

STATE OF CALIFORNIA

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
320 W 4th Street, Suite 200, Los Angeles

FACT SHEET
WASTE DISCHARGE REQUIREMENTS
for
BP WEST COAST PRODUCTS, LLC
(HATHAWAY TANK FARM)

NPDES Permit No.: CA0058343
Public Notice No.: 04-010

FACILITY ADDRESS

BP West Coast Products, LLC
Hathaway Terminal
2350 Obispo Avenue (formerly
Hathaway Avenue)
Signal Hill, CA 90806

FACILITY MAILING ADDRESS

BP West Coast Products, LLC
1300 Pier B Street
Long Beach, CA 90813

Contact: Stephen D. Comley
Telephone: (562) 499-2241

I. Public Participation

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is considering the issuance of waste discharge requirements (WDRs) that will serve as a National Pollutant Discharge Elimination System (NPDES) permit for the above-referenced facility. As an initial step in the WDR process, the Regional Board staff has developed tentative WDRs. The Regional Board encourages public participation in the WDR adoption process.

A. Written Comments

The staff determinations are tentative. Interested persons are invited to submit written comments concerning these tentative WDRs. Comments should be submitted either in person or by mail to:

Executive Officer
California Regional Water Quality Control Board
Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

To be fully responded to by staff and considered by the Regional Board, written comments should be received at the Regional Board offices by 5:00 p.m. on April 9, 2004.

B. Public Hearing

The Regional Board will hold a public hearing on the tentative WDRs during its regular Board meeting on the following date and time and at the following location:

Date: May 6, 2004
Time: 9:00 a.m.
Location: City of Simi Valley Council Chambers
2929 Tapo Canyon Road
Simi Valley, CA

Interested persons are invited to attend. At the public hearing, the Regional Board will hear testimony, if any, pertinent to the discharge, WDRs, and permit. Oral testimony will be heard; however, for accuracy of the record, important testimony should be in writing.

Please be aware that dates and venues may change. Our web address is www.swrcb.ca.gov/rwqcb4 where you can access the current agenda for changes in dates and locations.

C. Waste Discharge Requirements Appeals

Any aggrieved person may petition the State Water Resources Control Board to review the decision of the Regional Board regarding the final WDRs. The petition must be submitted within 30 days of the Regional Board's action to the following address:

State Water Resources Control Board, Office of Chief Counsel
ATTN: Elizabeth Jennings, Senior Staff Counsel
1001 I Street, 22nd Floor
Sacramento, CA 95814

D. Information and Copying

The Report of Waste Discharge (ROWD), related documents, tentative effluent limitations and special conditions, comments received, and other information are on file and may be inspected at 320 West 4th Street, Suite 200, Los Angeles, California, 90013, at any time between 8:30 a.m. and 4:45 p.m., Monday through Friday. Copying of documents may be arranged through the Los Angeles Regional Board by calling (213) 576-6600.

E. Register of Interested Persons

Any person interested in being placed on the mailing list for information regarding the WDRs and NPDES permit should contact the Regional Board, reference this facility, and provide a name, address, and phone number.

II. Introduction

BP West Coast Products, LLC (hereinafter BP West Coast or Discharger) discharges wastes from its Hathaway Tank Farm (Facility) to the Los Cerritos Channel, a water of the United States. Wastes discharged from the Facility are regulated under WDRs and NPDES permit contained in Order No. 97-018 (NPDES Permit No. CA0058343) adopted by the Regional Board on March 3, 1997. Order No. 97-018 expired on February 10, 2002.

BP West Coast has filed a report of waste discharge and has applied for renewal of its WDRs and NPDES permit. The tentative Order is the reissuance of the WDRs and NPDES permit for discharges from BP West Coast. A site visit was conducted on August 27, 2003 to observe operations and collect additional data to develop permit limits and requirements.

The Facility was formerly owned and operated by ARCO Terminal Services Corporation, a subsidiary of BP West Coast Products. On January 1, 2002, BP West Coast Products, LLC took ownership and assumed the operations of the Facility. ARCO notified the Regional Board in writing of the transfer of ownership of their Facility on February 15, 2002.

Description of Facility and Waste Discharge

BP West Coast owns and operates the Facility, a petroleum products storage and distribution facility located at 2350 Obispo Avenue (formerly Hathaway Avenue), Signal Hill, California. The Facility is comprised of two tank farms (Upper Tank Farm and Lower Tank Farm). Ten tanks are located in the Upper Tank Farm (30,000-nominal barrel capacity each) and nine tanks are located in the Lower Tank Farm (100,000-nominal barrel capacity each). Dedicated containment is provided for each tank in the Lower Tank Farm (shared containment for the Upper Tank Farm), and the containment for each tank is identified by the associated tank number. The Facility receives gasoline and diesel components via pipeline for storage and transfer. Products are loaded and unloaded via a truck rack on the western side of the Facility.

BP West Coast intermittently discharges up to 50,000 gallons per day of storm water runoff through Discharge Serial No. 001 (Latitude 33°47'33" North, Longitude 118°07'38" West) into Los Cerritos Channel, a water of the United States, near the north end of the channel, within the estuary. Los Cerritos Channel eventually discharges to Alamos Bay. Storm water is collected in the tank farm and cascades via a series of sumps and manually operated valves from the Upper Tank Farm, through the dedicated containment structures in the Lower Tank Farm, to the containment structure for Tank 104. Flow from the Tank 104 containment structure is restricted by two manually operated valves and is routed via a discharge pipe, Discharge Serial 001, to the Facility' s northeast corner, and subsequently overland to two storm water drainage pipes routed to Los Cerritos Channel.

Secondary containment is provided for the truck rack, product transfer manifolds, and pump stations. Storm water collected within these containment structures is pumped via level control to either Tank No. 30026 or Tank No. 30024 for transfer to the BP Carson Refinery for

treatment. The discharge of storm water is intermittent and occurs only during periods of heavy rainfall. During light rain, the runoff is contained on the property and allowed to evaporate.

The Facility' s hydrostatic test water discharge is regulated under the General NPDES Permit and Waste Discharge Requirements for Discharges of Hydrostatic Test Water to Surface Waters (NPDES Permit No. CAG674001, CI-8306).

The Regional Board and the United States Environmental Protection Agency (U.S. EPA) have classified the Hathaway Tank Farm facility as a minor discharge.

The Discharger characterized the storm water effluent from Discharge Serial No. 001 in Section V, Part A of EPA Form 2C as follows:

Pollutant (units)	Reported Maximum Daily Value	Reported Long Term Average Value
Biochemical Oxygen Demand (BOD) (mg/L)	6	3
BOD (lb/d)	2.3	1.1
Total organic carbon (TOC) (mg/L)	6	2
TOC (lb/d)	2.3	0.7
Total suspended solids (TSS) (mg/L)	76	43
TSS (lb/d)	29.1	16
Ammonia (as N) (mg/L)	0.7	0.7
Ammonia (as N) (lb/d)	0.3	0.3
Flow (gpd)	50,000	NR
Temperature (winter/summer) (°C)	16/25	15/20
PH (min./max.) (s.u.)	7.4/7.5	NR
Oil and grease (mg/L)	6	NR
Oil and grease (lb/d)	2.3	NR

NR = Not Reported

All other pollutants listed in Section V, Part B of EPA Form 2C are marked “believed absent”.

III. Applicable Plans, Policies, and Regulations

The requirements contained in the proposed Order are based on the requirements and authorities contained in the following:

1. The federal Clean Water Act (CWA). The federal Clean Water Act requires that any point source discharges of pollutants to a water of the United States must be done in conformance with an NPDES permit. NPDES permits establish effluent limitations that incorporate various requirements of the CWA designed to protect water quality.
2. Code of Regulations, Title 40 (40 CFR) – Protection of Environment, Chapter I, Environmental Protection Agency, Subchapter D, Water Programs, Parts 122-125 and Subchapter N, Effluent Guidelines. These CWA regulations provide effluent limits for certain dischargers and establish procedures for NPDES permitting, including how to establish effluent limits for certain pollutants discharged by Hathaway.

3. On June 13, 1994, the Regional Board adopted a revised *Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan). The Basin Plan contains water quality objectives and beneficial uses for inland surface waters and for the Pacific Ocean. The beneficial uses listed in the Basin Plan for the Los Cerritos Channel are as follows:

Existing Uses: industrial service supply, navigation, water contact recreation, non-contact water recreation, commercial and sport fishing, estuarine habitat, marine habitat, wildlife habitat, preservation of rare and endangered species, migration of aquatic organisms, spawning, reproduction, and/or development, and shellfish harvesting.

4. **Ammonia Basin Plan Amendment.** The 1994 Basin Plan provided water quality objectives for ammonia to protect aquatic life, in Tables 3-1 through Tables 3-4. However, those ammonia objectives were revised on April 25, 2002, by the Regional Board with the adoption of Resolution No. 2002-011, *Amendment to the Water Quality Control Plan for the Los Angeles Region to Update the Ammonia Objectives for Inland Surface Waters (Including Enclosed Bays, Estuaries and Wetlands) with Beneficial Use Designations for Protection of Aquatic Life*. The ammonia Basin Plan amendment was approved by the State Board, the Office of Administrative Law, and United States Environmental Protection Agency (U.S. EPA) on April 30, 2003, June 5, 2003, and June 19, 2003, respectively. Although the revised ammonia water quality objectives may be less stringent than those contained in the 1994 Basin Plan, they are still protective of aquatic life and are consistent with U.S. EPA's 1999 ammonia criteria update.
5. The State Water Resources Control Board (State Board) adopted a *Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Water and Enclosed Bays and Estuaries of California* (Thermal Plan) on May 18, 1972, and amended this plan on September 18, 1975. This plan contains temperature objectives for Los Cerritos Channel estuary.
6. On May 18, 2000, the U.S. EPA promulgated numeric criteria for priority pollutants for the State of California [known as the *California Toxics Rule* (CTR) and codified as 40 CFR Section 131.38]. In the CTR, U.S. EPA promulgated criteria that protect the general population at an incremental cancer risk level of one in a million (10^{-6}) for all priority toxic pollutants regulated as carcinogens. The CTR also allows for a schedule of compliance not to exceed 5 years from the date of permit renewal for an existing discharger if the Discharger demonstrates that it is infeasible to promptly comply with effluent limitations derived from the CTR criteria.
7. 40 CFR Section 122.44(d)(vi)(A) requires the establishment of numeric effluent limitations to attain and maintain applicable narrative water quality criteria to protect the designated beneficial uses. Where numeric water quality objectives have not been established in the Basin Plan, 40 CFR Section 122.44(d) specifies that water quality-based effluent limits

(WQBELs) may be set based on U.S. EPA criteria and supplemented, where necessary, by other relevant information to attain and maintain narrative water quality criteria to fully protect designated beneficial uses.

8. State and Federal antibacksliding and antidegradation policies require that Regional Board actions to protect the water quality of a water body and to ensure that the waterbody will not be further degraded. The antibacksliding provisions are specified in Section 402(o) of the CWA and in the Title 40 of the Code of Federal Regulations (40 CFR), Section 122.44(l). Those provisions require a reissued permit to be as stringent as the previous permit with some exceptions where effluent limitations may be relaxed.
9. Effluent limitations are established in accordance with sections 301, 304, 306, and 307 of the federal CWA, and amendments thereto. These requirements, as they are met, will maintain and protect the beneficial uses of the Los Cerritos Channel.
10. Existing waste discharge requirements are contained in Order No. 97-018, adopted by the Regional Board on March 3, 1997. In some cases, permit conditions (effluent limits and other special conditions) established in the existing waste discharge requirements have been carried over to this Order.

IV. Regulatory Basis for Effluent Limitations

The CWA requires point source discharges to control the amount of conventional, nonconventional, and toxic pollutants that are discharged into the waters of the United States. The control of the discharge of pollutants is established through NPDES permits that contain effluent limitations and standards. The CWA establishes two principal bases for effluent limitations. First, dischargers are required to meet technology-based effluent limitations that reflect the best controls available considering costs and economic impact. Second, they are required to meet water quality-based effluent limitations (WQBELs) that are developed to protect applicable designated uses of the receiving water.

The CWA requires that technology-based effluent limitations be established based on several levels of control:

- Best practicable treatment control technology (BPT) is based on the average of the best performance by plants within an industrial category or subcategory. BPT standards apply to toxic, conventional, and nonconventional pollutants.
- Best available technology economically achievable (BAT) represents the best existing performance of treatment technologies that are economically achievable within an industrial point source category. BAT standards apply to toxic and nonconventional pollutants.
- Best conventional pollutant control technology (BCT) is a standard for the control from existing industrial point sources of conventional pollutants including BOD, TSS, fecal coliform, pH, and

oil and grease. The BCT standard is established after considering the “cost reasonableness” of the relationship between the cost of attaining a reduction in effluent discharge and the benefits that would result, and also the cost effectiveness of additional industrial treatment beyond BPT.

- New source performance standards (NSPS) represent the best available demonstrated control technology standards. The intent of NSPS guidelines is to set limitations that represent state-of-the-art treatment technology for new sources.

The CWA requires U.S. EPA to develop effluent limitations, guidelines and standards (ELGs) representing application of BPT, BCT, BAT, and NSPS. Section 402(a)(1) of the CWA and 40 CFR Section 125.3 of the NPDES regulations authorize the use of best professional judgment (BPJ) to derive technology-based effluent limitations on a case-by-case basis where ELGs are not available for certain industrial categories and/or pollutants of concern.

If a reasonable potential exists for pollutants in a discharge to exceed water quality standards, WQBELs are also required under 40 CFR Section 122.44(d)(1)(i). WQBELs are established after determining that technology-based limitations are not stringent enough to ensure that state water quality standards are met for the receiving water. WQBELs are based on the designated use of the receiving water, water quality criteria necessary to support the designated uses, and the state’s antidegradation policy. For discharges composed entirely of storm water, such as the potential discharges to inland surface waters, enclosed bays, and estuaries, the U.S. EPA’s *Technical Support Document for Water Quality-Based Toxics Control (TSD) of 1991* (U.S. EPA/505/2-90-001) establishes procedures for determining reasonable potential and establishing WQBELs for priority pollutant criteria promulgated by U.S. EPA through the CTR and the National Toxics Rule (NTR), as well as the Basin Plan. With respect to a reasonable potential analysis, the TSD provides an approach for determining whether a discharge has a reasonable potential. The approach used in the TSD is equally valid for determining the reasonable potential for discharges not comprised entirely of storm water discharges.

There are several other specific factors affecting the development of limitations and requirements in the proposed Order. These are discussed as follows:

1. **Pollutants of Concern**

The CWA requires that any pollutant that may be discharged by a point source in quantities of concern must be regulated through an NPDES permit. Further, the NPDES regulations require regulation of any pollutant that (1) causes; (2) has the reasonable potential to cause; or (3) contributes to the exceedance of a receiving water quality criteria or objective.

Effluent limitations for Discharge Serial No. 001 in the existing Order were established for oil and grease, total suspended solids, and phenols, because they have the potential to be present in storm water runoff from a petroleum tank farm. Storm water runoff may affect the pH and temperature of the discharge. Effluent limitations have been established for pH and

temperature and are based on the Basin Plan water quality objectives. Storm water runoff from the tank farm areas may contain constituents that may contribute to biochemical oxygen demand (BOD) and turbidity, and add total suspended solids (TSS) and sulfide to the discharge. Therefore, effluent limitations for BOD, turbidity, TSS, and sulfide have been established in the proposed Order.

2. **Technology-Based Effluent Limits**

The proposed Order will require the Discharger to continue to develop and implement, consistent with the existing Order requirements, a *Storm Water Pollution Prevention Plan* (SWPPP). The SWPPP will outline site-specific management processes for minimizing storm water runoff contamination and for preventing contaminated storm water runoff from being discharged directly into surface waters. Storm water discharges occur at the BP West Coast Facility. As a result, the proposed Order requires BP West Coast to update and continue to implement a SWPPP and address storm water runoff including runoff from facility roads that is directed to the manually operated valve and then discharged overland to the storm water drainage pipes to Los Cerritos Channel.

National ELGs have not been developed for tank farm facilities. Also, data is not available to apply best professional judgement (BPJ). Therefore, pursuant to 40 CFR Section 122.44(k), the Regional Board will require the Discharger to develop and implement a *Best Management Practices Plan* (BMPP). In the absence of established ELGs, and with the combination of the SWPPP and BMPP, the existing permit limitations based on past performance and BPJ will serve as the equivalent of technology-based effluent limitations to carry out the purposes and intent of the CWA.

3. **Water Quality-Based Effluent Limits**

As specified in 40 CFR Section 122.44(d)(1)(i), Orders must include WQBELs for toxic pollutants (including toxicity) that are or may be discharged at levels which cause, have reasonable potential to cause, or contribute to an excursion above any state water quality standard. The process for determining reasonable potential and calculating WQBELs when necessary is intended to protect the designated uses for the receiving water as specified in the Basin Plan, and achieve applicable water quality objectives and criteria that are contained in other state plans and policies, or U.S. EPA water quality criteria contained in the CTR and NTR. The procedures for determining reasonable potential, and if necessary for calculating WQBELs, are contained in the TSD for storm water discharges. Further, in the best professional judgment of the Regional Board staff, the TSD provides an approach to determine whether storm water discharges have a reasonable potential to exceed water quality standards.

(a) Reasonable Potential Analysis (RPA)

Sufficient effluent and ambient data are needed to conduct and complete an RPA. If data are not sufficient, the Discharger is required to collect the appropriate data for the

Regional Board to conduct an RPA. Upon review of the data, and if the Regional Board determines that WQBELS are needed to protect the beneficial uses, the permit will be reopened for appropriate modification.

There are insufficient monitoring data available to perform the RPA for the priority pollutants. The TSD requires the dischargers to submit sufficient data to conduct the determination of priority pollutants requiring WQBELS and to calculate the effluent limitations. This permit includes an interim monitoring requirements to obtain the necessary data.

(b) Calculating WQBELS

If a reasonable potential exists to exceed applicable water quality criteria or objectives, then a WQBEL must be established in accordance with one of three procedures contained in Section 5.4 of the TSD. These procedures include:

- 1) If applicable and available, use of the wasteload allocation (WLA) established as part of a total maximum daily load (TMDL).
- 2) Use of a steady-state model to derive maximum daily effluent limitations (MDELs) and average monthly effluent limitations (AMELs).
- 3) Where sufficient effluent and receiving water data exist, use of a dynamic model which has been approved by the Regional Board.

(c) Impaired Water Bodies on the 303 (d) List

Section 303(d) of the CWA requires states to identify specific water bodies where water quality standards are not expected to be met after implementation of technology-based effluent limitations on point sources. For all 303(d)-listed water bodies and pollutants, the Regional Board plans to develop and adopt TMDLs that will specify WLAs for point sources and load allocations (LAs) for non-point sources, as appropriate.

The U.S. EPA has approved the State's 303(d) list of impaired water bodies on July 25, 2003. Certain receiving waters in Los Angeles County watersheds do not fully support beneficial uses and therefore have been classified as impaired on the 2002 303(d) list and have been scheduled for TMDL development.

Los Cerritos Channel is included on the 2002 State Board's California 303(d) list and is classified as impaired. The pollutants of concern, detected in the water column in Los Cerritos Channel include: ammonia, copper, coliform, lead and zinc. Chlordane is also found in the sediment. Therefore, TMDLs will be developed for the Los Cerritos Channel in the future. Los Cerritos Channel eventually discharges to Alamitos Bay; Alamitos Bay is not included on the 303(d) List.

(d) Whole Effluent Toxicity

Whole Effluent Toxicity (WET) protects the receiving water quality from the aggregate toxic effect of a mixture of pollutants in the effluent. WET tests measure the degree of response of exposed aquatic test organisms to an effluent. The WET approach allows for protection of the narrative “no toxics in toxic amounts” criterion while implementing numeric criteria for toxicity. There are two types of WET tests: acute and chronic. An acute toxicity test is conducted over the short term and measures mortality. A chronic toxicity test is conducted over the long term and measures mortality, reproduction, and growth.

The Basin Plan specifies a narrative objective for toxicity, requiring that all waters be maintained free of toxic substances in concentrations that are lethal to or produce other detrimental response from aquatic organisms. Detrimental response includes but is not limited to, decreased growth rate, decreased reproductive success of resident or indicator species, and/or significant alterations in population, community ecology, or receiving water biota. The existing permit does not contain acute toxicity limitations or monitoring requirements.

In accordance with the Basin Plan, acute toxicity limitations dictate that the average survival in undiluted effluent for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test having less than 70% survival. Consistent with Basin Plan requirements, this Order establishes acute toxicity limitations.

The discharges at the BP West Coast Facility occur only after a significant storm event or a hydrostatic test; the discharge is not continuous. Therefore, the discharge is not expected to contribute to long term toxic effects. Intermittent discharges are likely to have short term toxic effects. Therefore, at this Facility, BP West Coast will be required to conduct acute toxicity testing in accordance with the Basin Plan.

4. Specific Rationale for Each Numerical Effluent Limitation

Section 402(o) of the Clean Water Act and 40 Section CFR 122.44(l) require that effluent limitations or conditions in reissued Orders be at least as stringent as those in the existing permit. Therefore, existing effluent limitations for the regulated pollutants (oil and grease, and phenols) are carried over to this permit. The effluent limitation for total suspended solids has been revised based on similar Orders that have been recently adopted by the Regional Board. The effluent limitations for pH and temperature are based on the Basin Plan. The proposed permit prescribed effluent limits for BOD, turbidity, settleable solids and are based on best professional judgement (BPJ). The Regional Board considers all of these constituents to be pollutants of concern due to the nature of operation, raw materials and products handling, and storage at the site.

Average monthly effluent limitations are established in the Order for certain pollutants. These average monthly effluent limitations are based on BPJ and are consistent with current

individual permits adopted by the Regional Board to industrial facilities of a similar nature. In addition, Section 402(o) of the Clean Water Act and 40 CFR 122.44(l) require that effluent limitations standards or conditions in reissued permits be at least as stringent as those in the existing permit.

The following table presents the effluent limitations and the specific rationales for pollutants that are expected to be present in the discharge

Constituents	Units	Discharge Limitations		Rationale
		Monthly Average ¹	Daily Maximum	
PH	pH Units	6.5 – 8.5		Basin Plan ²
Temperature	⁰ F	86		Thermal Plan, BPJ ³
Total Suspended Solids	Mg/L	50	75	BPJ ³
Turbidity	NTU	50	75	BPJ ³
BOD ₅ 20°C	Mg/L	20	30	BPJ ³
Oil and Grease	Mg/L	10	15	E, BPJ ³
Settleable solids	ml/L	---	0.3	BPJ ³
Sulfides	mg/L	---	0.10	E
Phenols	mg/L	---	1.0	E
Acute toxicity	% survival	Average survival for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test producing less than 70% survival.		Basin Plan ²

¹ Average monthly effluent limitations are established in the Order for certain pollutants. These average monthly effluent limitations are based on BPJ and are consistent with current individual permits adopted by the Regional Board to industrial facilities of a similar nature. In addition, Section 402(o) of the Clean Water Act and 40 CFR 122.44(l) require that effluent limitations standards or conditions in reissued permits be at least as stringent as those in the existing permit.

² Basin Plan Objectives are instantaneous maximum concentrations of pollutants that when not exceeded are protective of the beneficial uses of the particular water body. They are generally set at the level required to protect the most sensitive beneficial use or at an even lower level based on antidegradation principles.

³ BPJ = Best professional judgement is the method used by permit writers to develop technology-based NPDES permit conditions on a case-by-case basis using all reasonably available and relevant data. BPJ limits are established in cases where effluent limitation guidelines are not available for a particular pollutant of concern. Authorization for BPJ limits is found under section 401(a)(1) of the Clean Water Act and under 40 CFR 125.3.

E - Existing Permit.

5. Monitoring Requirements

The existing Order requires monitoring for storm water once per discharge event for total waste flow, temperature, pH, oil and grease, suspended solids, and phenol. In addition, the existing

Order requires the Discharger to monitor for certain priority pollutants during the first discharge, and if the constituents in the wastewater were below a specific concentration, monitoring could be discontinued for the life of the permit.

(a) Effluent Monitoring

To demonstrate compliance with effluent limitations established in the permit, and to assess the impact of the discharge on the beneficial uses of the receiving water, this Order carries over the existing monitoring requirements for most parameters. Monitoring once per discharge event for flow, temperature, pH, suspended solids, BOD, settleable solids, turbidity, oil and grease, sulfides, phenols is required to ensure compliance with effluent limitations. In addition, the proposed permit prescribed annual monitoring for acute toxicity. The Discharger is also required to monitor for priority pollutants once per storm event, where no more than two samples are required in the same calendar year for the first 2 years of the permit. After the first 2 years, the Discharger is required to monitor once per storm event, where no more than one sample is required each calendar year as described in Section IV.5(b) of the *M&RP*. Based on the Discharger's nature of operation and materials and/or wastes present at the site, the proposed permit prescribed monitoring for dissolved oxygen, sulfates, sulfites, conductivity, total organic compounds, ammonia, methyl tertiary butyl ether, tertiary butyl alcohol, and total petroleum hydrocarbons.

(b) Effluent Monitoring for Reasonable Potential Determination

Consistent with the TSD, the Discharger is required to submit data sufficient for: (1) determining if WQBELs for priority pollutants are required, and (2) to calculate effluent limitations, if required. Therefore, the Discharger is required to conduct an interim monitoring program for all priority pollutants 2 years (i.e., until May 31, 2006), or until ordered otherwise by the Regional Board. As described in the Monitoring and Reporting Program, monitoring reports must be submitted quarterly.