CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 97-112

REVISION TO SITE CLEANUP REQUIREMENTS AND RESCISSION OF ORDER NO. 95-065 FOR:

NCH CORPORATION AND MOHAWK LABORATORIES

for the property located at

932 KIFER ROAD
COMMERCIAL STREET OPERABLE UNIT, SUBUNIT 1
SUNNYVALE
SANTA CLARA COUNTY

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

1. **Site Location**: The Mohawk Laboratories (Mohawk) site is located near the intersection of Commercial Street and Kifer Road in the City of Sunnyvale (Figure 1). The site covers approximately 11 acres, and the regional topography slopes gently toward the north. A warehouse and office building is located on the south and east portions of the site. The north and west portions of the site are unpaved. The surrounding areas are generally commercial and industrial.

2. **Site History**: Mohawk Laboratories is a division of NCH Corporation (NCH, also known as National ChemSearch). Mohawk and NCH have owned and operated a chemical blending and distribution plant at the site since 1967. An above-ground tank farm with a capacity of 157,000 gallons was located on the site from 1967 to 1988. Chemicals stored in the tank farm included chlorinated solvents, methylene chloride, kerosene, xylene, and isopropanol. Chemicals stored in the tank farm were transferred into an on-site blending/warehouse building prior to sale and distribution.

3. **Named Dischargers**: Mohawk is named as a discharger because it owns and operates the 932 Kifer Road facility. As a parent company and as co-owner of the site, NCH is also named as a discharger. Releases at the site by Mohawk have resulted in soil and groundwater pollution.

If additional information is submitted indicating that other parties caused or permitted any waste to be discharged on the site where it entered or could have entered waters of the state, the Board will consider adding that party's name to this order.

4. **Regulatory Status**: This site is subject to the following Board orders:

   o Site Cleanup Requirements Order No. 95-065 adopted March 15, 1995

   The purpose of this order is to update the previous Site Cleanup Requirement, and to provide for coordinated groundwater cleanup with other dischargers in the area.

5. **Site Hydrogeology**: Hydrogeological conditions at the Mohawk site are similar to those at other groundwater pollution sites in the area. The area is underlain by unconsolidated sedimentary deposits of clay, silt, sand, and gravel extending to depths of at least 1,000 feet below the ground surface. These deposits have been subdivided into aquifers (water producing zones), and semi-permeable to relatively impermeable saturated zones (aquitards). At the Mohawk site, the shallow groundwater zone (A-zone) is encountered at approximately 15 feet below ground surface, and extends to approximately 20 feet below the ground surface. The groundwater gradient within within the shallow A-zone slopes in a north-northeasterly direction. The B-zone is encountered at approximately 45 feet below the ground surface; the thickness of the B-zone is undetermined. Groundwater in the B-zone flows in a northwesterly direction.

6. **Remedial Investigation**: Subsurface investigation have revealed significant levels of organic chemical pollution in soil and groundwater beneath the site. Chemicals detected on-site include trichloroethylene (TCE), cis-1,2-dichloroethene (DCE), and perchloroethylene (PCE). The most significant pollution is located in the area of the above-ground tank farm; in the area both light and dense free product has been observed at the site in the A-zone aquifer. Significant levels of dissolved groundwater pollution in the A-zone (ranging from approximately 10,000-70,000 ppb total VOCs) have migrated northward from the tank farm area, and have most likely impacted the A-zone offsite as far as East Arques Avenue. Trace levels of VOCs have impacted the B-zone at the Mohawk site. Additional data is necessary north of Mohawk to fully define the extent of A-zone groundwater pollution originating from Mohawk, and to better determine whether the B-zone north of Mohawk has been impacted by the pollutants originating from Mohawk.

7. **Interim Remedial Measures**: In 1993 three horizontal extraction wells were installed in the area of the former tank farm to remediate soil and groundwater on-site. In 1994, a vertical groundwater extraction was installed near the northern site boundary. During three years of operation, the remediation system has removed a total of approximately 20,000 pounds of light and dense separate phase free product,

dissolved product, and soil vapor. To address the area immediately north of the Mohawk site, which contains the highest levels of off-site pollution, Mohawk will utilize recirculating cell wells. The recirculation cell wells work by supplying oxygen into groundwater, which effects a density-driven convection cell and strips groundwater of VOCs. The off-site interim remedial measures will be implemented in phases in 1997 through early 1998.

Additional interim remedial measures most likely need to be implemented to address pollution originating from the Mohawk site in order to reduce the threat to water quality, public health, and the environment posed by the discharge of waste and to provide a technical basis for selecting and designing final remedial measures. The additional interim remedial measures are most likely necessary in areas beyond the area immediately north of Mohawk, and possibly within the B-aquifer.

8. **Operable Unit and Subunits**: The groundwater VOC pollution plume originating from the Mohawk site has most likely migrated northward at least to East Arques Avenue. The plume has most likely commingled with a VOC groundwater pollution plume originating from the Fairchild Semiconductor Corporation (Fairchild) site at 974 East Arques Avenue. Fairchild and Applied Materials (the site owner) are currently addressing groundwater pollution at their site utilizing a groundwater pump and treatment system, a basement dewatering system, and an iron filing wall.

   The area including the Mohawk and Fairchild pollution plumes is referred to as the Commercial Street Operable Unit (Commercial Street OU, Figure 2). The OU has been divided into two subunits: subunit 1 consists of the Mohawk site and the VOC groundwater pollution plume extending north of Mohawk to East Arques Avenue. Subunit 2 consists of the Fairchild site, which includes the VOC groundwater pollution plume originating at the site, and VOC groundwater pollution migrating onto the site from subunit 1.

   Mohawk, as the only confirmed source of VOC pollution within subunit 1, is the discharger named responsible for addressing groundwater pollution in the subunit 1. Mohawk, Fairchild, and Applied Materials, as the sources of VOC pollution in subunit 2, are the dischargers named responsible for addressing pollution in subunit 2.

   The Board recognizes the discharger(s) named to each subunit are largely responsible for the most significant VOC groundwater pollution in the subunit. The dischargers are wholly responsible for addressing significant VOC groundwater pollution by meeting the requirements of this Order. As additional information is generated in each subunit, the Board may modify the dischargers named in each subunit, or the subunit boundaries.

9. **Other Sites in the Area**: In addition to the Fairchild site, several other sites which are confirmed or potential sources of pollution exist in the vicinity of the Mohawk

site. These sites include:

Operable Unit 1

National Semiconductor Corp.	2900 Semiconductor Drive
United Technologies Corp.	1050 E. Arques Avenue
Advanced Micro Devices	1165 E. Arques Avenue

Stewart Drive Operable Unit

999 Arques Avenue Corporation	999 E. Arques Avenue
Sobrato Development Company	968-970 Stewart Drive
CAE Electronics	1077 East Arques Avenue

Potential Sources of VOC pollution Within the Commercial Street Operable Unit

City of Sunnyvale Corp. Yard	221 Commercial Street
Proto Engineering	183 Commercial Street
Modern Machine	214 Commercial Street
Western Precision	230 Commercial Street

Potential Sources of VOC pollution West of the Commercial Street Operable Unit

Pilkington Barnes Hind	895 Kifer Road
Philips Semiconductor	730 E. Evelyn Avenue

With the exception of the Sunnyvale Corporation Yard, Proto Engineering, Modern Machine and Western Precision, all of the above sites have completed remedial investigations and have implemented, or are in the process of implementing interim/final groundwater remediation systems.

Staff are currently requiring additional site investigation at the Sunnyvale Corporation Yard, Proto Engineering, Modern Machine, and Western Precision sites in order to determine whether the sites are sources of VOC groundwater pollution. The Board may modify the orders for the Commercial Street OU, depending on additional investigation results.

In addition, should additional investigation indicate that the Commercial Street OU pollution plume has significantly impacted areas beyond the designated Commercial Street OU boundary, the Board may modify the orders for the Commercial Street OU.

10. **Basin Plan:** The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on June 21, 1995. This updated and consolidated plan represents the Board's master water quality control planning document. The revised Basin Plan was approved by the State Water Resources Control Board and the Office of Administrative Law on July 20, 1995, and November 13, 1995, respectively. A summary of regulatory provisions is contained in 23 CCR 3912. The Basin Plan defines beneficial uses and water quality objectives for waters of the State,

including surface waters and groundwaters.

The potential beneficial uses of groundwater underlying and adjacent to the site include:

a. Municipal and domestic water supply
b. Industrial process water supply
c. Industrial service water supply
d. Agricultural water supply
e. Freshwater replenishment to surface waters

At present, there is no known use of groundwater underlying the site for the above purposes.

11. **Other Board Policies**: Board Resolution No. 88-160 allows discharges of extracted, treated groundwater from site cleanups to surface waters only if it has been demonstrated that neither reclamation nor discharge to the sanitary sewer is technically and economically feasible.

    Board Resolution No. 89-39, "Sources of Drinking Water," defines potential sources of drinking water to include all groundwater in the region, with limited exceptions for areas of high TDS, low yield, or naturally-high contaminant levels.

12. **State Water Board Policies**: State Water Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California," applies to this discharge and requires attainment of background levels of water quality, or the highest level of water quality which is reasonable if background levels of water quality cannot be restored. Cleanup levels other than background must be consistent with the maximum benefit to the people of the State, not unreasonably affect present and anticipated beneficial uses of such water, and not result in exceedance of applicable water quality objectives.

    State Water Board Resolution No. 92-49, "Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304," applies to this discharge. This order and its requirements are consistent with the provisions of Resolution No. 92-49, as amended.

13. **Preliminary Cleanup Goals**: The discharger will need to make assumptions about future cleanup standards for soil and groundwater, in order to determine the necessary extent of remedial investigation, interim remedial actions, and the draft cleanup plan. Pending the establishment of site-specific cleanup standards, the following preliminary cleanup goals should be used for these purposes:

    a. Groundwater: Applicable water quality objectives (e.g. maximum contaminant

levels, or MCLs) or, in the absence of a chemical-specific objective, risk-based levels (e.g. drinking water equivalent levels).

b. Soil: 1 mg/kg total volatile organic compounds (VOCs), 10 mg/kg total semi-volatile organic compounds (SVOCs), and background concentrations of metals.

14. **Basis for 13304 Order**: The discharger has caused or permitted waste to be discharged or deposited where it is or probably will be discharged into waters of the State and creates or threatens to create a condition of pollution or nuisance.

15. **Cost Recovery**: Pursuant to California Water Code Section 13304, the discharger is hereby notified that the Board is entitled to, and may seek reimbursement for, all reasonable costs actually incurred by the Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this order.

16. **CEQA**: This action is an order to enforce the laws and regulations administered by the Board. As such, this action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15321 of the Resources Agency Guidelines.

17. **Notification**: The Board has notified the discharger and all interested agencies and persons of its intent under California Water Code Section 13304 to prescribe site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments.

18. **Public Hearing**: The Board, at a public meeting, heard and considered all comments pertaining to this discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that the discharger (or its agents, successors, or assigns) shall cleanup and abate the effects described in the above findings as follows:

A. PROHIBITIONS

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

2. Further significant migration of wastes or hazardous substances through subsurface transport to waters of the State is prohibited.

3. Activities associated with the subsurface investigation and cleanup which will cause significant adverse migration of wastes or hazardous substances are prohibited.

B. TASKS

1. AREA IMMEDIATELY NORTH OF MOHAWK:

a. IRM PILOT TEST DESIGN REPORT

COMPLIANCE DATE: September 30, 1997

Submit the Pilot Test Design of the IRM Workplan (Phase II) for the area immediately north of the Mohawk site. The report should include pilot well test results, and design criteria for the groundwater remediation system.

b. IRM STARTUP REPORT

COMPLIANCE DATE: December 16, 1997

Submit a technical report documenting implementation and startup of the interim remedial measures proposed in Task 1.a.

c. WORKPLAN FOR EXPANDED IRMs

COMPLIANCE DATE: April 7, 1998

Submit a workplan for expanded IRMs to address the area immediately north of Mohawk. The report should include an evaluation of the performance of IRMs implemented pursuant to Task 1.a. and Task 1.b. and design criteria for the groundwater remediation system.

d. COMPLETION OF EXPANDED IRMs

COMPLIANCE DATE: November 7, 1998

Submit a technical report which documents completion of necessary tasks identified in the Task 1.c. workplan.

2. REMEDIAL INVESTIGATION WORKPLAN

COMPLIANCE DATE: October 30, 1997

Submit a workplan acceptable to the Executive Officer to define the vertical and lateral extent of groundwater pollution in subunit 1 north of the Mohawk site. The workplan should provide for definition of the vertical and lateral extent of pollution originating from Mohawk down to concentrations at or below typical cleanup standards for groundwater, or to the extent to which it migrated within subunit 1. The workplan should specify investigation methods and a proposed time schedule.

3. **COMPLETION OF REMEDIAL INVESTIGATION**

COMPLIANCE DATE: March 31, 1998

Submit a technical report acceptable to the Executive Officer documenting completion of necessary tasks identified in the Task 2 workplan.

4. **WORKPLAN FOR REMEDIATION AND PLUME MIGRATION CONTROL OF HIGH LEVEL VOCs BEYOND THE AREA IMMEDIATELY NORTH OF THE MOHAWK SITE**

COMPLIANCE DATE: April 30, 1998

Submit a workplan acceptable to the Executive Officer to evaluate interim remedial action alternatives for 1) reducing and preventing high level VOC pollution originating from the Mohawk site from migrating beyond the area immediately north of the Mohawk site; and to the extent necessary as determined by the Remedial Investigation, 2) preventing significant VOC pollution originating from the Mohawk site from migrating beyond the area of subunit 1. The workplan should recommend one or more alternatives for implementation. The workplan should specify a proposed time schedule. Phased work should be described in detail. If groundwater extraction is selected as an interim remedial action, then one task will be the completion of an NPDES permit application for discharge of extracted, treated groundwater to waters of the State. The application must demonstrate that neither reclamation nor discharge to the sanitary sewer is technically or economically feasible.

5. **COMPLETION OF INTERIM REMEDIAL ACTIONS TO ADDRESS HIGH LEVEL VOCs BEYOND THE AREA IMMEDIATELY NORTH OF THE MOHAWK SITE**

COMPLIANCE DATE: November 30, 1998

Submit a technical report acceptable to the Executive Officer documenting completion of necessary tasks identified in the Task 6 workplan.

6. **PROPOSED FINAL REMEDIAL ACTIONS AND CLEANUP STANDARDS**

COMPLIANCE DATE: April 30, 2000

Submit a technical report acceptable to the Executive Officer containing:

a. Results of the remedial investigation
b. Evaluation of the installed interim remedial actions
c. Feasibility study evaluating alternative final remedial actions
d. Risk assessment for current and post-cleanup exposures
e. Recommended final remedial actions and cleanup standards
f. Implementation tasks and time schedule

Item c should include projections of cost, effectiveness, benefits, and impact on public health, welfare, and the environment of each alternative action.

Items a through c should be consistent with the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300), CERCLA guidance documents with respect to remedial investigations and feasibility studies, Health and Safety Code Section 25356.1(c), and State Board Resolution No. 92-49 as amended ("Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304").

Items a through e should consider the preliminary cleanup goals for soil and groundwater identified in finding 12.

10. **Delayed Compliance**: If the discharger is delayed, interrupted, or prevented from meting one or more of the completion dates specified for the above tasks, the discharger shall promptly notify the Executive Officer and the Board may consider revision to this Order.

C. PROVISIONS

1. **No Nuisance**: The storage, handling, treatment, or disposal of polluted soil or groundwater shall not create a nuisance as defined in California Water Code Section 13050(m).

2. **Good Operation and Maintenance (O&M):** The discharger shall maintain in good working order and operate as efficiently as possible any facility or control system installed to achieve compliance with the requirements of this Order.

3. **Cost Recovery:** The discharger shall be liable, pursuant to California Water Code Section 13304, to the Board for all reasonable costs actually incurred by the Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. If the site addressed by this Order is enrolled in a State Board-managed reimbursement program, reimbursement shall be made pursuant to this Order and according to the procedures established in that program. Any disputes raised by the discharger over reimbursement amounts or methods used in that program shall be consistent with the dispute resolution procedures for that program.

4. **Access to Site and Records:** In accordance with California Water Code Section 13267(c), the discharger shall permit the Board or its authorized representative:

    a. Entry upon premises in which any pollution source exists, or may potentially exist, or in which any required records are kept, which are relevant to this Order.

    b. Access to copy any records required to be kept under the requirements of this Order.

    c. Inspection of any monitoring or remediation facilities installed in response to this Order.

    d. Sampling of any groundwater or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the discharger.

5. **Self-Monitoring Program:** The discharger shall comply with the Self-Monitoring Program as attached to this Order and as may be amended by the Executive Officer.

6. **Contractor / Consultant Qualifications:** All technical documents 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.

7. **Lab Qualifications:** All samples shall be analyzed by State-certified

laboratories or laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control (QA/QC) records for Board review. This provision does not apply to analyses that can only reasonably be performed on-site (e.g. temperature).

8. **Document Distribution:** Copies of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be provided to the following agencies:

   a. City of City of Sunnyvale, Department of Public Safety
   b. County of Santa Clara, Department of Environmental Health
   c. Santa Clara Valley Water District

   The Executive Officer may modify this distribution list as needed.

9. **Reporting of Changed Owner or Operator:** The discharger shall file a technical report on any changes in site occupancy or ownership associated with the property described in this Order.

10. **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 Board by calling (510) 286-1255 during regular office hours (Monday through Friday, 8:00 to 5:00).

    A written report shall be filed with the Board within five working days. The report shall describe: the nature of the hazardous substance, estimated quantity involved, duration of incident, cause of release, estimated size of affected area, nature of effect, corrective actions taken or planned, schedule of corrective actions planned, and persons/agencies notified.

    This reporting is in addition to reporting to the Office of Emergency Services required pursuant to the Health and Safety Code.

11. **Rescission of Existing Order:** This Order supersedes and rescinds Order No. 95-065.

12. **Periodic SCR Review:** The Board will review this Order periodically and may revise it when necessary. The discharger may request revisions and upon review the Executive Officer may recommend that the Board revise these requirements.

I, Loretta K. Barsamian, Executive Officer, do hereby certify that the foregoing 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 17, 1997.

Loretta K. Barsamian
Executive Officer

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FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY SUBJECT YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER CODE SECTIONS 13268 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY

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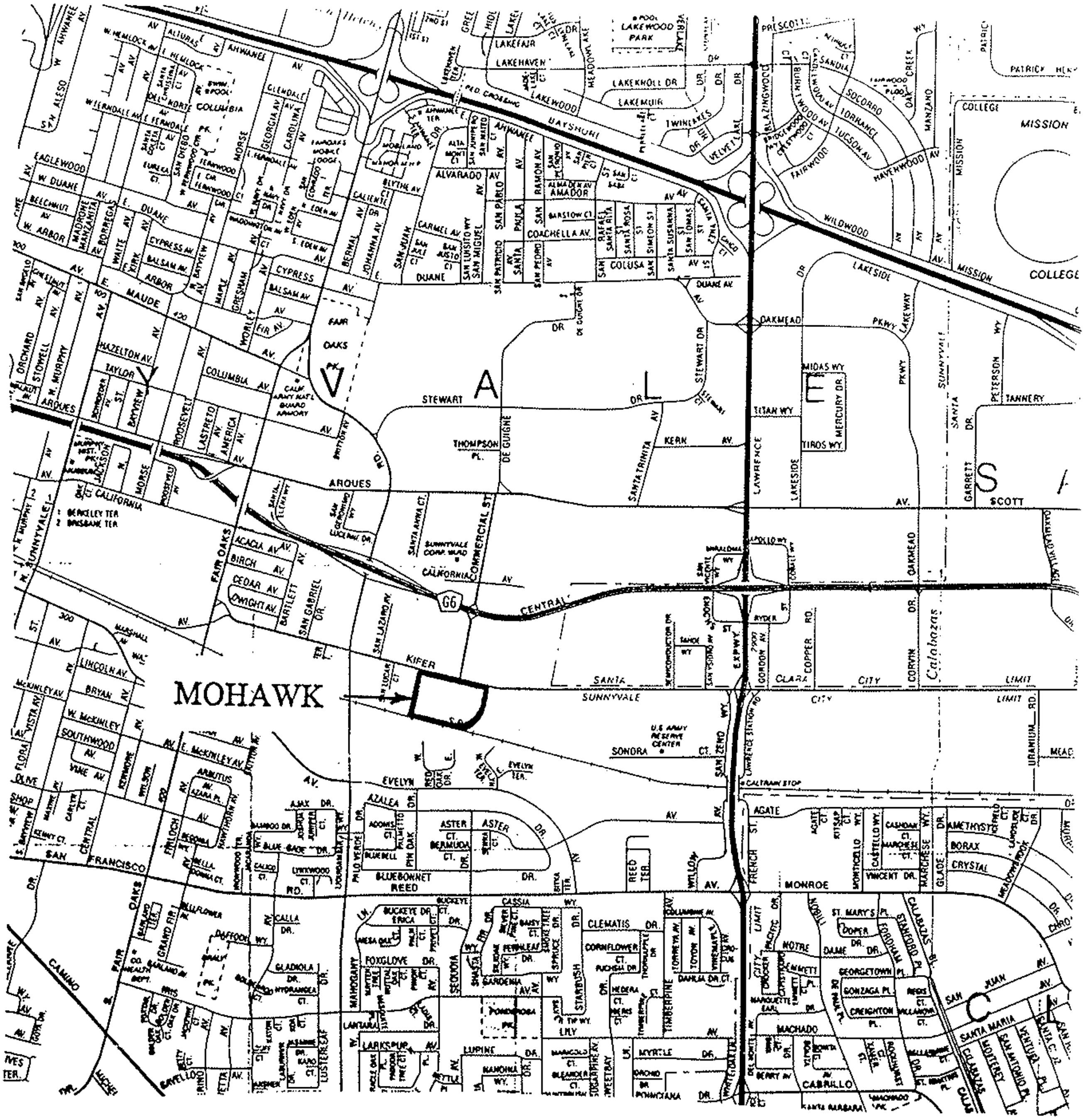
Attachments: Site Map
Self-Monitoring Program



NORTH

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SITE LOCATION MAP

MOHAWK LABORATORIES SITE
932 KIFER ROAD
SUNNYVALE, SANTA CLARA COUNTY

DRAWN BY:	DATE:	DRWG NO.

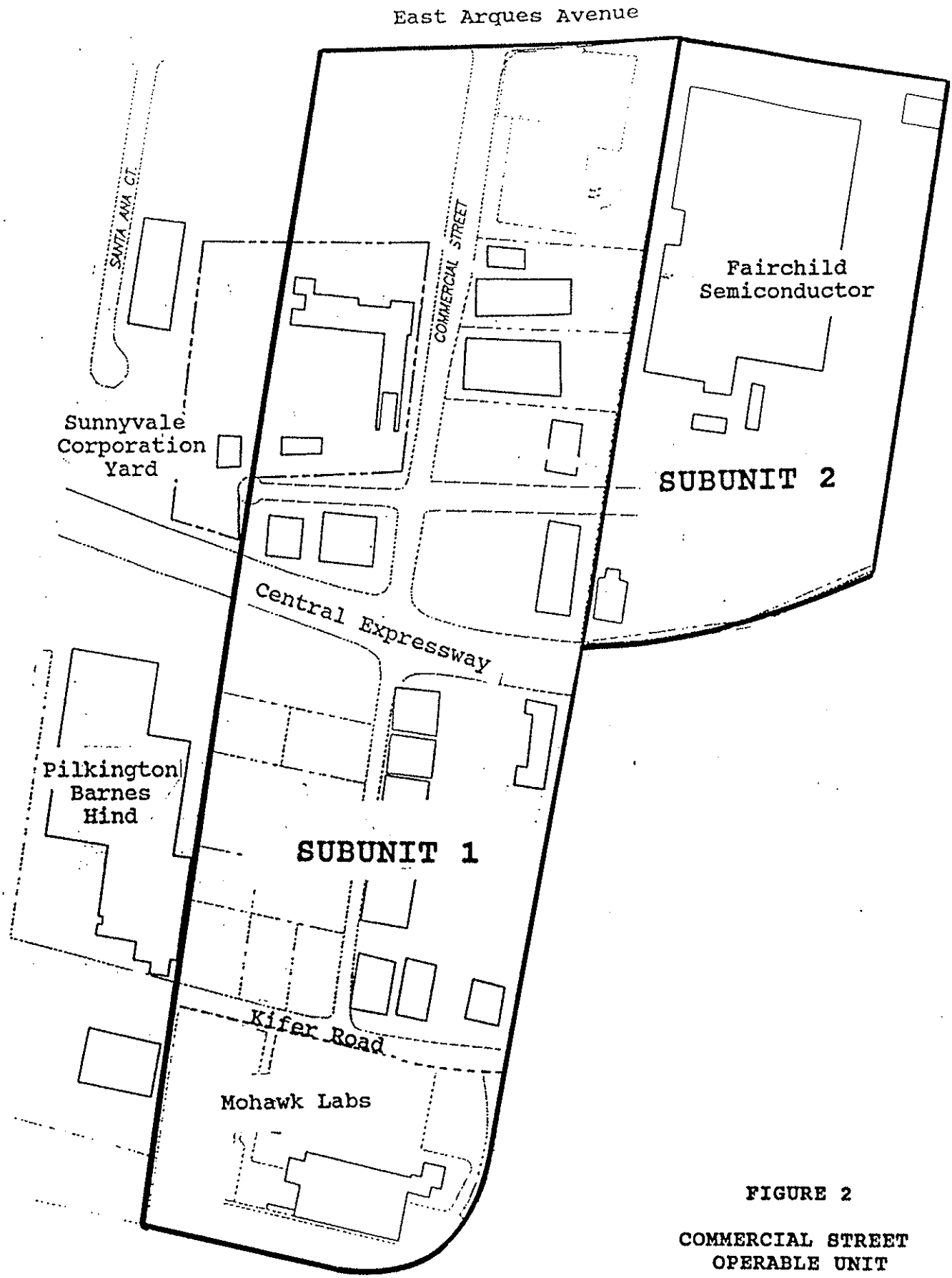


FIGURE 2

COMMERCIAL STREET OPERABLE UNIT

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM FOR:

NCH CORPORATION AND MOHAWK LABORATORIES

for the property located at

932 KIFER ROAD
COMMERCIAL STREET OPERABLE UNIT, SUBUNIT 1
SUNNYVALE
SANTA CLARA COUNTY

1. **Authority and Purpose**: The Board requests the technical reports required in this Self-Monitoring Program pursuant to Water Code Sections 13267 and 13304. This Self-Monitoring Program is intended to document compliance with Board Order No. 97-112 (site cleanup requirements).

2. **Monitoring**: The discharger shall measure groundwater elevations quarterly in all monitoring wells, and shall collect and analyze representative samples of groundwater according to the following schedule:

Well #	Sampling Frequency	Analyses	Well #	Sampling Frequency	Analyses
BC-01	SA	8010	BC-11	SA	8010
BC-02	SA	8010	BC-12	SA	8010
BC-02B	SA	8010	BC-13	SA	8010
BC-03	SA	8010	BC-14	SA	8010
BC-03B	SA	8010	BC-15	SA	8010
BC-04	SA	8010	BC-16	SA	8010
BC-05A	SA	8010	BC-17	SA	8010
BC-06	SA	8010	BC-18	SA	8010
BC-10	SA	8010	BC-19	SA	8010

Key: SA = Semi-Annually 8010 = EPA Method 8010 or equivalent

The discharger shall sample the above groundwater monitoring wells in April and October. Any new monitoring or extraction wells shall be sampled quarterly and analyze groundwater samples for the same constituents as shown in the above table. The discharger may propose changes in the above table; any proposed changes are subject to Executive Officer approval.

3. **Semi-Annual Monitoring Reports**: The discharger shall submit semi-annual monitoring reports to the Board no later than 30 days following the end of the second and fourth quarters (e.g. the next semi-annual report is due on July 30, 1998). 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 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. Groundwater Elevations: Groundwater elevation data shall be presented in tabular form, and a groundwater elevation map should be prepared for each monitored water-bearing zone. Historical groundwater elevations shall be included in the second semi-annual report each year.

   c. Groundwater Analyses: Groundwater sampling data shall be presented in tabular form, and an isoconcentration map should be prepared for one or more key contaminants for each monitored water-bearing zone, as appropriate. The report shall indicate the analytical method used, detection limits obtained for each reported constituent, and a summary of QA/QC data. Historical groundwater sampling results shall be included in the second semi-annual report each year. 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 (however, see record keeping - below).

   d. Groundwater Extraction: If applicable, the report shall include groundwater extraction results in tabular form, for each extraction well and for the site as a whole, expressed in gallons per minute and total groundwater volume for the quarter. The report shall also include contaminant removal results, from groundwater extraction wells and from other remediation systems (e.g. soil vapor extraction), expressed in units of chemical mass per day and mass for the quarter. Historical mass removal results shall be included in the second semi-annual report each year.

   e. Status Report: The semi-annual report shall describe relevant work completed

during the reporting period (e.g. site investigation, interim remedial measures) and work planned for the following reporting period.

4. **Violation Reports:** If the discharger violates requirements in the Site Cleanup Requirements, then the discharger shall notify the Board office 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.

5. **Other Reports:** The discharger shall notify the Board in writing prior to any site activities, such as construction or underground tank removal, which have the potential to cause further migration of contaminants or which would provide new opportunities for site investigation.

6. **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 Board upon request.

7. **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.

I, Loretta K. Barsamian, Executive Officer, hereby certify that this Self-Monitoring Program was adopted by the Board on September 17, 1997.

Loretta K. Barsamian
Executive Officer