

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION**

MONITORING AND REPORTING PROGRAM R7-2013-0059
FOR
HUDSON RANCH POWER I LLC, OWNER
HUDSON RANCH ENERGY SERVICES LLC, OPERATOR
HUDSON RANCH I GEOTHERMAL DEVELOPMENT PROJECT
JOHN L. FEATHERSTONE GEOTHERMAL POWER PLANT
Salton Sea Known Geothermal Resource Area (KGRA) - Imperial County

CONSISTS OF:

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PART I

GENERAL REQUIREMENTS

A. GENERAL

A Discharger who owns or operates a Class II Surface Impoundment is required to comply with the provisions of Title 27, Division 2, Chapter 3, Subchapter 3, Article 1 of the California Code of Regulations for the purpose of detecting, characterizing, and responding to releases to the groundwater. Section 13267, California Water Code gives the Regional Water Board authority to require monitoring program reports for discharges that could affect the quality of waters within its region.

1. This Monitoring and Reporting Program (MRP) is issued pursuant to Specification No. 27 of Regional Water Board Order No. R7-2013-0059. The principal purpose of this self-monitoring program is:
 - a. To document compliance with Waste Discharge Requirements (WDRs) and prohibitions established by the Regional Water Board;
 - b. To facilitate self-policing by the Discharger in the prevention and abatement of pollution arising from waste discharge;
 - c. To conduct water quality analyses.
2. The Regional Water Board Executive Officer may alter the monitoring parameters, monitoring locations, and/or the monitoring frequency during the course of this monitoring program.

B. DEFINITION OF TERMS

1. Affected Persons – all persons who either own or occupy land outside the boundaries of the parcel upon which a waste management unit (surface impoundment or impoundment) is located that has been or may be affected by the release of waste constituents from the unit.
2. Background Monitoring Point – a device (e.g. well) or location (e.g. a specific point along a lakeshore) that is upgradient or side gradient from the impoundment assigned by this MRP, where water quality samples are taken that are not affected by a release from the impoundment and that are used as a basis of comparison against samples taken from downgradient Monitoring Points.
3. Constituents of Concern (COCs) – those constituents likely to be in the waste, or derived from waste constituents in the event of a release from the impoundment.

4. Matrix Effect – refers to any change in the Method Detection Limit (MDL) or Practical Quantitation Limit (PQL) for a given constituent as a result of the presence of other constituents - either of natural origin or introduced through a spill or release - that are present in the sample being analyzed.
5. Method Detection Limit (MDL) – the lowest constituent concentration that can support a non-zero analytical result with 99 percent reliability. The MDL is laboratory specific and should reflect the detection capabilities of specific procedures and equipment used by the laboratory.
6. Monitored Media – water bearing media monitored pursuant to this Monitoring and Reporting Program. The Monitored Media may include: (1) groundwater in the uppermost aquifer, in any other portion of the zone of saturation (as defined in Title 27, Section 20164) in which it would be reasonable to anticipate that waste constituents migrating from the surface impoundment could be detected, and in any perched zones underlying the impoundment, (2) any bodies of surface water that could be measurably affected by a release, (3) soil-pore liquid beneath and/or adjacent to the surface impoundment, and (4) soil-pore gas beneath and/or adjacent to the surface impoundment.
7. Monitoring Parameters – the list of constituents and parameters used for the majority of monitoring activity.
8. Monitoring Point – a device (e.g. well) or location (e.g. a specific point along a lakeshore) that is downgradient from the surface impoundment assigned by this MRP, at which samples are collected for the purpose of detecting a release by comparison with samples collected at Background Monitoring Points.
9. Practical Quantification Limit (PQL) – the lowest constituent concentration at which a numerical concentration can be assigned with a 99 percent certainty that its value is within 10 percent of the actual concentration in the sample. The PQL is laboratory specific and should reflect the detection capabilities of specific procedures and equipment used by the laboratory.
10. Reporting Period – the duration separating the submittal of a given type of monitoring report from the time the next iteration of that report is scheduled for submittal. Unless otherwise stated, the due date for any given report shall be 30 days after the end of its Reporting Period.
11. Sample Size –
 - a. For Monitoring Points – the number of data points obtained from a given Monitoring Point during a given Reporting Period – used for carrying out the statistical or non-statistical analysis of a given analyte during a given Reporting Period.
 - b. For Background Monitoring Points – the number of new and existing data points from all applicable Background Monitoring Points in a given Monitored Medium – used to

collectively represent the background concentration and variability of a given analyte in carrying out a statistical or non-statistical analysis of that analyte during a given Reporting Period.

12. Uppermost Aquifer – the geologic formation nearest the natural ground surface that is an aquifer, as well as, lower aquifers that are hydraulically interconnected with this aquifer within the facility's property boundary.
13. Volatile Organic Constituents (VOCs) – the suite of organic constituents having a high vapor pressure. The term includes at least the 47 organic constituents listed in Appendix I to 40 CFR Part 258.
14. VOC_{water} – the composite monitoring parameter that includes all VOCs that are detectable in less than 10 percent of the applicable background samples. This parameter is analyzed, using the non-statistical method described in Part III.A.2. of this MRP, to identify releases of VOCs that are detected too infrequently in backgroundwater to allow for statistical analysis.

C. SAMPLING AND ANALYTICAL METHODS

Sample collection, storage, and analysis shall be performed according to the most recent version of Standard USEPA (United States Environmental Protection Agency) methods, and California ELAP (Environmental Laboratory Accreditation Program) rulings. Water and waste analysis shall be performed by a laboratory approved for these analyses by the California Department of Public Health. Specific methods of analysis must be identified. If methods other than USEPA-approved methods or Standard Methods are used, the exact methodology must be submitted for review and approval by the Regional Water Board Executive Officer prior to use. The director of the laboratory whose name appears on the certification shall supervise all analytical work in his/her laboratory and shall sign all reports of such work submitted to the Regional Water Board. All monitoring instruments and equipment shall be properly calibrated and maintained to ensure accuracy of measurement. In addition, the Discharger is responsible for verifying that laboratory analysis of all samples from Monitoring Points and Background Monitoring Points meet the following restrictions:

1. Methods, analysis, and detection limits used must be appropriate for expected concentrations. For detection monitoring of any constituent or parameter found in concentrations that produce more than 90% non-numerical determinations (i.e. "trace" or "ND") in data from Background Monitoring Points for that medium, the analytical methods having the lowest "facility-specific method detection limit (MDL)", defined in Part I.B.5., shall be selected from among those methods that provide valid results in light of any "Matrix Effects" (defined in Part I.B.4.) involved.
2. Analytical results falling between the MDL and the PQL shall be reported as "trace", and shall be accompanied both by the estimated MDL and PQL values for that analytical run, and by an estimate of the constituent's concentration.

3. MDLs and PQLs shall be derived by the laboratory for each analytical procedure, according to State of California laboratory accreditation procedures. These MDLs and PQLs shall reflect the detection and quantitation capabilities of the specific equipment used by the lab. If the lab suspects that, due to a change in matrix or other effects, the true detection limit or quantitation limit for a particular analytical run differs significantly from the laboratory-derived MDL/PQL values, the results shall be flagged accordingly, along with an estimate of the detection limit and quantitation limit actually achieved.
4. All Quality Assurance/Quality Control (QA/QC) data shall be reported, along with the sample results to which it applies, including the method, equipment, and analytical detection limits, the recovery rates, an explanation of any recovery rate that is less than 80%, the results of equipment and method blanks, the results of spiked and surrogate samples, the frequency of quality control analysis, and the name and qualifications of the person(s) performing the analyses. Sample results shall be reported unadjusted for blank results or spike recovery.
5. Upon receiving written approval from the Regional Water Board Executive Officer, an alternative statistical or non-statistical procedure can be used for determining the significance of analytical results for a constituent that is a common laboratory contaminant (i.e., methylene chloride, acetone, diethylhexyl phthalate, and di-n-octyl phthalate) during any given Reporting Period in which QA/QC samples show evidence of laboratory contamination for that constituent. Nevertheless, analytical results involving detection of these analytes in any background or downgradient sample shall be reported and flagged for easy reference by Regional Water Board staff.
6. In cases where contaminants are detected in QA/QC samples (i.e. field, trip, or lab blanks), the accompanying sample results shall be appropriately flagged.
7. The MDL shall always be calculated such that it represents a concentration associated with a 99% reliability of a non-zero result.

D. RECORDS TO BE MAINTAINED

Written reports shall be maintained by the Discharger or laboratory, and shall be retained for a minimum of five (5) years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge or when requested by the Regional Water Board. Such records shall show the following for each sample:

1. Identity of sample and of the Monitoring Point or Background Monitoring Point from which it was taken, along with the identity of the individual who obtained the sample;
2. Date and time of sampling;

3. Date and time that analyses were started and completed, and the initials of the personnel performing each analysis;
4. Complete procedure used, including method of preserving the sample, and the identity and volumes of reagents used;
5. Calculations of results; and
6. Results of analyses, and the MDL and PQL for each analysis.

E. REPORTS TO BE FILED WITH THE BOARD

1. Detection Monitoring Reports – For each Monitored Medium, all Monitoring Points and Background Monitoring Points assigned to detection monitoring under Part II.A.7 of this MRP shall be monitored **semiannually** for the Monitoring Parameters (Part II.A.4). A “Detection Monitoring Report” shall be submitted to the Regional Water Board in accordance with the schedule contained in the Summary of Self-Monitoring and Reporting Requirements, and shall include the following:
 - a. A Letter of Transmittal that summarizes the essential points in each report shall accompany each report submittal. The letter of transmittal shall be signed by a principal executive officer at the level of vice-president or above, or by his/her duly authorized representative, if such representative is responsible for the overall operation of the facility from which the discharge originates. The letter of transmittal shall include:
 - i. A discussion of any violations noted since the previous report submittal and a description of the actions taken or planned for correcting those violations. If no violations have occurred since the last submittal, that should be so stated;
 - ii. If the Discharger has previously submitted a detailed time schedule or plan for correcting any violations, a progress report on the time schedule and status of the corrective actions being taken; and
 - iii. A statement by the official, under penalty of perjury, that to the best of the signer's knowledge the report is true, complete, and correct.
 - b. A Compliance Evaluation Summary shall be included in each Detection Monitoring Report. The compliance evaluation summary shall contain at least:
 - i. Velocity and direction of groundwater flow for each monitored groundwater body under and around the surface impoundment based upon the water level elevations taken during the collection of water quality data. A description and graphical presentation (e.g., arrow on a map) shall be submitted;
 - ii. Methods used for water level measurement and pre-sampling purging for each monitoring well addressed by the report including:

1. Method, time, and equipment used for water level measurement;
 2. Type of pump used for purging, placement of the pump in the well, pumping rate, and well recovery rate;
 3. Methods and results of field testing for pH, temperature, electrical conductivity, and turbidity, including:
 - a. Equipment calibration methods, and
 - b. Method for disposing of purge water
- iii. Methods used for sampling each Monitoring Point and Background Monitoring Point, including:
1. A description of the type of pump, or other device used, and its placement for sampling;
 2. A detailed description of the sampling procedure: number and description of samples, field blanks, travel blanks, and duplicate samples; types of containers and preservatives used; date and time of sampling; name and qualifications of individual collecting samples, and other relevant observations;
- c. A map or aerial photograph showing the locations of Monitoring Points, and Background Monitoring Points;
- d. For each Detection Monitoring Report, provide all relevant laboratory information including results of all analyses, and other information needed to demonstrate compliance with Part I.C.;
- e. An evaluation of the effectiveness of the run-off/run-on control facilities;
- f. A summary of reportable spills/leaks occurring during the reporting period; include estimated volume of liquids/solids discharged outside designated containment area, a description of management practices to address spills/leaks, and actions taken to prevent reoccurrence.
2. Annual Summary Report – The Discharger shall submit to the Regional Water Board, an “Annual Summary Report” for the period extending from January 1 through December 31. The “Annual Summary Report” is due **March 15** of each year, and shall include the following:
- a. A graphical presentation of analytical data for each Monitoring Point and Background Monitoring Point (Title 27, Section 20415(e)(14)). The Discharger shall submit, in graphical format, the laboratory analytical data for all samples taken within at least the previous five (5) calendar years. Each such graph shall plot the concentration of one (1) or more constituents over time for a given Monitoring Point and Background Monitoring Point, at a scale appropriate to show trends or variations in water quality. The graphs shall plot each datum, rather than plotting mean values. For any given

constituent or parameter, the scale for background plots shall be the same as that used to plot downgradient data. On the basis of any aberrations noted in the plotted data, the Regional Water Board Executive Officer may direct the Discharger to carry out a preliminary investigation (Title 27, Section 20080(d)(2)), the results of which will determine whether or not a release is indicated;

- b. A tabular presentation of all monitoring analytical data obtained during the previous two (2) Monitoring and Reporting Periods, submitted on hard copy within the annual report as well as digitally on electronic media in a file format acceptable to the Regional Water Board Executive Officer (Title 27, Section 20420(h)). The Regional Water Board regards the submittal of data in hard copy and on diskette CD-ROM as "...a form necessary for..." statistical analysis in that this facilitates periodic review by the Regional Water Board statistical consultant;
- c. A comprehensive discussion of the compliance record and any corrective actions taken or planned, which may be needed to bring the Discharger into full compliance with WDRs;
- d. A written summary of the groundwater analyses, indicating changes made since the previous annual report; and
- e. An evaluation of the effectiveness of the run on/run-off control facilities, pursuant to Title 27, Section 20365.

3. Contingency Reporting

- a. The Discharger shall report any spill outside of containment by telephone, facsimile or email within 48 hours of discovery. The reportable quantity for geothermal brine is 150 gallons. Any other type of spill, regardless of type or size, is to be reported by telephone within 48 hours.

After reporting a spill, a written report shall be filed with the Regional Board Executive Officer within seven (7) days, containing at a minimum the following:

- i. A map showing the location(s) of the discharge/spill;
 - ii. A description of the nature of the discharge (all pertinent observations and analyses including quantity, duration, etc.); and
 - iii. Corrective measures underway or proposed.
- b. Should the initial statistical comparison (Part III.A.1.) or non-statistical comparison (Part III.A.2.) indicate, for any Constituent of Concern or Monitoring Parameter, that a release is tentatively identified, the Discharger shall immediately notify the Regional Water Board verbally as to the Monitoring Point(s) and constituent(s) or parameter(s)

- involved, shall provide written notification by certified mail within seven (7) days of such determination (Title 27, Section 20420(j)(1)), and shall conduct a discrete retest in accordance with Part III.A.3. If the retest confirms the existence of a release, the Discharger shall carry out the requirements of Part I.E.3.d. In any case, the Discharger shall inform the Regional Water Board of the outcome of the retest as soon as the results are available, following up with written results submitted by certified mail within seven (7) days of completing the retest.
- c. If either the Discharger or the Regional Water Board determines that there is significant physical evidence of a release (Title 27, Section 20385(a)(3)), the Discharger shall immediately notify the Regional Water Board of this fact by certified mail (or acknowledge the Regional Water Board's determination) and shall carry out the requirements of Part I.E.3.d. for all potentially-affected monitored media.
- d. If the Discharger concludes that a release has been discovered:
- i. If this conclusion is not based upon "direct monitoring" of the Constituents of Concern, pursuant to Part II.A.5., then the Discharger shall, within thirty days, sample for all Constituents of Concern at all Monitoring Points and submit them for laboratory analysis. Within seven (7) days of receiving the laboratory analytical results, the Discharger shall notify the Regional Water Board, by certified mail, of the concentration of all Constituents of Concern at each Monitoring Point. Because this scan is not to be tested against background, only a single datum is required for each Constituent of Concern at each Monitoring Point (Title 27 Section 20420(k)(1));
 - ii. The Discharger shall, within 90 days of discovering the release (Title 27, Section 20420(k)(5)), submit a Revised Report of Waste Discharge proposing an Evaluation Monitoring Program meeting the requirements of Title 27, Section 20425; and
 - iii. The Discharger shall, within 180 days of discovering the release (Title 27, Section 20420(k)(6)), submit a preliminary engineering feasibility study meeting the requirements of Title 27, Section 20430.
- e. Any time the Discharger concludes - or the Regional Water Board Executive Officer directs the Discharger to conclude - that a liquid phase release from the surface impoundment has proceeded beyond the facility boundary, the Discharger shall so notify all persons who either own or reside upon the land that directly overlies any part of the plume (Affected Persons).
- i. Initial notification to Affected Persons shall be accomplished within 14 days of making this conclusion and shall include a description of the Discharger's current knowledge of the nature and extent of the release; and

- ii. Subsequent to initial notification, the Discharger shall provide updates to all Affected Persons, including any persons newly affected by a change in the boundary of the release, within 14 days of concluding a material change in the nature or extent of the release has occurred.

4. Monitoring of Injection Wells

- a. Sampling and reporting shall be conducted semi-annually.
- b. For brine injection wells, collect one grab sample semi-annually from the main injection header leaving the facility, and analyze for Total Dissolved Solids (mg/L, grab sample).
- c. Provide a summary of integrity tests (if any) conducted pursuant to requirements ordered by the State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources.
- d. Provide a summary of major repairs (if any).

5. Surface Impoundment - Leakage Detection System (LDS), and Solids Monitoring

- a. Sampling and reporting shall be conducted semi-annually.
- b. Provide volume of solids removed from the brine pond each month for that reporting period, and transported to a waste management facility for disposal. Include name and location of waste management facility.
- c. Conduct quarterly inspections of Leakage Detection System (LDS), and brine pond.

PART II

MONITORING REQUIREMENTS FOR GROUNDWATER

A. GROUNDWATER SAMPLING AND ANALYSIS FOR DETECTION MONITORING

1. Groundwater Surface Elevation and Field Parameters – Groundwater sampling and analysis shall be conducted semiannually pursuant to California ELAP rulings, and include an accurate determination of the groundwater surface elevation and field parameters (temperature, electrical conductivity, turbidity) for each Monitoring Point and Background Monitoring Point (Title 27, Section 20415(e)(13)). Groundwater elevation obtained prior to purging the well and sample collection, shall be used to fulfill the semi-annual groundwater flow rate/direction analyses required under Part I.E.1.b.i. Groundwater wells shall be gauged using an electronic sounder capable of measuring depth to groundwater within 100th of a foot. Following gauging, wells shall be purged according to EPA groundwater sampling procedures until:

- a. pH, temperature, and conductivity are stabilized within 10 percent, and
- b. turbidity has been reduced to 10 NTUs or the lowest practical levels achievable.

The above identified parameters shall be recorded in the field, and submitted in the monitoring report. Sampling equipment shall be decontaminated between wells. Purge water may be discharged to the brine pond; discharge to the ground surface is prohibited.

2. Groundwater Sample Collection - Groundwater samples shall be collected from all monitoring points and background monitoring points after wells recharge to within at least 80 percent of their original static water level. Groundwater samples shall be collected with a peristaltic pump that is decontaminated between sampling events. Samples shall be labeled, logged on chain-of-custody forms, and placed in cold storage pending delivery to a State certified analytical laboratory.
3. Five-Day Sample Procurement Limitation – To satisfy data analysis requirements for a given reporting period, samples collected from all Monitoring Points and Background Monitoring Points shall be taken within a span not exceeding five (5) days, and shall be taken in a manner that insures sample independence to the greatest extent feasible (Title 27, Section 20415(e)(12)(B)).

4. Groundwater Monitoring Parameters for Detection Monitoring – Groundwater samples collected from monitoring points and background monitoring points shall be analyzed for the following:

<u>Parameter</u>	<u>Unit</u>	<u>Sample Type</u>
Total Dissolved Solids (TDS)	mg/L	Grab
pH	#	Grab
Specific Conductance	μohms/cm	Grab
Total Petroleum Hydrocarbon (TPH-gas & diesel)	mg/L	Grab
Heavy Metals (As, Ba, Cd, Pb, Zn)	mg/L	Grab
Oil & Grease	mg/L	Grab

All Monitoring Points and Background Monitoring Points assigned to Detection Monitoring shall be sampled semi-annually in **November** and **April** of each year in accordance with Part I of this MRP. Monitoring results shall be reported in the semi-annual Detection Monitoring Report.

5. Data Analysis – Statistical or non-statistical analysis shall be carried out as soon as the data is available, in accordance with Part III of this monitoring program.

Monitoring Points and Background Monitoring Points – At a minimum of 90 days prior to the operation of the facility, the Discharger shall submit a proposed groundwater monitoring program, including background and detection monitoring locations, to the Executive Officer for review and approval.

6. Initial Background Determination: For the purpose of establishing an initial pool of background data for each Constituent of Concern at each Background Monitoring Point (Title 27, Section 20415(e)(6)):

- a. Whenever a new Constituent of Concern is added to the Water Quality Protection Standard, including any added by the adoption of this Board Order, the Discharger shall collect at least one (1) sample **quarterly** for at least one (1) year from each Background Monitoring Point in each monitored medium and analyze for the newly-added constituent(s); and
- b. Whenever a new Background Monitoring Point is added, including any added by this Board Order, the Discharger shall sample the new monitoring point at least **quarterly** for at least one (1) year, analyzing for all Constituents of Concern and Monitoring Parameters.

7. Semiannual Determination of Groundwater Flow Rate/Direction (Title 27, Section 20415(e)(15)): The Discharger shall measure the water level in each well and determine groundwater flow rate and direction in each groundwater body described in Part II.A.1. at

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least semiannually. This information shall be included in the semi-annual Detection Monitoring Reports required under Part I.E.1.

PART III
STATISTICAL AND NON-STATISTICAL ANALYSES

A. STATISTICAL AND NON-STATISTICAL ANALYSIS

The Discharger shall use the most appropriate of the following methods to compare the downgradient concentration of each monitored constituent or parameter with its respective background concentration to determine if there has been a release from the surface impoundment. For any given data set, proceed sequentially down the list of statistical analysis methods listed in Part III.A.1., followed by the non-statistical method in Part III.A.2., using the first method for which the data qualifies. If that analysis tentatively indicates the detection of a release, implement the retest procedure under Part III.A.3.

1. Statistical Methods. The Discharger shall use one (1) of the following statistical methods to analyze Constituents of Concern or Monitoring Parameters that exhibit concentrations exceeding their respective MDL in at least ten percent of the background samples taken during that Reporting Period. Each of these statistical methods is more fully described in the Statistical Methods discussion below. Except for pH, which uses a two-tailed approach, the statistical analysis for all constituents and parameters shall be a one-tailed (testing only for statistically significant increase relative to background) approach:
 - a. One-Way Parametric Analysis of Variance (ANOVA) followed by multiple comparisons (Title 27, Section 20415(e)(8)) – This method requires at least four (4) independent samples from each Monitoring Point and Background Monitoring Point during each sampling episode. It shall be used when the background data for the parameter or constituent obtained during a given sampling period, has not more than 15% of the data below PQL. Prior to analysis, replace all 'trace' determinations with a value halfway between the PQL and the MDL values reported for that sample run, and replace all "non-detect" determinations with a value equal to half the MDL value reported for that sample run. The ANOVA shall be carried out at the 95% confidence level. Following the ANOVA, the data from each downgradient Monitoring Point shall be tested at a 99% confidence level against the pooled background data. If these multiple comparisons cause the Null Hypothesis (i.e., that there is no release) to be rejected at any Monitoring Point, the Discharger shall conclude that a release is tentatively indicated from that parameter or constituent; or
 - b. One-Way Non-Parametric ANOVA (Kruskal-Wallis Test), followed by multiple comparisons – This method requires at least nine (9) independent samples from each Monitoring Point and Background Monitoring Point; therefore, the Discharger shall anticipate the need for taking more than four (4) samples per Monitoring Point, based upon past monitoring results. This method shall be used when the pooled background data for the parameter or constituent, obtained within a given sampling period, has not more than 50% of the data below the PQL. The ANOVA

shall be carried out at the 95% confidence level. Following the ANOVA, the data from each downgradient Monitoring Point shall be tested at a 99% confidence level against the pooled background data. If these multiple comparisons cause the Null Hypothesis (i.e., that there is no release) to be rejected at any Monitoring Point, the Discharger shall conclude that a release is tentatively indicated for that parameter or constituent; or

- c. Method of Proportions – This method shall be used if the "combined data set" – the data from a given Monitoring Point in combination with the data from the Background Monitoring Points – has between 50% and 90% of the data below the MDL for the constituent or parameter in question. This method; (1) requires at least nine (9) downgradient data points per Monitoring Point per Reporting Period, (2) requires at least thirty data points in the combined data set, and (3) requires that $n * P > 5$ (where n is the number of data points in the combined data set and P is the proportion of the combined set that exceeds the MDL); therefore, the Discharger shall anticipate the number of samples required, based upon past monitoring results. The test shall be carried out at the 99% confidence level. If the analysis results in rejection of the Null Hypothesis (i.e., that there is no release), the Discharger shall conclude that a release is tentatively indicated for that constituent or parameter; or
 - d. Other Statistical Methods. – These include methods pursuant to Title 27, Section 20415(e)(8)(c-e).
2. Non-Statistical Method. The Discharger shall use the following non-statistical methods for all constituents that are not amenable to statistical analysis by virtue of having been detected in less than 10% of applicable background samples. A separate variant of this test is used for the VOC_{water} Composite Monitoring Parameters. Regardless of the test variant used, the method involves a two-step process: (1) from all constituents to which the test variant applies, compile a list of those constituents which equal or exceed their respective MDL in the downgradient sample from a given Monitoring Point, then (2) evaluate whether the listed constituents meet either of the test variant's two possible triggering conditions. For each Monitoring Point, the list described above shall be compiled based on either the data from a single sample taken during the Monitoring Period for that Monitoring Point, or (where several independent samples have been analyzed for that constituent at a given Monitoring Point) from the sample that contains the largest number of detected constituents. Background shall be represented by the data from all samples taken from the appropriate Background Monitoring Points during that Reporting Period (at least one (1) sample from each Background Monitoring Point). The method shall be implemented as follows:
 - a. VOC_{water} Composite Monitoring Parameter – For any given Monitoring Point, the VOC_{water} Monitoring Parameter is a composite parameter addressing all detectable VOCs including at least all 47 VOCs listed in Appendix I to 40 CFR 258 and all unidentified peaks. The Discharger shall compile a list of each VOC which (1) exceeds its MDL in the Monitoring Point sample (an unidentified peak is compared

- to its presumed (MDL), and also (2) exceeds its MDL in less than ten percent of the samples taken during that Reporting Period from that medium's Background Monitoring Points. The Discharger shall conclude that a release is tentatively indicated for the VOC_{water} composite Monitoring Parameter if the list either (1) contains two or more constituents, or (2) contains one constituent that exceeds its PQL;
- b. Constituents of Concern: As part of the COC monitoring required under Part 2.A.5 of this MRP, for each Monitoring Point, the Discharger shall compile a list of COCs that exceed their respective MDL at the Monitoring Point, yet do so in less than ten percent of the background samples taken during that Reporting Period. The Discharger shall conclude that a release is tentatively indicated if the list either (1) contains two or more constituents, or (2) contains one constituent that exceeds its PQL.
3. Discrete Retest – In the event that the Discharger concludes that a release has been tentatively indicated (under Parts III.A.1. or III.A.2.), the Discharger shall, within 30 days of that conclusion, collect two (2) new suites of samples for the indicated Constituent(s) of Concern or Monitoring Parameter(s) at each indicated Monitoring Point, collecting at least as many samples per suite as were used for the initial test. Re-sampling of Background Monitoring Points is optional. As soon as the retest data is available, the Discharger shall use the same statistical method or non-statistical comparison separately on each suite of retest data. For any indicated Monitoring Parameter or Constituent of Concern at an affected Monitoring Point, if the test results of either (or both) of the retest data suites confirms the original indication, the Discharger shall conclude that a release has been discovered. All retests shall be carried out only for the Monitoring Point(s) for which a release is tentatively indicated, and only for the Constituent of Concern or Monitoring Parameter that triggered the indication there, as follows:
- a. If an ANOVA method was used in the initial test, the retest shall involve only a repeat of the multiple comparison procedure, carried out separately on each of the two (2) new suites of samples taken from the indicating Monitoring Point;
- b. If the Method of Proportions statistical test was used, the retest shall consist of a full repeat of the statistical test for the indicated constituent or parameter, carried out separately on each of the two (2) new sample suites from the indicating Monitoring Point;
- c. If the non-statistical comparison was used:
- i. Because the VOC Composite Monitoring parameters (VOC_{water}) each address, as a single parameter, an entire family of constituents which are likely to be present in any surface impoundment release, the scope of the laboratory analysis for each retest sample shall include all VOCs detectable in that retest sample. Therefore, a confirming retest for either parameter

shall have validated the original indication even if the suite of constituents in the confirming retest sample(s) differs from that in the sample that initiated the retest;

- ii. Because all Constituents of Concern that are jointly addressed in the non-statistical testing under Part III.A.2. remain as individual Constituents of Concern, the scope of the laboratory analysis for the non-statistical retest samples shall be narrowed to involve only those constituents detected in the sample which initiated the retest.

SUMMARY OF SELF-MONITORING AND REPORTING REQUIREMENTS

A. GROUNDWATER MONITORING

1. Groundwater monitoring wells shall be sampled/analyzed semi-annually for the following parameters/constituents:

<u>Parameters & Constituent</u>	<u>Unit</u>	<u>Type of Sample</u>	<u>Reporting Frequency</u>
a. Total Dissolved Solids (TDS)	mg/L	grab	semiannual
b. PH	#	field measurement	semiannual
c. Specific Conductance	μohms/cm	field measurement	semiannual
d. Total Petroleum Hydrocarbons (TPH-Gas & Diesel)	mg/L	grab	semiannual
e. Heavy Metals (As, Ba, Cd, Pb, Zn)	mg/L	grab	semiannual
f. Oil & Grease	mg/L	grab	semiannual

2. The collection, preservation, and holding times of all samples shall be in accordance with the U.S. Environmental Protection Agency approved procedures. All analyses shall be conducted by a laboratory certified by the California Department of Public Health to perform the required analyses.

B. BRINE TO/FROM SIMBOL, INC RESEARCH AND DEMONSTARTION FACILITY

	<u>Sampling</u>	<u>Reporting</u>	<u>Unit</u>	<u>Observation or Frequency</u>	<u>Frequency</u>
1. Number of days per month brine is piped to the R&D Facility.			days	Monthly	semiannual
3. Estimated daily volume of brine that is piped to the R&D Facility.			days	Monthly	semiannual
3. Number of days in a month that brines is piped from the R&D Facility back to the brine pond			days	Monthly	semiannual
3. Estimated daily volume of brine that is piped back to the Brine Pond from the R&D Facility			days	Monthly	semiannual

C. BRINE POND SURFACE IMPOUNDMENT: Leakage Detection System (LDS), and Solids Monitoring

	<u>Sampling</u>	<u>Reporting</u>	<u>Unit</u>	<u>Observation or Frequency</u>	<u>Frequency</u>
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1. Estimated volume of solid/liquid in brine pond	ft ³	Monthly	semiannual
2. Measurement of freeboard	ft	Monthly	semiannual
3. Volume of solids removed and shipped to off site waste management facility	tons	Monthly	semiannual

C. INJECTION WELL MONITORING

	Sampling	Reporting	Observation or		
			<u>Unit</u>	<u>Frequency</u>	<u>Frequency</u>
1. Volume of fluid injected into each well				Monthly	semiannual
2. Grab sample from main injection header analyzed for the following:					
a. Total Dissolved Solids (TDS)			mg/L	semiannual	semiannual
b. pH			#	semiannual	semiannual

D. MONITORING REORTS AND OBSERVATION SCHEDULE

“Reporting Period” means the duration separating the submittal of a given type of monitoring report from the time the next iteration of that report is scheduled for submittal. An annual report, which is a summary of all the monitoring during the previous year, shall also be submitted to the Regional Water Board. The submittal dates for Detection Monitoring Reports and the Annual Summary Report are as follows:

1. Detection Monitoring Reports

- a. 1st Semiannual Report (January 1 through June 30) – report due by August 1
- b. 2nd Semiannual Report (July 1 through December 31) – report due by March 1

2. Annual Summary Report

January 1 through December 31 – report due March 15 of the following year.

- 3. The Detection Monitoring Reports and the Annual Summary Report shall include the following:
 - a. The Discharger shall arrange the data in tabular form so that the specified information is readily discernible. The data shall be summarized in such a manner as to clearly illustrate whether the facility is operating in compliance with WDRs.

b. Records of monitoring information shall include:

- i. The date, exact place, and time of sampling or measurement;
- ii. The individual performing the sampling or measurement;
- iii. The date the analysis was performed;
- iv. The initials of the individual performing the analysis;
- v. The analytical technique or method used; and
- vi. The result of the analysis.

c. Each report shall contain the following statement:

"I declare under the penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations."

d. A duly authorized representative of the Discharger may sign the documents if:

- i. Authorization is made in writing by the person described in Part I.E.1.a;
- ii. Authorization specifies an individual or person having responsibility for the overall operation of the regulated disposal system; and
- iii. Written authorization is submitted to the Regional Water Board Executive Officer.
- iv. Monitoring reports shall be certified under penalty of perjury to be true and correct, and shall contain the required information at the frequency designated in this monitoring report.

Ordered by: _____
Original Signed By
ROBERT PERDUE
Executive Officer

June 20, 2013
Date