CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

TIME SCHEDULE ORDER NO. R5-2006-0097-01
As Amended by Order No. R5-2010-0906

REQUIRING
LINDA COUNTY WATER DISTRICT
WASTEWATER TREATMENT PLANT
YUBA AND SUTTER COUNTIES

TO COMPLY WITH REQUIREMENTS PRESCRIBED IN ORDER NO. R5-2006-0096
(NPDES PERMIT NO. CA0079651)

The California Regional Water Quality Control Board, Central Valley Region, (hereafter Regional Water Board) finds that:

1. On 22 September 2006, the Regional Water Board adopted Waste Discharge Requirements (WDRs) Order No. R5-2006-0096, prescribing waste discharge requirements for the Linda County Water District Wastewater Treatment Plant in Yuba and Sutter Counties (hereafter Discharger).

2. WDRs Order No. R5-2006-0096 contains Final Effluent Limitations in Section IV.A.1.a., which read, in part, as follows:

   a. Upon commencement of discharge from the proposed diffuser at EFF-001 or 18 May 2010, whichever is sooner, the discharge of treated wastewater to the Feather River shall maintain compliance with the following effluent limitations:

Parameter [1]	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Bis (2-ethylhexyl) phthalate	ug/L	1.8	--	4.1	--	--
	lbs/day [2]	0.075	--	0.17	--	--
Chromium (VI), Total Recoverable	ug/L	8.1	--	16	--	--
	lbs/day [2]	0.34	--	0.68	--	--
Copper, Total Recoverable	ug/L	2.4	--	4.5	--	--
	lbs/day [2]	0.10	--	0.19	--	--
Cyanide. Total Recoverable	ug/L	4.3	--	8.5	--	--
	lbs/day [2]	0.18	--	0.36	--	--
Dibenzo(a,h) anthracene	ug/L	0.0044	--	0.0088	--	--
	lbs/day [2]	0.00018	--	0.00037	--	--
Dichlorobromomethane	ug/L	2.6	--	5.3	--	--
Lead, Total Recoverable	ug/L	0.43	--	1.2	--	--
	lbs/day [2]	0.018	--	0.052	--	--
Tetrachloroethene	ug/L	21	--	56	--	--
Zinc, Total Recoverable	ug/L	21	--	43	--	--
	lbs/day [2]	0.88	--	1.8	--	--

[1] Monitoring of Eff-002 for compliance with the effluent limitations is required until the treatment/disposal ponds located within the Feather River levees are permanently closed

[2] Based upon a design capacity of 5.0 mgd.

3. WDRs Order No. R5-2006-0096 contains Interim Effluent Limitations – Discharge Point EFF-002, Section IV.A.2.a, which reads, in part, as follows:

"2. Interim Effluent Limitations – Discharge Point EFF-002

*a. During the period beginning **upon the effective date of this Order** and ending **upon commencement of discharge from the proposed diffuser at EFF-001 or 18 May 2010, whichever is sooner,** the discharge of treated wastewater shall maintain compliance with the following priority pollutant limitations at EFF-002…"*

Parameter [1]	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Bis (2-ethylhexyl) phthalate	ug/L	84	--	190	--	--
	lbs/day [1]	1.3	--	2.9	--	--
Chromium (VI), Total Recoverable	ug/L	60	--	120	--	--
	lbs/day [1]	0.91	--	1.8	--	--
Copper, Total Recoverable	ug/L	44	--	84	--	--
	lbs/day [1]	0.67	--	1.3	--	--
Cyanide. Total Recoverable	ug/L	97	--	200	--	--
	lbs/day [1]	1.5	--	2.9	--	--
Dibenzo(a,h) anthracene	ug/L	0.37	--	0.73	--	--
	lbs/day [1]	0.0055	--	0.011	--	--
Dichlorobromomethane	ug/L	2.6	--	5.3	--	--
Lead, Total Recoverable	ug/L	6.8	--	20	--	--
	lbs/day [1]	0.10	--	0.30	--	--
Tetrachloroethene	ug/L	21	--	56	--	--
Zinc, Total Recoverable	ug/L	240	--	490	--	--
	lbs/day [1]	3.6	--	7.4	--	--

[1]. Based upon a design treatment capacity of 1.8 mgd.

4. WDRs Order No. R5-2006-0096 contains Interim Effluent Limitations – Discharge Point EFF-002, Section IV.A.2 which reads, in part, as follows:

"2. Interim Effluent Limitations – Discharge Point EFF-002

*b. During the period beginning **upon the effective date of this Order** and ending **upon commencement of discharge from the proposed diffuser at EFF-001 or 21 September 2011, whichever is sooner**, the discharge of treated wastewater shall maintain compliance with the following limitations at EFF-002, with compliance measured at Monitoring Location EFF-002 as described in the attached Monitoring and Reporting Program (Attachment E). These interim effluent limitations shall apply in lieu of the corresponding final effluent limitations specified for the same parameters during the time period indicated in this provision.*

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Aluminum	µg/L	*74*	--	*140*	--	--
Diazinon	µg/L	*0.040*	--	*0.080*	--	--
	lbs/day	*0.00060*	--	*0.0012*	--	--
Iron, Total Recoverable	µg/L	*300*	--	--	--	--
Manganese, Total Recoverable	µg/L	*50*	--	--	--	--
Methoxychlor	µg/L	--	--	--	--	*0.03*
Organochlorine Pesticides	µg/L	--	--	--	--	*ND*[1]

1. The non-detectable (ND) limitation applies to each individual pesticide. No individual pesticide may be present in the discharge at detectable concentrations. The Discharger shall use USEPA standard analytical techniques with detection limits equal to or less than the lowest minimum level published in Appendix 4 of the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (known as the State Implementation Plan or SIP).

***iv. Total Ammonia**: Effluent total ammonia (as N) shall not exceed the following from 1 April through 31 October:*

a) 1.22 mg/L as a monthly average;
b) 18.3 lbs/day as a monthly average;
c) 5.62 mg/L as a one-hour average; and
d) 84.4 lbs/day as a one-hour average.

***Total Ammonia**: Effluent total ammonia (as N) shall not exceed the following from 1 November through 31 March:*

e) 1.80 mg/L as a monthly average;
f) 27.0 lbs/day as a monthly average;
g) 5.62 mg/L as a one-hour average; and
h) 84.4 lbs/day as a one-hour average.

5. The effluent limitations specified in Order No. R5-2006-0096 for aluminum, ammonia, and methoxychlor are based on the Basin Plan narrative toxicity objective; the effluent limitations for iron and manganese are based on the Basin Plan chemical constituents objective; the effluent limitations for organochlorine pesticides are based on the Basin Plan pesticides objectives; and the effluent limitations for diazinon are based on the site-specific Basin Plan objective and waste load allocation for diazinon in the lower Feather River. With the exception of the site-specific objective and waste load allocation for diazinon, these limitations are based on existing Basin Plan water quality objectives that were adopted prior to 25 September 1995. The Basin Plan deadline for compliance with the waste load allocation for diazinon is 30 June 2008. Effluent limitations for these pollutants are new limitations that were not prescribed in previous Order No. 5-00-165, adopted by the Regional Water Board on 16 June 2000.

6. The effluent limitations specified in Order No. R5-2006-0096 for bis (2-ethylhexyl) phthalate, chromium VI, copper, cyanide, dibenzo (a,h) anthracene, dichlorobromomethane, lead, tetrachloroethene, and zinc are based on the California Toxics Rule (CTR).

7. On 29 August 2008 the Discharger submitted a Pollution Prevention Plan (PPP) for the parameters listed in Time Schedule Order No. R5-2006-0097; aluminum, ammonia, diazinon, iron, manganese, methoxychlor, and organochlorine pesticides as required in WDRs Order No. R5-2006-0096. A PPP was not required in the WDRs for bis (2-ethylhexyl) phthalate, chromium VI, copper, cyanide, dibenzo (a,h) anthracene, dichlorobromomethane, lead, tetrachloroethene, and zinc.

NEED FOR TIME SCHEDULE ORDER (TSO) AND LEGAL BASIS

8. The Discharger operates the Linda County Water District Wastewater Treatment Plant.

9. California Water Code (CWC) Section 13300 states: "*Whenever a regional board finds that a discharge of waste is taking place or threatening to take place that violates or will violate requirements prescribed by the regional board, or the state board, or that the waste collection, treatment, or disposal facilities of a discharger are approaching capacity, the board may require the discharger to submit for approval of the board, with such modifications as it may deem necessary, a detailed time schedule of specific actions the discharger shall take in order to correct or prevent a violation of requirements*."

10. Federal regulations, 40 CFR Part 122.44 (d)(1)(i), require that NPDES permit effluent limitations must control all pollutants which are or may be discharged at a level which will cause or have the reasonable potential to cause or contribute to an in-stream excursion above any State water quality standard, including any narrative criteria for water quality. Beneficial uses, together with their corresponding water quality objectives or promulgated water quality criteria, can be defined per federal regulations as water quality standards.

11. In accordance with CWC Section 13385(j)(3), the Regional Water Board finds that, based upon results of effluent monitoring, the Discharger is not able to consistently comply with the effluent limitations for aluminum, ammonia, diazinon, iron, manganese, methoxychlor, and organochlorine pesticides, nor with effluent limitations for bis (2-ethylhexyl) phthalate, chromium VI, copper, cyanide, dibenzo (a,h) anthracene, dichlorobromomethane, lead, and zinc. These limitations are new requirements that become applicable to the Order after the effective date of adoption of the waste discharge requirements, and after 1 July 2000, for which new or modified control measures are necessary in order to comply with the limitation, and the new or modified control measures cannot be designed, installed, and put into operation within 30 calendar days.

12. Immediate compliance with these new effluent limitations for aluminum, ammonia, diazinon, iron, manganese, methoxychlor, and organochlorine pesticides and for bis (2-ethylhexyl) phthalate, chromium VI, copper, cyanide, dibenzo (a,h) anthracene, dichlorobromomethane, lead, and zinc is not possible or practicable. The Clean Water Act and the California Water Code authorize time schedules for achieving compliance as soon as possible, up to a maximum duration of five (5) years, which is the maximum term of any NPDES permit. Enforcement orders such as Time Schedule Orders and Cease and Desist Orders may contain compliance schedules that extend beyond 5 years from the date of NPDES permit adoption.

13. Facilities can be built to correct the violations that would otherwise be subject to mandatory penalties under CWC Section 13385(h) and (i). The Discharger can take reasonable measures to achieve compliance within five (5) years. This Order provides a time schedule for the Discharger to develop, submit, and implement methods to achieve compliance or to construct necessary treatment facilities to meet these new effluent limitations.

14. The *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (SIP) requires compliance with California Toxics Rule (CTR) criteria no later than 18 May 2010. Organochlorine pesticides in the effluent (alpha BHC, aldrin, beta endosulfan, beta BHC, heptachlor, and lindane) have a reasonable potential to exceed CTR criteria. Compliance with the Basin Plan objective of no detectable organochlorine pesticides will result in compliance with the CTR. The SIP includes a compliance date of 18 May 2010 for CTR constituents; therefore this Order requires full compliance with the organochlorine pesticides objective and effluent limitation by 18 May 2010.

15. The Discharger has proposed to upgrade the WWTP to comply with the compliance dates in this Order.

16. Since the time schedule for completion of action necessary to achieve full compliance and bring the waste discharge into compliance exceeds one year, interim requirements and dates for their achievement are included in this Order. This Order includes interim, performance-based effluent limitations although the Discharger cannot identify and control the sources of aluminum, ammonia, diazinon, iron, manganese, methoxychlor, and organochlorine pesticides in the wastewater until implementation of the final compliance project. These interim effluent limitations consist of a maximum daily effluent concentration derived using effluent sample data summarized below and applying the statistical methodologies for estimating maximum concentrations identified in Chapter 3 of U.S. EPA's *Technical Support Document for Water Quality-based Toxics Control* (TSD). Derivation of these interim limitations is summarized below:

	Aluminum (µg/L)	***Ammonia (mg/L)***	***Diazinon (µg/L)***	***Iron (µg/L)***	***Manganese (µg/L)***	***Methoxychlor (µg/L)***	***Organochlorine Pesticides[1] (µg/L)***
Number of Observations	12	33	4	15	13	6	6-8
Maximum Concentration	470	27.2	0.36	275	3,200	0.093	ND-0.094
Coefficient of Variation[2]	0.495	0.475	0.600	0.319	2.82	2.29	0.600
Multiplier[3]	2.4	1.7	4.7	1.7	14	3.8	3.3-3.8
Projected Maximum Effluent Concentration[4]	1,120	46.78	1.7	466	45,768	0.355	0.729

1. Used individual, detected organochlorine pesticides and summed projected maximum effluent concentrations for each.
2. A default CV of 0.6 was used where the number of observations was less than 10.
3. The multiplying factor (for 99% confidence level and 99% probability basis) is dependent on the coefficient of variation (CV) and number of reported effluent results (From Table 3-1 of the U.S. EPA's *Technical Support Document for Water Quality-based Toxics Control*).
4. The projected Maximum Effluent Concentration is determined by multiplying the maximum detected concentration by a factor that accounts for statistical variation.

17. This time schedule does not exceed five years. Actions can be taken to correct the violations that would otherwise be subject to mandatory penalties under CWC Section 13385(h) and (i), and the Discharger can take reasonable measures to achieve compliance within five (5) years from the date the waste discharge requirements were required to be reviewed pursuant to CWC Section 13380.

18. The SIP requires compliance with CTR criteria no later than 18 May 2010. The CTR constituents Bis (2-ethylhexyl) phthalate, chromium VI, copper, cyanide, dibenzo (a,h) anthracene, dichlorobromomethane, lead, and zinc in the effluent have a reasonable potential to exceed CTR criteria. The SIP includes a compliance date of 18 May 2010 for CTR constituents. Because the treatment plant improvements and expansion have not been completed, compliance with the new effluent limitations for bis (2-ethylhexyl) phthalate, chromium VI, copper, cyanide, dibenzo (a,h) anthracene, dichlorobromomethane, lead, and zinc is not possible by 18 May 2010.

19. Since the time schedule for completion of action necessary to achieve full compliance and bring the waste discharge into compliance exceeds one year, interim requirements and dates for their achievement are included in this Order. This Order includes interim, performance-based effluent limitations although the Discharger cannot identify and control the sources of bis (2-ethylhexyl) phthalate, chromium VI, copper, cyanide, dibenzo (a,h) anthracene, dichlorobromomethane, lead, and zinc. This order also contains requirements for development and implementation of a PPP for bis (2-ethylhexyl) phthalate, chromium VI, copper, cyanide, dibenzo (a,h) anthracene, dichlorobromomethane, lead, and zinc

20. Analytical information collected to date for bis (2-ethylhexyl) phthalate, copper, cyanide, lead, and zinc indicate concentrations exceed the final effluent limitations but comply with the interim limitations in WDR Order No. R5-2006-0096 shown in Finding No. 3 of this Order

21. Analytical data to date for chromium VI, dibenzo(a,h)anthracene, and dichlorobromomethane, indicate that concentrations exceed both the final and the interim effluent limitations. Therefore, new performance based interim effluent limitations have been calculated by multiplying 3.11 times the MEC for each constituent. The MEC for chromium VI is 7.6 ug/L, the MEC for dibenzo(a,h)anthracene is 3.7 ug/L, and the MEC for dichlorobromomethane is 1.6 ug/L. The resulting performance-based interim effluent limitations are shown in the table below

Parameter	Units	Interim Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Chromium VI	ug/L	23.6	--	--	--	--
Dibenzo(a,h)anthracene	ug/L	11.5	--	--	--	--
Dichlorobromomethane	ug/L	5.0	--	--	--	--

22. CWC Section 13385(j)(3) requires the Discharger to prepare and implement a pollution prevention plan pursuant to Section 13263.3 of the California Water Code. A pollution prevention plan addresses only those constituents that can be effectively reduced by source control measures.

MANDATORY MINIMUM PENALTIES

23. The CWC Section 13385(h) and (i) require the Regional Water Board to impose mandatory minimum penalties (MMPs) upon dischargers that violate certain effluent limitations. CWC Section 13385(j) exempts certain violations from the mandatory minimum penalties. CWC Section 13385(j)(3) exempts the discharge from mandatory minimum penalties "*where the waste discharge is in compliance with either a cease and desist order issued pursuant to Section 13301 or a time schedule order issued pursuant to Section 13300, if all the [specified] requirements are met. …For the purposes of this subdivision, the time schedule may not exceed five years in length…*"

24. By statute, a Cease and Desist Order or Time Schedule Order may provide protection from MMPs for no more than five years. Compliance with this TSO exempts the Discharger from mandatory penalties for violations of Interim Effluent Limitations – Discharge Point EFF-002 IV.A.2 contained in Order No. R5-2006-0096 for aluminum, ammonia, diazinon, iron, manganese, methoxychlor, and organochlorine pesticides from 22 September 2006 until 21 September 2011; and bis (2-ethylhexyl phthalate, chromium VI, copper, cyanide, dibenzo (a,h) anthracene, dichlorobromomethane, lead, and zinc from 29 June 2010 until 21 September 2011, in accordance with CWC Section 13385(j)(3).

OTHER REGULATORY REQUIREMENTS

25. On 22 September 2006, in Rancho Cordova, California, after due notice to the Discharger and all other affected persons, the Regional Water Board conducted a public hearing at which evidence was received to consider a Time Schedule Order under California Water Code Section 13300 to establish a time schedule to achieve compliance with waste discharge requirements.

26. Issuance of this Order is exempt from the provisions of the California Environmental Quality Act (Public Resources Code Section 21000, *et seq*.), in accordance with California Water Code Section 15321 (a)(2), Title 14, of the California Code of Regulations.

27. Any person adversely affected by this action of the Board may petition the State Water Resources Control Board to review this action. The petition must be received by the State Water Resources Control Board, Office of the Chief Counsel, P.O. Box 100, Sacramento, CA 95812-0100, within 30 days of the date on which this action was taken. Copies of the law and regulations applicable to filing petitions will be provided on request.

IT IS HEREBY ORDERED THAT:

1. Pursuant to California Water Code Section 13300, the Linda County Water District shall comply with the following time schedule to ensure compliance with the aluminum, ammonia, diazinon, iron, manganese, methoxychlor, and organochlorine pesticides effluent limitations contained in WDRs Order No. R5 2006-0096 as described in the above Findings:

Task	Compliance Date
Progress Report/Implementation Schedule	**1 November 2006**
Submit Pollution Prevention Plan[1]	**1 January 2007**
Progress Reports[2]	**1 January and 1 July of each year**
Achieve Compliance with Organochlorine Pesticides Effluent Limitation	**18 May 2010**
Achieve Full Compliance	**21 September 2011**

1. The Pollution Prevention Plan shall be prepared for all constituents listed above and shall meet the requirements specified in California Water Code Section 13263.
2. The progress reports shall detail what steps have been implemented towards achieving compliance with waste discharge requirements, including construction progress, evaluate the effectiveness of the implemented measures and assess whether additional measures are necessary to meet the time schedule.

2. Discharge from the Linda County Water District WWTP at Discharge Point EFF-002 shall not exceed the following interim, performance-based effluent limitations:

Constituent	Units	Average Monthly Effluent Limitation
Aluminum, Total Recoverable	µg/L	1,100
Ammonia (as N)	mg/L	46.8
	lbs/day	703
Diazinon	µg/L	1.7
	lbs/day	0.026
Iron, Total Recoverable	µg/L	470
Manganese, Total Recoverable	µg/L	46,000
Methoxychlor	µg/L	0.36
Organochlorine Pesticides	µg/L	0.73

3. Pursuant to California Water Code Section 13300, the Linda County Water District shall comply with the following time schedule to ensure compliance with the bis (2-ethylhexyl) phthalate, chromium VI, copper, cyanide, dibenzo (a,h) anthracene, dichlorobromomethane, lead, and zinc effluent limitations contained in WDRs Order No. R5-2006-0096 as described in the above Findings:

Task	Compliance Date
Complete Construction of Facility upgrades and expansion	**21 September 2011**
Submit Pollution Prevention Plan[1]	**1 August 2010**
Progress Reports[2]	**1 January and 1 July of each year**
Achieve Full Compliance with Final Effluent Limitations for bis (2-ethylhexyl) phthalate, chromium VI, copper, cyanide, dibenzo (a,h) anthracene, dichlorobromomethane, lead, and zinc	**21 September 2011**

1. The Pollution Prevention Plan shall be prepared for all constituents listed above and shall meet the requirements specified in California Water Code Section 13263.
2. The progress reports shall detail what steps have been implemented towards achieving compliance with waste discharge requirements, including construction progress, evaluate the effectiveness of the implemented measures and assess whether additional measures are necessary to meet the time schedule.

4. Discharge from the Linda County Water District WWTP at Discharge Point EFF-002 shall not exceed the following interim, performance-based effluent limitations:

Constituent	Units	Average Monthly Effluent Limitation	Maximum Daily Effluent Limitation
Bis (2-ethylhexyl) phthalate	ug/L	84	190
	lbs/day [1]	1.3	2.9
Copper, Total Recoverable	ug/L	44	84
	lbs/day [1]	0.67	1.3
Cyanide. Total Recoverable	ug/L	97	200
	lbs/day [1]	1.5	2.9
Lead, Total Recoverable	ug/L	6.8	20
	lbs/day [1]	0.10	0.30
Zinc, Total Recoverable	ug/L	240	490
	lbs/day [1]	3.6	7.4
Chromium VI	ug/L	23.6	--
Dibenzo(a,h)anthracene	ug/L	11.5	--
Dichlorobromomethane	ug/L	5.0	--

1. Based on a design treatment capacity of 5.0 mgd.

5. If, in the opinion of the Executive Officer, the Discharger fails to comply with the provisions of this Order, the Executive Officer may apply to the Attorney General for judicial enforcement or issue a complaint for Administrative Civil Liability.

I, PAMELA C. CREEDON, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, Central Valley Region, on 22 September 2006, and amended on 29 June 2010.

Original Signed by

PAMELA C. CREEDON, Executive Officer

California Regional Water Quality Control Board
Central Valley Region
Katherine Hart, Chair

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Linda S. Adams
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

Approved

Author _____

Senior _____

Supervisor_____

16 July 2010

Mr. Douglas Lofton, Manager
Linda County Water District
1280 Scales St.
Marysville, CA 95901

CERTIFIED MAIL NO.
7009 1410 0002 1421 6150

NOTICE OF ISSUANCE
ORDER NO. R5-2010-0906
AMENDING TIME SCHEDULE ORDER NO. R5-2006-0097
NPDES PERMIT NO. CA0079651
FOR
LINDA COUNTY WATER DISTRICT
WASTEWATER TREATMENT PLANT
SUTTER AND YUBA COUNTIES

Enclosed is Order No. R5-2010-0906 (Order) which amends Time Schedule Order (TSO) No. R5-2006-0097 (NPDES Permit No. CA0079651) for Linda County Water District Wastewater Treatment Plant, issued by the Executive Officer by delegated authority of the California Regional Water Quality Control Board, Central Valley Region, on 29 June 2010.

Please note that Attachment 1 of the Order shows the amendments to TSO No. R5-2006-0097 in underline/strikeout format. A copy of the amended TSO No. R5-2006-0097-01 is also enclosed for your convenience.

All compliance and enforcement questions should be directed to Spencer Joplin at (916) 464-4660 or at sjoplin@waterboards.ca.gov. All technical reports and monitoring reports should be submitted to Spencer Joplin.

If you have any questions regarding changes to your permitted operations or about the amended TSO, please contact Elizabeth Thayer at (916) 464-4671 or at ethayer@waterboards.ca.gov.

Cliff Raley, P.E.
Senior Engineer

Enclosures: Order No. R5-2010-0906 w/Attachment 1
Amended Time Schedule Order No. R5-2006-0097-01

cc: Mr. Dave Smith, U.S. Environmental Protection Agency, Region IX, San Francisco
Mr. Phil Isorena, State Water Resources Control Board, Sacramento