INFORMATION SHEET

ORDER NO. R5-2007-_____
LOCKEFORD COMMUNITY SERVICES DISTRICT
WASTEWATER TREATMENT FACILITY
SAN JOAQUIN COUNTY

Background

The Lockeford Community Services District (CSD) is planning a Wastewater Treatment Facility (WWTF) expansion that will result in improved treatment, more flexibility in how the WWTF is operated, and lower waste constituent loading rates. The improvements will serve existing and future residential and commercial developments and will be completed in two projects: the Disposal Improvement Project and the Treatment Improvement Project, although some aspects of the Treatment Improvement Project will be performed sooner to improve present treatment.

The Wastewater Treatment Facility (WWTF) includes the wastewater treatment equipment, wastewater collection system, recycled water storage ponds, recycled water delivery system, and land application areas. The Discharger owns all the equipment and land Lockeford CSD is hereafter referred to as "Discharger."

The facility presently treats approximately 240,000 to 290,000 gallons per day (gpd). Initially, the flow limit in this Order will allow discharge of up to 300,000 gallons per day (gpd) to the existing facility. Upon completion of improvements and submittal of technical documents describing the improvements, the flow limit can be increased through submittal of a *Recycled Water Expansion Report* (RWER), which must be approved by the Executive Officer. This Order will allow the wastewater flow rate to increase to a maximum of 400,000 gpd.

The WWTF is located in three places. The Treatment Area is the location of the headworks, the Treatment Pond (Pond No. 1), and three wastewater storage ponds (Ponds No. 2, 3, and 4). An existing off-site Land Application Area (LAA) (LAA No. 1) is equipped with a storage pond (Pond No. 5). A second off-site land application area (LAA No. 2) is also planned and a storage pond is planned for that location (Pond No. 6), but the pond will not be constructed until the treatment improvements at the Treatment Area are scheduled to begin. Pond No. 5 requires deepening to provide adequate storage for the increased flow rate. None of the ponds are, or are planned to be, equipped with synthetic liners.

Wastewater Treatment

The treatment facility provides biological treatment in an oxidation pond. Present treatment capacity is in excess of 400,000 gpd. However, this Order limits the discharge flow rate to 300,000 gpd, as the wastewater system is limited by the disposal capacity. The Disposal Improvement Project will increase the disposal capacity to 400,000 gpd. To improve operational flexibility and reliability, the Discharger has also developed the Treatment Improvement Project. Each of those projects is described below.

The Disposal Improvement Project will be performed upon adoption of this Order. . The project includes the following: deepening an existing pond to increase storage capacity,

installation of groundwater monitoring wells, installation of disinfection equipment, preparing a new LAA for wastewater application, securing a legal covenant regarding land use with an adjacent property owner, and technical report preparation and submittal. The improvements will be described in a Disposal Improvement Project Report.

The Treatment Improvement Project will be performed based on treatment system performance criteria described in the WDRs. The project includes the following: construction of at least 17 million gallons (Mgal) of storage in a new pond located at LAA No. 2, conversion of an existing wastewater storage pond to a two-cell treatment pond, rehabilitation of the existing treatment pond and conversion to a two-cell treatment pond, and addition of two 10-horsepower mechanical aerators in the existing treatment pond. The addition of new aerators in the existing pond will be performed before the rest of the items in the Treatment Improvement Project.

Sludge will be allowed to accumulate in the treatment or storage ponds and will be removed on an as needed basis to maintain pond capacity and treatment effectiveness. There are two pump stations that deliver wastewater to the WWTF. One of the stations is equipped with an alarm, the other is visually inspected daily. This Order requires all new and existing lift stations to be equipped with alarms. Additional pump stations will be added as needed with new developments.

Land Application

The Discharger owns 133 acres of land application areas, but plans to apply wastewater to only 80 acres each year through a LAA rotation that will result in LAAs in use three out of five years. The fallow land will minimize the impact of salinity on groundwater quality. The water balance submitted in the RWD states the storage capacity required is 101 Million gallons (Mgal) (395 ac•ft) and 80-acres of LAA is required for the designed flow rate of 400,000 gallons per day (gpd).

Recycled water will be applied during spring, summer, and fall months, and if conditions allow, application during winter months is acceptable. Recycled water will be applied to cropped LAAs. Recycled water will be applied by flood irrigation but sprinkler irrigation is also acceptable if performed in accordance with the WDRs. Recycled water will be applied at crop uptake rates for both nitrogen and water application with a 47-percent irrigation efficiency. (Indicates 47-percent of wastewater applied is transpired by the crop). Irrigation tailwater will be controlled using perimeter berms, grading the area to prevent off-site drainage, and/or management controls. This Order requires that wastewater be disinfected to secondary standards before application to land. Therefore, stormwater runoff from the land application areas is acceptable if wastewater is not applied at least 24-hours before a precipitation event. The RWD states stormwater will be retained on-site at the land application areas to the extent possible to dilute concentrations of wastewater percolate.

Basin Plan, Beneficial Uses, and Regulatory Considerations

Surface water from the WWTF is to the Mokelumne River between Camanche Reservoir and the Delta. The beneficial uses are agricultural supply; water contact recreation; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; migration of aquatic organisms; spawning, reproduction, and/or early development; and wildlife habitat
The *Water Quality Control Plan for the California Regional Water Quality Control Board Central Valley Region, Fourth Edition* (Basin Plan), designates beneficial uses, establishes water quality objectives, and contains implementation plans and policies for all waters of the Basin. Beneficial uses often determine the water quality objectives that apply to a water body. For example, waters designated as municipal and domestic supply must meet the Maximum Contaminant Levels (MCLs) for drinking waters. The Basin Plan sets forth the applicable beneficial uses (industrial, agricultural, and domestic and municipal supply in this instance) of groundwater, procedure for application of water quality objectives, and the process for and factors to consider in allocating waste assimilation capacity.

Antidegradation

The antidegradation directives of State Water Board Resolution No. 68-16, "Statement of Policy With Respect to Maintaining High Quality Waters in California," or "Antidegradation Policy" require that waters of the State that are better in quality than established water quality objectives be maintained "consistent with the maximum benefit to the people of the State." Waters can be of high quality for some constituents or beneficial uses and not others. Policies and procedures for complying with this directive are set forth in the Basin Plan.

Resolution 68-16 is applied on a case-by-case, constituent-by-constituent basis in determining whether a certain degree of degradation can be justified. It is incumbent upon the Discharger to provide technical information for the Regional Board to evaluate that fully characterizes:

- All waste constituents to be discharged;
- The background water quality of the uppermost layer of the uppermost aquifer;
- The background quality of other waters that may be affected;
- The underlying hydrogeologic conditions;
- Waste treatment and control measures;
- How treatment and control measures are justified as best practicable treatment and control;
- The extent the discharge will impact the quality of each aquifer; and
- The expected degree of degradation below water quality objectives.

In allowing a discharge, the Regional Water Board must comply with CWC Section 13263 in setting appropriate conditions. The Regional Water Board is required, relative to the groundwater that may be affected by the discharge, to implement the Basin Plan and consider the beneficial uses to be protected along with the water quality objectives essential for that

purpose. The Regional Board need not authorize the full utilization of the waste assimilation capacity of the groundwater (CWC 13263(b)) and must consider other waste discharges and factors that affect that capacity.

Certain domestic wastewater constituents are not fully amenable to waste treatment and control and it is reasonable to expect some impact on groundwater. Some degradation for certain constituents is consistent with maximum benefit to the people of California because the technology, energy, water recycling, and waste management advantages of municipal utility service to the State far outweigh the environmental impact of a community that would otherwise be reliant on numerous concentrated individual wastewater systems. Economic prosperity of local communities is of maximum benefit to the people of California, and therefore sufficient reason to accommodate wastewater discharge provided terms of reasonable degradation are defined and met. The proposed Order authorizes some degradation consistent with the maximum benefit to the People of the State but does not authorize pollution (i.e., violation of any water quality objective).

Groundwater monitoring has been conducted at the site but the area monitored is large and additional investigation is needed at the off-site storage ponds and land application areas, and possibly at the Treatment Area; therefore staff is unable to establish the most appropriate groundwater limits. In addition, certain aspects of wastewater treatment and control practices may not be justified as representative of Best Practicable Treatment and Control (BPTC). Reasonable time is necessary to gather specific information about the WWTF to make informed, appropriate, long-term decisions. This Order, therefore, establishes interim groundwater limitations to assure protection of the beneficial uses of groundwater of the State pending the completion of certain tasks and provides time schedules to complete specified tasks. During this period, degradation may occur from certain constituents, but can never exceed water quality objectives (or natural background water quality should it exceed objectives) or cause nuisance.

According to the Basin Plan, water quality objectives define the least stringent limits that could apply as water quality limitations for groundwater at this location, except where natural background quality unaffected by the discharge of waste already exceeds the objective. The interim groundwater limits below apply numeric and narrative water quality objectives that must be met to maintain specific beneficial uses of groundwater. The constituents listed are those that are expected to be found in treated domestic wastewater or to be released from the soil upon the application of such waste. The *Policy for Application of Water Quality Objectives* in Chapter IV of the Basin Plan provides a mechanism to apply narrative objectives using relevant and appropriate numeric limits published by other agencies and organizations. Due to the expected high quality of natural background groundwater in the location of the discharge, numeric limits were selected so as to require that conditions of nuisance, adverse tastes and odors, toxicity, or impact to sensitive agricultural uses would not be expected to occur. For the same reason, where incorporated drinking water MCLs are expressed as ranges, limits were selected that represent no impact on the municipal or domestic supply beneficial use. Unless

natural background for a constituent proves to be higher, the groundwater quality limit established in proposed Order is the most stringent of the values for the listed constituents. Once the discharger provides information on background water quality and best practicable treatment or control, the groundwater limits may need to be adjusted (see *Reopener* below).

Constituent	Units	Limit	Beneficial Use	Water Quality Objective	Criteria or Justification
Ammonia	mg/L	1.5	MUN [1]	Tastes and Odors	Odor Threshold [2]
Boron	mg/L	0.7	AGR [3]	Chemical Constituents	Protect sensitive crops [4]
	mg/L	1.0	MUN[1]	Toxicity	Calif. Drinking Water Notification Level based on toxicity[11]
Chloride	mg/L	106	AGR [3]	Chemical Constituents	Sensitivity of certain crops irrigated via sprinklers [4]
Chloride (cont.)	mg/L	142	AGR [3]	Chemical Constituents	Chloride sensitivity on certain crops [4]
	mg/L	250	MUN [1]	Chemical Constituents	Recommended Secondary MCL [5]
	mg/L	500	MUN [1]	Chemical Constituents	Upper Secondary MCL [5]
Iron	mg/L	0.3	MUN [1]	Chemical Constituents	Secondary MCL [6]
Manganese	mg/L	0.05	MUN [1]	Chemical Constituents	Secondary MCL [6]
Nitrate plus Nitrite as N	mg/L	10	MUN [1]	Chemical Constituents	Primary MCL [7]
Nitrite as N	mg/L	1	MUN [1]	Chemical Constituents	Primary MCL [7]
Sodium	mg/L	69	AGR [3]	Chemical Constituents	Sensitivity of certain crops [4]
Total Dissolved Solids	mg/L	450[8]	AGR [3]	Chemical Constituents	Crop sensitivity [4]
	mg/L	500	MUN [1]	Chemical Constituents	Recommended Secondary MCL [5]
	mg/L	1,000	MUN [1]	Chemical Constituents	Upper Secondary MCL [5]
Total Coliform Organisms	MPN/100 ml	<2.2	MUN [1]	Bacteria	Basin Plan and non-detect
Trihalomethanes	ug/L	80	MUN [1]	Chemical Constituents	MCL [8]
Bromoform	ug/L	4	MUN [1]	Toxicity	USEPA IRIS Cancer Risk Level [9]
Bromodichloromethane	ug/L	0.27	MUN [1]	Toxicity	Cal/EPA Cancer Potency Factor [12]

Constituent	Units	Limit	Beneficial Use	Water Quality Objective	Criteria or Justification
Chloroform	ug/L	1.1	MUN [1]	Toxicity	Cal/EPA Cancer Potency Factor [12]
Dibromochloromethane	ug/L	0.37	MUN [1]	Toxicity	Cal/EPA Cancer Potency Factor [12]
pH	pH Units	6.5 to 8.5	MUN [1]	Chemical Constituents	Secondary MCL [10]
		6.5 to 8.4	AGR [3]	Chemical Constituents	Protect sensitive crops [4]

1 Municipal and domestic supply
2 J.E. Amoore and E. Hautala, *Odor as an Aid to Chemical Safety: Odor Thresholds Compared with Threshold Limit Values and Volatilities for 214 Industrial Chemicals in Air and Water Dilution*, Journal of Applied Toxicology, Vol. 3, No. 6 (1983).
3 Agricultural supply
4 Ayers, R. S. and D. W. Westcot, Water Quality for Agriculture, Food and Agriculture Organization of the United Nations – Irrigation and Drainage Paper No. 29, Rev. 1, Rome (1985)
5 Title 22, California Code of Regulations (CCR), Section 64449, Table 64449-B which is incorporated by reference into the Basin Plan.
6 Title 22, CCR, Section 64449, Table 64449-A which is incorporated by reference into the Basin Plan.
7 Title 22, CCR, Section 64431, Table 64431-A which is incorporated by reference into the Basin Plan.
8 Title 22, CCR, Section 64439, which applies the narrative objective to fully protect the cited beneficial use.
9 USEPA Integrated Risk Information System, http://www.epa.gov/iris.
10 Title 40, Code of Federal Regulations, Section 143.3, which applies the narrative objective to fully protect the cited beneficial use.
11 California Department of Health Services, Division of Drinking Water and Environmental Management, Drinking Water Notification Levels, http://www.dhs.ca.gov/ps/ddwem.
12 CAL/EPA Toxicity Criteria Database (OEHHA), http://www.oehha.org/risk/ChemicalDB.

Domestic wastewater contains numerous dissolved organic and inorganic constituents that together comprise Total Dissolved Solids (TDS). Each component constituent is not individually critical to any beneficial use. Critical constituents are individually listed. The cumulative impact from the other constituents, along with the cumulative affect of the constituents that are individually listed can be effectively controlled using TDS as a generic indicator parameter. The relevant numerical water quality limit for salinity is 450 mg/L, and is used through Basin Plan procedures to apply the narrative Chemical Constituents water quality objective for the protection of agricultural supply, the beneficial use most sensitive to TDS. This limit assumes no impact on sensitive agricultural uses, consistent with the high quality of expected natural background water quality in the area of the discharge. Most individual salt components can safely be assumed to be proportionately low such that TDS can be an effective indicator parameter in their regulation.

Not all TDS constituents pass through the treatment process and soil profile in the same manner or rate. Chloride tends to pass through both rapidly to groundwater. As chloride concentrations in most groundwaters in the region are much lower than in treated municipal wastewater, chloride is a useful indicator parameter for evaluating the extent to which effluent reaches groundwater. Boron is another TDS constituent that may occur in wastewater in concentrations greater than groundwater depending on the source water and the extent

residents use cleaning products containing boron. Other indicator constituents for monitoring for groundwater degradation due to recharged effluent include total coliform bacteria, ammonia and total nitrogen, and Total Trihalomethanes (TTHMs), a by-product of chlorination.

A Groundwater Limitation for chloroform is included in this Order and is based on the Basin Plan Toxicity objective and OEHHA Toxicity Criteria for the protection of human health. The Office of Environmental Health Hazard Assessment (OEHHA) has published and maintains the Toxicity Criteria Database, which contains cancer potency factors for chemicals, including chloroform, that have been used as a basis for regulatory actions by the boards, departments and offices within the California Environmental Protection Agency (Cal/EPA). The cancer potency factor for oral exposure to chloroform in this database is 0.031 milligrams per kilogram body weight per day (mg/kg-day). By applying standard toxicologic assumptions used by OEHHA, USEPA and other environmental agencies in evaluating health risks via drinking water exposure (i.e., 70 kg body weight and 2 liters per day water consumption), this cancer potency factor is equivalent to a concentration in drinking water of 1.1 ug/L (ppb) at the 1-in-a-million cancer risk level. The 1-in-a-million risk level is consistent with that used by the California Department of Public Health (CDPH) to set *de minimis* risks from involuntary exposure to carcinogens in drinking water in the development of drinking water MCLs and Action Levels and by OEHHA to set negligible cancer risks in the development of Public Health Goals for drinking water. The one-in-a-million cancer risk level is also mandated by USEPA in applying human health protective criteria contained in the National Toxics Rule and the California Toxics Rule for priority toxic pollutants in California surface waters.

Similarly, Groundwater Limitations for bromodichloromethane and dibromochloromethane are included in this Order and are based on the Basin Plan Toxicity objective and the Cal/EPA cancer potency factor. Ther Groundwater Limitation for bromoform included in this Order is based on the Basin Plan Toxicity objective and USEPA IRIS cancer risk level for the protection of human health. The U.S. Environmental Protection Agency maintains the Integrated Risk Information System (IRIS), which contains concentrations of constituents in drinking water associated with specified cancer risk levels. The Groundwater Limitations for bromoform, bromodichloromethane, and dibromochloromethane were also based on the 1-in-a-million risk level. Assumptions and rationale for selection of these limitations are identical to those discussed above for chloroform.

Treatment Technology and Control

Given the character of domestic wastewater, secondary treatment technology is generally sufficient to control degradation of groundwater from decomposable organic constituents. Adding disinfection significantly reduces populations of pathogenic organisms, and reasonable soil infiltration rates and unsaturated soils can reduce them further. Neither organics nor total coliform organisms, the indicator parameter for pathogenic organisms, should be found in groundwater in a well-designed, well-operated facility. The bacteria objective in the Basin Plan, cited as a groundwater limitation in the order, is equivalent to requiring that coliform

organisms not be detected in groundwater. Because all stormwater will not be prevented from running off the land application areas disinfection of wastewater is required. Chlorine disinfection of effluent causes formation of trihalomethanes, which are toxic priority pollutants. Treatment to reduce these in wastewater generally has not been performed, and little is known at this point on the typical impact on groundwater. Because the Discharger did not disinfect wastewater previously, THMs are unlikely to exist in groundwater at the site. However, the Discharger will begin disinfecting wastewater prior to storage or application at the off-site land application areas. As a result, groundwater monitoring of land application areas includes THMs on the analyte list.

Domestic wastewater typically contains nitrogen in concentrations greater than water quality objectives, which vary according to the form of nitrogen. Groundwater degradation by nitrogen can be controlled by an appropriate secondary treatment system, soil bacteria which naturally remove some nitrogen, and growing crops that are harvested and removed from the land application area. The effectiveness varies, but generally best practicable treatment and control is able to control nitrogen degradation of groundwater at a concentration well below the water quality objectives. The proposed interim limitation reflects water quality objectives.

Dissolved solids can pass through the treatment process and soil profile; effective control of such constituents relies primarily upon source control and pretreatment measures. In the best of circumstances, long-term land discharge of recycled water will degrade groundwater with dissolved solids (as measured by TDS and EC). The proposed Order sets water quality objectives for the interim while site-specific, constituent-specific limits are developed in conjunction with a BPTC evaluation of source control and pretreatment.

Other constituents in domestic wastewater that may pass through the treatment process and the soil profile, include recalcitrant organic compounds, radionuclides, and pharmaceuticals. Hazardous compounds are not usually associated with domestic wastewater and when present are reduced in the discharge to inconsequential concentrations through dilution and treatment. It is inappropriate to allow degradation of groundwater with such constituents, so proposed limits are nondetectable concentrations.

A discharge of recycled water that overloads soils with nutrients and organics can result in anaerobic conditions in the soil profile, which in turn creates organic acids and decreases soil pH. Under conditions of low soil pH (below 5), iron and manganese compounds in the soil can solubilize and leach into groundwater. Overloading the land application areas is preventable. Though iron and manganese limits are set at the water quality objective, groundwater pH is expected to remain the same as background.

Title 27

Title 27, CCR, Section 20005 et seq. (“Title 27”), contains regulations to address certain discharges to land. Title 27 establishes a waste classification system, specifies siting and construction standards for containment of classified waste, requires extensive monitoring of

groundwater and the unsaturated zone for any indication of failure of containment, and specifies closure and post-closure maintenance requirements. Generally, no degradation of groundwater quality by any waste constituent is acceptable under Title 27 regulations.

Discharges of domestic sewage and recycled water can be treated and controlled to a degree that will not result in unreasonable degradation of groundwater. For this reason, they have been conditionally exempted from Title 27. Discharges of domestic sewage and treated effluent that are regulated by WDRs and treatment and storage facilities associated with the WWTF are considered exempt from Title 27 under Section 20090(a), provided that the discharges and facilities will not result in a violation of any water quality objective. As the exemption specifically excludes the discharge to land of: 1) solid waste such as grit and screenings that result from treatment of domestic sewage, and 2) residual sludge that will not be further treated at the WWTF, such discharges must comply with provisions of Title 27. The discharge of recycled water and the operation of treatment and/or storage facilities associated with a wastewater treatment plant can be allowed without requiring compliance with Title 27 only if groundwater degradation complies with the Basin Plan, Resolution No. 68-16 (Antidegradation Policy), and does not violate any water quality objectives.

Proposed Order Terms and Conditions

Discharge Prohibitions and Specifications

The Order allows the flow rate to increase based on submittal, and approval by the Executive Officer, of a *Recycled Water Expansion Report* which will document the treatment system capacity, and the availability of land application areas.

The proposed Order's Effluent Limitations for BOD_5, TDS, and total nitrogen are based on reasonable loading limits, odor control, and groundwater quality protection. Historical effluent sampling indicates the Discharger has been able to meet the limits. Effluent TDS concentrations average approximately 505 mg/L; that is an increase over domestic water supply of approximately 218 mg/L, a reasonable increase in salinity based on domestic water use. The discharge specifications regarding dissolved oxygen and freeboard are consistent with Regional Board policy for the prevention of nuisance conditions and overtopping, and are applied to all such facilities.

In order to protect public health and safety, the proposed Order requires the Discharger to comply with the provisions of Title 22 and to implement best management practices with respect to recycled water application (application at reasonable rates considering the crop, soil, and climate).

Monitoring Requirements

Section 13267 of the CWC authorizes the Regional Board to require monitoring and technical reports as necessary to investigate the impact of a waste discharge on waters of the state. In recent years there has been increased emphasis on obtaining all necessary information, assuring the information is timely as well as representative and accurate, and thereby improving accountability of any discharger for meeting the conditions of discharge. Section 13268 of the CWC authorizes assessment of civil administrative liability where appropriate.

The proposed Order includes influent and effluent monitoring requirements, wastewater and storage pond monitoring, land application area monitoring, sludge monitoring, groundwater monitoring, and water supply monitoring. In order to adequately characterize the effluent, the Discharger is required to monitor for BOD, total coliform organisms, TDS, sodium, chloride, nitrogen, pH, and other constituents. Monitoring of additional minerals is required on an annual basis. To ensure that storage ponds do not create nuisance conditions, the Discharger is required to monitor freeboard and dissolved oxygen weekly.

The Title 27 zero leakage protection strategy relies heavily on extensive groundwater monitoring to increase a discharger's awareness of, and accountability for, compliance with the prescriptive and performance standards. With treated wastewater application to land, monitoring takes on even greater importance. The proposed Order includes monitoring of effluent quality, application rates, and groundwater quality.

Title 27 regulations pertaining to groundwater monitoring and the detection and characterization of waste constituents in groundwater have been in effect and successfully implemented for many years. No regulation currently specifies similar criteria more suitable for a situation where extensive land application of recycled water occurs. It is appropriate that the Title 27 groundwater monitoring procedures be extended and applied on a case-by-case basis under Water Code Section 13267.

The Discharger must monitor groundwater for wastewater constituents expected to be present in the discharge, capable of reaching groundwater, and violating groundwater limitations if treatment, control, and environmental attenuation proves inadequate. This Order requires evaluation of the existing monitoring wells for suitability, and additional wells to be installed in areas most likely to detect groundwater impacts. Those areas were identified to be locations of storage ponds and land application areas.

For each constituent listed in the Groundwater Limitations section, the Discharger must, as part of each monitoring event, compare concentrations of constituents found in each monitoring well (or similar type of groundwater monitoring device) to the background concentration or to prescribed numerical limitations to determine compliance.

Reopener

The conditions of discharge in the proposed Order were developed based on currently available technical information and applicable water quality laws, regulations, policies, and plans, and are intended to assure conformance with them. However, information is presently insufficient to develop final recycled water and groundwater limitations, so the proposed Order contains interim limitations. Additional information must be developed and documented by the Discharger as required by schedules set forth in the proposed Order. As this additional information is obtained, decisions will be made concerning the best means of assuring the highest water quality possible and that could involve substantial cost. It may be appropriate to reopen the Order if applicable laws and regulations change, but the mere possibility that such laws and regulations may change is not sufficient basis for reopening the Order. The CWC requires that WDRs implement all applicable requirements.

TRO/WSW: 11/04/07