CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
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ORDER NO. R2-2008-0079

WASTE DISCHARGE REQUIREMENTS FOR GE-HITACHI NUCLEAR ENERGY AMERICAS, LLC, VALLECITOS NUCLEAR CENTER

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter Regional Water Board), finds:

1. **Discharger**. GE-Hitachi Nuclear Energy Americas, LLC (hereinafter Discharger) is currently discharging pursuant to Order No. R-2-2003-0052 and National Pollutant Discharge Elimination System (NPDES) Permit No. CA0006246.

2. **Facility Description.** The Discharger owns and operates Vallecitos Nuclear Center (hereinafter Facility), a research facility located at 6705 Vallecitos Road in the Vallecitos Valley near the town of Sunol about five miles southeast of the City of Pleasanton in Alameda County (Figure 1). The primary functions of the Facility are nuclear fuel and materials research and production of radio-isotopes for medical and other uses. Facilities onsite include a small nuclear test reactor; laboratories for studies in radiochemistry, metallurgy, and nuclear fuels; machine shops; and administrative facilities.

3. **Sanitary Wastewater.** The Discharger produces about 11,000 liters per day (2,900 gallons per day) of domestic sanitary wastewater (hereinafter Waste 001). This wastewater is routed to an Imhoff tank, filtered through sand beds, disinfected, and held in a 230,000 liter (60,000-gallon) retention basin where it is recirculated to ensure that it remains adequately oxidized. The Discharger tests its sanitary effluent for compliance with discharge limitations before disposing of it onsite through a sprinkler irrigation system to about ten acres of land to the disposal area identified on Figure 2. The Discharger has a contractor haul its sludge and septage to an offsite treatment plant. The table below summarizes water quality parameter of Waste 001 from January 2005 through December 2007.

Parameter	Range	Average	N
pH, standard units	5.1-8.8	7.0±0.7	62
Total coliforms, MPN	<2-1600	[1]	68
Dissolved oxygen	5.7-13	9.1±2.1	55

1- Only 8 of 68 samples were above the detection limit.

4. **Industrial Wastewater.** The Discharger also produces about 76,000 liters per day (20,000 gallons per day) of once-through non-contact cooling water primarily from its nuclear test reactor (hereinafter Waste 002). Industrial water is also generated from

other sources such as the waste evaporator, equipment chillers, boilers, high temperature/pressure loops, and runoff from machine shop and laboratory sinks. This waste stream may also contain stormwater that infiltrates into the collection system. Waste 002 is stored in one of three 230,000-liter retention basins, pH adjusted as necessary, and tested for compliance with discharge limits prior to onsite disposal through a sprinkler irrigation system to about ten acres of land to the disposal area identified in Figure 2. After demonstrating compliance with discharge limitations, Waste 002 may also be used for landscape watering to other areas onsite. Since the Facility does not discharge Waste 001 or Waste 002 offsite, there are no restrictions on combining sanitary and industrial wastewaters provided the Discharger can demonstrate compliance with the effluent limitation specified in this Order. The table below summarizes water quality parameters of Waste 002 from January 1999 through September 2002:

Parameter	**Average[1]**	**Range**
Temperature, ^{o}C	--	7.8-29
pH, standard units	--	6.2-8.6
TSS, mg/L	1.4	<1-3
TDS, mg/L	61	4-430
Chloride, mg/L	6.3	2.3-20
Oil and grease, mg/L	[2]	<1-5.3[4]
Dissolved oxygen, mg/L	9.2	7.2-11.8
Chromium, total, µg/L	2.4	<1-5.35
Copper, µg/L	11	<2-93
Lead, µg/L	1.2	<0.5-1.8
Mercury, µg/L	[3]	<0.002-<0.2
Zinc, µg/L	19	<1-80
Acute toxicity, % survival		75-100

1- for non-detect values, ½ of the detection limit was used to calculate the average.
2- There was only one detected value for oil and grease.
3- All reported values were below the detection limits.
4- The sample analyzed in September 2000 was collected improperly and resulted in a concentration of 120 mg/L. The effluent was re-sampled and the analysis indicated a concentration below detectable levels.

More recent data for most of these parameters is not available because monitoring for them was not required during this permit cycle. The table below summarizes water quality parameters of Waste 002 from January 2005 through December 2007.

Parameter	**Range**	**Average**	**N**
Temperature, ^{o}C	27-34	22±4.8	425
pH, standard units	6.5-8.5	7.8±0.5	424
Oil and grease, mg/L	<4.7-5.2	[1]	34

1- Only three samples were above the detection limit.

5. **Permit Application.** The Discharger submitted a Report of Waste Discharge, dated January 7, 2008**,** and applied for an NPDES permit reissuance to discharge up to 23,000 gallons per day of treated domestic wastewater and untreated industrial wastewater from its Facility into a tributary of Vallecitos Creek. An NPDES permit is unnecessary because these wastewaters can be and are disposed of through land application rather than to surface waters. On April 14, 2008, the Discharger submitted an assessment of its wastewater disposal practices that indicates land disposal will be the primary method of future wastewater disposal, but surface water disposal may be necessary under certain conditions such as equipment failure, future business expansion, or wet weather conditions that prevent adequate percolation. However, the Discharger did not adequately demonstrate a need to discharge to surface waters. There have been no discharges to surface waters since about 2002, and the Discharger has not demonstrated a need to so in the future. Contingency measures are required in the event of equipment failure, and the Discharger can implement other measures (such as increased storage) to address future growth or adverse environmental conditions. This Order rescinds Order No. R-2-2003-0052 and it establishes new Waste Discharge Requirements for land application of wastewaters only. Surface water discharges are not allowed.

6. **Legal Authorities.** This Order serves as Waste Discharge Requirements (WDRs) pursuant to article 4, chapter 4, division 7 of the California Water Code (commencing with section 13260).

7. **Basin Plan.** The Regional Water Board adopted a Water Quality Control Plan for the San Francisco Bay Basin (hereinafter Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan. In addition, the Basin Plan implements State Water Resources Control Board (State Water Board) Resolution No. 88-63, which establishes state policy that all waters, with certain exceptions, be considered suitable or potentially suitable for municipal or domestic supply. This Order implements the Regional Water Board's Basin Plan.

8. **Beneficial Uses.** The Facility is located in the Sunol Groundwater Basin (Basin 2-11 in the Basin Plan) upgradient of Niles Cone. Existing uses of the Sunol Valley Groundwater Basin are:

   a. Municipal supply (MUN),
   b. Industrial process supply (PROC),
   c. Industrial service supply (IND), and
   d. Agricultural supply (AGR)

9. **Site Hydrogeology.** The Facility is located in the Vallecitos Groundwater Subbasin within the Sunol Valley Groundwater Basin. The Sunol Valley Groundwater Basin is primarily a closed groundwater basin within the Alameda Creek Watershed with multiple sub-basins of variable water quality. The Main Basin (that portion underlying the Cities of Livermore and Pleasanton) has the highest water quality and supplies most of the municipal wells in the area. The Cities of Livermore and Pleasanton export their treated wastewater to East Bay Dischargers Authority's interceptor in San Leandro

for disposal in San Francisco Bay to avoid salt buildup in the groundwater supply. The Water Quality Objectives for groundwater in the Alameda Creek Watershed above Niles are listed in Table 3-7 of the Basin Plan.

Groundwater within the Vallecitos Subbasin occurs in the sandy clay and cemented gravels of the Livermore Formation, and in alluvial deposits, which are naturally drained by outflow through Vallecitos Creek. Groundwater in the Vallecitos Subbasin occurs under both confined and unconfined conditions. Groundwater at the Facility ranges from 8.1 to 19 meters below ground surface (bgs). Near the wastewater retention basins at the southwest portion of the property, groundwater depths are as shallow as 0.6 meters bgs in winter. Groundwater at the Facility flows in a southwesterly direction at velocities ranging from 0.003 meters/day in clays to 2.4 meters/day in gravels. In areas where gravels mixed with clays (most of the developed site) are saturated close to the surface, the average groundwater flow rate is 0.6 meters/day. The Discharger pumps groundwater near the wastewater storage basins to prevent them from floating due to shallow water conditions. This Order will establish a groundwater monitoring program to ensure beneficial uses are protected.

10. **Previous Permit Limits.** Board Order No. R-2-2003-0052 contained effluent limits for temperature, pH, settleable solids, total suspended solids, oil and grease, dissolved oxygen, copper, lead, mercury, zinc, and acute toxicity. There were also receiving water limits for dissolved oxygen, dissolved sulfides, pH, and un-ionized ammonia. These limits were based on the protection of surface waters. Since surface water discharges are no longer allowed, effluent limits for many of these parameters are no longer necessary. This Order sets limits designed specifically to protect groundwater and to prevent nuisance conditions.

11. **Total Dissolved Solids.** The table below compares the total dissolved solids (TDS) concentrations of the Discharger's waste streams to ambient and regulatory levels:

	Average TDS conc. (mg/L)	**N**	**Notes**
Waste 001	1100±700	63	per batch from June 2003 to Jan 2008 monitoring reports
Waste 002	96±78	40	per batch from June 2003 to Jan 2008 monitoring reports
001 & 002 combined	190±92	42	flow weighted monthly average
Ambient	531±100	22	from select nearby Alameda County Flood Control and Water Conservation District wells, 1985-1997
Water Quality Objective	500 or ambient, whichever is lower		from Basin Plan, Table 3-7

As both the industrial and sanitary discharges will affect TDS values in groundwater, this Order allows for an average limit for the combined discharge.

12. **Nutrients.** To protect the beneficial uses of groundwater for the Alameda Creek watershed above Niles (central basin), the Basin Plan indicates that nitrate (as NO_3) must not exceed 45 mg/L. Waste 001 has high concentrations of nutrients, while such levels are expected to be low in Waste 002. The average nitrate concentration of Waste 001 from August 2003 through February 2007 was 200±82 mg/L (n=12). The total kjeldahl nitrogen, which is the ammonia and organic nitrogen combined, was normally below detection levels. Nutrients were not measured in Waste 002. Ammonia present in Waste 001 could be taken up by plants, immobilized by microbes, and/or oxidized to nitrate. Plants may also uptake nitrate, but this form is very soluble and could quickly leach to groundwater. To address nitrate, the Discharger developed a nutrient management plan to ensure the amount of nutrients discharged to the irrigation fields do not exceed the crop demand. This Order incorporates the Nutrient Management Plan into a more general wastewater Disposal Plan that address all environmental issues related to the discharge. As both the industrial and sanitary discharges will affect nutrient levels in groundwater, this Order allows for an average limit for the combined discharge.

13. **Metals.** Historically, the Discharger has not been able meet effluent limits for copper and zinc when discharging to surface waters because those limits were based on aquatic life protection. To determine if limits for copper and zinc are necessary when discharging to land, maximum observed concentrations of the effluent were compared to objectives for protecting agricultural and municipal uses. The most restrictive objectives were based on protecting the buildup of metals in the soil. Those threshold concentrations are 200 µg/L for copper and 2000 µg/L for zinc (Basin Plan Table 3-6). The maximum observed concentrations in the discharge from 2003 to 2008 were 60 µg/L for copper and 50 µg/L for zinc. Since there is no reasonable potential for the discharge to harm beneficial uses, this Order does not include effluent limits for copper or zinc.

14. **Radioactive substances.** The Discharger does not discharge wastewaters containing radioactive substances. Specific radiological effluent limits are not included in this Order because (1) there are none in the discharge, and (2) the Nuclear Regulatory Commission and the California Department of Public Health have primary responsibility for regulations of such constituents in wastewater discharges pursuant to Title 10 CFR, Chapter 1, Part 20 et seq. and in the California Code of Regulations, Titles 17 and 22 (Regulations for Radiation Control and Domestic Water Quality and Monitoring, respectively).

15. **Nuisance Conditions.** To demonstrate that it will not cause nuisance conditions, as defined in Section 13050(m) of the California Water Code, the Discharger provided a water balance that shows wastewaters will percolate in a timely manner. This is necessary to ensure that the Discharger does not create conditions favorable to mosquitoes. To minimize such conditions, this Order limits the time for standing water in the disposal area and requires corrective measures to prevent emergent vegetation

in areas where water tends to pond. Additionally, this Order requires that Waste 001 be adequately oxidized before it is discharged.

16. **Storm Water Pollution Prevention Plan.** The Discharger has filed a Notice of Intent with the State Water Board for coverage under the Statewide General Permit for Storm Water Discharges Associated with Industrial Activities (Order No. 97-03-DWQ). Therefore, this Order does not cover storm water discharges. The Discharger must maintain a Storm Water Pollution Prevention Plan in accordance with the general permit for the portions of the Facility that require coverage.

17. **Monitoring and Reporting.** Water Code sections 13267 and 13383 authorize the Regional Water Board to require technical and monitoring reports. The Monitoring and Reporting Program (Attachment 3) establishes monitoring and reporting requirements to implement federal and State requirements.

18. **California Environmental Quality Act (CEQA).** Under Water Code section 13389, this action to adopt Waste Discharge Requirements is exempt from the provisions of CEQA.

19. **Notification of Interested Parties.** The Regional Water Board has notified the Discharger and interested agencies and persons of its intent to prescribe Waste Discharge Requirements for the discharge and has provided them with an opportunity to submit their written comments and recommendations.

20. **Consideration of Public Comment**: The Regional Water Board, in a public meeting, heard and considered all comments pertaining to this discharge.

21. **Permit Reopener.** This Order includes a reopener provision to allow numeric effluent limitations to be added or deleted for any constituent that exhibits or does not exhibit, respectively, reasonable potential. The Regional Water Board will make this determination based on monitoring results.

IT IS HEREBY ORDERED, pursuant to the provisions of Division 7 of the California Water Code, and the regulations, plans and policies adopted thereunder, that Order No. R-2-2003-0052 be rescinded upon the effective date of this Order as specified in Provision C.13 below, and that the Discharger shall comply with the following:

A. Discharge Prohibitions

1. The discharge of wastewater at a location or in a manner different than that described in the Findings of this Order is prohibited.

2. The discharge of wastes or hazardous substances in a manner that will degrade water quality or adversely affect beneficial uses of waters of the State is prohibited.

3. The discharge shall not escape the disposal area, either by surface flow or airborne spray.

4. There shall be no bypasses of any treatment processes for Waste 001. In the event of a treatment process failure to Waste 001, waste should be stored until treatment can occur or an alternate disposal plan has been approved by the Regional Water Board.

5. The discharge shall not cause a nuisance as defined by Section 13050(m) of the California Water Code.

6. The nutrient load to any portion of the waste disposal area shall not exceed the crop demand.

7. No chemicals pollutants may be discharged into any of the laboratory sinks. Residual/trace amounts of chemicals from cleaning (e.g., soap, household cleaners) may be discharged into the sinks. Also, trace amounts of metals from occasional drainage of the high/temperature loops are authorized.

B. Effluent Limitations

1. The Discharger shall comply with the following effluent limitations:

Parameter	Units	Waste	Monthly Average	Instantaneous Minimum	Instantaneous Maximum
Total Dissolved Solids*	mg/L	001 & 002	500		
pH	Standard Units	001		6.0	9.0
pH	Standard Units	002		6.0	9.0
Dissolved Oxygen	mg/L	001		1.0	
Nitrate (as NO_3) *	mg/L	001 & 002	45		

* Compliance shall be determined using the weighted average of Waste 001 and Waste 002 calculated as follows:

$$TDS_{MonthlyAverage} = \frac{\Sigma(Q_{001} * C_{001}) + \Sigma(Q_{002} * C_{002})}{\Sigma(Q_{001} + Q_{002})}$$

where Q= volume discharged, and
C= TDS concentration

2. For Waste 001, the median most probable number (MPN) shall not exceed 23 coliform organisms per 100 milliliters of sample, as determined from the bacteriological results of the last seven (7) samples, and the MPN shall not exceed 240 coliform organisms per 100 milliliters in any two (2) consecutive samples.

C. Provisions

1. **Mosquito abatement**. To prevent the breeding of mosquitoes:

   i. The topography of the disposal area shall be maintained to minimize low areas and ditches where water tends to pond,

   ii. Application of wastewater shall be managed so that there is no standing water in any part of the disposal area for more than ten (10) days,

   iii. The disposal area shall be maintained free of all emergent, marginal, and floating vegetation, with the exception of normally occurring grasses and other plants, and

   iv. Low pressure and unpressurized pipelines shall not be accessible to mosquitoes.

2. **Self-Monitoring Program.** The Discharger shall comply with the Self-Monitoring Program (Attachment 3) for this Order and any amendments made to it by the Executive Officer.

3. **Monitoring Well Installation Workplan.** Within 60 days of the adoption date of this Order, the Discharger shall submit a monitoring well installation workplan acceptable to the Executive Officer designed to monitor the impacts of the discharge to the underlying shallow groundwater. The workplan shall propose well locations and screening depth intervals for a monitoring well network. Wells shall be constructed in accordance with guidelines provided by the Alameda County Flood Control and Water Conservation District. At a minimum, the network shall consist of at least three wells down gradient from the disposal area, two wells within the disposal area, and one well up gradient of the disposal area. The wells shall be screened at depth intervals that will most effectively monitor the impacts, if any, of the discharge to the groundwater.

4. **Monitoring Well Completion Report.** Within 90 days of approval by the Executive Officer of the Workplan in Provision 3 above, the Discharger shall submit a report documenting the completion of the monitoring well installations. The report shall show the locations of the wells and provide the boring logs and the as-built construction details.

5. **Wastewater Disposal Plan.** Within 60 days of the adoption date of this Order, the Discharger shall submit a first annual Wastewater Disposal Plan acceptable to the Executive Officer describing how wastewater is managed to minimize impacts to the

groundwater and to the environment. The plan shall describe (1) how wastewater is to be applied to the irrigation fields to maximize infiltration, (2) how the irrigation fields are to be maintained in regard to topography and crop management, (3) the application rates and locations of discharges within the irrigation fields over the past year, (4) any problems over the past year regarding standing water or any other potential nuisances, and (5) proposed maintenance measures for the next year. The Discharger shall review the Wastewater Disposal Plan annually, at a minimum, and revise it as necessary. The Discharger shall submit to the Regional Water Board, along with its annual report, a description of the results of the review process, including an estimated time schedule for completion of any revisions determined to be necessary and a description of any revisions.

6. **Operations and Maintenance Manual.** The Discharger shall review, and update as necessary, its Operations and Maintenance Manual annually or within 90 days of completion of any significant facility or process changes. The Discharger shall submit to the Regional Water Board, along with its annual report, the results of the review process, including an estimated time schedule for completion of any revisions determined necessary and a description of any such revisions.

7. **Contingency Plan.** The Discharger shall maintain a Contingency Plan as required by Board Resolution 74-10, and as prudent in accordance with current industrial facility emergency planning. The discharge of pollutants in violation of this Order where the Discharger has failed to develop and/or adequately implement a contingency plan will be the basis for considering such discharge a willful and negligent violation of this Order pursuant to 13387 of the California Water Code. The Discharger shall review, and update as necessary, the Contingency Plan for the plan to remain useful and relevant to current equipment and operation practices. Reviews shall be conducted annually, and updates shall be completed as necessary. The Discharger shall submit to the Regional Water Board, along with its annual report, a description of the results of the review process, including an estimated time schedule for completion of any revisions determined to be necessary and a description of any revisions.

8. **Change in Control or Ownership.** In the event of any change in control or ownership of land or waste discharge facilities presently owned or controlled by the Discharger, the Discharger shall notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be immediately forwarded to the Regional Water Board. To assume responsibility of and operations under this Order, the succeeding owner or operator must apply in writing to the Executive Officer requesting transfer of the Order. Failure to submit the request shall be considered a discharge without requirements, a violation of the California Water Code.

9. **Contractor / Consultant Qualifications**: All documents required in the Provisions of this Order shall be signed by and stamped with the seal of a California registered geologist, a California certified engineering geologist, or a California registered civil engineer.

10. **Lab Qualifications**: All samples shall be analyzed by State-certified laboratories or laboratories accepted by the Regional Water Board using approved U.S. EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control (QA/QC) records for Regional Water Board review. This provision does not apply to analyses that can only reasonably be performed on-site (e.g. temperature).

11. **Reporting of Hazardous Substance Release**: If any hazardous substance is discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, the Discharger shall report such discharge to the Regional Water Board by calling (510) 622-5633 during regular office hours (Monday through Friday, 8:00 to 5:00). This reporting is in addition to reporting to the Office of Emergency Services required pursuant to the Health and Safety Code.

12. **Permit Reopener.** The Regional Water Board may modify or reopen this Order if present or future investigations demonstrate that the discharge(s) governed by this Order will have reasonable potential to cause or contribute to adverse impacts on water quality and/or beneficial uses of the receiving waters, or new or revised water quality objectives come into effect.

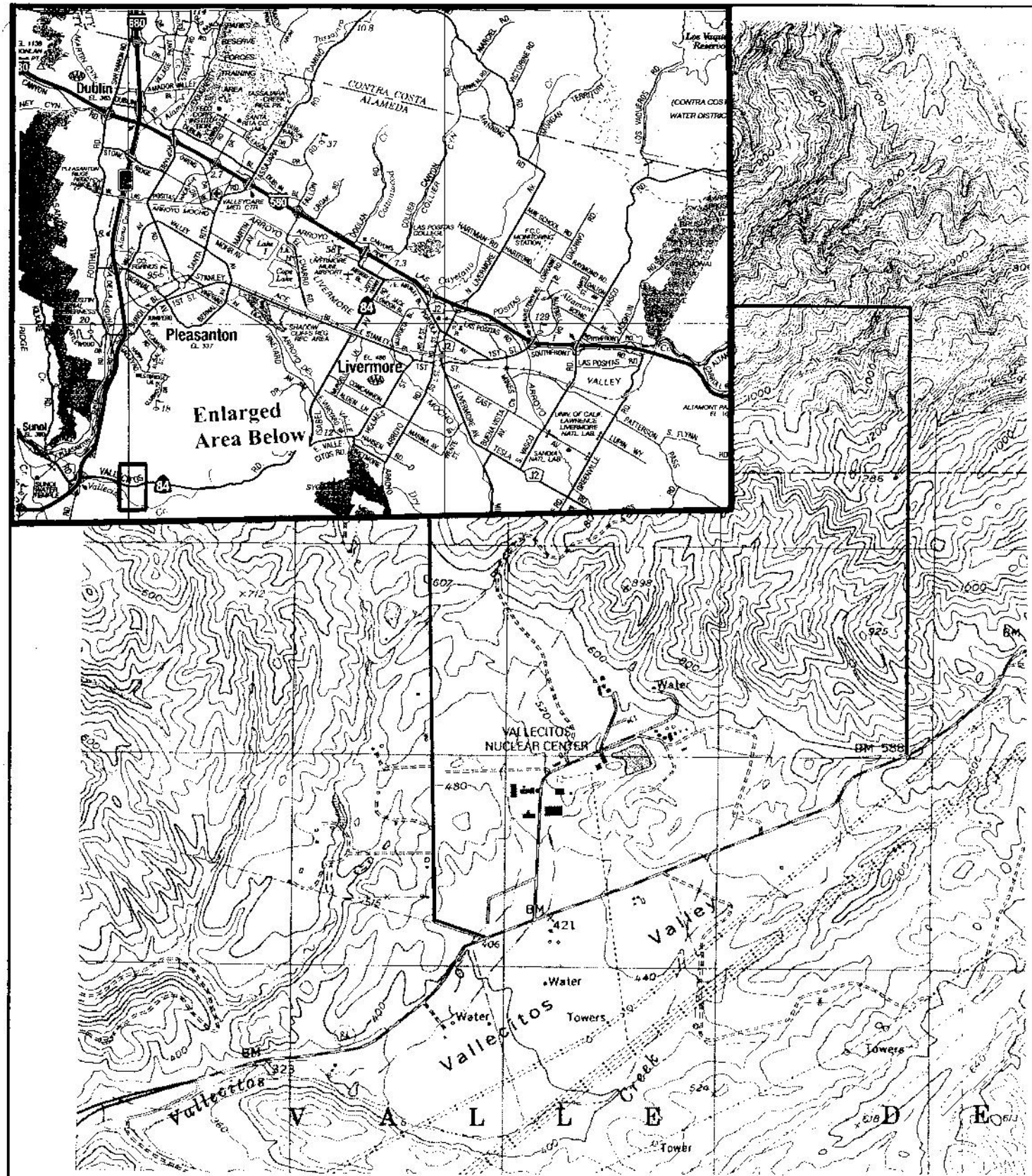
13. **Effective Date.** This Order is effective December 1, 2008.

I, Bruce H. Wolfe, Executive Officer, do hereby certify that this Order with all attachments is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on September 10, 2008.

Digitally signed by Bruce Wolfe
Date: 2008.09.15 11:04:10 -07'00'

Bruce H. Wolfe, Executive Officer

Attachments
1. Site Location
2. Site Map
3. Self-Monitoring Program



Scale 1:24,000

Site Boundary

Contour Interval 40 feet

based on USGS Topographic Maps
Lacosta Valley and Livermore, CA

Figure 1. Site Location

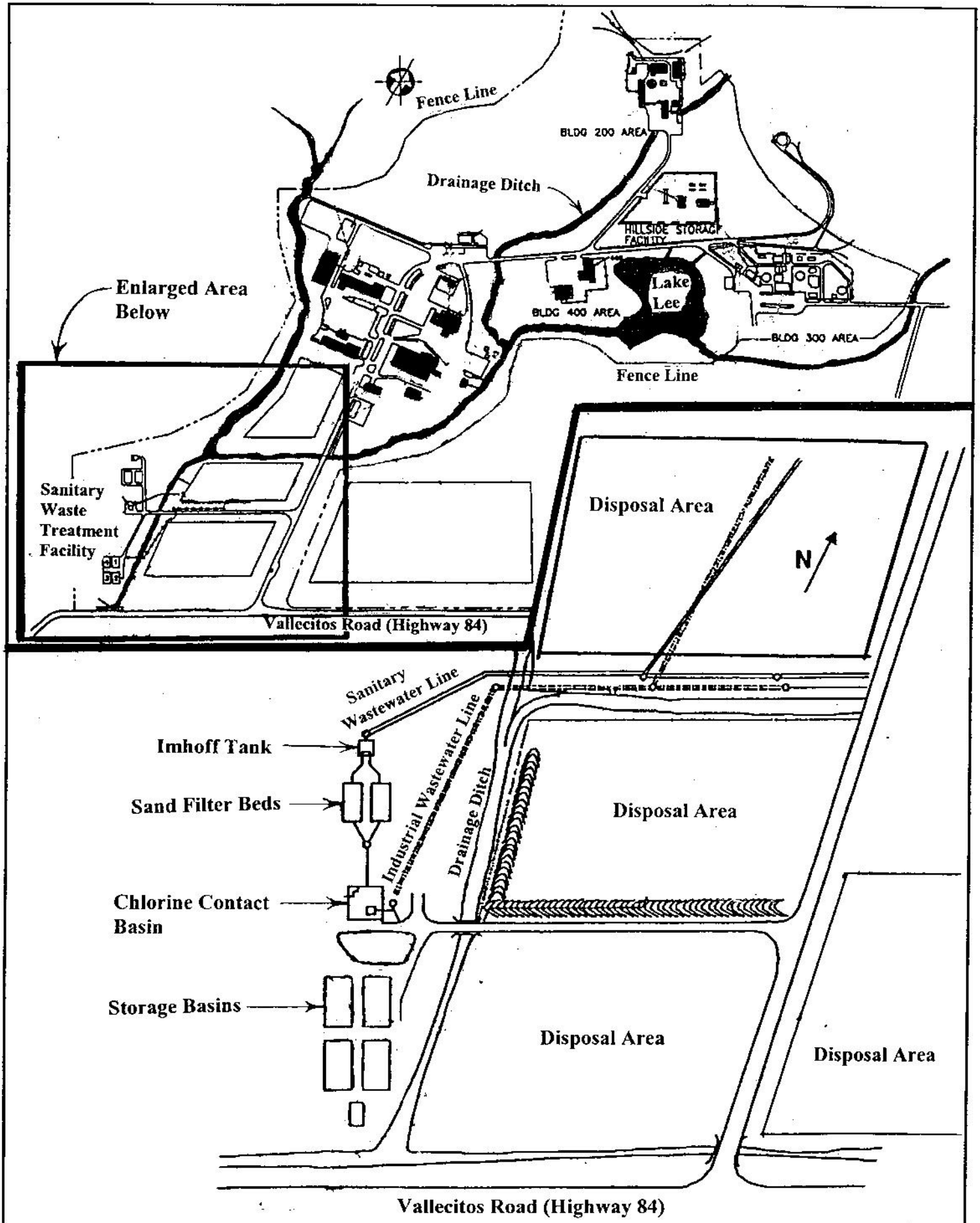


Figure 2. Site Map

Attachment 3

SELF-MONITORING PROGRAM FOR:

GE-HITACHI NUCLEAR ENERGY AMERICAS, LLC,
VALLECITOS NUCLEAR CENTER

for the property located at

6705 VALLECITOS ROAD, SUNOL
ALAMEDA COUNTY

1. **Authority and Purpose**: The Regional Water Board requires the technical reports in this Self-Monitoring Program pursuant to California Water Code Sections 13267 and 13383.

2. **Effluent Monitoring Locations:** Monitoring locations are:

   E-001 – At any point in the retention basin that is representative of Waste 001 prior to disposal in the irrigation fields.

   E-002 – At any point in the retention basin that is representative of industrial wastewater (Waste 002) prior to disposal in the irrigation fields.

3. **Effluent Monitoring:** The Discharger shall collect representative samples of its effluent and analyze the samples according the table below:

Parameter	Units	Frequency	Location	Sample Type
Volume Discharged	Liters	every batch discharge	E-001 & E-002	Estimate
Total Dissolved Solids	mg/L	monthly	E-001 & E-002	grab or composite
pH	Standard Units	monthly	E-001 & E-002	grab
Total Coliform	MPN/100mL	monthly	E-001	grab
Dissolved Oxygen	mg/L	monthly	E-001	grab
Nitrate (as NO_3)	mg/L	monthly	E-001 & E-002	grab
Total Ammonia (as N)	mg/L	monthly	E-001	grab

4. **Groundwater Monitoring**: The Discharger shall measure groundwater elevations and collect groundwater samples monthly in all monitoring wells identified in its monitoring well network (Provision C.3 and C.4) for the first year after installation and quarterly after that. The Discharger shall analyze groundwater samples for total dissolved solids, ammonia, and nitrate.

5. **Quarterly Monitoring Reports**: The Discharger shall submit quarterly monitoring reports to the Regional Water Board no later than 30 days following the end of the quarter (e.g., report for first quarter of the year due April 30). The first quarterly monitoring report shall be due on January 31, 2009. The reports shall include:

   a. Transmittal Letter: The transmittal letter shall discuss any violations during the reporting period and actions taken or planned to correct the problem. The Discharger's principal executive officer or his/her duly authorized representative shall sign the letter and shall include a statement by the official, under penalty of perjury, that the report is true and correct to the best of the official's knowledge.

   b. Groundwater Elevations: Present groundwater elevation data in tabular form, and prepare a groundwater elevation map for each monitored water-bearing zone.

   c. Groundwater Analyses: Present groundwater sampling data in tabular form and prepare an isoconcentration map for total dissolved solids. The report shall indicate the analytical method used, detection limits obtained for each reported constituent, and a summary of QA/QC data. The report shall describe any significant increases in contaminant concentrations since the last report and any measures proposed to address the increases. Supporting data, such as lab data sheets, need not be included (see "Record Keeping" - below).

   d. Status Report: The quarterly report shall describe any significant changes to treatment and/or operational procedures and planned changes for the following quarter.

6. **Annual Monitoring Reports**: The Discharger shall submit annual monitoring reports to the Regional Water Board no later by March 1 of each year. The reports shall include:

   a. Transmittal Letter: The transmittal letter shall discuss any violations during the reporting period and actions taken or planned to correct them. The letter shall be signed by the Discharger's principal executive officer or his/her duly authorized representative, and shall include a statement by the official, under penalty of perjury, that the report is true and correct to the best of the official's knowledge.

   b. Compliance summary: A summary and analysis of the compliance history, treatment effectiveness, and groundwater quality over the past year.

   c. Management Plans. Summary reports of the Wastewater Disposal Plan, the Contingency Plan, and Operations and Maintenance Manual as described in Provisions C.5, C.6, and C.7, respectively.

7. **Violation Reports**: If the Discharger violates requirements in this Order, then the Discharger shall notify the Regional Water Board by telephone as soon as practicable once the discharger has knowledge of the violation. Board staff may, depending on violation severity, require the Discharger to submit a separate technical report on the violation within five working days of telephone notification.

8. **Record Keeping**: The Discharger or his/her agent shall retain data generated for the above reports, including lab results and QA/QC data, for a minimum of six years after origination and shall make them available to the Regional Water Board upon request.

9. **SMP Revisions**: Revisions to the Self-Monitoring Program may be ordered by the Executive Officer, either on his/her own initiative or at the request of the Discharger. Prior to making SMP revisions, the Executive Officer will consider the burden, including costs, of associated self-monitoring reports relative to the benefits to be obtained from these reports.