consider revising this section to include data on a rolling 5-year window and that select data (such as max, min, average) be included in a tabular summary to provide historical context to current/recent data, and including the moisture data in semi-annual reports.
Part II.B.3.d	IMP-2 Moisture Monitoring Workplan	
	As provided in Section I.6 of the Order, the Discharger is required to submit a workplan regarding the moisture monitoring program for IMP-2 within 90 days of the adoption of the Order.	Requirements for development of a Moisture Monitoring Workplan is included sections for unsaturated zone monitoring; therefore, the need for this to be developed as a stand-alone report is unnecessary. To reduce the effort associated with redundant reporting, we request the RWQCB consider revising this section to identify that all components of unsaturated zone monitoring should be incorporated into one report, or at a minimum that it would be permitted.
Part II.C.1	Observed Surface Water Monitoring	
	If surface water is observed at the Facility, the source of the surface water shall be identified, and observations of the following shall be included in the next quarterly monitoring report:	Request the RWQCB revise this section to refer to the next semi-annual (not quarterly) monitoring report. Also, it unclear why wind direction and velocity is relevant to monitoring of stormwater flows at a remote site such as this.
Part II.D.1	Waste Capacity Monitoring	
	References to quarterly reporting	Request the RWQCB revise all quarterly reporting references in this section to semi-annual reporting.
Part II.D.2	Residual Solids of Treated Sludge Monitoring	
	References to quarterly reporting	Request the RWQCB revise all quarterly reporting references in this section to semi-annual reporting.
Part II.D.3	LCRS Monitoring	
	References to quarterly reporting	Request the RWQCB revise all quarterly reporting references in this section to semi-annual reporting.
Part II.E.1	Waste Monitoring	
	Incoming loads of waste shall be monitored, and the following information included in each quarterly report:	Request the RWQCB revise all quarterly reporting references in this section to semi-annual reporting.
Part II.E.2.c.II	Leachate Monitoring at LF-2B	
	The first time liquid is found in a LCRS sump...a sample of the leachate shall be collected within 48 hours and analyzed for the Field Monitoring Parameters, Routine Monitoring Parameters and COC Monitoring Parameters used for groundwater monitoring.	Routine leachate monitoring and sampling is conducted monthly and annually, respectively once leachate is identified in the sump, which would appear to indicate that its presence is anticipated during the lifespan of the unit. Therefore, the expedited collection of data from the sump does not appear warranted. Requesting the RWQCB consider revising this section to remove the 48-hour sample requirement and instead use "as soon as practicable" to allow for coordination with qualified personnel and laboratories. It is also requested that the RWQCB identify the timeline for reporting results from initial leachate testing to ensure that timelines for sample collection and laboratory turnaround time is selected appropriately.
Part II.F.3.a	Excessive Leachate Production at IMP-2	
	When a possible leak is identified....The Discharger shall submit monthly status reports to the Regional Water Board documenting activities and monitoring results until the Regional Water Board indicates that status reports are no longer needed.	Request RWQCB consider revising this section to de-escalate the reporting frequency (but not the original notification timeline) to allow collection of data over several months to evaluate possible leak and report findings quarterly along with other routine monitoring results. Also request the RWQCB consider providing additional detail on what criteria the board will use to determine when status reports are no longer needed.
Part II.G	Corrective Action EFS Workplan	
	As provided in Section H.3 of the Order, within 90 days of the issuance of the Order, the Discharger is required to submit to the Regional Water Board for review and approval a workplan and time schedule for re-performing an Engineering Feasibility Study (Revised EFS) to evaluate the fate and transport of the pollutants detected in groundwater under the Facility using up-to-date data. The Revised EFS must evaluate remedial alternatives for both groundwater releases identified in Finding 38 of the Order. If "intrinsic remediation" continues to be the preferred alternative, the Revised EFS report shall contain: (1) predictions regarding the rate at which concentrations will decline; (2) data analysis methods for monitoring the rate of decline; and (3) thresholds for further action should that time frame be exceeded.	Request RWQCB consider revising this section to be consistent with the requirements in Title 27. Groundwater monitoring performed since the late 1980s demonstrates relatively stable to declining trends for COCs in groundwater. More specifically, time-series plots included in the 2019 Annual Monitoring Report document stable to declining trends for chloride, nitrate, TDS, and VOCs, which are the COCs described in Finding 38 and Section H.3 of the Order as the basis for requesting an updated EFS. Monitoring data collected since 2000 demonstrates that "intrinsic remediation" remains the most appropriate to address the COCs detected in groundwater at the site. Therefore, preparation and submittal of an updated EFS within 90 days of issuance of the Order is unnecessary and unwarranted. This comment also applies to Finding 38 and the requirement for an updated EFS described in Section H.3 of the Order.
Part III	**Evaluation of Monitoring Data**	
Part III.A	Detection Mode Monitoring	
	Inter-well comparisons shall be used where upgradient and downgradient wells intercept the same aquifer and are expected to have similar concentrations of naturally-occurring constituents. The following wells may be evaluated using inter-well comparisons: L-17, L-18 and L-19 (background wells & L-13 and L-21 (downgradient wells),	This section is unnecessarily prescriptive and inconsistent with current MRPs for other solid waste facilities in southern California. We request that the RWQCB consider not using Monitoring Parameter or COC interchangeably to refer to routine (i.e. quarterly/annual) and non-routine (i.e. 5-year COC scan) throughout the document to avoid the Discharger misinterpreting language of the order. Additionally, the

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Summary of Comments and Recommendations
Review of Tentative Order R7-2019-0013
Landers Sanitary Landfill
San Bernardino County, California

Geosyntec consultants

	Intra-well comparisons shall be used where uncontaminated background wells are not present, or the chemical composition of upgradient and downgradient wells are significantly different. Intra-well comparisons shall be used on all wells not listed above for inter-well comparisons. The data used to calculate natural background concentrations shall exclude data from a monitoring event during which a release of naturally occurring chemicals appears to have been detected. This section also provides the rationale for data exclusion for L-1, L-6, L-7, and L-9.	RWQCB has drafted this section to indicate that inter-well comparisons may (not shall) be used to prepare concentrations limits for select monitoring wells. We recommend that the discharger be allowed to rely on results of statistical analysis to validate background data sets from each well to determine the appropriateness of the use of inter-well or intra-well concentration limits, the need to truncate data sets due to increasing trends, or deselect data flagged as outliers. Additionally, we request the RWQCB consider revising this section to better describe frequencies for re-evaluation of selected concentration limits, validating new data to add to the background data sets for each well, and for options to retire older sets of data that may not be representative current site conditions, either due to natural variation or corrective action.
Part III.B	Tracking Mode Monitoring	
	When one or more COCs are detected in groundwater samples and there is statistically significant evidence of a release, the Discharger shall monitor all COCs in that groundwater monitoring well in "tracking mode." In tracking mode, the Discharger shall analyze COC concentrations in groundwater by plotting the concentrations in groundwater samples collected from a given well over time. The graphical representation of the groundwater data will be used to track trends in COC concentrations over time, and assist in evaluating the impacts of COCs on groundwater quality. All corrective action monitoring wells shall be monitored in "tracking mode."	Reiterate request for clarification between Monitoring Parameter and COC, as stated previously. Additionally, we request that the RWQCB consider the identification of "tracking mode" references on a monitoring parameter/well pair (MPar/Well pair) basis, as opposed to including all monitoring parameters (even those in compliance with Water Quality Objectives or Concentration Limits) as in tracking mode, which is later defined as being in violation of the Water Standard.
Part III.C	Water Quality Protection Standard	
	The Facility is in violation of its water quality protection standard (Water Standard) any time a constituent in a given groundwater well in "detection mode" exhibits a measurably significant increase (as defined by Cal. Code Regs., title 27, section 20164) over the applicable background data set. All groundwater wells monitored in "tracking mode" remain in violation of the Water Standard until completion of a successful proof period that ends the corrective action program.	Request the RWQCB consider providing details on the criteria for determining completion of a successful proof period and procedures to return specific Mpar/Well Pairs or well locations (as a whole) back to detection mode monitoring.
Part III.D	Validation of Background Data Sets	
	The Discharger may need to validate an intra-well background dataset for COCs at an existing well if there have not been enough sampling events at that well to create a background data set, and for each new well installed as part of the groundwater detection monitoring program. If the Discharger uses an intra-well approach, then the Discharger shall report the validated background dataset, specifying the COCs and monitoring well(s) affected, in the next scheduled monitoring report. If the Discharger detects COCs in monitoring wells while establishing the background dataset, then the Regional Water Board may determine that affected wells will become part of the corrective action monitoring program well network.	Request the RWQCB consider expanding the explanation of validating background data sets to include specific criteria for determining when validating or updating background data sets is appropriate (or inappropriate) such as when statistically significant trends are observed and truncating historical data may be appropriate. Also request the RWQCB consider revising this section to include criteria for accelerated background data collection for new wells or new COCs to allow more rapid development of concentration limits (such as quarterly sampling to facilitate collection of a minimum data points).
Part IV	Reports to be Filed with the Regional Water Board	
Part IV.A.1	Required Reports	
	Quarterly Monitoring Reports	As mentioned in previous comments, we request the RWQCB consider modification of the monitoring and reporting frequency to semi-annually to more appropriately reflect the conditions and threats presented by the site based on more than 30 years of monitoring performed at the site. Also request discontinued use of COCs and Monitoring Parameters interchangeably throughout.
Part IV.A.1.a	Topographic Map	
	The information contained on the topographic map shall also be provided in a Geographic Information System (GIS) shape file. The shape file must be polygons and include two Global Positioning Systems (GPS) points for each line of the polygon, with a minimum of 10 points. GIS metadata must also be submitted. The shape file and metadata shall be included on a CD attached to the report.	This section is unnecessarily prescriptive and inconsistent with current MRPs for other solid waste facilities in southern California. Locations of all pertinent groundwater monitoring locations are required for upload to the State Boards online database, GeoTracker, as are monitoring reports with figures representing the groundwater conditions encountered during each monitoring period. Complying with the existing regulatory requirements should satisfy the RWQCB and that the requirement to prepare and deliver GIS data is overly prescriptive, burdensome, and unnecessary. We request that the RWQCB consider striking this unnecessary requirement from the Tentative Order.
Part IV.A.1.h	Graphical Display	
	For each downgradient monitoring well and background monitoring well, a graphical display of all the groundwater data collected within at least the previous ten calendar years as required by California Code of Regulations, title 27, section 20415(e)(14). Each graph shall plot the concentration of one or more constituents on a semi-log scale, as appropriate. Based on visual inspection of trends, the Regional Water Board may direct the Discharger to carry out a preliminary investigation to determine whether a release is indicated.	Pertinent sections of Title 27 indicate that preparation of graphical displays of data (i.e. time-series plots) are required for submittal annually (at a minimum). Additionally, similar sites and graphical displays are required to show a minimum of 5-years of background data. Existing data adequately identify which wells/parameters have exceeded Water Quality Objectives, and the prescribed notification requirements when parameters are moved from Detection Mode to Tracking mode, will allow the RWQCB to stay aware of new exceedances. Additionally, with electronic data uploads to GeoTracker and existing capabilities of the database to prepare graphical displays of data by the case workers, preparation of plots with 10 years of data in every report is unwarranted. Therefore, we request that the RWQCB consider requiring submittal of graphical displays in the Annual Report and reduce the required data set to the most current 5-years (i.e., consider striking this requirement and retain in the Annual Report described in Part IV.A.2.d). Adopting this change will allow the registered professionals interpreting the data the opportunity to shorten or lengthen the timelines presented based on the ranges of current and historical data.
Part IV.A.1.i	Evaluation of Corrective Actions	
	A written summary that includes a discussion and evaluation of the effectiveness of corrective action measures implemented at the site to mitigate the release of waste constituents from the Facility.	We request that the RWQCB consider moving this section to the Annual Report section Part IV.A.2.
Part IV.A.1.m	Data Tables	
	All data obtained during the current reporting period and previous ten years presented in tabular form. Data files larger than 150 megabytes shall be provided electronically in a file format approved by the Regional Water Board. Any electronic files submitted to the Regional Water Board in accordance with Order No. R9-2019-0013 and this MRP, shall not be password protected.	Submittal of separate electronic files that duplicate required GeoTracker uploads is unnecessary and unwarranted. Historical data and EDDs are uploaded to GeoTracker and available for RWQCB review. Similarly, submittal of 10 years of tabular data is an unnecessary and burdensome requirement, since graphical data displays are prepared and provided to the RWQCB to review long term trends and concentrations. Additionally, GeoTracker contains historical site data and has capabilities for case workers to generate plots for their specific use. We request that the RWQCB consider striking this unnecessary requirement from the Tentative Order.
Part IV.A.1.n	Site Inspections	

Table 1
Summary of Comments and Recommendations
Review of Tentative Order R7-2019-0013
Landers Sanitary Landfill
San Bernardino County, California

Geosyntec consultants

	A copy of any site inspection report produced by the Discharger, the Local Enforcement Agency (LEA), or the Regional Water Board. Inspection reports may be included as an appendix to the quarterly report.	Inclusion of Discharger-performed inspections is common practice for Monitoring and Reporting Programs. However, we believe it should not be the responsibility of the Discharger to include or upload inspection reports generated by regulatory agencies. Therefore we request the RWQCB consider removing this requirement or revising the language to allow the inclusion of a general summary of regulatory correspondence to agencies other than the RWQCB in the cover letter or as an attachment to the routine monitoring reports.
Part IV.A.2.a	Annual Summary Report; Sample Collection and Analysis Plan	
	The current version of the Sample Collection and Analysis Plan (SCAP) provided in Annual Report	As noted in prior comments, a Sampling and Analysis Plan for groundwater and vadose zone monitoring is included in each routine monitoring report. Current and revised SCAPs will be provided to the RWQCB for review and approval and will also be uploaded to GeoTracker. Therefore, existing requirements make these documents available to the RWQCB at any time. This requirement appears unwarranted and RWQCB should consider striking this requirement from the Tentative Order.
Part IV.A.2.d	Graphical Display	
	A graphical display for all data collected within at least the previous ten calendar years for each monitoring point and background monitoring point. Each graph shall plot the concentration of one or more constituents over time for a given monitoring point. For any given constituent, the scale for all plots should be the same to facilitate comparison and identification of trends. On the basis of any outliers noted in the plotted data, the Regional Water Board may direct the Discharger to carry out a preliminary investigation, in accordance with Part II.F of this MRP, to determine whether a release is indicated. Trend analyses shall include identification of current trends, a comparison to previously identified trends, and a discussion of any significant changes in the trends. This shall be prepared for groundwater and any vadose zone monitoring points (including subdrains, lysimeters, or landfill gas).	Current MRPs for similar sites require a minimum of 5-years of data and electronic data uploads to GeoTracker to allow for graphical displays of data to be prepared by the case workers. We request that the RWQCB consider requiring the use of a minimum of 5-years of historical data for graphical displays. This will allow registered professionals to alter the scale of graphs to match more current data and improve data resolution. See comment above for Part IV.A.1.h.
Part IV.A.2.e	Background Concentration Limits Update	
	Reevaluate background concentration limits and propose any appropriate changes.	Current MRPs for similar sites require re-evaluation of background data sets and updates to concentration limits every two-years. The purpose of this is to allow the collection of sufficient new data to compare to the previous historical data. We request that the RWQCB consider modify the background data/concentration limit re-evaluation requirements to every 2 years to align with the previous comments related to the frequency of background data/concentration limit evaluations.
Part IV.A.2.k	Compliance Summary	
	Include a comprehensive discussion of the compliance record, and of any corrective actions taken or planned which may be needed to bring the Discharger into full compliance with the Order or this MRP.	We recognize the need for acknowledgement of conditions of non-compliance and that a discussion of the specific measures taken/planned to return the facility to compliance is warranted. However, in practice the maintaining a comprehensive compliance record discussion (which we assume to be ordered chronologically) can lead to the development of documents which perpetually grow, without providing any improved benefit to groundwater quality. Past conditions of non-compliance that have been corrected are not warranted for inclusion or discussion in a routine report. Such conditions are sufficiently documented and archived in previous annual reports and/or in Notices of Violation (NOVs) prepared by the RWQCB.
Part IV.C.7	Standard Reporting Procedures	
	As specified in Standard Provisions M.12, the Discharger shall comply with Electronic Submittal of Information (ESI) requirements by submitting all correspondence and reports required under this MRP and future revisions thereto, including groundwater monitoring data and discharge location data (latitude and longitude), correspondence, and monitoring reports to the State Water Board's GeoTracker database. Documents that are 2.0 MB or larger should be broken down into smaller electronic files, labelled properly, and uploaded into GeoTracker.	The GeoTracker site allows for the upload of files up to 40 MB in size before they are needed to be broken down. We request the RWQCB revise the language in this section to reflect the current upload capacity of GeoTracker.