



Winston H. Hickox
Secretary for
Environmental
Protection

California Regional Water Quality Control Board Los Angeles Region

(50 Years Serving Coastal Los Angeles and Ventura Counties)

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Gray Davis
Governor

August 3, 2001

Mr. Brude C. Amig
Coltec Industries Inc.
2550 W. Tyvola Road
Charlotte, NC 28217

Dear Mr. Amig:

REQUIREMENT FOR MONITORING OF PRIORITY POLLUTANTS REGULATED IN THE CALIFORNIA TOXIC RULE – Coltec Industries Inc., Former Menasco Aerosystem, Burbank (Order No. 99-088, NPDES No. CA0064319, CI-8044)

On March 2, 2000, the State Water Resources Control Board (SWRCB) adopted the *Policy for Implementation of Toxic Standards (SIP) for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (Policy). The Policy implements the provisions promulgated by the U.S. Environmental Protection Agency in National Toxics Rule [40 CFR 136.36] and the California Toxics Rule (CTR) [40 CFR 131.38]. Criteria for 126 priority pollutants are established by the CTR. The SIP requires the Regional Water Quality Control Board (Regional Board) to conduct reasonable potential analysis (RPA) to determine whether a discharge may: (1) cause, (2) have a reasonable potential to cause, or (3) contribute to an excursion above any applicable priority pollutant objective. If the RPA determines that a limitation for a priority pollutant is required, the Regional Board will establish an appropriate limitation for that pollutant.

In accordance with Section 13267 of the California Water Code, dischargers must submit data to the Regional Board to: (1) determine if water quality-based effluent limitations for priority pollutants are required; and (2) to calculate effluent limitations, if required. The policy further provides that the time schedule for providing the data shall be as short as practicable but not to exceed three years from the effective date of the SIP, which was May 22, 2000.

A. Reasonable Potential Analyses (RPA) Data Requirement

The following data must be compiled to perform an RPA, and, if necessary, to develop effluent limits:

- The concentration of each priority pollutant in the effluent at the point of discharge;
- The concentration of each pollutant in the receiving water upstream of the point of discharge;
- The flow rate of the receiving water at the time of sampling (if discharge is to a river or creek);
- The pH of the receiving water;
- The hardness of the receiving water; and,
- The salinity of the receiving water.

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The RPA and effluent limit calculations are statistically based. Thus, the more data sets used in the calculations, the better would be the results of the analyses. Normally ten data sets are necessary to perform an RPA. However, to minimize monitoring and analytical costs dischargers will be allowed to submit seven quarters of monitoring and analysis data for this purpose.

B. Reasonable Potential Monitoring Program

Pursuant to CWC Section 13267, Coltec Industries Inc. is hereby directed to conduct seven quarters (from August 2001 to March 2003) of effluent and receiving water sampling/monitoring for all the constituents listed in Attachment A.

- The effluent sample shall be collected at the end of discharge pipe from your facility.
- You must monitor your effluent and receiving water for the presence of the 17 congeners of 2,3,7,8-TCDD listed in Attachment A, once during the dry weather and once during the wet weather (a total of two samples) during this period. You must report for each congener the analytical results of the effluent monitoring, including the quantifiable limit and the Method Detection Limit (MDL), and the measured or estimated concentration. You must multiply each measured or estimated congener concentration by its respective Toxicity Equivalent Factors (TEFs) and report the sum of these values.
- The receiving water samples shall be collected upstream of the effluent discharge point in the receiving water outside the influence of the discharge. Where feasible receiving water sample should be collected 50 feet upstream of the effluent discharge point.

You may conduct the quarterly/semi-annually sampling during the periods prescribed in the monitoring and reporting section of your current permit, but the data must be submitted according to the Monitoring and Reporting Schedule in Section C of this correspondence. However, if quarterly/semi-annually sampling is not required in your current permit, you must sample your effluent and the receiving water, and submit a report according to the Monitoring and Reporting Schedule in Section C, below. Please note that the report for this required monitoring must be submitted separately from the regular discharger self-monitoring reports.

C. Reasonable Potential Reporting Program

The RPA monitoring reports must be submitted every quarter according to the schedule below:

Monitoring and Reporting Schedule	
Monitoring Period	Report Due Date
January – March	April 15
April – June	July 15
July – September	October 15
October – December	January 15
Semi-annual sampling (to be conducted during October to March, and during April to September)	April 15 & October 15, respectively

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D. Reasonable Potential Monitoring Provisions

- SWRCB-approved laboratory methods and the corresponding minimum levels (MLs) for the examination of each priority pollutant are listed in Attachment B of this letter. Reporting requirements for the data to be submitted are listed in Attachment C of this letter. We recommend that you select analytical method from Attachment A capable of achieving the lowest ML for each pollutant as listed on Attachment B. ML is necessary for determining compliance for a priority pollutant when an effluent limit is below the MDL.
- The laboratory analytical data shall include applicable MLs, MDL, quality assurance/quality control data, and shall comply with the reporting requirements contained in the Attachments B & C.
- The first and last monitoring data under this program are due **October 15, 2001 and April 15, 2003**, respectively to this Regional Board. The last monitoring data shall include all the analytical data from the previous sampling events under this program. You must provide these analytical results in both **electronic format** (available as a **Microsoft Excel Spreadsheet** on our Web site <http://www.swrcb.ca.gov/rwqcb4/>) and in **paper format**.
- Please forward all monitoring data/report to the Regional Board, Attn: Industrial Permitting Unit, and please include a reference to "Compliance File No. CI-8044 and NPDES No. CA0064319.

Pursuant to Section 13268 of the CWC, failure to conduct the required monitoring and/or to provide the required information in a timely manner may result in civil liability imposed by the Regional Board in an amount not to exceed one thousand dollars (\$1000) for each day the information is not received.

Attached for your information is a copy of answers to some of the most frequently asked questions. If you have any other questions, please contact Harry Nguyen at (213) 576-6658 or fax your questions to (213) 576-6660.

Sincerely,



Dennis A. Dickerson
Executive Officer

Enclosures: Attachment "A" – Priority Pollutants Analytical Methods Table
Attachment "B" – SWRCB Minimum Levels
Attachment "C" – Example Data Format

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