California Regional Water Quality Control Board Los Angeles Region

Executive Officer's Report Dennis A. Dickerson, Executive Officer

May 6, 2002

INSIDE THIS REPORT:

Groundwater Division
Enforcement
Stormwater
Remediation
Underground Storage Tanks
Surface Water Division
Watershed Regulatory

Regional Programs Watershed/Coastal Waters **Outreach**

Outreach Staff Development Administrative Services

- *** Interested in receiving this report electronically? Go to the Los Angeles Regional Water Control Board website: www.swrcb.ca.gov/rwqcb4/ click on "Contact Us" and select Email Subscription. On the Mailing List Subscription Form under Mailing List select "Board Meeting Short Form Agenda". You will be automatically added to the subscriber list for future copies of the Executive Officer's Report.
- *** The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption
- *** For a list of simple ways to reduce demand and cut your energy costs, see the tips at: http://www.swrcb.ca.gov/news/echallenge.html

2002 WATER QUALITY AWARDS

The Los Angeles Regional Water Quality Control Board held it's Second Annual Water Quality Awards ceremony. The event took place on April 18 at the Doubletree Hotel in Pasadena with over 275 people in attendance.

The awards recognize the extraordinary steps taken by individuals, organizations and agencies to protect and enhance the health of the State's waters. This year's recipients are distinguished by having moved beyond clean water regulatory requirements to help achieve even greater levels of protection and awareness for the residents of the Los Angeles Watershed Basin.

The 2002 Water Quality Award Winners were as follows (also available on the website):

Water Quality Excellence - Felicia Marcus for her exceptional and successful efforts to protect human health and the environment through grass roots activism, legal advocacy and governmental leadership.

Innovation in Water Quality Protection - Michael Stenstrom, Ph.D., from UCLA, for his significant contributions to storm water research and the development of treatment technologies.

Public Education in Water Quality - County of Los Angeles and Heal the Bay for their innovative and educational Bay Days program.

Water Quality Educator - Ray Millette, a science teacher at Palisades High School, for developing a marine science program that educates students about the importance and preservation of water resources.

Water Quality Stewardship - Jessica Alstatt, from Santa Barbara BayKeeper, for successfully developing and implementing a volunteer based water quality monitoring program for the Ventura

River Watershed.

Water Quality Leadership - Assemblymember Fran Pavley for her extraordinary and steadfast advocacy in protecting California's coast

Water Quality Conservation - TreePeople for advancing an integrated approach to urban watershed management. Honorable mention went to Andy Lipkis, founder

Water Quality Research - Southern California Coastal Water Research Project for enriching our understanding of the affects of man's activities on the state's coastal environment. Honorable mention went to Drew Ackerman, Steven Bay and Ken Schiff, researchers.

Waterbody Restoration - Santa Monica Baykeeper, for its restoration of kelp forests in the Santa Monica Bay

Water Quality Most Improved Permittee - Port of Long Beach for its aggressive clean up and comprehensive storm water management programs.

GROUNDWATER DIVISION

ENFORCEMENT & GROUNDWATER PERMITTING

Settlement Agreement

Parvaneh Khayat

The Regional Board Executive Officer issued Complaint No. 00-117 for Administrative Civil Liability against Chevron on August 30, 2000 ("Complaint"). The Complaint alleges that Chevron failed to comply with certain provisions of Cleanup and Abatement Order No. 88-55 and Board Order 97-112. The Complaint recommends assessment of civil liability of \$2,254,200. Subsequent to the initial assessment of civil liability in this matter, Chevron provided the Regional Board staff with additional information regarding the factual allegations set forth in the Complaint. At the time the Complaint was issued, the Regional Board staff was not in possession of this additional information. This additional information provides the justification for the penalty reduction set forth in this Settlement Agreement. The Regional Board staff has not found evidence that would support a finding that the releases giving rise to the Complaint was either willful or intentional. This Agreement supplants the Complaint, which shall be deemed withdrawn upon Regional Board approval of this Agreement.

In accordance with California Water Code section 13323, the Regional Board, on March 25, 2002 considered a Resolution authorizing the Executive Officer to approve a Settlement Agreement between Chevron USA, Inc. and the California Regional Water Quality Control Board, Los Angeles Region, in the amount of \$1.55 million towards resolution of ACL No. 00-117 for discharging petroleum hydrocarbons to waters of the State.

Administrative Civil Liabilities

Alpine Paper Recycling

Dionisia Rodriguez

An ACL was issued to Alpine Paper Recycling, on March 22, 2002, for \$6,980, for violating California

Water Code section 13399, by failing to submit the required Notice of Intent.

City of Redondo Beach

Lala Kabadaian

Mandatory Minimum Penalty was issued to the City of Redondo Beach, on March 29, 2002, for \$51,000, for exceeding their NPDES permit daily maximum effluent limit for residual chlorine 5 times during the month of June 2000, 3 times during the month of July 2000, 5 times during the month of August 2000, and one time during July 2001. The Discharger also exceeded their monthly average effluent limitation during the months of June, July, and August 2000 for residual chlorine. The wastes flow to King Harbor, a water of the State.

Las Virgenes Municipal Water District

Lala Kabadaian

A Mandatory Minimum Penalty was issued to Las Virgenes Municipal Water District, on March 27, 2002, for \$12,000, for exceeding their NPDES permit daily maximum effluent limit for sulfate on February 2, 2000, on August 3, 2000, October 26, 2000, and on August 8, 2001. The wastes flow to Malibu Creek, a water of the State.

G&K Management Company

Joyce Wang

A Mandatory Minimum Penalty was issued to G & K Management Company, on March 20, 2002, for \$3,000, for exceeding their NPDES permit daily maximum effluent limit on May 2, 2001 for MTBE. The wastes flow to the Los Angeles River, a water of the State.

Macerich Marina

Lala Kabadaian

A Mandatory Minimum Penalty was issued to Macerich Marina Limited Partnership, on March 15, 2002, for \$12,000, for exceeding their NPDES permit daily maximum effluent limit for trichloroethylene on September 14, 2000, for selenium on June 15, 2001, for selenium by on July 27, 2001, and for trichloroethylene on August 17, 2001. The wastes flow to the Pacific Ocean, a water of the State. The penalty was paid in full on March 27, 2002.

Dow Chemical

Lala Kabadaian

A Mandatory Minimum Penalty was issued to Dow Chemical Company, on March 8, 2002, for \$3,000, for exceeding their NPDES permit monthly average effluent limit during March 2001 for vinyl chloride. The wastes flow to the Long Beach Inner Harbor, a water of the State. The penalty was paid in full on March 25, 2002.

University of California

Lala Kabadaian

A Mandatory Minimum Penalty was issued to University of California at Los Angeles, on March 6, 2002, for \$6,000, for exceeding their NPDES permit daily maximum effluent limit on April 13, 2001 for TSS. The Discharger also exceeded their monthly average effluent limitation during the April 2001 for TSS. The wastes flow via the Sepulveda Channel and Ballona Creek to Santa Monica Bay, a water of the State.

Revised Mandatory Minimum Penalty issued to RMR Properties

Lala Kabadaian

A Revised Mandatory Minimum Penalty was issued to RMR Properties, on March 29, 2002, for \$36,000, for exceeding their NPDES permit limits. The wastes flow to Ballona Creek, a water of the State.

NPDES Facility Inspections

Jesus Plasencia and Jose Morales

Enforcement Unit NPDES inspectors conducted 16 level B inspections (Routine non-sampling inspection) and 18 level A inspections (Comprehensive inspection, no samples were taken) of facilities with NPDES Permits.

Notices Of Violation - NPDES DMRs

Enforcement Staff

The Executive Officer issued Notices of Violation and Requirements to Submit information to 3 facilities for failing to comply with provisions of Waste Discharge Requirements included as part of their NPDES Permits. Enforcement staff identified these violations as part of the NPDES discharger monitoring report review process.

Self Monitoring Reports

Enforcement Staff

In January 2002, staff reviewed a total of 310 Self-Monitoring Reports submitted by NPDES permit holders.

Waste Discharge Requirement Program (Non-Chapter 15)

Halaco Engineering Co.

Gary Schultz

Halaco Engineering Co. (Halaco), located at 6200 Perkins Road, Oxnard, currently discharges solid and liquid wastes to a waste management unit under waste discharge requirements contained in Order No. 80-58. The Regional Board staff scheduled the Halaco tentative item [a negotiated tentative Cease and Desist Order (NTCDO)] for a February 19, 2002, Board meeting. However, due to substantive questions of Board members, the item was continued to a February 28, 2002, Board meeting. When the hearing resumed on February 28, 2002, the Board considered the changes made to the revised NTCDO, considered public comments, and directed further changes. The Regional Board's motion approving the Cease and Desist Order reserved the right to review the final document incorporating changes read into the record. On March 7, 2002, the final adopted negotiated Cease and Desist Order No. R4-2002-0064 is deemed adopted and effective.

Hotubs, Inc.

Thanloan Nguyen

Hotubs, Inc. owns and operates the Puddingstone Hot Tubs Resort located at 1777 campers View Road, San Dimas, California. On October 31, 2001, Hotubs, Inc. filed a Report of Waste Discharge for dischargeing tub water (graywater) from 16 existing spas and 5 proposed additional spas to on-site landscape irrigation fields. The total graywater discharged from 21 spas in two weeks will be approximately 1,000 gallons per day. The graywater will be discharged over an area of approximately 2.5 acres.

Tentative Waste Discharge Requirements (WDR) for Hotubs, Inc. were presented to the Board at the March 28, 2002 Board meeting. The Regional Board adopted Order No. 01-135 for WDR.

General Waste Discharge Requirements (WDRs) for J & P Limited

Thanloan Nguyen

Board staff has received a Waste Discharge Requirements application for J & P Limited located at 3806 Cross Creek Road, Malibu, California. Board staff reviewed the information provided by J & P Limited and determined that the proposed discharge meets the conditions specified in Order No. 01-031, "General Waste Discharge Requirements for Small Commercial and Multifamily Residential Subsurface Subsurface Sewage Disposal". The subject case was enrolled under Order No. 01-031 on March 6, 2002.

General Waste Discharge Requirements (WDRs) for Well-Pict, Inc.

Carey Wilder

Board staff has received a Waste Discharge Requirements application for Well-Pict, Inc., located at 4300 Etting Road, Oxnard, California. Board staff reviewed the information provided by Well-Pict, Inc. and determined that the proposed discharge meets the conditions specified in Order No. 01-031, "General Waste Discharge Requirements for Small Commercial and Multifamily Residential Subsurface Subsurface Sewage Disposal". The subject case was enrolled under Order No. 01-031 on March 20, 2002.

General Waste Discharge Requirements (WDRs) for the California State Department of Parks and Recreation (Topanga State Park)

Hoan Tang

The California State Department of Parks and Recreation, a public agency, operates Topanga State Park at 20825 Entrada Road, Topanga, California. Topanga State Park is currently discharging their wastewater under Order No. 87-88 adopted by this Regional Board on June 22, 1987. Board staff reviewed the information provided by the California State Department of Parks and Recreation. Board staff determined that the regulation of Topanga State Park under the General Permit (Order No. 01-031) would be appropriate and met the conditions specified in Order No. 01-031. The subject case was enrolled under Order No. 01-031 on March 26, 2002.

WDR Facility Inspections

Non-Chapter 15 Unit staff

Non-Chapter 15 Unit staff conducted level B1 inspections (Routine non-sampling inspection) of 11 facilities with WDR Permits. Inspection of these facilities is a required part of the WDR program.

Monthly Enforcement Summary

A summary listing the Monthly Enforcement actions has been included with this report as Attachment <a href="C".

STORM WATER SECTION

Construction and Industrial - Inspection Update

Yi Lu

During March, staff completed 67 compliance inspections, compared to 143 during March of 2001. However, this decline was anticipated, as staff focussed on followup inspections and informal

enforcement actions arising from the 386 inspections completed by a contractor (TetraTech) from November through February. Even with this diversion, staff have almost reached year-end targets for compliance inspections, and will continue to focus on enforcement followup inspections plus a backlog of Notice of Termination applications that have come in since the wet season started.

	Complianc	e Inspec	tions					
	2000/01	00/01 First Quarter		Jan	Feb	Mar	YTD Total	2001/02 Target
	Total						(% Target)	
	(% Target)							
Construction	324	62	51	53	18	23	207	250
	(138%)						(83%)	
Industrial	251	57	67	40	28	44	235	250
	(121%)						(94%)	
Contractor	N/A	N/A	170	150	66	0	386	500
							(77%)	
Total	575	119	288	243	112	67	828	1,000
	(130%)						(83%)	

As of the end of March, staff has issued almost 300 informal enforcement actions arising from the contractor inspections, as summarized below.

- 192 NOVs issued to facilities with major violations of the General Permit
- 106 Notices of Non-compliance (NNCs) issued to facilities with minor violations
- **56** Facilities were in compliance no followup action needed.
- 32 Facilities were found closed or moved out.

386 Total

To assist in high priority addressing high priority violations, staff have referred 11 cases to the US EPA, and is in the process of prioritizing the remaining cases.

Industrial - General Permit Renewal Update

Yi Lu

On March 12th, the State Board distributed an internal draft of the General Industrial Permit, for review and comment by the Regional Boards. The State Board intends to release a draft for public review in April. Public hearings are tentatively scheduled for July 2002. A copy of the draft for public review will be posted on the State Board's website.

Industrial—SWIM 2 Implementation

The State Water Resource Control Board has dedicated resources to implement the second generation of a "System for Water Information Management" (SWIM 2) over the next several years. Once implemented and in full function, SWIM 2 will enhance Regional Board's capacity and capability to manage and share information regarding water quality. During the month of March 2002, staff participated in a total of four teleconference meetings to discuss the SWIM 2 database development and management for the Storm Water and Enforcement Programs.

Industrial—Storm Report Newsletter

RoseLynn Wright

On March 29, 2002, staff sent out the March 2002 Issue of the Industrial Storm Report. In this issue, staff continued the series of the articles addressing the water quality criteria and common pollution prevention tips, and updated our efforts on non-filers project, contractor inspection project, and the AB 2019 enforcement actions. Copies of the current issue, as well as the prior issues, of the Storm Report can be found on the Storm Water webpage

(www.sw<u>rcb.ca.gov/rwqcb4/html/programs/stormwater/newsletter.html.</u>)

<u>Industrial – Planned Industrial Permit Compliance Training for Ventura Permittees Postponed</u> Ejigu Solomon

Regional Board staff jointly with the Ventura Storm Water Management Program had planned to host an industrial permit compliance training for Ventura permittees on February 28, 2002. This training has been postponed. The training will be rescheduled in the near future as the identification of non-filers that need to participate in this training gets sufficiently underway.

Municipal - Ventura County MS4 Permit Audit Update

Ejigu Solomon

As indicated in the December 2001 Executive Officer's Report, the Ventura County MS4 audit report was issued on February 14, 2002 to the co-permittees of the Ventura County Municipal Storm Water NPDES Permit. The results of the findings were subsequently discussed between Regional Board staff and co-permittee representatives. The four co-permittees who were audited have already started addressing most of the identified deficiencies, and they are expected to build upon the positive elements of their programs. A second round of audits for the remaining six co-permittees is planned for the near future.

County of Los Angeles Municipal Storm Water Permit

Wendy Phillips

Seven parties have petitioned the State Board to overturn certain requirements in the municipal storm water permit for the County of Los Angeles, adopted by the Regional Board on December 13, 2001. Some of the Permittees also have petitioned for a stay of the permit, until the State Board has an opportunity to consider the petitions. As Regional Board representatives explained at a hearing on the stay on March 25th, approval of a stay will delay progressive permit requirements, such as a requirement for each city to inspect certain industrial/commercial facilities for storm water best management practices. On April 25th, the State Board denied the stay petition.

REMEDIATION SECTION

Well Investigation Program

Status Report of the San Fernando Valley Chromium VI Investigation

Dixon Oriola

Regional Board staff met with USEPA representatives on March 27, 2002 to obtain feedback on the Draft Chromium VI Investigation Report. These informal discussions centered on report format and content. USEPA indicated that formal comments would be provided in writing by mid April 2002. Also at this meeting, USEPA indicated that their Cooperative Agreement with the Regional Board would be ending on June 30, 2002 due to limited Federal funding.

The results of the Chromium VI Investigation revealed that of the 255 suspected sites, 105 are recommended for further assessment while the remaining 150 will be closed. Regional Board staff intend to transfer those 105 sites recommended for further assessment into the State Cost Recovery Program. This will ensure continued assessment and eventual cleanup. Sites that have impacted groundwater will be subject to a Cleanup and Abatement Order to help facilitate the cleanup.

San Gabriel Valley Superfund

Dixon Oriola

USEPA and Regional Board staffs have completed draft mail-out letters for Emergent Chemical groundwater sampling in Puente Valley (74) and South El Monte (76) Operable Units. These joint titled letters are scheduled for mail-out in mid April and will be directed only at identified potentially responsible parties (PRPs) for the respective operable units. The emergent chemicals targeted are: Ammonia Perchlorate, 1,4-Dioxane, N-Nitrosodimethylamine (NDMA), total chromium and hexavalent chromium. Sampling results for both areas are due by July 1, 2002.

UNDERGROUND STORAGE TANK PROGRAM

Charnock Sub-basin MTBE Investigation

Weixing Tong

Introduction: The Charnock Sub-Basin Investigation Area is located in the Central Groundwater Basin of the Los Angeles Coastal Plain. During March 1996, MTBE concentrations up to 610 m g/L was detected in the City of Santa Monica (CSM) wells, consequently in June 1996, the CSM shut down its five production wells. The Southern California Water Company (SCWC) has a wellfield adjacent to the CSM wellfield and shut down its two production wells in October 1996, to avoid drawing in MTBE pollution. No MTBE was ever detected in the SCWC production wells. During April 1997, the Regional Board and USEPA (jointly the "Agencies") signed a Memorandum of Understanding (MOU) to deal with the MTBE pollution problem affecting both the CSM and SCWC wellfields (collectively "Charnock Wellfields"). Pursuant to the MOU, the Agencies identified 48 potential responsible party sites (PRP sites) within one and one quarter mile radius of the wellfields (Charnock Sub-Basin Investigation Area). Based upon record search, 32 potential source sites were required to perform a preliminary investigation to determine the potential of soil and groundwater contamination. At present, there are 27 active sites in the Charnock Sub-Basin Investigation Area. Of the 27 active sites, additional site assessment work is required at 13 sites. Groundwater monitoring is being performed at all 27 sites. Remedial action workplans for the soil and/or groundwater have been approved for a total of 9 sites.

<u>Site Specific Cleanup:</u> Site specific cleanup technologies include air stripper, granular activated carbon adsorption, advanced oxidation process, and soil vapor extraction. The following are the current status of site-specific cleanup activities:

PRP Site No. 4 (ARCO): Implement soil vapor extraction. To date approximately 52,623 pounds of total petroleum hydrocarbons have been removed from beneath the site.

PRP Site No. 7 (Unocal): Implement soil vapor extraction. To date approximately 16,908 pounds of

total petroleum hydrocarbons have been removed from beneath the site. A remedial action plan has been approved to clean up the contaminated groundwater beneath the site. A two-month groundwater remediation test has been completed at the site. The Agencies have issued a directive letter requiring more aggressive remediation for the contaminated groundwater.

PRP Site No. 8 (Mobil): Implement soils vapor extraction and groundwater pump and treat system. To date approximately 305 pounds of MTBE, 85 pounds of benzene, and 14,020 pounds of petroleum hydrocarbons have been removed by soil vapor extraction. Since November 1999, approximately 23.5 million gallons of groundwater have been pumped, treated and discharged under an NPDES permit. Approximately 780 pounds of petroleum hydrocarbons have been removed from groundwater underneath the site.

PRP Site No. 10 (Chevron): Implement soils vapor extraction and groundwater extraction system. A vapor and groundwater extraction system (VEGE) has been installed and operated at the site. To date approximately 4,258 pounds of petroleum hydrocarbons have been removed by soil vapor extraction.

PRP Site No. 11 (Shell): Implement soil vapor extraction and onsite and offsite groundwater pump and treat system. A groundwater pump and treat is used to recover polluted groundwater and is then treated using an air stripper to remove MTBE followed by advanced oxidation process to remove TBA. To date approximately 124 million gallons of groundwater have been treated and discharged under an NPDES permit. Since the inception of the remediation system, 8,669 pounds of total petroleum hydrocarbons, 435 pounds of benzene and 1,627 pounds of MTBE have been removed from the site. The system influent concentrations for MTBE have decreased from 19,000 m g/L in November 1999, to 420 m g/L in February 2002. The soil vapor extraction system has been operated since September 2000. To date approximately 86 pounds of MTBE, 29.6 pounds of benzene, and 3,247.3 pounds of petroleum hydrocarbons have been removed by soil vapor extraction.

PRP Site No. 12 (Winall Oil): Implement soil vapor extraction. A soil vapor extraction system has been operating since May 2000, and has removed to date (January 2002) 14,309 pounds of petroleum hydrocarbons, 96 pounds of benzene, and 1,869 pounds of MTBE.

PRP Site No. 6 (Conoco): Voluntary onsite soil excavation is ongoing.

PRP Site No. 16 (Tosco): Implement pilot test for soil vapor extraction system.

PRP Site No. 23 (Chevron-Thrifty-Best): Completed tanks removal and excavation of contaminated soil onsite and is Installing a duel-phase vapor extraction system to cleanup onsite and offsite vadose zone contamination. Construction for offsite soil vapor extraction piping has been complete. Offsite gasoline free product removal is ongoing.

Chevron-Thrifty-Best has completed the installation of onsite vapor extraction wells and 14 offsite groundwater monitoring well clusters between the site and the Charnock Wellfield. Chevron-Thrifty-Best is currently installing three additional step-out groundwater monitoring well clusters along the Sawtelle Boulevard in February 2002. The startup operation of the onsite vapor extraction system is scheduled to commence in April 2002.

Charnock Sub-basin Regional Approach: On the Charnock Sub-basin regional issues, the Regional Board and Shell have entered into a Stipulated Agreement containing a specified Scope of Work (SOW) to perform regional investigation and analysis of alternatives for both Interim Water Replacement and Interim Regional Response Actions. The Regional Board members at the August 31, 2000, meeting approved the Stipulated Agreement. As part of this investigation, a number of groundwater monitoring wells have been installed into the Upper Silverado Aquifer and Shallow Unnamed Aquifer to aid in determining plume source(s) and characteristics, and to perform periodic groundwater monitoring. This work requires development of a basin-wide flow model, development a

GIS database, evaluate alternative drinking water sources within the Charnock Sub-Basin, evaluate methods of treating polluted groundwater, restoring the Charnock Sub-Basin Investigation Area to its full beneficial use, and provide a community relations plan. The work specified in the SOW is a necessary step to restore the drinking water supply at the Charnock Wellfields. Per the agreement, Shell's consultant has completed the fieldwork as specified in the scope of work. On November 19, 2001, the final reports for regional investigation results and recommendations for selection of remedy were submitted. Regional Board and USEPA staffs have been evaluating the reports. On March 18, 2002, with Regional Board staff concurrence, USEPA issued a draft scope of work for the second phase of Charnock Initial Regional Response Activities (CIRRA2) to all PRPs.

Arcadia Wellfield Restoration from MTBE Contamination

Jay Huang

Three aquifers were impacted by MTBE contamination. Two groundwater aquifers, the shallow aquifer and the production aquifer are located north of the Brentwood fault; the lower aquifer is located south of the fault. The shallow aquifer and lower aquifer in the vicinity of the former Mobil Station 18-LDM have been treated with a pump and treat system since October 1997. Currently approximately 22 gallons per minute (GPM) of groundwater are being pumped from 18 groundwater extraction wells of the shallow and lower aquifers and treated at the Mobil facility. To date (February 27, 2002) the treatment system has pumped 27.5 million gallons of groundwater and removed an estimated amount of 82.4 pounds of TPH and 213.5 pounds of MTBE. The average MTBE concentration in the shallow aquifer influent has been decreased from over 2,000 m g/L in 1998 to 34 m g/L in February 2002. The impacted soil in the vadose zone has been treated with a vapor extraction system (VES). The cumulative VOC mass removed is 13,145 pounds since May 1999. The VES has been shutdown since December 2001 due to low influent concentrations.

A Production Aquifer Remediation System (PARS) using activated carbon filtering to clean up the production aquifer has been in operation since May 17, 2000. Currently groundwater from Arcadia Well No.5 are being pumped at 300 GPM and discharged to a storm drain. To date (February 2002), PARS has pumped approximately 248.77 million gallons of groundwater and removed 0.51 pounds of MTBE. The average daily influent concentration of MTBE was less than 0.5 m g/L.

A spiking demonstration test designed to further evaluate system reliability and effectiveness has been conducted for 45 days and completed in December 2000. A Demonstration Test Report dated July 2, 2001 has been submitted and reviewed by the California Department of Health Service (CDHS). CDHS has decided that no public hearing will be held prior to issuance of the permit amendment for the PARS treatment facility. CDHS has completed a third draft permit amendment and is expected to issue a formal permit amendment to City of Santa Monica (CSM) in May 2002. CSM is then allowed to resume its distribution of treated groundwater water extracted from the Arcadia Wellfield to the resident of CSM. CSM will notify its residents about the intention to resume groundwater production after permit is issued in their newsletter.

Methyl Tertiary Butyl Ether Investigation of Southern California Water Company's Harrison Well No. 2

John Chiang

In May 2001, Regional Board staff was notified of methyl tertiary butyl ether (MTBE) pollution in Southern California Water Company's (SCWC) Harrison Well No. 2, located at 673 West Harrison Avenue, Claremont. Groundwater sampling of Harrison Well No. 2 during November 2000, detected MTBE ranging from 4.0 to 7.0 μ g/L. Harrison Well No. 2 remains off-line because MTBE concentration has exceeded the secondary drinking water standard of 5 μ g/L.

In July 2001, Regional Board staff conducted site inspections and completed records searches, and identified fifteen (15) potential responsible parties (PRPs) within the one mile radius of the Harrison

Well No. 2. On October 26, 2001, Regional Board staff issued directive letters to the 15 PRPs notifying them of the MTBE problem and requiring site specific information pertaining to their underground storage tank operations and assessment work completed. The information from the PRPs is due to the Regional Board by January 15, 2002. On the same day, the Regional Board sent a letter to SCWC requesting that they provide well construction, production, and hydrogeologic information in the area surrounding the Harrison Well No.2, to assist in determining the source(s) and cause(s) for the pollution in their well.

To date, all fifteen PRPs provided site information for their underground storage tanks in response to the October 26, 2001 letter. However, SCWC has not provided information as per our October 26, 2001 letter.

Regional Board staff are in the process to review and evaluate the information provided from the PRPs, and will make a determination with respect to any future assessment work.

Completion of Corrective Action at Leaking Underground Fuel Storage Tank Sites

Regional Board staff have reviewed corrective actions taken for soil and/or groundwater contamination problems from leaking underground storage tanks for the time of March 4, 2002, through April 5, 2002, and determined that no further corrective actions are required:

Thrifty Oil Station # 305, La Puente (I-00130)

Alta Dena Certified Dairy Product, Pico Rivera (R-24295)

76 Products Station # 3266, Arcadia (R-24666)

United Rentals, Inc., Long Beach (908050661)

Pacific Service Station, Downey (R-11904)

Supreme Roofing Company, Hollywood (900380434)

A-1 Automotive Repair, Los Angeles (900260116)

All Right Self Storage, Inglewood (R-14062)

Triangle Distributing Company, Santa Fe Springs (906700216)

SURFACE WATER DIVISION

General NPDES Permits

A list of General NPDES Permit Authorization/Revision and Termination for April 2002 can be found on "Attachment B".

REGIONAL PROGRAMS

STANDARDS AND TOTAL MAXIMUM DAILY LOADS (TMDLs)

Basin Plan Amendment to Update the Ammonia Water Quality Objective Deborah Neiter

Staff received several comments on the February 5, 2002 draft basin plan amendment to revise the ammonia water quality objectives. The draft amendment was revised in response to comments, and public noticed on March 22, 2002.

The revisions in the March 22, 2002 basin plan amendment primarily focused on implementation issues. The significant changes included the addition of:

- 1. Ocean Plan Objectives for Marine Waters;
- 2. California Toxics Rule criteria for determining when to apply the fresh vs. marine objectives to waters with salinities between salt and fresh water; and
- 3. Equations and detailed instructions on translating objectives into effluent limits.

The amendment was considered and approved by the Regional Board on April 25, 2002 following a public hearing.

Pathogen/Coliform Workgroups

Lisa Carlson

The statewide TMDL pathogen workgroup held a teleconference on March 5, 2002. This group includes members from the regional boards, State Board, and EPA Region 9. This month's meeting included discussions on the pathogenic input from different animals (human, domestic, wildlife), controlling natural vs. unnatural sources, pathogen input to watersheds, management and design practices for reduction of pathogens, and models for stakeholder interaction.

Additionally, Board staff have established a coliform workgroup and conducted a meeting on April 29, 2002. The discussion included beach closures, wet and dry critical conditions, technical updates and updates on current coliform TMDLs.

McGrath/Mandalay Coastal Area Pathogen TMDL

Lisa Carlson

Staff continues contact with stakeholders in a number of different meetings. The most recent general stakeholder meeting was held on March 19, 2002 at the Ventura County Administration Building. Invitations were sent to stake holders, and over 20 stakeholders from affected agencies, agriculture, industry, and environmental groups. Board staff updated stakeholders on advancements in the TMDL. As part of this, stakeholders were given drafts of the Numeric Target and Problem Statements. Reviews of these documents are due before the next meeting, and will be discussed at that time.

Additionally, Board staff discussed potential implementation tools for the TMDL. Finally, the group agreed to the new name for the TMDL, the McGrath/Mandalay Coastal Area Pathogen TMDL.

On April 3, 2002, staff met with the McGrath Lake Watershed Action Committee (WAC). Stakeholders,

including members of the WAC, originally stated that they prefer informal meetings where Regional Board staff informs them of progress on and issues with the TMDL, while stakeholders state their concerns. The WAC has now stated that they wish to have a more active role in the TMDL. They also suggested that they would assist with the TMDL, including aiding in data collection.

A meeting was held on April 23, 2002 at the Ventura County Administration Building. Invitations for meetings are sent to stakeholders and the notice is published on the Regional Board's website. The agenda includes discussions on existing and new data, sampling, and progress of the TMDL staff report, and additional stakeholder involvement.

Santa Clara River - Chloride TMDL

Elizabeth Erickson

A Basin Plan Amendment draft has been developed for a chloride TMDL in the Santa Clarita reaches of the Santa Clara River. The draft has received peer and legal review and is undergoing internal management review. A draft will be released to affected parties in advance of a question and answer session to gather comments. A final draft will be released at least 45 days prior to the Board Hearing at which the TMDL will be considered.

For further information, please call Samuel Unger at 213- 576-6784 or Elizabeth Erickson at 213- 576-6683. For copies of the December 7, 2000 Basin Plan amendment, or to be placed on the mailing list, call Sandra Kelley at 213-576-6619.

Santa Clara River - Nutrient TMDL

Elizabeth Erickson

Steering Committee meetings were held on March 29 and April 4, 2002 in Santa Clarita to select a modeler, compile data, and discuss issues related to the problem statement and numeric targets for the nutrient TMDL of the Santa Clara River. Among six modeling contracts received, the group selected a first and second choice. Final contract negotiations are in progress between the parties and the group's facilitator, Dr. Arturo Keller of the Bren School of Environmental Science and Management at the University of California at Santa Barbara. The Regional Board contributed \$138,365 and the steering group members contributed over \$140,000 for the modeling effort not counting substantial inkind support.

The 15 participants of the stakeholder group comprise the steering group and all activities will be reported to all stakeholders on May 20. The Steering Committee will continue to meet monthly, with the next meetings scheduled for April 22, July 22 and August 19. During these meetings, the modeling design, inputs and assumptions will be finalized. Additional quarterly meetings involving all stakeholders will take place on September 16, and in February 2003. The Nutrient TMDL for the Santa Clara River is scheduled to be heard before the Regional Board in March 2003.

For further information, please call Samuel Unger at 213- 576-6784 or Elizabeth Erickson at 213- 576-6683. To be placed on the mailing list, call Sandra Kelley at 213- 576- 6619. To receive a copy of materials related to the steering group meetings, contact Dr Arturo Keller at Keller@bren.ucsb.edu.

Calleguas Watershed Nutrient TMDL

Elizabeth Erickson

A technical report submitted by Larry Walker and Associates covering the requirements of a nutrient TMDL for the Calleguas Creek Watershed is under review by staff. The material has been compiled into a Basin Plan Amendment which is undergoing staff review. Preliminary flow data collected on April 4, 2002 for the Supplemental Environmental Project for the Calleguas Creek Watershed Non-Point Source Pollution Investigation Plan presently being completed by Larry Walker and Associates for the

Regional Board and Calleguas Municipal Water District found an increase of flow in the Arroyo Simi of 20cfs due to groundwater discharge below the Simi Treatment plant. The impact of this volume of groundwater flow on the proposed nutrient allocations is under consideration.

For further information, please call Samuel Unger at 213-576-6784 or Elizabeth Erickson at 213-576-6683. To be placed on the mailing list, call Sandra Kelley at (213) 576 6619.

Surface Water Ambient Monitoring Program (SWAMP)

Tracy Vergets

The SWAMP roundtable meeting in Sacramento, in which the State Board, Regional Boards, and California Department of Fish and Game participate in, was held on April 9, 2002. Topics on the agenda include the reassignment of the SWAMP to the Monitoring and Assessment Unit of the State Board, a summary of the bacteria source tracking workshop held at SCCWRP, a discussion on training and preparation of handling of pathogenic/biohazardous materials, an update on the development and review of the QAPP, funding issues, and a data management update. An external scientific review committee is being formed and is set to meet May 21-23, 2002, at Moss Landing Marine Lab. Current Regional Board activities include performing the field reconnaissance in the Santa Monica Bay Watershed Management Area necessary for the upcoming sampling funded in FY2001/02. Thirty of the sixty-eight potential sites have been visited and assessed. For more information, please contact Tracy Vergets at (213) 576-6661.

Santa Monica Bay Beaches Pathogen

Melinda Becker

A meeting of the Santa Monica Bay Beaches TMDL Steering Committee was held on Wednesday, April 10, at the Regional Board offices. The purpose of the meeting was to discuss proposed changes to the wet-weather beaches pathogen TMDL. The Santa Monica Bay Beaches pathogen TMDL originally was public noticed in December 2002 and a public work shop was conducted on December 20, 2002. Due to comments received, the TMDL was bifurcated into dry-weather and wet-weather TMDLs. The dry weather Santa Monica Bay pathogen TMDL was adopted by the Regional Board on January 24, 2002. The revised wet-weather TMDL is expected to be released for public comment later this month. It is tentatively scheduled for the June 27, 2002 Regional Board meeting. For more information contact Renee DeShazo at 213-576-6783.

Malibu Creek TMDLs

Melinda Becker

Regional Board staff made a presentation at the Malibu Creek Watershed Advisory Council on April 9, 2002. The presentation included an update on recent studies and provided a preview of the proposed implementation plans to address algae and bacteria impairments within the watershed. Studies performed by the Southern California Coastal Water Research Project (SCCWRP), University of California Santa Barbara, and Heal the Bay confirmed the algae impairment in the watershed and provided additional information used to establish numeric targets for nutrients and excessive algal growth. The pathogen TMDL will be based on the implementation plan for the Santa Monica Bay pathogen TMDLs. However, some allowance may be required to accommodate natural sources of bacteria, including birds and other wildlife. The draft TMDLs are expected to be released for public review within the next two months.

For more information contact Rod Collins at 213-576-6691 or Melinda Becker 213-576-6681.

NONPOINT SOURCE

Section 401 Water Quality Certification Program

The following Section 401 Water Quality Certification (WQC) actions have been issued since March 1, 2002:

Date of Issuance	<u>Applicant</u>	<u>Project</u>	Action
March 1, 2002	American Beauty	Wes Thompson Ranch - Amendment #1	Conditional WQC Amendment
March 1, 2002	Tyco Networks US, Inc.	Tyco Transpacific Fiber Optic Cable and Hermosa Beach Landing Project	Conditional WQC
March 1, 2002	LACDPW	Old Topanga Canyon Road, et al	Conditional WQC
March 7, 2002	Los Angeles County Dept. of Parks and Recreation	Diamond Bar Golf Course	Conditional WQC
March 7, 2002	Los Angeles County Department of Public Works: Programs Development Division	Arroyo Seco - Invert Access Ramp at Colorado Blvd.	Standard WQC
March 8, 2002	Porter Ranch Development Company	Porter Ranch Specific Plan - Amendment #1	Conditional WQC Amendment
March 8, 2002	Shapell/Monteverde Partnership	Plum Canyon Phase 1C - Amendment #1	Conditional WQC Amendment
March 12, 2002	Standard Pacific Homes	Walnut Hills Project	Conditional WQC
March 13, 2002	Glendora East Ranch LLC	Gordon Highlands (formerly Gard Ranch)	Conditional WQC
March 13, 2002	Santa Monica Mountains Conservancy	Baldwin Open Space Richland Area One Riparian Restoration	Standard WQC
March 14, 2002	County of Los Angeles Department of Public Works	Newhall Creek - Invert Access Ramp	Standard WQC
March 19, 2002	Los Angeles County Department of Public Works	Oak Grove over Arroyo Seco	Standard WQC
March 20, 2002	LB/L-RBF Simi Valley LLC	Marr Ranch Tract 5207	Conditional WQC
March 20, 2002	Los Angeles County Department of Public Works	Oak Grove over Flint Canyon Wash	Standard WQC
March 20, 2002	City of Los Angeles	Tujunga Avenue Bridge Restoration Project	Standard WQC
March20, 2002	County of Los Angeles Department of Public Works	Los Angeles River - Channel Repair and Invert Access Ramp	Standard WQC
March 22, 2002	City of Los Angeles	Radford Avenue Bridge Restoration Project	Standard WQC
April 5, 2002	Los Angeles County	Puddingstone Channel - Invert	Standard WQC

	Department of Public Works: Programs Development Division	Access Ramp Project	
April 12, 2002	City of Los Angeles	Moorpark Street Bridge Restoration Project	Standard WQC
April 12, 2002	City of Los Angeles	Fulton Avenue Bridge Restoration Project	Standard WQC
April 15, 2002	Rose Hills Company	Sycamore Channel (west) Restoration	Conditional WQC
April 25, 2002	County Sanitation District No. 26 of Los Angeles County	Soledad Canyon Trunk Sewer, Section Four Rehabilitation	Standard WQC

Certification actions recently issued and project descriptions for applications currently being reviewed can be viewed from our Web Site located at

http://www.swrcb.ca.gov/rwgcb4/html/meetings/401wgc.html

For additional information regarding our Section 401 Program, please contact Jason Lambert at (213) 576-5733 or Valerie Carrillo at (213) 576-6759. Any petitions for the appeal of a Section 401 WQC action must be filed within 30 days of the date of its issuance. We encourage public input during the certification process.

OUTREACH ACTIVITIES

Building Industry Association Workshop

Wendy Phillips

On April 24th, Regional Board staff participated in panel discussions on New Storm Water Regulations and Construction/Development Projects. Other participants will include staff from Region 8, the County of Los Angeles, and attorneys for permittees. Sponsors and co-sponsors of the event include: Petra Geotechnical, Inc., Southern California Gas Company, the Construction Industry Coalition, and the American Public Works Association.

Managing Ground Water Basins for Water Quality and Supply

Wendy Phillips

On April 11th, Regional Board staff participated on a panel at a conference in Ontario, California entitled "Managing Ground Water Basins for Water Quality and Supply" sponsored by the Water Education Foundation and the Association of Ground Water Agencies. Staff addressed Region 4's SUSMP policy (Standard Urban Storm Water Mitigation Plans), as set forth in storm water permits for municipalities in Region 4.

National Association of County Engineers Presentation

Dan Radulescu

Regional Board staff participated on a panel presentation on storm water regulations at the annual meeting of the National Association of County Engineers held in San Diego on March 25, 2002. Dan discussed the progress of storm water quality management efforts in Phase 1 municipal storm water permits in Los Angeles, and what Phase 2 communities might expect. Public works engineers from around the country attended the meeting.

Staff participation of Professional Conference

Yue Rong

Regional Board staff were among the conference speakers in the Association for the Environmental Health and Sciences (AEHS) West Coast Conference, held from March 18 to 21, 2002, in San Diego. Staff presented a workshop on "Use of PC Spreadsheet Analytical Model to Estimate MTBE Plume Life and Travel Time." Staff also offered a second workshop with the USEPA Region 9 staff, entitled "Application of Simple Mathematical Models for Estimating Impacts to Ground Water at Petroleum Release Sites." The conference was well attended by environmental professionals and regulators.

Personnel Report

As of April 25, 2002 our staff total is 168: 147 technical staff (including 4 part-time staff), 9 permanent analytical staff and 12 permanent clerical staff.

Staff is currently taking steps to fill our vacant CEA positions, 1 Section Chief position and 4 technical positions.

The following appointment was made:

Patricia Garcia, Office Technician (Typing), Storm Water Section, appointed 04/08/02.

Attachment "A"

Enforcement Unit NPDES Facility Inspections March 2002

"A" type compliance - Comprehensive inspection, no samples were taken

"B" type compliance - A routine nonsampling inspection

<u>Discharger</u>	Facility Name			Program	Most	City	NPDES_No	Date of	Type of
		No.	No.	Class	Recent			Inspection	Inspection
					Inspection				
University of California LA	University of California LA	8151	97- 045	MIN	None	Los Angeles	CAG994001	3/1/02	В
Burbank, City Of Public Works	Burbank WWRP, NPDES	4424	98- 052	MAJ	11/9/99	Burbank	CA0055531	3/7/02	A
Southern California Edison	Ormond Beach Generating Statio	5619	94-	MAJ	1/4/00	Oxnard	CA0001198	3/8/02	A
DTSC/England & Assoc.	Former Southland Oil Site	8152	97- 044	MIN	None	Commerce	CAG914001	3/12/02	В
City of Santa Paula/OMI	Santa Paula WWRP, NPDES	1759	97- 041	MAJ	4/13/01	Santa Paula	CA0054224	3/14/02	A
Exxon Mobil Corporation	Former Exxon Station 7-7221	8146	97- 046	MIN	None	Los Angeles	CAG834001	3/14/02	В
Simi Valley, City Of	Simi Valley WWRP, NPDES	3021	97- 122	MAJ	4/17/01	Simi Valley	CA0055221	3/19/02	A
LA City Bureau of Sanitation	Terminal Island WWTP	2171	93- 014	MAJ	10/26/99	San Pedro	CA0053856	3/20/02	A
Walnut Valley Water District	Thatcher Well	8255	97- 045	MIN	None	Diamond Bar	CAG994001	3/21/02	В
Equilon Enterprises LLC	L.A. Refining Co. (Wilmington)	5427	99- 093	MAJ	4/25/01	Wilmington	CA0003778	3/22/02	A
Cerritos Redevelopment Agency	Civic Center Parking Facility	8204	045	MIN	None	Cerritos (Dairy Valley)	CAG994001	3/25/02	В
Tosco Corp.	L.A.Refinery, Wilmington Plant	6103	93-	MAJ	9/30/99	Wilmington	CA0000035	3/27/02	A

			019						
Crescenta Valley Water District	Water Well No. 15 & 17	8181	97- 043	MIN	None	Verdugo City	CAG994002	3/28/02	В
The Boeing Company	Rocketdyne Div Santa Susana	6027	98- 051	MAJ	10/18/99	Simi Hills	CA0001309	3/29/02	A
Oxnard Wastewater Div. Plant	Oxnard WWTP, NPDES	2022	94- 045	MAJ	6/28/01	Oxnard	CA0054097	3/5/02	A
San Buenaventura City Of	Ventura WWRP, NPDES	1822	00- 143	MAJ	6/26/01	Ventura	CA0053651	3/6/02	A
Mobil Oil Corp.*	Torrance Refinery, NPDES	5742	93- 003	MAJ	12/22/99	Torrance	CA0055387	3/26/02	A
Los Angeles County San Dist	Long Beach WWRP, NPDES	5662	95- 076	MAJ	1/13/00	Long Beach	CA0054119	3/15/02	A
Equilon Enterprises LLC*	Carson Plant	6108	00- 165	MAJ	8/17/00	Carson	CA0000809	3/26/02	A
Tutor-Saliba Team	Alameda Mid-Corridor Trench Pj	8084	99- 143	MAJ	1/23/01	Lynwood	CA0064351	3/15/02	A
Las Virgenes MWD	Tapia WWRP, NPDES	8059	99- 066	MAJ	2/1/01	Calabasas	CA0064271	3/14/02	A
Los Angeles City of DWP	Harbor Generating Station	2020	95- 027	MAJ	2/23/01	Wilmington	CA0000361	3/20/02	A
Las Virgenes MWD	Tapia WWRP, NPDES	4760	97- 135	MAJ	4/12/01	Calabasas	CA0056014	3/14/02	A
Camarillo Sanitary District	Camarillo WWRP, NPDES	1278	96- 042	MAJ	4/18/01	Camarillo	CA0053597	3/13/02	A
Equilon Enterprises LLC	L.A. Refining Co. (Wilmington)	5427	99- 093	MAJ	4/25/01	Wilmington	CA0003778	by JP3/5	A
Kinder Morgan (Former GATX)	Gaffey Street Terminal	8157	97- 047	MIN	None	San Pedro	CAG674001	3/28/02	В
Casden Properties, Inc.	Park La Brea, Parcel A	8159	97- 043	MIN	None	Los Angeles	CAG994002	3/29/02	В
LA Co Dept of Public Works	Project 9037 Unit 4	8162	97- 043	MIN	None	Long Beach	CAG994002	3/8/02	В
Valencia Co.	East Creek Channel Lining Proj	8165	97- 045	MIN	None	Santa Clarita	CAG994001	3/22/02	В
Long Beach Water Dept.	Ocean Bl. Peninsula Sewer Proj	8174	97- 045	MIN	None	Long Beach	CAG994001	3/8/02	В
Mobil Oil Corp.	Newhall Station	8178	97- 046	MIN	None	Santa Clarita	CAG834001	3/6/02	В
Long Beach Water Dept.	S12 Sewer Force & Gravity Main	8179	97- 045	MIN	None	Long Beach	CAG994001	3/28/02	В

Attachment "B"

General Permitting Unit

General NPDES Permit Authorization/Revision and Termination – April 2002

	General Permit type and Facility name &	Date of	Date of	Date of
	<u>Location</u>	Coverage	Revision	Termination
A.	NPDES CAG994001 (Order No. 97-045) Dewatering (no treatment)			
1	City of Lakewood, City Well #18, Production Pumping Test Project, West of Bellflower Blvd., and Ashworth Street, Lakewood	04/18/02		
2	City of Lakewood, Well No. 11A, 5136 Sunfield Avenue, Lakewood			04/19/02
В	NPDES CAG994002 (Order No. 97-043)			

	Dewatering (treatment required)		
1	County of Los Angeles, Department of Public Works, Dominguez Gap Barrier Project, Part 2B, Intermodal Way and Spring Street, Carson & Long Beach	04/26/02	
C.	NPDES CAG674001 (Order No. 97-047) Hydrostatic Test Water		
1	BP West Coast Products, LLC, 8601 S. Garfield Avenue, South Gate	4/03/02	
2	Southern California Gas Company, Line 2000 and Line 30-02 Relocation Project, Santa Fe Springs	04/12/02	
3	Chevron Products Company, Chevron Van Nuys Terminal, 15359 Oxnard Street, Van Nuys	4/24/02	
4	Chevron USA Products Company (Montebello Terminal) 601 South Vail Avenue, Montebello	4/24/02	
D.	NPDES CAG994003 (Order No. 98-055) Nonprocess		
E.	NPDES CAG834001 (Order No. 97-046) – Cleanup of Petroleum Fuel Pollution		
1	Calclean, Inc., Former Texaco Station, 1344 W. Redondo Beach Blvd., Gardena	04/10/02	
2	ExxonMobil Pipeline Company, Newhall Pump Station, 2550 Magic Mountain Parkway, Santa Clarita		04/24/02
F.	NPDES CAG914001(Order No. 97-044) – Cleanup of Volatile Organic Compounds Contaminated Groundwater		

Attachment "C"

Monthly Summary of Regional Board Enforcement Actions

April 2002

	13267 Letters			NTCs	CAOs	TSOs	CDOs	Administrative Civil Liability Penalty Complaints				Program Total
								Mandatory	Storm- water related	others	Total ACLs	
Enforcement	6	-	6	-	-	-	-	4	-	1	5	17
NPDES	1	-	-	-	-	-	-	-	-	-	-	1
Stormwater	-	-	21	20	-	-	-	-	-	-	-	41
Underground Tanks	1	-	3	2	-	-	-	-	-	-	1	7
Site Cleanup	-	-	-	-	-	-	-	-	-	-	-	-

I, II & III												
WDRs	-	-	-	-	-	-	-	-	-	-	-	-
WIP	-	-	-	-	-	-	-	-	-	-	-	-
Landfills	-	-	-	-	-	-	-	-	-	-	-	-
Other (401, NPS)	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL	8	-	30	22	-	-	-	4	-	1	6	66
YTD Total	41	9	174	140	3	-	1	10	3	1	16	384

<u>13267 Letter – Requirement to Submit Information</u>

Level 1 enforcement - Notice of Non Compliance

NOV - Notice of Violation

NTC - Notice to Comply

CAO - Clean up and Abatement Order

TSO - Time Schedule Order

CDO - Cease and Desist Order

ACL - Administrative Civil Liability

NPDES - National Pollutant Discharge Elimination System

WIP - Well Investigation Program

NPS - Nonpoint Source

WDR – Waste Discharge Requirement