

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
PLASKOLITE WEST, INC.**

NPDES Permit No.: CA0060798
Public Notice No.: 02-030

FACILITY ADDRESS
Plaskolite West, Inc.
2225 East Del Amo Blvd.
Compton, California 90220

FACILITY MAILING ADDRESS
Plaskolite West, Inc.
2225 East Del Amo Blvd.
Compton, California 90220
Contact: Mr. Jason Shen
Telephone: (310) 637-2103

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 have 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 June 25, 2002.

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: July 11, 2002
Time: 9:00 a.m.
Location: Simi Valley Council Chambers
2929 Tapo Canyon Road
Simi Valley, California

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.

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 the Chief Counsel
ATTN: Elizabeth Miller 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

Plaskolite West, Inc. (hereinafter Plaskolite or Discharger) discharges wastewater to Dominguez Channel, a water of the United States. Wastes discharged from Plaskolite are regulated by WDRs and NPDES permit contained in Board Order No. 95-026 (NPDES Permit No. CA0060798). Order No. 95-026 expired on January 10, 2000.

Plaskolite has filed a report of waste discharge and has applied for renewal of its WDRs and NPDES permit on December 13, 1999, and based on comments from the Regional Board, submitted a second permit application May 3, 2001. The tentative Order is the reissuance of the WDRs and NPDES permit for discharges from Plaskolite. A site visit was conducted on March 26, 2002, to observe operations and collect additional data to develop permit limits and conditions.

Plaskolite has implemented a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the general NPDES permit for storm water discharges associated with industrial activity [State Water Resources Control Board (State Board) Order No. 97-03-DWQ, NPDES Permit No. CAS000001]. The storm water requirements contained in the general storm water permit are incorporated in this Order.

III. Description of Facility and Waste Discharge

Plaskolite operates an acrylic plastic polymerization facility at 2225 East Del Amo Boulevard, Compton, California. Plaskolite manufactures acrylic polymer from liquid methyl methacrylate and ethyl acrylate monomers. Liquid monomers are combined with a catalyst, laurel peroxide, and are polymerized in steam-heated reaction ovens. The polymer is cooled down, ground into a malleable product, and directed to an extruder to be shaped into long strands. The strands are cooled in a rain bath, fed to a pelletizer and then chopped into pellets. The pellets are packaged in bags, drums, or boxes and then shipped to customers.

Plaskolite discharges up to 1,700 gallons per day (0.0017 million gallons per day, MGD) of wastewater to a ditch, thence to a storm drain in Del Amo Boulevard (Discharge No. 001, Latitude 33° 50' 15" North; Longitude 118° 13' 36" West). The wastewater flows into Dominguez Channel at 223rd Street, a water of the United States, within the tidal prism. The wastewater consists of water softener backwash, pellet cooling water, condensate receiver blowdown, and cooling tower blowdown.

Connection of the discharges covered under this permit to the sanitary sewer is not a feasible option because the facility will have to disrupt its operations, re-configure its wastewater discharge setup, and undergo a major construction activity to install new sewer lines.

Facility inspection reports (June 1999 and June 2000) indicate that Plaskolite has been in compliance with the limitations and requirements of the existing permit.

The Regional Board and the United States Environmental Protection Agency (USEPA) have classified the Plaskolite facility as a minor discharge.

The Permit Application, Form 2E, specifies the use of sodium hydroxide and organophosphate compound additives (sodium hydroxide and sodium salts) in the cooling water to control alkalinity.

Effluent limits contained in the existing permit for Plaskolite and representative monitoring data from the previous permit term are presented in the following table:

Constituent (units)	Effluent Limit (Monthly Average)	Effluent Limit (Daily Maximum)	Monitoring Data (January 1995 – March 2001)	
			Maximum	Average
pH (standard units)	--	--	10.3	7.47
Temperature (°F)	--	--	117	79
Oil and Grease (mg/L)	10	15	< 5.0	--
Oil and Grease (lbs/day) ¹	0.14	0.21	--	--
BOD ₅ (mg/L)	20	60	6 ²	4.37
BOD ₅ (lbs/day) ¹	0.28	0.85	--	--
Suspended Solids (mg/L)	50	150	50	15.1
Suspended Solids (lbs/day) ¹	0.71	2.13	--	--
Settleable Solids (ml/L)	0.1	0.3	< 1 ²	0.4
Methyl Methacrylate (µg/L)	--	35	< 100	--

¹ The mass-based effluent limits are based on a maximum discharge flow rate of 1,700 gallons per day.

² BOD₅: Two points were detected at 5 mg/L and 6 mg/L; others were non-detect values (<1 - <6).

Settleable Solids: Two points were detected at 0.5 and 0.3 mg/L; others were non-detect values (<0.1 - <1.0).

IV. 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 Plaskolite.
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 Basin Plan contains beneficial uses and water quality objectives for the Dominguez Channel estuary.

Existing: 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, and spawning, reproduction, or early development.

Potential: navigation.

4. 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 the Dominguez Channel estuary.
5. On May 18, 2000, the U.S. Environmental Protection Agency (USEPA) promulgated numeric criteria for priority pollutants for the State of California [known as the *California Toxics Rule* (CTR) and codified as 40 CFR § 131.38]. In the CTR, USEPA 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 provides 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 the CTR criteria.
6. On March 2, 2000, State Board adopted the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (State Implementation Policy or SIP). The SIP was effective on April 28, 2000, with respect to the priority pollutant criteria promulgated for California by the USEPA through National Toxics Rule (NTR) and to the priority pollutant objectives established by the Regional Boards in their basin plans, with the exception of the provision on alternate test procedures for individual discharges that have been approved by the USEPA Regional Administrator. The alternate test procedures provision was effective on May 22, 2000. The SIP was effective on May 18, 2000, with respect to the priority pollutant criteria promulgated by the USEPA through the CTR. The SIP requires the dischargers' submittal of data sufficient to conduct the determination of priority pollutants requiring water quality-based effluent limitations (WQBELs) and to calculate the effluent limitations. The CTR criteria for saltwater or human health for consumption of organisms, whichever is more stringent, are used to develop the effluent limitations in this Order to protect the beneficial uses of the Dominguez Channel estuary.
7. 40 CFR Part 414 specifies effluent limitations and requirements applicable to the process wastewater discharges resulting from manufacturing of the products classified under SIC 28213, thermoplastic resins, including acrylate-methacrylate latexes. The discharges covered under this permit are considered process wastewater as they come in contact with raw and manufactured materials.
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 Dominguez Channel estuary.

10. Existing waste discharge requirements contained in Board Order No. 95-026, adopted by the Regional Board on February 27, 1995. In some cases, permit conditions (effluent limits and other special conditions) established in the existing waste discharge requirements have been carried over to this permit.

V. 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 controls:

- 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) that 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 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 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 122.44(d)(1)(i). WQBELs are established after determining that technology-based limitations are not stringent enough to ensure that state water

FACT SHEET

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 to inland surface waters, enclosed bays, and estuaries, the SIP establishes specific implementation procedures for determining reasonable potential and establishing WQBELs for priority pollutant criteria promulgated by USEPA through the CTR and NTR, as well as the Basin Plan.

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 and SIP 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. The SIP includes provisions for priority pollutant criteria promulgated by USEPA in the CTR and NTR, and for those priority pollutants outlined in the Basin Plan.

Liquid methyl methacrylate and ethyl acrylate are thermoplastic monomers that when combined, will create an acrylic plastic product. These substances are highly volatile and are not expected to bioaccumulate in the environment but are considered pollutants of concern for this discharge. Water softening backwash, condensate receiver blowdown, and cooling tower blowdown may contribute solids, BOD₅, and oil and grease to the discharge; therefore, effluent limitations were set for these parameters.

2. Technology-Based Effluent Limits

Plaskolite produces polymethyl methacrylate, an acrylic plastic from liquid methyl methacrylate and ethyl acrylate monomers. Plaskolite extrudes and pelletizes the acrylic plastic, and packages it for shipment off-site. 40 CFR Part 414 established effluent limitations and requirements for the Organic Chemicals and Plastics and Synthetic Fibers (OCPSF) point source category. The category regulation applies to plastics molding and forming processes when plastic resin manufacturers mold or form (e.g., extrude and pelletize) crude intermediate plastic material for shipment off-site. Plastics molding and forming processes other than the aforementioned are regulated by the Plastics Molding and Forming effluent guidelines and standards (40 CFR Part 463).

As stated in 40 CFR § 414.11, the provisions contained in the OCPSF guidelines are applicable to process wastewater discharges from facilities included within the U.S. Department of Commerce Bureau of the Census Standard Industrial Classification (SIC) group 2821 – Plastic Materials, Synthetic Resins, and Nonvulcanizable Elastomers. The NPDES Permit Application states Plaskolite is classified under SIC code 2821. OCPSF process wastewater discharges are defined as discharges from all establishments or portions of establishments that manufacture thermoplastic resins, and are included within SIC code 2821. Process wastewater discharge is defined to include wastewaters

resulting from manufacture of OCPSF products that come in direct contact with raw materials, intermediate products, or final products, and surface runoff from the immediate process area that has the potential to become contaminated.

40 CFR § 414.101 establishes toxic pollutant effluent limitations and standards for direct discharge point sources that do not use end-of-pipe biological treatment. The limitations contained in 40 CFR Part 414 are concentration-based and require an estimate of process wastewater flow to determine mass-based effluent limitations for process wastewaters. Pellet cooling water and condensate receiver blowdown come into contact with the plastic material, and according to the schematic of wastewater flow, maximum flow rates for these processes are 500 gallons per day (gpd) and 600 gpd, respectively. Concentration limitations will be applied to the two waste streams to develop mass-based effluent limitations for wastewater discharges. Metals limitations are applied only to the flows discharged from metal-bearing process wastewaters, as defined in Appendix A to 40 CFR Part 414. In the case of chromium, copper, lead, nickel, and zinc, the mass-based effluent limitations are determined by multiplying the concentrations listed in 40 CFR § 414.101 by the flow from metal-bearing waste streams. The process wastewater discharges from Plaskolite do not contain any metal-bearing waste streams. Therefore, metal effluent limitations will not be established in this Order. Effluent limitations established in this Order are applicable to process wastewater discharges from the NPDES Discharge No. 001, a ditch, thence to a storm drain in Del Amo Boulevard (Latitude 33° 50' 15" North; Longitude 118° 13' 36" West).

The Plaskolite facility has two outfalls (designated 002 and 003) that collect storm water discharges only. These outfalls are covered under the general NPDES permit for storm water discharges associated with industrial activity [State Water Resources Control Board (State Board) Order No. 97-03-DWQ, NPDES Permit No. CAS000001]. Discharge No. 002 is located in the East Parking Lot and receives storm water runoff only. Discharge No. 003 is located in the West Parking Lot and also receives solely storm water runoff. The general permit for the Plaskolite facility requires the Discharger to develop and implement a *Storm Water Pollution Prevention Plan (SWPPP)*. The SWPPP outlines site-specific management processes for minimizing storm water runoff contamination and for preventing contaminated storm water runoff from being discharged directly into surface waters. Due to the fact that storm water discharges occur at the Plaskolite facility, this permit will require that Plaskolite update and continue to implement their SWPPP.

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

As specified in 40 CFR § 122.44(d)(1)(i), permits are required to 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 USEPA water quality criteria contained in the CTR and NTR). The specific procedures for determining reasonable potential, and if

necessary for calculating WQBELs, are contained in the SIP.

The CTR contains both saltwater and freshwater criteria. According to 40 CFR § 131.38(c)(3), freshwater criteria apply at salinities of 1 part per thousand (ppt) and below at locations where this occurs 95 percent or more of the time; saltwater criteria apply at salinities of 10 ppt and above at locations where this occurs 95 percent or more of the time; and at salinities between 1 and 10 ppt the more stringent of the two apply. The CTR criteria for freshwater or human health for consumption of organisms, whichever is more stringent, are used to prescribe the effluent limitations in this Order to protect the beneficial uses of the Dominguez Channel Estuary.

(a) Reasonable Potential Analysis (RPA)

In accordance with Section 1.3 of the SIP, the Regional Board will conduct a reasonable potential analysis for each priority pollutant with an applicable criterion or objective to determine if a WQBEL is required in the permit. The Regional Board would analyze effluent data to determine if a pollutant in a discharge has a reasonable potential to cause or contribute to an excursion above a state water quality standard. For all parameters that have a reasonable potential, numeric WQBELs are required. The RPA considers water quality objectives outlined in the CTR, NTR, as well as the Basin Plan. To conduct the RPA, the Regional Board must identify the maximum observed effluent concentration (MEC) for each constituent, based on data provided by the Discharger.

Section 1.3 of the SIP provides the procedures for determining reasonable potential to exceed applicable water quality criteria and objectives. The SIP specifies three triggers to complete a RPA:

- 1) Trigger 1 – If the MEC is greater than or equal to the CTR water quality criteria or applicable objective (C), a limit is needed.
- 2) Trigger 2 – If $MEC < C$ and background water quality (B) $> C$, a limit is needed.
- 3) Trigger 3 – If other related information such as CWA 303(d) listing for a pollutant, discharge type, compliance history, etc. indicates that a WQBEL is required.

Sufficient effluent and ambient data are needed to conduct a complete RPA. If data are not sufficient, the Discharger will be required to gather the appropriate data for the Regional Board to conduct the 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.

For Plaskolite the RPA was performed for the priority pollutants for which effluent data were available. The table below summarizes the monitoring data available to the Regional Board for use in performing a RPA for this Discharger.

Pollutant	Reported Monitoring Results				
	2/2000	2/1999	3/1998	3/1996	3/1995
Acrolein (µg/L)				< 5	< 200
Acrylonitrile (µg/L)				< 10	< 200
Benzene (µg/L)	< 0.5	< 5	< 1	< 1	< 2
Bromoform (µg/L)	< 1	< 5	< 1	< 1	< 2
Carbon Tetrachloride (µg/L)	< 0.5	< 5	< 1	< 1	< 2
Chlorobenzene (µg/L)	< 1	< 5	< 1	< 1	< 2
Chloroethane (µg/L)	< 1	< 5	< 1	< 2	< 2
2-Chloroethylvinyl ether (µg/L)	< 5		< 1	< 5	< 4
Chloroform (µg/L)	< 1	< 5	< 1	< 2	< 2
1,1-Dichloroethane (µg/L)	< 1	< 5	< 1	< 1	< 2
1,2-Dichloroethane (µg/L)	< 0.5	< 5	< 1	< 1	< 2
1,1-Dichloroethylene (µg/L)	< 1				
1,2-Dichloropropane (µg/L)	< 1	< 5	< 1	< 1	< 2
Ethylbenzene (µg/L)	< 0.5	< 5	< 1	< 1	< 2
Methyl Bromide (µg/L)	< 1		< 1	< 2	< 2
Methyl Chloride (µg/L)	< 1	< 5	< 1	< 2	< 2
Methylene Chloride (µg/L)	< 20	< 5	< 10	< 2	< 4
1,1,2,2-Tetrachloroethane (µg/L)	< 1	< 5	< 1	< 1	< 2
Toluene (µg/L)	< 0.5	< 5	< 1	< 1	< 2
1,1,1-Trichloroethane (µg/L)	< 1	< 5	< 1	< 1	< 2
1,1,2-Trichloroethane (µg/L)	< 1	< 5	< 1	< 1	< 2
Vinyl chloride (µg/L)	< 0.5	< 5	< 1	< 2	< 2
1,2-Dichlorobenzene (µg/L)	< 1	< 5	< 1	< 1	< 2
1,3-Dichlorobenzene (µg/L)	< 1	< 5	< 1	< 1	< 2
1,4-Dichlorobenzene (µg/L)	< 1	< 5	< 1	< 1	< 2
Hexachlorobutadiene (µg/L)	< 1	< 5		< 1	< 2
Naphthalene (µg/L)	< 1	< 5	< 10		
1,2,4-Trichlorobenzene (µg/L)	< 1	< 5	< 1		

Based on the RPA, none of the constituents in the table above had reasonable potential to exceed water quality standards. The table presented as Attachment A summarizes the RPA. However, there were a number of other toxic pollutants for which effluent data did not exist. In addition, background data was not available for any pollutant. As described further in Section V.6.(a), Plaskolite is currently being required by the Regional Board to monitor to provide data to enable future determination of reasonable potential.

(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 1.4 of the SIP. 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 in 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 USEPA has approved the State's 303(d) list of impaired water bodies. Certain receiving waters in the Los Angeles and Ventura County watersheds do not fully support beneficial uses and therefore have been classified as impaired on the 1998 303(d) list and have been scheduled for TMDL development.

Dominguez Channel begins at the border of El Segundo and Los Angeles Airport and flows through portions of Hawthorne, Torrance, Gardena, Carson, and Wilmington to the East Basin of the Los Angeles Harbor. The channel is concrete-lined above the estuary (Vermont Avenue). Dominguez Channel receives discharges from highly developed and industrialized areas. The 1998 State Board's California 303(d) List classifies the Dominguez Channel Estuary as impaired. The pollutants of concern, detected in the water column, in the sediment, and in the fish tissue, include chromium, lead, zinc, DDT, polynuclear aromatic hydrocarbons (PAHs), benthic community effects, ChemA (refers to the sum of aldrin, dieldrin, chlordane, endrin, heptachlor, heptachlor epoxide, hydrochlorocyclohexane (HCH), endosulfan, and toxaphene), polychlorinated biphenyls (PCBs), copper, ammonia, and coliform. Known and/or suspected sources of pollution include historical deposits of DDT and PCBs in sediment, discharges and/or spills from industrial facilities, leaching of contaminated groundwater, and urban runoff.

(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 a short time period and measures mortality. A chronic toxicity test is conducted over a longer period of time 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 on 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 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 includes acute toxicity limitations.

In addition to the Basin Plan requirements, Section 4 of the SIP states that a chronic toxicity effluent limitation is required in permits for all discharges that will cause, have the reasonable potential to cause, or contribute to chronic toxicity in receiving waters.

The discharges at the Plaskolite facility occur continuously and, due to the types of materials handled at the site, could contribute to long-term toxic effects. However, no chronic toxicity data is available for the discharge. Therefore, the Discharger will be required to conduct chronic toxicity testing in order to determine reasonable potential and establish WQBELs as necessary. In addition, the Order includes a chronic testing trigger hereby defined as an exceedance of 1.0 toxic units chronic (TU_c) in a critical life stage test for 100% effluent. (The monthly median for chronic toxicity of 100% effluent shall not exceed 1.0 TU_c in a critical life stage test.) If the chronic toxicity of the effluent exceeds 1.0 TU_c, the Discharger will be required to immediately implement accelerated chronic toxicity testing according to Monitoring and Reporting Program, item IV.D.1. If the results of two of the six accelerated tests exceed 1.0 TU_c, the Discharger shall initiate a toxicity identification evaluation (TIE).

4. **Specific Rationale for Each Numerical Effluent Limitation**

Section 402(o) of the Clean Water Act and 40 CFR § 122.44(l) require, with certain exceptions, that effluent limits standards or conditions in re-issued permits are at least as stringent as in the existing permit. The Regional Board has determined that reasonable potential exists for all pollutants that are regulated with WQBEL under the current permit; therefore effluent limitations have been established for these pollutants. Furthermore, the requirements in the proposed Order for pH, temperature, oil and grease, settleable solids, and methyl methacrylate, shown in the table below, are based on limits specified in Plaskolite's existing permit. Also, maximum daily effluent limitations for BOD₅ and total suspended solids have been revised based on current limitations for conventional pollutants contained in industrial waste discharge requirements issued by the Regional Board.

40 CFR Part 414 establishes effluent limitations and requirements for the OCPSF point source category. As discussed earlier, the wastewater discharges from the Plaskolite facility are considered process wastewaters. 40 CFR § 414.101 established toxic pollutant effluent limitations and standards for direct discharge point sources that do not

use end-of-pipe biological treatment. The limitations contained in 40 CFR Part 414 are concentration-based and require an estimate of process wastewater flow to determine mass-based effluent limitations for process wastewaters. Pellet cooling water and condensate receiver blowdown come into contact with the plastic material. According to the schematic of wastewater flow, maximum flow rates for these processes are 500 gpd and 600 gpd, respectively. Concentration limitations will be applied to the sum of the two waste streams to develop mass-based effluent limitations for wastewater discharges. Effluent limitations for metals will not be established in this Order, as this discharge does not contain any metal-bearing waste streams.

In compliance with 40 CFR § 122.45(f), mass-based limits have also been established in the proposed Order for conventional and toxic pollutants.

Constituent (units)	Maximum Daily Discharge Limitations		Average Monthly Discharge Limitations		Rationale ²
	Concentration	Mass ¹ (lbs/day)	Concentration	Mass ¹ (lbs/day)	
PH	Between 6.5 – 8.5 S.U.	--	Between 6.5 – 8.5 S.U.	--	BP
Temperature	100 (°F)	--	--	--	BP
BOD ₅ @ 20°C	30 mg/L	0.43	20 mg/L	0.28	BPJ
Oil and Grease	15 mg/L	0.21	10 mg/L	0.14	E
Total Suspended Solids	75 mg/L	1.06	50 mg/L	0.71	BPJ
Settleable Solids	0.3 ml/L	--	0.1 ml/L	--	E
Methyl Methacrylate	35 µg/L	0.0005	--	--	E
Acrylonitrile	232 µg/L	0.0033	94 µg/L	0.00133	BAT
Benzene	134 µg/L	0.0019	57 µg/L	0.00081	BAT
Carbon Tetrachloride	380 µg/L	0.0054	142 µg/L	0.00201	BAT
Chlorobenzene	380 µg/L	0.0054	142 µg/L	0.00201	BAT
Chloroethane	295 µg/L	0.0042	110 µg/L	0.00156	BAT
Chloroform	325 µg/L	0.0046	111 µg/L	0.00157	BAT
1,1-Dichloroethane	59 µg/L	0.0008	22 µg/L	0.00031	BAT
1,2-Dichloroethane	574 µg/L	0.0081	180 µg/L	0.00255	BAT
1,1-Dichloroethylene	60 µg/L	0.0009	22 µg/L	0.00031	BAT
1,2-Dichloropropane	794 µg/L	0.0113	196 µg/L	0.00278	BAT
1,3-Dichloropropylene	794 µg/L	0.0113	196 µg/L	0.00278	BAT

Constituent (units)	Maximum Daily Discharge Limitations		Average Monthly Discharge Limitations		Rationale ²
	Concentration	Mass ¹ (lbs/day)	Concentration	Mass ¹ (lbs/day)	
Ethylbenzene	380 µg/L	0.0054	142 µg/L	0.00201	BAT
Methyl Chloride	295 µg/L	0.0042	110 µg/L	0.00156	BAT
Methylene Chloride	170 µg/L	0.0024	36 µg/L	0.00051	BAT
Tetrachloroethylene	164 µg/L	0.0023	52 µg/L	0.00074	BAT
Toluene	74 µg/L	0.0010	28 µg/L	0.00040	BAT
1,2-trans-Dichloroethylene	66 µg/L	0.0009	25 µg/L	0.00035	BAT
1,1,1-Trichloroethane	59 µg/L	0.0008	22 µg/L	0.00031	BAT
1,1,2-Trichloroethane	127 µg/L	0.0018	32 µg/L	0.00045	BAT
Trichloroethylene	69 µg/L	0.0010	26 µg/L	0.00037	BAT
Vinyl Chloride	172 µg/L	0.0024	97 µg/L	0.00138	BAT
2,4-Dimethylphenol	47 µg/L	0.0007	19 µg/L	0.00027	BAT
2,4-Dinitrophenol	4,291 µg/L	0.0608	1,207 µg/L	0.01711	BAT
2-Nitrophenol	231 µg/L	0.0033	65 µg/L	0.00092	BAT
4-Nitrophenol	576 µg/L	0.0082	162 µg/L	0.00230	BAT
Phenol	47 µg/L	0.0007	19 µg/L	0.00027	BAT
Acenaphthene	47 µg/L	0.0007	19 µg/L	0.00027	BAT
Acenaphthylene	47 µg/L	0.0007	19 µg/L	0.00027	BAT
Anthracene	47 µg/L	0.0007	19 µg/L	0.00027	BAT
Benzo (a) Anthracene	47 µg/L	0.0007	19 µg/L	0.00027	BAT
Benzo (a) Pyrene	48 µg/L	0.0007	20 µg/L	0.00028	BAT
Benzo (k) Fluoranthene	47 µg/L	0.0007	19 µg/L	0.00027	BAT
Bis (2-ethylhexyl) Phthalate	258 µg/L	0.0037	95 µg/L	0.00135	BAT
Chrysene	47 µg/L	0.0007	19 µg/L	0.00027	BAT
1,2-Dichlorobenzene	794 µg/L	0.0113	196 µg/L	0.00278	BAT
1,3-Dichlorobenzene	380 µg/L	0.0054	142 µg/L	0.00201	BAT
1,4-Dichlorobenzene	380 µg/L	0.0054	142 µg/L	0.00201	BAT

Constituent (units)	Maximum Daily Discharge Limitations		Average Monthly Discharge Limitations		Rationale ²
	Concentration	Mass ¹ (lbs/day)	Concentration	Mass ¹ (lbs/day)	
Diethyl Phthalate	113 µg/L	0.0016	46 µg/L	0.00065	BAT
Dimethyl Phthalate	47 µg/L	0.0007	19 µg/L	0.00027	BAT
Di-n-butyl Phthalate	43 µg/L	0.0006	20 µg/L	0.00028	BAT
Fluoranthene	54 µg/L	0.0008	22 µg/L	0.00031	BAT
Fluorene	47 µg/L	0.0007	19 µg/L	0.00027	BAT
Hexachlorobenzene	794 µg/L	0.0113	196 µg/L	0.00278	BAT
Hexachlorobutadiene	380 µg/L	0.0054	142 µg/L	0.00201	BAT
Hexachloroethane	794 µg/L	0.0113	196 µg/L	0.00278	BAT
Naphthalene	47 µg/L	0.0007	19 µg/L	0.00027	BAT
Nitrobenzene	6,402 µg/L	0.0908	2,237 µg/L	0.03172	BAT
Phenanthrene	47 µg/L	0.0007	19 µg/L	0.00027	BAT
Pyrene	48 µg/L	0.0007	20 µg/L	0.00028	BAT
1,2,4-Trichlorobenzene	794 µg/L	0.0113	196 µg/L	0.00278	BAT
3,4-Benzofluoranthene	48 µg/L	0.0007	20 µg/L	0.00028	BAT
4,6-Dinitro-o-cresol	277 µg/L	0.0039	78 µg/L	0.00111	BAT

¹ The mass-based effluent limitations for conventional pollutants are based on a maximum discharge flow rate of 1,700 gpd, which was carried over from the previous permit.

² BP = Basin Plan, BPJ = Best Professional Judgment, E = Existing Permit, BAT = Effluent Guidelines reflecting Best Available Technology Economically Achievable.

5. Interim Requirements

Section 2.2.2 of the SIP established interim requirements while sufficient data is collected to determine reasonable potential and calculate effluent limitations, if necessary. Requirements include monitoring for priority pollutants and reporting, in writing, to the Regional Board within 14 days if the discharger of compliance or noncompliance with the data collection and submission requirements. Numeric limitations for the pollutants regulated in the permit are based on technology-based effluent. A review of effluent guidelines that reflect the best available technology economically available (BAT) and water quality criteria established in the CTR shows that for a number of pollutants, the technology-based effluent limitations are more stringent than the CTR criteria. Therefore, the Regional Board deems that these effluent limitations will be protective of water quality. Refer to Attachment B for a comparison between BAT effluent guidelines and water quality

criteria promulgated in the CTR.

6. **Monitoring Requirements**

For regulated parameters, the previous permit for Plaskolite required monthly monitoring for temperature and pH, and annual monitoring for conventional pollutants and certain toxic pollutants (methyl methacrylate and ethyl acrylate). Although the existing permit did not require monitoring for priority pollutants, the Discharger submitted periodic monitoring data for certain priority pollutants. The Regional Board issued a letter on February 21, 2002 that required Plaskolite to monitor for priority pollutants regulated in the CTR, and submit the data by May 22, 2003. According to Section 1.3 of the SIP, if data are unavailable or insufficient to conduct the RPA, the Regional Board must establish interim requirements that require additional monitoring for the pollutants in place of a WQBEL. Upon completion of the required monitoring, the Regional Board must use the gathered data to conduct the RPA and determine if a WQBEL is required. As prescribed in the Monitoring and Reporting Program, the Regional Board shall require periodic monitoring for pollutants for which criteria or objectives apply and for which no effluent limitations have been established.

Monitoring is required at the storm water outfalls (Nos. 002 and 003), and the Discharger shall develop and implement best management practices (BMPs) in accordance with the requirements in the general NPDES permit for storm water discharges associated with industrial activity [State Water Resources Control Board (State Board) Order No. 97-03-DWQ, NPDES Permit No. CAS000001]. This Order requires quarterly monitoring for the regulated conventional pollutants (pH, BOD₅, TSS, and oil and grease) and semi-annual monitoring for priority pollutants.

(a) Effluent Monitoring

To demonstrate compliance with effluent limitations established in the permit, quarterly monitoring for conventional pollutants (pH, BOD₅, TSS, and oil and grease) and temperature is required. This Order carries over the annual monitoring requirement for ethyl acrylate to ensure system integrity. Organo phosphate compounds are added to the boiler for alkalinity control and may contribute phosphorous-containing substances to the discharge. Phosphorous is a concern because in its elemental form it is subject to bioaccumulation. Phosphorous as phosphate is a nutrient required for plant nutrition, but in excess concentrations, it may be associated with accelerated eutrophication. This Order requires annual monitoring for phosphorous. Annual monitoring is also required for the final product of polymethyl methacrylate, as there is potential for the product to be present in the wastewater. Finally, in accordance with 40 CFR § 122.44 (i)(2), monitoring requirements are established on a case-by-case basis, with a frequency dependent on the nature and effect of the discharge, but in no case less than once a year. Therefore, because it is not anticipated that certain pollutants will be present in the effluent, semiannual monitoring is required for the toxic pollutants for which BAT effluent limitations were established in this Order. This monitoring requirement is sufficient to protect water quality.

40 CFR § 122.44 (a)(2) describes monitoring waivers for certain effluent guideline-listed pollutants. This waiver allows dischargers subject to technology-based effluent limitations guidelines and standards to forego sampling of a regulated pollutant if the discharger has demonstrated through sampling that the pollutant is not present in the discharge, or is present only at background levels from intake water and without any increase in the pollutant due to activities of the discharger. The Discharger may request this waiver upon permit re-issuance or modification of a re-issued permit. The request must demonstrate through sampling or other technical information that the pollutant is not present in the discharge, or is present only at background levels from intake water and without any increase in the pollutant due to activities of the Discharger.

The following shall constitute the effluent monitoring program for Discharge No. 001, a ditch, thence to a storm drain in Del Amo Boulevard (Latitude 33° 50' 15"; Longitude 118° 13' 36"):

Constituent	Units	Type of Sample	Sampling Frequency
Flow	gal/day	----	Monthly
pH	standard units	grab	quarterly
Temperature	°F	grab	quarterly
Oil and Grease	mg/L	grab	quarterly
BOD ₅ @ 20°C	mg/L	grab	quarterly
Total suspended solids	mg/L	grab	quarterly
Settleable Solids	ml/L	grab	Semiannual
Methyl methacrylate	µg/L	grab	Semiannually
Phosphorous	mg/L	grab	Annually
Ethyl acrylate	µg/L	grab	Annually
Polymethyl methacrylate	µg/L	grab	Annually
Acrylonitrile	µg/L	grab	Semiannually
Benzene	µg/L	grab	Semiannually
Carbon Tetrachloride	µg/L	grab	Semiannually
Chlorobenzene	µg/L	grab	Semiannually
Chloroethane	µg/L	grab	Semiannually
Chloroform	µg/L	grab	Semiannually
1,1-Dichloroethane	µg/L	grab	Semiannually
1,2-Dichloroethane	µg/L	grab	Semiannually
1,1-Dichloroethylene	µg/L	grab	Semiannually
1,2-Dichloropropane	µg/L	grab	Semiannually
1,3-Dichloropropylene	µg/L	grab	Semiannually
Ethylbenzene	µg/L	grab	Semiannually
Methyl Chloride	µg/L	grab	Semiannually
Methylene Chloride	µg/L	grab	Semiannually
Tetrachloroethylene	µg/L	grab	Semiannually
Toluene	µg/L	grab	Semiannually
1,2-trans-Dichloroethylene	µg/L	grab	Semiannually
1,1,1-Trichloroethane	µg/L	grab	Semiannually
1,1,2-Trichloroethane	µg/L	grab	Semiannually
Trichloroethylene	µg/L	grab	Semiannually
Vinyl Chloride	µg/L	grab	Semiannually

2,4-Dimethylphenol	µg/L	grab	Semiannually
2,4-Dinitrophenol	µg/L	grab	Semiannually
2-Nitrophenol	µg/L	grab	Semiannually
4-Nitrophenol	µg/L	grab	Semiannually
Phenol	µg/L	grab	Semiannually
Acenaphthene	µg/L	grab	Semiannually
Acenaphthylene	µg/L	grab	Semiannually
Anthracene	µg/L	grab	Semiannually
Benzo (a) Anthracene	µg/L	grab	Semiannually
Benzo (a) Pyrene	µg/L	grab	Semiannually
Benzo (k) Fluoranthene	µg/L	grab	Semiannually
Bis (2-ethylhexyl) Phthalate	µg/L	grab	Semiannually
Chrysene	µg/L	grab	Semiannually
1,2-Dichlorobenzene	µg/L	grab	Semiannually
1,3-Dichlorobenzene	µg/L	grab	Semiannually
1,4-Dichlorobenzene	µg/L	grab	Semiannually
Diethyl Phthalate	µg/L	grab	Semiannually
Dimethyl Phthalate	µg/L	grab	Semiannually
Di-n-butyl Phthalate	µg/L	grab	Semiannually
Fluoranthene	µg/L	grab	Semiannually
Fluorene	µg/L	grab	Semiannually
Hexachlorobenzene	µg/L	grab	Semiannually
Hexachlorobutadiene	µg/L	grab	Semiannually
Hexachloroethane	µg/L	grab	Semiannually
Naphthalene	µg/L	grab	Semiannually
Nitrobenzene	µg/L	grab	Semiannually
Phenanthrene	µg/L	grab	Semiannually
Pyrene	µg/L	grab	Semiannually
1,2,4-Trichlorobenzene	µg/L	grab	Semiannually
3,4-Benzofluoranthene	µg/L	grab	Semiannually
4,6-Dinitro-o-cresol	µg/L	grab	Semiannually
Toxicity-acute	% survival	grab	Semiannually
Toxicity-chronic	TU _c	grab	Semiannually

(b) Effluent Monitoring for Reasonable Potential Determination

As discussed earlier, the Regional Board issued a letter on February 21, 2002 that required Plaskolite to monitor for priority pollutants regulated in the CTR, and submit the data by May 22, 2003. According to Section 1.3 of the SIP, if data are unavailable or insufficient to conduct the RPA, the Regional Board must establish interim requirements that require additional monitoring for the pollutants in place of a WQBEL. Upon completion of the required monitoring, the Regional Board must use the gathered data to conduct the RPA and determine if a WQBEL is required. As prescribed in the Monitoring and Reporting Program, the Regional Board shall require periodic monitoring for pollutants for which criteria or objectives apply and for which no effluent limitations have been established.

This interim monitoring shall occur at the following locations:

- Effluent discharge point (Discharge No. 001).
- Receiving water. The monitoring stations shall be at 50 feet upstream from the discharge point.

The required monitoring frequency and type of sample of the effluent and the receiving water for toxic pollutants are listed below:

Constituent	Units	Type of Sample	Monitoring Frequency
pH	Standard Units	grab	monthly
Hardness (as CaCO ₃)	mg/L	grab	monthly
PAHs	µg/L	grab	Semiannually
Antimony	µg/L	grab	Semiannually
Arsenic	µg/L	grab	Semiannually
Beryllium	µg/L	grab	Semiannually
Cadmium	µg/L	grab	Semiannually
Chromium (III)	µg/L	grab	Semiannually
Chromium (VI)	µg/L	grab	Semiannually
Copper	µg/L	grab	Semiannually
Lead	µg/L	grab	Semiannually
Mercury	µg/L	grab	Semiannually
Nickel	µg/L	grab	Semiannually
Selenium	µg/L	grab	Semiannually
Silver	µg/L	grab	Semiannually
Thallium	µg/L	grab	Semiannually
Zinc	µg/L	grab	Semiannually
Cyanide	µg/L	grab	Semiannually
Asbestos	µg/L	grab	Semiannually
Acrolein	µg/L	grab	Semiannually
Acrylonitrile	µg/L	grab	Semiannually
Benzene	µg/L	grab	Semiannually
Bromoform	µg/L	grab	Semiannually
Carbon tetrachloride	µg/L	grab	Semiannually
Chlorobenzene	µg/L	grab	Semiannually
Chlorodibromomethane	µg/L	grab	Semiannually
Chloroethane	µg/L	grab	Semiannually
2-Chloroethylvinyl ether	µg/L	grab	Semiannually
Chloroform	µg/L	grab	Semiannually
Dichlorobromomethane	µg/L	grab	semiannually
1,1-Dichloroethane	µg/L	grab	semiannually
1,2-Dichloroethane	µg/L	grab	semiannually
1,1-Dichloroethylene	µg/L	grab	semiannually
1,2-Dichloropropane	µg/L	grab	semiannually
1,3-Dichloropropylene	µg/L	grab	semiannually
Ethylbenzene	µg/L	grab	semiannually
Methyl bromide	µg/L	grab	semiannually
Methyl chloride	µg/L	grab	semiannually
Methylene chloride	µg/L	grab	semiannually
1,1,2,2-Tetrachloroethane	µg/L	grab	semiannually
Tetrachloroethylene	µg/L	grab	semiannually

Constituent	Units	Type of Sample	Monitoring Frequency
Toluene	µg/L	grab	semiannually
1,2-Trans-dichloroethylene	µg/L	grab	semiannually
1,1,1-Trichloroethane	µg/L	grab	semiannually
1,1,2-Trichloroethane	µg/L	grab	semiannually
Trichloroethylene	µg/L	grab	semiannually
Vinyl chloride	µg/L	grab	semiannually
2-Chlorophenol	µg/L	grab	semiannually
2,4-Dichlorophenol	µg/L	grab	semiannually
2,4-Dimethylphenol	µg/L	grab	semiannually
2-Methyl-4,6-Dinitrophenol	µg/L	grab	semiannually
2,4-Dinitrophenol	µg/L	grab	semiannually
2-Nitrophenol	µg/L	grab	semiannually
4-Nitrophenol	µg/L	grab	semiannually
3-Methyl-4-Chlorophenol	µg/L	grab	semiannually
Pentachlorophenol	µg/L	grab	semiannually
Phenol	µg/L	grab	semiannually
2,4,6-Trichlorophenol	µg/L	grab	semiannually
Acenaphthene	µg/L	grab	semiannually
Acenaphthylene	µg/L	grab	semiannually
Anthracene	µg/L	grab	semiannually
Benidine	µg/L	grab	semiannually
Benzo (a) Anthracene	µg/L	grab	semiannually
Benzo (a) Pyrene	µg/L	grab	semiannually
Benzo (b) Fluoranthene	µg/L	grab	semiannually
Benzo (g,h,i) Perylene	µg/L	grab	semiannually
Benzo (k) Flouranthene	µg/L	grab	semiannually
Bis (2-Chloroethoxy) Methane	µg/L	grab	semiannually
Bis (2-Chloroethyl) Ether	µg/L	grab	semiannually
Bis (2-Chloroisopropyl) Ether	µg/L	grab	semiannually
Bis (2-Ethylhexyl) Phthalate	µg/L	grab	semiannually
4-Bromophenyl Phenyl Ether	µg/L	grab	semiannually
Butylbenzyl Phthalate	µg/L	grab	semiannually
2-Chloronapthalene	µg/L	grab	semiannually
4-Chlorophenyl Phenyl Ether	µg/L	grab	semiannually
Chrysene	µg/L	grab	semiannually
Dibenzo (a,h) Anthracene	µg/L	grab	semiannually
1,2-Dichlorobenzene	µg/L	grab	semiannually
1,3-Dichlorobenzene	µg/L	grab	semiannually
1,4-Dichlorobenzene	µg/L	grab	semiannually
3,3'-Dichlorobenzidine	µg/L	grab	semiannually
Diethyl Phthalate	µg/L	grab	semiannually
Dimethyl Phthalate	µg/L	grab	semiannually
Di-n-Butyl Phthalate	µg/L	grab	semiannually
2,4-Dinitrotoluene	µg/L	grab	semiannually
2,6-Dinitrotoluene	µg/L	grab	semiannually
Di-n-Octyl Phthalate	µg/L	grab	semiannually
1,2-Diphenylhydrazine	µg/L	grab	semiannually
Fluoranthene	µg/L	grab	semiannually
Fluorene	µg/L	grab	semiannually
Hexachlorobenzene	µg/L	grab	semiannually

Constituent	Units	Type of Sample	Monitoring Frequency
Hexachlorobutadiene	µg/L	grab	semiannually
Hexachlorocyclopentadiene	µg/L	grab	semiannually
Hexachloroethane	µg/L	grab	semiannually
Indeno (1,2,3-cd) Pyrene	µg/L	grab	semiannually
Isophorone	µg/L	grab	semiannually
Napthalene	µg/L	grab	semiannually
Nitrobenzene	µg/L	grab	semiannually
N-Nitrosodimethylamine	µg/L	grab	semiannually
N-Nitrosodi-n-Propylamine	µg/L	grab	semiannually
N-Nitrosodiphenylamine	µg/L	grab	semiannually
Phenanthrene	µg/L	grab	semiannually
Pyrene	µg/L	grab	semiannually
1,2,4-Trichlorobenzene	µg/L	grab	semiannually
Aldrin	µg/L	grab	semiannually
alpha-BHC	µg/L	grab	semiannually
beta-BHC	µg/L	grab	semiannually
gamma-BHC	µg/L	grab	semiannually
delta-BHC	µg/L	grab	semiannually
Chlordane	µg/L	grab	semiannually
4,4'-DDT	µg/L	grab	semiannually
4,4'-DDE	µg/L	grab	semiannually
4,4'-DDD	µg/L	grab	semiannually
Dieldrin	µg/L	grab	semiannually
alpha-Endosulfan	µg/L	grab	semiannually
beta-Endosulfan	µg/L	grab	semiannually
Endosulfan Sulfate	µg/L	grab	semiannually
Endrin	µg/L	grab	semiannually
Endrin Aldehyde	µg/L	grab	semiannually
Heptachlor	µg/L	grab	semiannually
Heptachlor Epoxide	µg/L	grab	semiannually
Polychlorinated Biphenyls ¹	µg/L	grab	semiannually
Toxaphene	µg/L	grab	semiannually

¹ The sum of Arochlors 1242, 1254, 1221, 1232, 1248, 1260, and 1016.

In accordance with Section 3 of the SIP, the Discharger is also required to conduct effluent/receiving water monitoring for the presence of the 2,3,7,8-tetrachlorodibenzo-p-dioxin (TCDD or Dioxin) congeners. The monitoring shall be a grab sample with a minimum frequency of once during dry weather and once during wet weather for 1 year. The Discharger is required to calculate Toxic Equivalence (TEQ) for each congener by multiplying its analytical concentration by the appropriate Toxicity Equivalence Factors (TEF) provided below.

Congeners	TEF
2,3,7,8-tetra CDD	1.0
1,2,3,7,8-penta CDD	1.0
1,2,3,4,7,8-hexa CDD	0.1
1,2,3,6,7,8-hexa CDD	0.1
1,2,3,7,8,9-hexa CDD	0.1
1,2,3,4,6,7,8-hepta CDD	0.01

Octa CDD	0.0001
2,3,7,8-tetra CDF	0.1
1,2,3,7,8-penta CDF	0.05
2,3,4,7,8-penta CDF	0.5
1,2,3,4,7,8-hexa CDF	0.1
1,2,3,6,7,8-hexa CDF	0.1
1,2,3,7,8,9-hexa CDF	0.1
2,3,4,6,7,8-hexa CDF	0.1
1,2,3,4,6,7,8-hepta CDF	0.01
1,2,3,4,7,8,9-hepta CDF	0.01
Octa CDF	0.0001

(c) Receiving Water Monitoring

In addition to the requirements for monitoring the receiving water described in (b) above, Plaskolite will be required to perform general observations of the receiving water when discharges occur and report the observations in the quarterly monitoring report. The Regional Board in assessing potential impacts of future discharges will use data from these observations. If no discharge occurred during the observation period, this shall be reported. Observations shall be descriptive where applicable, such that colors, approximate amounts, or types of materials are apparent. The following observations are required:

- Tidal stage, time, and date of monitoring;
- Weather conditions;
- Color of water;
- Appearance of oil films or grease, or floatable materials;
- Extent of visible turbidity or color patches;
- Direction of tidal flow;
- Description of odor, if any, of the receiving water; and
- Presence and activity of California Least Tern and California Brown Pelican.