CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL VALLEY REGION

REVISED MONITORING AND REPORTING PROGRAM R5-2011-0009

FOR

BUENA VISTA BIOMASS POWER, LLC BUENA VISTA BIOMASS POWER PROJECT CLASS II SURFACE IMPOUNDMENT AMADOR COUNTY

Compliance with this Monitoring and Reporting Program, and with the companion Standard Provisions and Reporting Requirements dated September 2003, is ordered by Waste Discharge Requirements Order R5-2011-0009. Failure to comply with this Program, or with the Standard Provisions and Reporting Requirements, constitutes noncompliance with the WDR's and with the Water Code, which can result in the imposition of civil monetary liability.

This Monitoring and Reporting Program shall be implemented as of date of the adoption of Waste Discharge Requirements Order R5-2011-0009. Therefore, all monitoring and reporting requirement shall be completed per the schedule established herein. If no discharge takes place during the reporting period, this shall be stated in the submitted Monitoring Report. The groundwater monitoring shall start as of date of the adoption of Waste Discharge Requirements Order R5-2011-0009.

A. REPORTING

The Discharger shall report monitoring data and information as required in this Monitoring and Reporting Program, and as required in the Standard Provisions and Reporting Requirements. Reports which do not comply with the required format will be rejected, and the Discharger shall be deemed to be in noncompliance with the WDR's. In reporting the monitoring data required by this Program, the Discharger shall arrange the data in tabular form so that the date, the constituents, the concentrations, and the units are readily discernible. The data shall be summarized in such a manner so as to illustrate clearly the compliance with waste discharge requirements, or the lack thereof. Historical and current monitoring data shall be graphed at least once annually. Graphs for the same constituent shall be plotted at the same scale to facilitate visual comparison of monitoring data. A short discussion of the monitoring results, including notations of any water quality violations shall precede the tabular summaries. Reports and data shall be submitted, whenever possible, in a digital format.

Method detection limits and practical quantitation limits for analyses shall be reported. All peaks shall be reported, including those which cannot be quantified and/or specifically identified. Field and laboratory tests shall be reported in the semiannual monitoring reports. The results of any monitoring done more frequently than required shall be reported to the Board.

B. REQUIRED MONITORING REPORTS AND SUBMITTAL DATES

1. Semi-annual Groundwater, Vadose Zone, and Leachate Monitoring Reports

All semiannual monitoring reports shall include all water quality data and observations collected during the reporting period and submitted as per the **Reporting Due Dates** in Section B.6. of this Monitoring and Reporting Program. At a minimum, the sampling and data collection as required in Section D of this Monitoring and Reporting Program; the Standard Provisions and Reporting Requirements (2003); and Waste Discharge Requirements Order R5-2011-0009, shall be reported.

2. Annual Monitoring Summary Report

The Discharger shall submit an Annual Monitoring Summary Report to the Board covering the previous monitoring year. The Annual Monitoring Report may be combined with the second semiannual report, but the title shall clearly state the annual report contains both the semi-annual and annual monitoring report. The annual report shall contain the information specified in Standard Provisions and Reporting Requirements (2003), Section VIII.B. of the "Reports to be Filed with the Board."

3. Facility Monitoring Report

Annually, prior to the anticipated rainy season, but no later than **30 September**, the Discharger shall conduct an inspection of the facility. The inspection shall assess needed maintenance, damage to the drainage control systems associated with the Class II surface impoundment, groundwater monitoring equipment (including wells, etc.), and shall include the Standard Observations contained in Section XII.S. of Standard Provisions and Reporting Requirements (2003). Repairs and maintenance shall be completed by **31 October**, and a report shall be submitted to the Board by **15 November**.

4. Response to a Release

If the Discharger determines that there is significant statistical evidence of a release (i.e. if for any constituent of concern or monitoring parameter, the initial statistical comparison or non-statistical comparison indicates that a release is tentatively identified), the Discharger shall immediately: 1) notify the Board verbally as to the monitoring point(s) and constituent(s) or parameter(s) involved; 2) provide written notification by certified mail within seven days of such determination; and 3) implement the Response to Release section of the Standard Provisions and Reporting Requirements (2003).

5. Water Quality Protection Standard Report

Any proposed changes to an analytical method or concentration limit for a constituent of concern or monitoring parameter shall be submitted in the Water Quality Protection Standard Report and include the information required in Section C.1 of this Monitoring Reporting Program. Any changes to Water Quality Protection Standard shall be approved by the Executive Officer in a

Revised Monitoring and Reporting Program prior to its being implemented.

6. Submittal Dates

Semiannual Groundwater, Unsaturated Zone and Leachate Monitoring Reports

| Reporting Type | Reporting Period | Report Date Due |
|----------------|----------------------|-----------------|
| Semi-annual | 1 January – 30 June | 1 August |
| | 1 July – 31 December | 1 February |

ReportDue DateAnnual Monitoring Summary Report:1 FebruaryFacility Monitoring Report:15 NovemberResponse to a Release:As necessaryWater Quality Protection Standard Report:As necessary

C. WATER QUALITY PROTECTION STANDARD AND COMPLIANCE PERIOD

1. Water Quality Protection Standard Report

The Water Quality Protection Standard for waste constituents consists of the constituents of concern, the concentration limits, and the point of compliance and all monitoring points. The Executive Officer shall review and approve the Water Quality Protection Standard or any modification thereto, for each monitored medium.

The report shall:

- a. Identify **all distinct bodies of surface and groundwater** that could be affected in the event of a release from a Unit or portion of a Unit. This list shall include at least the uppermost aquifer and any permanent or ephemeral zones of perched groundwater underlying the facility.
- b. Include a map showing the surface trace of the Point of Compliance along the down gradient boundary of the impoundment, as well as the monitoring points and background monitoring points for the surface water monitoring program, groundwater monitoring program, and the unsaturated zone monitoring program. The map shall include the point of compliance in accordance with §20405 of Title 27.
- c. Evaluate the perennial direction(s) of groundwater movement within the uppermost groundwater zone(s).

If subsequent sampling of the background monitoring point(s) indicates

significant water quality changes due to either seasonal fluctuations or other reasons unrelated to waste management activities at the site, the Discharger may request modification of the Water Quality Protection Standard.

2. Constituents of Concern

Constituents of concern include all the waste constituents, their reaction products, and hazardous constituents that are reasonably expected to be in, or derived from, waste contained in the Unit. The constituents of concern for all Units at the facility are those listed in Tables 1 through 4 for the specified monitored medium.

3. Monitoring Parameters

Monitoring parameters are constituents of concern that are the waste constituents, reaction products, hazardous constituents, or physical parameters that provide a reliable indication of a release from a Unit. The monitoring parameters for all Units are those listed in Tables 1 through 4 for the specified monitored medium.

4. Concentration Limits

The concentration limit for each constituent of concern shall be determined as follows:

- a. By calculation in accordance with a statistical method pursuant to §20415 of Title 27;
- b. By an alternate statistical method acceptable to the Executive Officer in accordance with §20415 of Title 27; or
- c. For a constituent whose background data set (concentration limit) is comprised of at least 90% non-detect (ND) values, the Threshold Value is the constituent's Practical Quantitation Limit (PQL).

The laboratory analytical methods to be used with each respective constituent of concern are listed in Table 5.

5. Point of Compliance

The point of compliance for the water standard at each Unit is a vertical surface located at the hydraulically down gradient limit of the Unit that extends through the uppermost aquifer underlying the Unit. The Discharger shall include in the Water Quality Protection Standard Report, a map showing the surface trace of the point of compliance (along the down gradient boundary of the Unit, relative to the local flow direction of groundwater in the uppermost aquifer).

D. MONITORING

The Discharger shall comply with the monitoring program provisions of Title 27 for groundwater, surface water, and the unsaturated zone, in accordance with Monitoring Specifications in Standard Provisions and Reporting Requirements (2003). Detection monitoring for a new facility, or a new Unit, shall be installed and operational, and have at least one year of quarterly monitoring data collected **prior to** the discharge of wastes. A minimum of eight samples should be used to develop background concentrations for constituents of concern. All monitoring shall be conducted in accordance with a Sample Collection and Analysis Plan that is acceptable to the Executive Officer, and shall include quality assurance/quality control standards.

All point of compliance monitoring wells established for the detection monitoring program shall constitute the monitoring points for the Water Quality Protection Standard for groundwater. All detection monitoring groundwater wells, unsaturated zone monitoring devices, and surface water monitoring points, shall be sampled and analyzed for the monitoring parameters and constituents of concern listed in Tables 2 through 4.

Method detection limits and practical quantitation limits shall be reported. All peaks shall be reported, including those which cannot be quantified and/or specifically identified. Metals shall be analyzed in accordance with the methods listed in Table 5.

The Discharger may, with the approval of the Executive Officer, use alternative analytical test methods, including new USEPA approved methods, provided the methods have method detection limits equal to or lower than the analytical methods specified in this Monitoring and Reporting Program.

1. Surface Impoundment

The Discharger shall monitor the Class II surface impoundment as per the schedule in Table 1, and report the results in the Semiannual Monitoring Reports. Surface impoundment samples shall be collected in a convenient location at least 50 feet, if possible, from the influent structure. Any liquids in the surface impoundments shall be sampled for the parameters in Table 1. If no liquid is present, this shall be stated in the Monitoring Report.

| Table 1 - Surface Impoundment Monitoring | | | |
|---|---|--|--|
| Field Parameter Quantity Discharged (flow meter) Freeboard Remaining Capacity Temperature Specific Cond. (field and lab) | Units gallons feet (0.1) acre-feet & % °C µmhos/cm | Frequency ¹ Monthly Weekly Monthly Semi-Annually Semi-Annually | |
| pH (field and lab) Analytical Parameters Total Dissolved Solids Total Alkalinity Chloride Potassium Sodium Sulfate Nitrate - Nitrogen Dissolved Metals: Arsenic Cadmium Copper Iron Lead Manganese | mg/l meq/l mg/l mg/l mg/l mg/l ug/l | Semi-Annually Annually Semi-Annually Semi-Annually Semi-Annually Semi-Annually Semi-Annually Semi-Annually | |

2. Groundwater

The Discharger shall operate and maintain a groundwater monitoring system that complies with the applicable provisions of Title 27 §20415. The Discharger shall also collect, preserve, and transport groundwater samples in accordance with the approved Sample Collection and Analysis Plan. The approved groundwater monitoring system and Sample Collection and Analysis Plan must be **completed before any discharge** to the Class II Surface Impoundment.

Quarterly, the Discharger shall determine the groundwater flow rate and direction in the uppermost aquifer, and in any zones of perched water or additional monitored zones of saturation pursuant to this Monitoring and Reporting Program, and **report the results semiannually**, including the times of highest and lowest elevations of the water levels in the wells, pursuant to Title 27 section 20415(b)(15).

¹ If liquids are present in the surface impoundment for less that the specified time interval of sampling frequency listed, sampling shall occur once per discharge episode.

Hydrographs of each well shall be submitted showing the elevation of groundwater with respect to the elevations of the top and bottom of the screened interval, and the elevation of the pump intake. Hydrographs of each well shall be prepared **quarterly** and submitted **annually**.

Groundwater samples shall be collected from the monitoring wells, background wells, and any additional wells added as part of the approved groundwater monitoring system. Samples shall be collected and analyzed for the monitoring parameters in accordance with the methods and frequencies specified in Table 2.

The monitoring parameters shall also be evaluated each reporting period with regards to the cation/anion balance, and the results shall be graphically presented using a Stiff diagram, a Piper graph, or a Schueller plot.

| Table 2 - Groundwater Monitoring | | |
|---|---|---|
| Field Parameter Groundwater Elevation Temperature Specific Conductance pH Groundwater Flow Rate | Units ft. (0.01), MSL °C µmhos/cm pH | Frequency Quarterly Semi-Annually Semi-Annually Semi-Annually Semi Annually |
| Analytical Parameters Total Dissolved Solids Volatile Organic Compounds Total Alkalinity Total Hardness Chloride Potassium Sodium Sulfate Nitrate - Nitrogen Dissolved Metals: Arsenic Cadmium Copper Iron Lead Manganese | mg/l ug/l meq/l mg/l CaCO₃ mg/l mg/l mg/l mg/l ug/l | Semi-Annually Semi-Annually Annually Annually Semi-Annually Semi-Annually Semi-Annually Semi-Annually Semi-Annually Semi-Annually |

3. Unsaturated Zone Monitoring

The Discharger shall operate and maintain an unsaturated zone detection monitoring system that complies with the applicable provisions of Title 27 §20415. The Discharger shall collect, preserve, and transport samples in accordance with the quality assurance/quality control standards contained in the approved Sample Collection and Analysis Plan. The unsaturated zone detection monitoring system and Sample Collection and Analysis Plan must be **completed before any discharge** to the Class II Surface Impoundment.

Unsaturated zone samples shall be collected from the monitoring devices and background monitoring devices of the approved unsaturated zone monitoring system. The collected samples shall be analyzed for the listed constituents in accordance with the methods and frequency specified in Table 3. All monitoring parameters shall be graphed so as to show historical trends at each monitoring point.

The lysimeters shall be checked monthly for liquid and monitoring shall also include the total volume of liquid removed from the system. Unsaturated zone monitoring reports shall be included with the corresponding semiannual groundwater monitoring, and shall include an evaluation of potential impacts of the facility on the unsaturated zone and demonstrate compliance with the Water Quality Protection Standard.

| Table 3- Unsaturated Zone Monitoring | | | |
|--|--|--|--|
| Field Parameter | <u>Units</u> °C | <u>Frequency</u> Quarterly | |
| Temperature Specific Conductance | µmhos/cm | Quarterly | |
| pH | рН | Quarterly | |
| Lysimeter | gallons | Monthly | |
| Analytical Parameters Total Dissolved Solids Volatile Organic Compounds Chloride Potassium Sodium Sulfate Nitrate - Nitrogen Dissolved Metals (as per Table 1) | mg/l µg/l mg/l mg/l mg/l mg/l mg/l | Annually Annually Annually Annually Annually Annually Annually Annually Annually | |

4. Leachate Collection and Recovery System (LCRS) Monitoring

The Discharger shall operate and maintain LCRS sumps, conduction monitoring of any detected leachate seeps, and conduct annual testing of each LCRS in accordance Title 27 and this monitoring program. All LCRS sumps shall be inspected monthly for the presence of

leachate, flow rate and total flow. If flow is detected in a previously dry sump, the Discharger shall verbally notify the Central Valley Water Board staff within **seven days**, and shall immediately sample and test the leachate for the parameters and constituents listed in Table 4. The LCRS shall be sampled and analyzed for the following:

| Table 4 - LCRS Monitoring | | | | |
|-----------------------------------|--------------|------------------|--|--|
| Field Parameter | <u>Units</u> | <u>Frequency</u> | | |
| Flow Rate | gallons/day | Monthly | | |
| Temperature | °C | Quarterly | | |
| Specific Conductance | µmhos/cm | Quarterly | | |
| pН | рН | Quarterly | | |
| LCRS Sump | gallons | Monthly | | |
| | | | | |
| Analytical Parameters | mg/l | Annually | | |
| Total Dissolved Solids | μg/l | Annually | | |
| Volatile Organic Compounds | mg/l | Annually | | |
| Chloride | mg/l | Annually | | |
| Potassium | mg/l | Annually | | |
| Sodium | mg/l | Annually | | |
| Sulfate | mg/l | Annually | | |
| Nitrate - Nitrogen | mg/l | Annually | | |
| Dissolved Metals (as per Table 1) | mg/l | Annually | | |

The LCRS shall be tested annually to demonstrate operation in conformance with waste discharge requirements. The results of these tests shall be reported to the Board and shall include comparison with earlier tests made under comparable conditions.

5. Surface Water Monitoring

The Discharger shall maintain a *Storm Water Pollution Prevention Plan* and *Monitoring Program and Reporting Requirements* in accordance with State Water Resources Control Board Order No. 97-03-DWQ (or revision), or retain all storm water on-site. Coverage under the statewide general order is required in lieu of a separate Title 27 surface water monitoring program under this MRP.

6. Solids Monitoring

Fly ash and bottom ash from the power plant boiler shall be stored onsite for a maximum of 90 days prior to removal and disposal off-site or beneficial reuse off-site. There shall be no storage of fly ash or bottom ash in open exposed piles. The amount of these solid wastes removed from the facility each month for disposal shall be reported in the facility annual report along with the receiver of the material and the location of ultimate disposal.

7. Facility Monitoring

a. Facility Inspection

Annually, prior to the anticipated rainy season, but no later than **30 September**, the Discharger shall conduct an inspection of the facility. The inspection shall assess needed maintenance, damage to the drainage control system, groundwater monitoring equipment (including wells, etc.), and shall include the Standard Observations contained in section F.4.f. of Standard Provisions and Reporting Requirements. Any necessary construction, maintenance, or repairs shall be completed by **31 October**. By **15 November** of each year, the Discharger shall submit an annual report describing the results of the inspection and the repair measures implemented, including photographs of the problem and the repairs.

b. Storm Events

The Discharger shall inspect all precipitation, diversion, and drainage facilities associated with the Class II surface impoundment for damage within 7 days following major storm events. Necessary repairs shall be completed within 30 days of the inspection. The Discharger shall report any damage and subsequent repairs within 45 days of completion of the repairs, including photographs of the problem and the repairs.

Analytical Methods

Table 5 provides the laboratory analytical methods. The Discharger may, with the approval of the Executive Officer, use alternative analytical test methods, including new USEPA approved methods, provided the methods have method detection limits equal to or lower than the analytical methods specified in this Monitoring and Reporting Program.

| Table 5 - Analytical Methods | | | |
|--------------------------------------|--------------|------------------------|--|
| Analytical Parameters | <u>Units</u> | Analytical Methods | |
| Total Dissolved Solids Major Anions: | mg/l | SM 2540C | |
| chloride | mg/l | EPA 300.0 | |
| sulfate | mg/l | EPA 300.0/9038 | |
| Major Cations: | · · | | |
| sodium | mg/l | EPA 6010 | |
| potassium | mg/l | EPA 6010 | |
| Dissolved Metals: | | | |
| arsenic | mg/l | EPA 6010B or 200.8 | |
| cadmium | mg/l | EPA 6010 or 6020 | |
| copper | mg/l | EPA 6010 or 6020 | |
| iron | mg/l | EPA 6010 or 6020 | |
| lead | mg/l | EPA 6010 or 6020 | |
| manganese | mg/l | EPA 6010 or 6020 | |
| Nitrate – Nitrogen | mg/l | EPA 300.0 /SM 4500-NO3 | |
| Volatile Organic Compounds | ug/l | EPA 8260 | |

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

Ordered by: Marin Mirost PAMELA C. CREEDON, Executive Officer

1/14/15

PG/WMH