

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL VALLEY REGION

MONITORING AND REPORTING PROGRAM R5-\_\_\_\_-\_\_\_\_

FOR  
SACRAMENTO RENDERING COMPANIES  
SACRAMENTO RENDERING COMPANIES RANCHO CORDOVA RENDERING PLANT  
SACRAMENTO COUNTY

The Monitoring and Reporting Program (MRP) describes requirements for monitoring the ponds, finger lagoon influent and effluent, effluent to the land application areas, land application areas, groundwater, and storm water. This MRP is issued pursuant to Water Code Section 13267. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Executive Officer.

All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. The time, date, and location of each sample shall be recorded on the sample chain of custody form. Field test instruments (such as those used to measure pH and dissolved oxygen) may be used provided that:

1. The operator is trained in proper use and maintenance of the instruments;
2. The instruments are calibrated prior to each monitoring event;
3. The instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and
4. Field calibration reports are submitted as described in the "Reporting" section of the MRP.

Analytical procedures shall comply with the methods and holding times specified in the following: *Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater* (EPA); *Test Methods for Evaluating Solid Waste* (EPA); *Methods for Chemical Analysis of Water and Wastes* (EPA); *Methods for Determination of Inorganic Substances in Environmental Samples* (EPA); *Standard Methods for the Examination of Water and Wastewater* (APHA/AWWA/WEF); and *Soil, Plant and Water Reference Methods for the Western Region* (WREP 125). Approved editions shall be those that are approved for use by the United States Environmental Protection Agency or the California Department of Public Health's Environmental Laboratory Accreditation Program. The Discharger may propose alternative methods for approval by the Executive Officer. Where technically feasible, laboratory reporting limits shall be lower than the applicable water quality objectives for the constituents to be analyzed.

### **GENERAL POND MONITORING**

The finger lagoons, winter storage ponds, and mixing ponds shall be monitored as follows. Freeboard shall be measured vertically from the surface of the pond water to the lowest elevation of the surrounding berm and shall be measured to the nearest 0.1 feet.

Constituent/Parameter	Units	Type of Sample	Sampling Frequency	Reporting Frequency
Influent Flow <sup>1</sup>	gpd	meter reading <sup>3</sup>	daily	monthly
Flows to Mixing Ponds:				
Wastewater Flow <sup>2</sup>	gpd	meter reading <sup>3</sup>	daily	monthly
Fresh Water Flow <sup>2</sup>	gpd	meter reading <sup>3</sup>	daily	monthly
Freeboard <sup>4</sup>	0.1 feet	staff gage	weekly	monthly
Dissolved Oxygen <sup>5</sup>	mg/L	grab	weekly	monthly
Odors	--	observation	weekly	monthly

<sup>1</sup> Report as total daily flow from the DAF unit to the finger lagoons.

<sup>2</sup> Report as total daily flow to each mixing pond.

<sup>3</sup> Prior to 1 June 2016, if there is no flow meter, flows may be estimated using calibrated pump curves and pump run times.

<sup>4</sup> Report freeboard at each finger lagoon, mixing pond, and winter storage pond.

<sup>5</sup> Report dissolved oxygen at finger lagoon pond 8 only, at each mixing pond, and at each winter storage pond.

### FINGER LAGOON INFLUENT AND EFFLUENT MONITORING

Influent samples shall be collected at a point downstream of the DAF unit to represent the discharge to the first finger lagoon. Effluent samples shall be collected at a point downstream of the last finger lagoon prior to discharge to the land application areas or storage ponds. At a minimum, the Discharger shall monitor the finger lagoon influent and effluent as follows:

Constituent/Parameter	Units	Sample Type	Sampling Frequency		Reporting Frequency
			Influent	Effluent	
BOD <sub>5</sub> <sup>1</sup>	mg/L	grab	monthly	monthly	monthly
Fixed Dissolved Solids	mg/L	grab	--	weekly	monthly, annually <sup>2</sup>
Total Kjeldahl Nitrogen	mg/L	grab	--	weekly	monthly
Nitrate Nitrogen	mg/L	grab	--	weekly	monthly
Sodium	mg/L	grab	--	monthly	monthly
Chloride	mg/L	grab	--	monthly	monthly

<sup>1</sup> 5-day, 20°C Biochemical Oxygen Demand.

<sup>2</sup> Flow-weighted annual average FDS.

### EFFLUENT MONITORING

During periods of discharge to the land application areas, the Discharger shall monitor the quantity and quality of the discharge. The Discharger shall establish one or more permanent monitoring stations within the wastewater conveyance system as needed to ensure that all samples are representative of the actual discharge from the mixing ponds to the land application areas. At a minimum, the Discharger shall monitor the effluent wastewater from each mixing pond as follows:

Constituent/Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
Flow to each LAA:				
Wastewater/fresh water blend	gallons	meter reading <sup>3</sup>	daily	monthly
Fresh water applied separately	gallons	meter reading <sup>3</sup>	daily	monthly
BOD <sub>5</sub> <sup>1</sup>	mg/L	grab	weekly	monthly
Fixed Dissolved Solids	mg/L	grab	monthly	monthly
Total Kjeldahl Nitrogen	mg/L	grab	weekly	monthly
Nitrate Nitrogen	mg/L	grab	weekly	monthly
Other salinity species <sup>2</sup>	mg/L	grab	weekly	monthly

<sup>1</sup> 5-day, 20°C Biochemical Oxygen Demand.

<sup>2</sup> Includes boron, chloride, iron, manganese, sodium, and sulfate. Samples for iron and manganese shall be filtered with a 0.45-micron filter prior to sample preservation.

<sup>3</sup> Prior to 1 June 2016, if there is no flow meter, flows may be estimated using calibrated pump curves and pump run times.

## LAND APPLICATION AREA MONITORING

### A. Daily Pre-Application Inspections

The Discharger shall inspect the land application areas at least **once daily** prior to and during irrigation events and observations from those inspections shall be documented for inclusion in the monthly monitoring reports. The following items shall be documented for each check or field to be irrigated on that day:

- a. Evidence of erosion;
- b. Containment berm condition;
- c. Condition of each standpipe and flow control valve (if applicable);
- d. Proper use of valves;
- e. Soil saturation;
- f. Ponding;
- g. Tailwater ditches and potential runoff to off-site areas;
- h. Potential and actual discharge to surface water;
- i. Odors that have the potential to be objectionable at or beyond the property boundary; and
- j. Insects.

Temperature; wind direction and relative strength; and other relevant field conditions shall also be observed and recorded. The notations shall also document any corrective actions taken based on observations made. A log of these inspections shall be kept at the facility and a summary of the inspections for the calendar month shall be submitted as part of the Monthly

Monitoring Report. If no irrigation with wastewater takes place during a given month, then the monthly monitoring report shall so state.

**B. Routine Monitoring**

The Discharger shall perform the following routine monitoring and loading calculations during all months when land application occurs, and shall present the data in the Monthly and Annual Monitoring Reports.

Constituent	Unit	Sample Type	Sampling Frequency	Reporting Frequency
Irrigation fields and checks receiving wastewater	--	observation	daily	monthly, annually
Hydraulic Loading Rate:				
Wastewater	inch	calculated <sup>2</sup>	daily	monthly, annually
Fresh Water/Supplemental Water	inch	calculated <sup>2</sup>	daily	monthly, annually
BOD Loading Rate:				
Daily Maximum	lb/ac/day	calculated <sup>2,3</sup>	daily	monthly, annually
Irrigation Cycle Average	lb/ac/day	calculated <sup>2,3</sup>	daily	monthly, annually
Wastewater Nitrogen Loading Rate	lb/ac	calculated <sup>2,4</sup>	daily	monthly, annually
Total Nitrogen Loading Rate, including other sources (fertilizer, manure, etc.)	lb/ac/mo	calculated <sup>2,4,5</sup>	monthly	monthly, annually

- <sup>1</sup> Data obtained from the nearest National Weather Service rain gauge is acceptable.
- <sup>2</sup> Rate shall be calculated for each irrigation check.
- <sup>3</sup> BOD<sub>5</sub> shall be calculated using the daily applied volume of wastewater, actual application area, and the average of the three most recent BOD<sub>5</sub> results.
- <sup>4</sup> Total nitrogen loading rates shall be calculated using the applied volume of wastewater, actual application area, and the average of the three most recent effluent monitoring results.
- <sup>5</sup> Loading rates for supplemental nitrogen shall be calculated using the actual load and the application area.

**APPLICABILITY OF GROUNDWATER LIMITATIONS**

Prior to construction and/or sampling of any groundwater monitoring wells, the Discharger shall submit plans and specifications to the Central Valley Water Board for review and approval. Once installed, all new wells shall be added to the compliance monitoring network. The following table lists all existing monitoring wells and designates the purpose of each well.

MW2 <sup>2,3</sup>	MW3 <sup>2,3</sup>	MW4 <sup>2</sup>	MW5 <sup>2</sup>	MW6 <sup>2</sup>	MW7 <sup>2</sup>	MW8 <sup>1</sup>	MW9 <sup>1</sup>	MW10 <sup>2</sup>
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- <sup>1</sup> Background well not used for compliance monitoring.
- <sup>2</sup> Compliance well.
- <sup>3</sup> To be replaced.

The Groundwater Limitations set forth in Section F of the WDRs shall apply to the specific compliance monitoring wells tabulated below. This table is subject to revision by the Executive Officer following construction of any new compliance monitoring wells.

<b>Constituent</b>	<b>Groundwater Limitation</b>	<b>Compliance Wells to which Limitation Applies</b>
TDS	1,000 mg/L <sup>1</sup>	MW2, MW3, MW4, MW5, MW6, MW7, MW10
All Others	Concentrations that exceed either the Primary or Secondary MCL.	MW2, MW3, MW4, MW5, MW6, MW7, MW10
All Others	Taste or odor-producing constituents, toxic substances, or any other constituents in concentrations that cause nuisance or adversely affect beneficial uses.	MW2, MW3, MW4, MW5, MW6, MW7, MW10

<sup>1</sup> Compliance with this requirement shall be determined on an intra-well basis for each of the specified wells using approved statistical methods.

### **GROUNDWATER MONITORING**

Prior to construction and/or sampling of any groundwater monitoring wells, the Discharger shall submit plans and specifications to the Central Valley Water Board for review and approval. Unless otherwise expressly approved, water supply wells shall not be used as monitoring wells. Once installed, all new monitoring wells shall be added to the MRP and shall be sampled and analyzed according to the schedule below.

Prior to sampling, the groundwater elevations shall be measured and the wells shall be purged of at least three well volumes until temperature, pH, and electrical conductivity have stabilized. Depth to groundwater shall be measured to the nearest 0.01 feet. Samples shall be collected and analyzed using standard EPA methods. Groundwater monitoring shall include, at a minimum, the following:

<b>Constituent/Parameter</b>	<b>Units</b>	<b>Sample Type</b>	<b>Sampling Frequency<sup>3</sup></b>	<b>Reporting Frequency<sup>3</sup></b>
Depth to Groundwater	feet	measurement	semi-annual	semi-annual
Groundwater Elevation <sup>1</sup>	feet	calculated	semi-annual	semi-annual
Gradient Magnitude	feet/feet	calculated	semi-annual	semi-annual
Gradient Direction	degrees	calculated	semi-annual	semi-annual
pH	pH units	grab	semi-annual	semi-annual
Total Dissolved Solids	mg/L	grab	semi-annual	semi-annual
Nitrate as Nitrogen	mg/L	grab	semi-annual	semi-annual
Other Salinity Species <sup>2</sup>	mg/L	grab	semi-annual	semi-annual

<sup>1</sup> Groundwater elevation shall be determined based on depth-to-water measurements using a surveyed measuring point elevation on the well and a surveyed reference elevation.

<sup>2</sup> Includes boron, chloride, iron, manganese, sodium, and sulfate. Samples for iron and manganese shall be filtered with a 0.45-micron filter prior to sample preservation.

- <sup>3</sup> Semi-annual groundwater monitoring shall occur in the first (January – March) and third (July – September) quarter of each calendar year.

### Groundwater Trigger Concentrations

The following groundwater trigger concentrations are intended only to serve as a means of assessing whether the discharge might potentially cause a violation of one or more of the Groundwater Limitations of the WDRs at some later date.

Constituent	Compliance Wells	Trigger Concentration, mg/L
Total Dissolved Solids	MW2, MW3, MW4, MW5, MW6, MW7, MW10	700
Nitrate as N	MW2, MW3, MW4, MW5, MW6, MW7, MW10	7.0

If the annual evaluation of groundwater quality performed pursuant to this MRP shows that the annual average of the trigger concentration has been exceeded in any compliance well during the calendar year, the Discharger shall submit either of the following technical reports by **1 May of the following calendar year** (e.g., if the trigger concentration is exceeded for calendar year 2020, the appropriate report is due by 1 May 2021):

- a. A technical evaluation of the reason(s) for the concentration increase[s] for each constituent and a technical demonstration that, although the concentration has increased more than expected in one or more compliance wells, continuing the discharge without additional treatment or control will not result in exceedance of the applicable groundwater limitation.
- b. An Action Plan that presents a systematic technical evaluation of each component of the facility's waste treatment and disposal system to determine whether additional treatment or control is feasible for each waste constituent that exceeds a trigger concentration. The plan shall evaluate each component of the wastewater treatment, storage, and disposal system (as applicable); describe available treatment and/or control technologies; provide preliminary capital and operation/maintenance cost estimates for each; designate the preferred option[s] for implementation; and specify a proposed implementation schedule. The schedule for full implementation shall not exceed one year, and the Discharger shall immediately implement the proposed improvements.

### STORM WATER MONITORING

The Discharger shall monitor the quality of storm water discharged from the land application areas to surface water. Permanent sampling locations shall be established to provide representative samples from each of the following sampling locations: the background pasture area (Background 1, 2, 3 and 4), Frye Creek upgradient of Outfall OpA, Outfall OpA, Outfall BP, and Frye Creek downgradient of Outfall BP, as shown on Attachment C of the WDRs. Samples from each location shall be obtained monthly during the first precipitation event of the month that generates runoff from the LAAs to Frye Creek. However, sampling may be deferred to the next weekday during daylight hours as needed. If there is no

precipitation during the month that generates runoff from the LAAs to Frye Creek, the Monthly Monitoring Report shall so state.

Constituent/Parameter	Units	Sample Type	Sampling Frequency	Reporting Frequency
pH	pH Units	grab	monthly	monthly
BOD	mg/L	grab	monthly	monthly
Total Dissolved Solids	mg/L	grab	monthly	monthly
Total Kjeldahl Nitrogen	mg/L	grab	monthly	monthly
Ammonia as Nitrogen	mg/L	grab	monthly	monthly
Nitrate as Nitrogen	mg/L	grab	monthly	monthly

### POND SLUDGE MONITORING

The Discharger shall keep records regarding the quantity of pond sludge removed from all ponds; any sampling and analytical data; the quantity of sludge stored on site; and the quantity removed for disposal. The records shall also indicate that steps taken to reduce odor and other nuisance conditions. Records shall be stored onsite and available for review during inspections.

If sludge is transported off-site for disposal, then the Discharger shall submit records identifying the hauling company, the amount of sludge transported, the date removed from the facility, the location of disposal, and copies of all analytical data required by the entity accepting the waste. All records shall be submitted as part of the Annual Monitoring Report.

### REPORTING

All monitoring reports should be converted to a searchable Portable Document Format (PDF) and submitted electronically. Documents that are less than 50MB should be emailed to: [centralvalleysacramento@waterboards.ca.gov](mailto:centralvalleysacramento@waterboards.ca.gov).

To ensure that your submittal is routed to the appropriate staff person, the following information should be included in the body of the email:

Attention: Compliance/Enforcement Section  
 Rancho Cordova Rendering Plant  
 Sacramento Rendering Company  
 Sacramento County  
 Place ID: 254982

Documents that are 50 MB or larger should be transferred to a CD, DVD, or flash drive and mailed to the following address:

Central Valley Regional Water Quality Control Board  
ECM Mailroom  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, California 95670

Please include a transmittal sheet that includes the following:

Attention: Compliance/Enforcement Section  
Rancho Cordova Rendering Plant  
Sacramento Rendering Company  
Sacramento County  
Place ID: 254982

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, groundwater), sampling location, and the reported analytical result for each sample are readily discernible. The data shall be summarized in such a manner to clearly illustrate compliance with waste discharge requirements and spatial or temporal trends, as applicable. The results of any monitoring done more frequently than required at the locations specified in the Monitoring and Reporting Program shall be reported in the next scheduled monitoring report.

As required by the California Business and Professions Code Sections 6735, 7835, and 7835.1, all groundwater monitoring reports shall be prepared under the direct supervision of a California-registered professional and signed by the registered professional.

#### **A. Monthly Monitoring Reports**

Daily, weekly, and monthly monitoring data shall be reported in the monthly monitoring report. Monthly reports shall be submitted to the Central Valley Water Board on the **1<sup>st</sup> day of the second month following sampling** (i.e., the January report is due by 1 March). At a minimum, the reports shall include:

1. Tabulated general pond monitoring data for the month, including daily flow and comparison to the Flow Limitations of the WDRs.
2. Tabulated finger lagoon influent and effluent monitoring data and comparison to the Effluent Limitations of the WDRs.
3. Tabulated effluent (discharged to each designated land application area) monitoring data for the month and comparison to the Effluent Limitations of the WDRs.
4. Tabulated land application area monitoring data for the month, including hydraulic and constituent loading rates and comparison to the Mass Loading Limitations of the WDRs.
5. Tabulated storm water monitoring data for the month and comparison of the Outfall BP monitoring results to the arithmetic mean of the background pasture results (Background 1 through Background 4). If storm water samples were not collected because there was no runoff from the LAAs during the month, the report shall so state.

6. A summary of the daily pre-irrigation inspection reports and a notation of any corrective actions taken based on observations made.
7. A comparison of monitoring data to the flow limitations, effluent limitations, discharge specifications and applicable limitations and an explanation of any violation of those requirements.
8. If requested by staff, copies of laboratory analytical report(s).
9. The most recent calibration log sheet(s) verifying calibration of any field monitoring instruments (e.g., DO and pH meters) used to obtain data.

## **B. Semi-Annual Monitoring Reports**

The Discharger shall establish a semi-annual groundwater sampling schedule such that samples are obtained approximately every six months. Semi-annual monitoring reports shall be submitted to the Central Valley Water Board by the **1<sup>st</sup> day of the second month after the sampling period** (i.e. the January-March sample period is due by May 1<sup>st</sup>) each year. The Semi-annual Report shall include the following:

1. Results of the semi-annual monitoring of the groundwater in tabular format.
2. A narrative description of all preparatory, monitoring, sampling, and analytical testing activities for the monitoring. The narrative shall be sufficiently detailed to verify compliance with the WDR, this MRP, and the Standard Provisions and Reporting Requirements. The narrative shall be supported by field logs for each well documenting depth to groundwater; parameters measured before, during, and after purging; method of purging; calculation of casing volume; and total volume of water purged.
3. Calculation of groundwater elevations, an assessment of groundwater flow direction and gradient on the date of measurement, comparison of previous flow direction and gradient data, and discussion of seasonal trends if any.
4. Summary data tables of historical and current water table elevations and analytical results.
5. A scaled map showing relevant structures and features of the facility, the disposal check boundaries, the locations of monitoring wells, and groundwater elevation contours referenced to mean sea level datum.
6. Copies of laboratory analytical report(s) for groundwater monitoring.

## **C. Annual Report**

An Annual Report shall be submitted to the Central Valley Water Board by **1 February** of each year. The Annual Report shall present a summary of all monitoring data obtained during the previous calendar year, and shall include the following.

1. The flow-weighted annual average FDS concentration of the wastewater discharged to the LAAs and comparison to the Effluent Limitations of the WDRs. The flow-weighted annual average FDS concentration shall be calculated using the following formula:

$$C_a = \frac{\sum_{1}^{12} [(C_{Pi} \times V_{Pi})]}{\sum_{1}^{12} (V_{Pi})}$$

Where:  $C_a$  = Flow-weighted annual average FDS concentration in mg/L  
 $C_{pi}$  = Monthly average process wastewater FDS concentration for calendar month  $i$  in mg/L  
 $V_{pi}$  = volume of process wastewater applied to LAAs during calendar month  $i$  in million gallons  
 $i$  = the number of the month (e.g., January = 1, February = 2, etc.)

2. The total hydraulic loading rate for wastewater and supplemental water applied to each LAA for the calendar year (measured in inches/year) and comparison to measured evapotranspiration (ET) values for the calendar year.
3. A summary of daily maximum and irrigation cycle average BOD loading rates applied to each LAA for the calendar year and comparison to the Mass Loading Limitations of the WDRs. Compliance with the BOD requirements shall be determined as specified below:
  - a. The mass of BOD applied to each LAA on a daily basis shall be calculated using the following formula:

$$M = \frac{8.345(CV)}{A}$$

Where:  $M$  = mass of BOD applied to an LAA in lb/ac/day  
 $C$  = concentration of BOD in mg/L based on average of the three most recent monitoring result  
 $V$  = volume of wastewater applied to the LAA in millions of gallons per day  
 $A$  = area of the LAA irrigated in acres  
 8.345 = unit conversion factor

- b. The mass of BOD applied to each LAA on an irrigation cycle average shall be calculated using the following formula:

$$M = \frac{8.345(CV)}{AT}$$

Where:  $M$  = mass of BOD applied to an LAA in lb/ac/cycle  
 $C$  = concentration of BOD in mg/L based on average of the three most recent monitoring result  
 $V$  = volume of wastewater applied to the LAA in millions of gallons per day  
 $A$  = area of the LAA irrigated in acres  
 $T$  = Time between subsequent wastewater applications (days of application plus days of drying) in days  
8.345 = unit conversion factor

4. The total nitrogen and plant available nitrogen (PAN) loading rate applied to each LAA for the calendar year with supporting data and calculations and comparison to crop nitrogen demand for the crops actually grown. The mass of total nitrogen applied to each LAA on an annual basis shall be calculated using the following formula:

$$M = \sum_{i=1}^{12} \frac{(8.345(C_i V_i) + M_x)}{A}$$

Where:  $M$  = mass of nitrogen applied to LAA in lb/ac/yr  
 $C_i$  = Concentration of total nitrogen for month  $i$  in mg/L based on average of the three most recent monitoring result  
 $V_i$  = volume of wastewater applied to the LAA during calendar month  $i$  in million gallons  
 $A$  = area of the LAA irrigated in acres  
 $i$  = the number of the month (e.g., January = 1, February = 2, etc.)  
 $M_x$  = nitrogen mass from other sources (e.g., fertilizer and livestock manure) in pounds  
8.345 = unit conversion factor

5. An evaluation of the performance of the pretreatment systems and finger lagoons.
6. A narrative discussion of the analytical results for all groundwater locations monitored including spatial and temporal trends, with reference to summary data tables, graphs, and appended analytical reports (as applicable).
7. Concentration vs. time graphs for each monitored constituent using all historic groundwater monitoring data. Each graph shall show the trigger concentration specified above (where applicable) and the Groundwater Limitation as horizontal lines at the applicable concentration.
8. An evaluation of the groundwater quality beneath the site and determination of whether any trigger concentrations were exceeded in any compliance well for the calendar year. This shall be determined by comparing the annual average concentration for each well during the calendar year to the corresponding trigger concentration specified above. If any groundwater trigger concentrations were exceeded, include acknowledgment that

the technical report described in the Groundwater Trigger Concentrations section of this MRP will be submitted in accordance with the specified schedule.

9. An evaluation of the groundwater quality beneath the site, determination of compliance with the Groundwater Limitation F.1 of the WDRs based on statistical analysis for each constituent monitored for each compliance well in accordance with the approved *Groundwater Limitations Compliance Assessment Plan*, and an explanation of any violation of those requirements. Include all calculations and data input/analysis tables derived from use of statistical software, as applicable.
10. An evaluation of storm water quality and compliance with Land Application Area Specification G.12. If any LAA runoff results exceed the results for the background sample, the report shall describe the specific structural and/or operational practices that will be implemented during the subsequent rainy season and thereafter to ensure compliance with Land Application Area Specification G.12.
11. A narrative description of wastewater residual solids and pond sludge disposal practices.
12. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into full compliance with the waste discharge requirements.
13. An evaluation of the performance of the treatment facility, including discussion of capacity issues, system problems, and a forecast of the flows anticipated in the next year.
14. A discussion of the following:
  - a. Waste constituent reduction efforts implemented in accordance with any required workplan;
  - b. Other treatment or control measures implemented during the calendar year either voluntarily or pursuant to the WDRs, this MRP, or any other Order;
  - c. A discussion of anticipated pond sludge removal in the coming year, and if so, include anticipated schedule for cleaning, drying, and disposal; and
  - d. Based on monitoring data, an evaluation of the effectiveness of the treatment or control measures implemented to date.
15. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.

A letter transmitting the self-monitoring reports shall accompany each report. The letter shall include a discussion of requirement violations found during the reporting period, and actions taken or planned for correcting noted violations, such as operation or facility modifications. If the Discharger has previously submitted a report describing corrective actions and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. The transmittal letter shall contain the penalty of perjury statement by the Discharger, or the Discharger's authorized agent, as described in the Standard Provisions General Reporting Requirements Section B.3.

The Discharger shall implement the above monitoring program as of the date of this Order.

Ordered by: \_\_\_\_\_  
PAMELA C. CREEDON, Executive Officer

\_\_\_\_\_  
(Date)

LLA: 051515