APPENDIX C

Responses to Comments and Comments Received

Part I: Staff responses to written comments submitted in response to the August 9, 2007, draft waste discharge requirements for Judy Borello and Borello Sewage Treatment Facility, County of Marin

Part II: Copies of all written comments (1-8).

PART I: STAFF RESPONSES TO WRITTEN COMMENTS ON THE AUGUST 9, 2007 DRAFT WASTE DISCHARGE REQUIREMENTS FOR JUDY BORELLO AND THE BORELLO SEWAGE TREATMENT FACILITY, COUNTY OF MARIN

Comment Letter No. 1: Julie Monson, Point Reyes Station, CA 94956; Tomales Bay Watershed Council Member; August 23, 2007.

Comment 1.1: ***"Regarding Self Monitoring, I strongly urge the WQCB to require a weekly inspection conducted not by the Discharger, but by an independent agent, to ensure that the regulations in the tentative order are being complied with."***

For over half a century the Water Board has regulated hundreds of facilities throughout the Bay Region. Monitoring at all those facilities is through self-monitoring programs, which are spot checked by Board staff (and other agencies) through inspections and audits. We have found this system to be effective in determining compliance at regulated facilities and therefore recommend its continued use at the Borello Ponds.

We appreciate Ms. Monson's concern and agree that having more presence and oversight by an independent agent would be helpful for compliance, given that Tomales Bay is listed as impaired for pathogens. Board staff agrees that having an independent 3rd party monitoring program would be beneficial to track this facility's compliance, along with other wastewater treatment facilities in the Tomales Bay watershed. Although there is not a current program such as this, we are exploring ways to make it happen. In response to this comment, we added a clause in the Tentative Order requiring self-monitoring, with the alternative of participation in a group monitoring program.

Comment 1.2: ***"The existence and scale of the Borello Sewage Treatment Facility is not well known by residents of the Tomales Bay watershed. I urge you to add to the Draft Tentative Order a requirement that a twice annual report be made available to the residents and businesses in the entire Tomales Bay watershed, so that people living and working here understand its local benefits and hazards."***

All documents required by the Tentative Order for the Facility, including monthly self-monitoring reports, are public information and available to the public upon request at our office.

Comment 1.3*: "Finally, I strongly urge the WQCB, perhaps in cooperation with the Discharger, to begin long-term planning to reduce the scale of this enterprise, with the 20-year expectation that it would be either 1) eliminated, or 2) reduced in size and so carefully regulated that any pollution from the project's effluent could never, under any circumstances, pollute ground water or the waters of Tomales Bay."*

We appreciate your strong interest in reducing possible threats to water quality in Tomales Bay. Board staff are looking at a variety of strategies to minimize water quality threats in Tomales Bay. Reducing or eliminating a private business that is in compliance with its water quality regulatory requirements, however, is beyond the authority of the California Water Code, which the Board implements. Further, the Ponds provide a necessary service to the public and can be a minimal threat to water quality if operated in compliance with Water Board requirements.

Comment Letter No. 2: Michael Mery, Point Reyes Station, CA 94956; August 23, 2007 (via email 9-12-07).

Mr. Mery submitted several comments focused primarily on encouraging the Board to: require an annual audit paid from business receipts that would enable the Regional Board staff to reconcile number of loads, total volume, pond capacity and reported gross income, as the discharger runs a business relying entirely on outside contractors for income; and, as there is no other similar facility in this jurisdiction.

Our agency's role involves regulating the management of waste from the treatment facility to avoid and minimize any threats to water quality. The required monitoring and reporting in the proposed Tentative Order constitutes an audit of the facility's operation with respect to waste management and water quality. Any additional auditing of the facility is beyond our authority.

Comment 2.1: ***"The suggested water balance process is a good change, but is inadequate to determine whether the facility is properly operated and monitored. A water balance would be part of an audit. See below."***

We feel that the required annual water balance is indeed adequate for water quality concerns given current methodologies for assessing wastewater treatment process flows. Further, the required water balance is an activity that is audited by Board staff for water quality, not financial concerns. Should improved methodologies for a water balance at the facility emerge, we can update the requirement as appropriate.

Comment 2.2: Mr. Mery states that ***"further water quality testing is also appropriate and useful, but testing below and above the site is in order to determine if there are any differences seems essential. In addition, testing in streams SE of the Borello site that drain to Millerton Creek is also in order. If there is upstream contamination, it may not originate on the Borello property."***

Board staff agree that surface water monitoring of Millerton Gulch Creek is appropriate and have proposed that requirement. As specified in the proposed Self-Monitoring Report, Provision No. 7, monthly stream sampling in Millerton Gulch Creek is required in two strategic locations. The goal of sampling at these locations is to have better characterization of the stream adjacent to the treatment facility ponds. See also response to Comment 7.1.

Comment Letter No. 3: Richard Plant, Inverness, CA, 94937; September 12, 2007.

Mr. Plant points out several important facts for consideration including the presence of an oyster growing business near the drainage of Millerton Gulch Creek; and, seasonal hyper-saline conditions, which make Tomales Bay exceedingly vulnerable to pollution and high nutrient levels. Board staff are aware of these conditions along with the complex nature of Tomales Bay, and are making efforts to minimize pollutant runoff and decrease nutrient levels through various regulatory programs.

***Mr. Plant states "…it is of highest importance that the operation of the facility be monitored other than by self monitoring. I suggest that an independent or public agency play this role*."**

Please see response to Comment 1.1.

Comment Letter No. 4: Angelo "Marc" Commandatore; California Department of Public Health, Environmental Management Branch, Preharvest Shellfish Unit; September 14, 2007 (via email).

Comment 4.1: ***"In the Pond Operation Specifications the SFBRWQCB outlines that the only provisions for preventing the threat of overflows is that a minimum freeboard of two (2) feet shall be maintained. If this freeboard level can not be maintained then the Borello Sewage Treatment Facility, shall implement removal of liquid from the pond(s) by pump truck for 'haul away' to a legal point of disposal and continue such removal until a freeboard level of at least two feet is regained and maintained. The entire pond area is not paved so this operation may be difficult during times when soils are saturated. Also site drainage is not connected to a collection system retuning any runoff to the ponds. The CDPH would like notification when any pond freeboard is measured to be at 2 feet or less. Of paramount concern is that any poor housekeeping of sewage during such transfer could enter Millerton Creek and pose a threat to public health and the environment."***

It is our understanding that removal of excess sewage by a pump truck from the pond area can take place with a very minimal chance of any discharge. Should any small discharge occur in the pond area during removal, the area surrounding the ponds is banked so that flows are directed towards the ponds. We have modified Finding No. 17 to describe surface drainage design surrounding the ponds that "flow toward the ponds so that any minor spills are captured." In addition, we have revised Provision C, No 13, which now requires that "The discharger report any non compliance that may endanger health or the environment to our office and CDPH."

Comment 4.2: ***"In the Pond Cleaning Specifications section the SFBRWQCB outlines in detail the sampling that is required for sludge. The CDPH would like a copy of all results from the CAM 17 metals forwarded at the same frequency required by the WDR to this office."***

This information is public information. Board staff will make it available to CDPH staff.

Comment 4.3: ***"In the Reclaimed Wastewater Specifications the SFBRWQCB allows the Borello Sewage Treatment Facility to irrigate in the designated spray field Area 1 only during the period from April 1 to the first rain storm in excess of 0.50 inch which occurs after October 31. The SFBRWQCB should be aware that the CDPH manage its nearest commercial shellfish growing area to be closed when a rainfall of 0.40 inch during a 24-hour period at any time during the year. The CDPH is requesting that the***

SFBRWQCB change the language to state that any storm of 0.40 inch in a 24-hour period at any time of the year triggers abatement of irrigation. If this should occur out side of the April 1 to October 31 period a monitoring plan should be developed to asses any impacts to Millerton Creek during the irrigation period. The CDPH records indicate that in the past 5-years every April has recorded a storm of .0.50 inch or greater of rainfall in a 24-hour period. In addition, in the last three years the month of May has recorded a single storm of 0.50 inch or greater. Recently, in July 2007 a storm of 0.20 inch was recorded and every other year storms greater than 0.40 inches have occurred in June. The CDPH recommends that the SFBRWQCB increase the non-irrigation period to May 15 each year with an additional provision for monitoring any such irrigation outside the non-irrigation period. The CDPH measures rainfall at Tomasini Point (http://cdec.water.ca.gov/cgi-progs/queryFx?s=TMP) and at Tomales Bay Oyster Company via a non-public access rain gauge."

Board staff made an error in the Reclaimed Wastewater Specifications, Section No.1. We have now corrected this error. Section 1 now reads reads *"Undisinfected wastewater may be reclaimed for irrigation in the designated Sprayfield Area 1 (see Figure 4) only during the period from April 1 until October 31, unless written authorization is obtained from Water Board staff expressly permitting an alternative time or activity. Wastewater shall not be applied to any irrigation area during periods of rainfall, threatening rainfall, or when the soils are already saturated."* Board staff feel this is protective and still flexible enough to accommodate to changing annual weather patterns, as it limits the irrigation months and also limits irrigation when there is the threat of rainfall.

Comment 4.4: *"In the Specifications for Sewage Sludge Disposal Area there appears to be no monitoring for runoff of the sludge. The CDPH recommends that a monitoring plan be developed to determine if any sludge drying operation facilitate runoff to Millerton Creek".*

Sludge is applied during summer months when there is no chance of stormwater runoff and when Millerton Gulch Creek is not flowing. As there is no runoff to monitor, it would not be appropriate for the Water Board to require surface water monitoring. However, the self-monitoring program does require visual monitoring and verification that there is not any runoff or conditions that may cause water quality concerns. Consistent with the Borello's facility operations manual, we added specification 4-b to the Tentative Order requiring the facility operator to be present at all times while irrigation is being performed.

Comment 4.5: *"In the Reporting of Hazardous Substance Release the Borello Sewage Treatment Facility should be instructed to notify the State Office of Emergency Services (916) 262-1621 or (800) 852-7550. In addition, the facility should contact the nearest Shellfish Grower (Tomales Bay Oyster Company at (415) 663-1242), the California Department of Public Health at (510) 412-4635 or (510) 412- 4631. These phone numbers should be included in any notification section of the WDR or the O&M Program. Notification is very important to the CDPH's management of the shellfish growing area since any spill or release may affect water quality and public health*

causing a closure of the shellfish growing area and possibly a recall of shellfish product from the market. This information should be included in the Endangerment of Health or the Environment section of the WDR."

Board staff agree and support improved notification procedures. We have modified the Tentative Order and Self-Monitoring Program to require immediate reporting to CDPH and oyster farmers.

Comment 4.6: ***"Related to comment # 5 above the SFBRWQCB should require in the Self-Monitoring Program a sampling scheme independent of the proposed monthly monitoring to identify and assess any sewage spill emergency from the facility that may enter Millerton Creek".***

The facility operations manual specifies activities targeted at identification of system flaws that could cause a water quality problem. Should any spills occur, a report of violations and additional sampling is appropriate for notification purposes and to assess the extent of sewage contamination.

In response to this comment, Staff have added the following language: WDR, Other Specifications #12; and, SMP, II. SELF-MONITORING PROVISIONS, 7c.: **"**Should an accidental or emergency discharge of sewage occur at the facility, the facility operator shall perform additional sampling in Millerton Creek Gulch to assess the magnitude and extent of the release."

Comment 4.7-sm1: ***"In the section for the Millerton Gulch Creek samples water samples shall be taken from Millerton Gulch Creek (MGC) at a monthly interval during the wet season from October 1 through March 31 and analyzed for fecal coliform are too infrequent to detect changes in water quality. The CDPH recommends that weekly sampling be required along with time-integrated sampling triggered by rainfall 24-hour rainfall events of 0.25 inch. Since most of the fecal coliform is delivered during rainfall events it is more important to sample during these events. Time-integrated sampling relative to rainfall events will help isolate each any pollution source form the Borello Ponds along the creek. In addition, the CDPH encourages the SFBRWQCB to work with the Borello Sewage Treatment Facility to monitor all of the critical control points of the facility that could help isolate any fecal coliform or other pathogen sources that could breach impoundments and runoff sludge drying areas. The CDPH would stress that any water quality sampling in the WDR that is analyzed for fecal coliform use the same methods that are used for the beneficial use of shellfish. Any laboratory utilized by the facility to perform analysis of shellfish growing waters must be accredited by the CDPH Environmental Laboratory Accreditation Program (ELAP) for shellfish and shellfish growing waters. The nearest laboratory is Sonoma County Public Health Laboratory (3313 Chanate Road, Santa Rosa, CA 95404 (707) 565-4711). The CDPH also request this be required by any third party sampling scheme.***

Given the facility design (e.g., all drainage to ponds, plus secondary containment at a quarry), operations (e.g., maintenance of two feet of freeboard), and process monitoring,

Board staff believe that weekly monitoring of Millerton Gulch Creek would be an excessive requirement and that monthly sampling is reasonable. In addition, we will continue to work with the Borello Pond operators, as we support the intent of the facility operations manual, to monitor, perform routine maintenance, and modify as appropriate, all critical facility control points that could impact water quality.

Staff concur that there is a clear benefit to having comparable water quality sampling methods and analytical laboratories. The Tentative Order does require that the fecal coliform laboratory analysis used for samples from the facility shall be performed by a laboratory approved by the California Department of Public Health (SMP IV, Sampling and Analysis), and is consistent with other sampling programs conducted by Board staff. Therefore, at this time we do not concur with the recommendation for a requirement of using the specific ELAP shellfish laboratory method analysis.

Comment 4.8-sm2: ***"The SFBRWQCB should add a section on Irrigation and sludge monitoring as well as emergency spill monitoring to the Self-Monitoring Program. See comment number 3, 4, and 6 of this letter".***

We feel that the proposed required seasonal water quality monitoring in Millerton Creek Gulch, combined with visual monitoring of the Irrigation and Sludge fields are adequate. Also see response made to Comments 3, 4 and 6.

Comment 4.9-sm3: "In the Report Submittals section the CDPH should be copied on all reports or submittals form the Borello Sewage Treatment Facility. All reports or submittals should be forwarded to the following address:

The California Department of Public Health, (Please universally change our name in the WDR, Environmental Management Branch, Preharvest Shellfish Unit /, MS G-165 850 Marina Bay Parkway, Richmond, CA 94804
ATTN. Tomales Bay Shellfish Growing Area Manager"

Board staff concur- Copying CDPH is now required in the Order.

Comment Letter No. 5: Kenneth Fox, Tomales Bay Association, PO Box 369 Point Reyes Station, CA 94956; September 14, 2007. Mr. Fox wanted to first go on record as supporting the comments of Mrs. Julie Monson (see comment letter No 1.).

Comment 5.1: "*The general section of the WDR describes Millerton Creek Gulch as a seasonal ephemeral creek. It should be noted that Millerton Creek was in past a perennial salmonoid bearing creek and could be again". Mr. Fox has additional comments and references supporting that Millerton Gulch Creek has been at some time in the past a perennial creek.*

Board staff appreciate Mr. Fox's comments and references; however it is our understanding that during the last few decades Millerton Gulch Creek has been a seasonal flowing creek. Board staff have however re-worded the Tentative Order findings:

Millerton Gulch Creek is a USGS Blue-line Creek that has been observed as having intermittant (seasonal) stream flow segments with some areas of perennial pooling and spring flows.

In either case, this status would not affect the WDR's provisions. The Basin Plan, by tributary rule, incorporates the beneficial surface water uses of Tomales Bay, which include fish migration, fish spawning, preservation of rare and endangered species, etc.

Comment 5.2: ***"Regarding SMP specifics, we suggest:***

II Self Monitoring Provisions; 1) Incoming sewage:
ADD:
d. Name and signature of the driver and hauling company, if different from the above".

The proposed SMP reads:

a. Record name of hauler; vehicle license plate; origin and nature of the sewage; and date and time of arrival;
b. Record sewage volume of incoming vehicle
c. Name and signature of the person logging the information.

Board staff are unsure about the benefit of what Mr. Fox proposes by adding his line D. (above) as it appears duplicative. The general listings in lines a, b, and c are subject headings that should collect all the information proposed in line d. We have added **"vehicle license plate"** to No. 1a above as this gives additional hauler accountability, and combine lines a and b for improved organization, but did not include the proposed item d.

Comment 5.3:

a) "Freeboard should be checked more frequently during rainfall events."

Staff concur and have added to the following: II. SELF-MONITORING PROVISIONS, 2a: "Once every week, and more frequently during rainfall events, measure……..."

b) "Note of correction on 2.d. should read less than 2 feet freeboard, not below 2 feet freeboard."

Staff concur, language added.

Comment 5.4: ***"Need to add that under storm events and unusual conditions of greater than normal rainfall that balance calculations shall be weekly or as determined by RWQCB staff, and that staff should be contacted in the event of large storms or periods of unusually high precipitation."***

Board staff concur that notification during unusual conditions (high rainfall and ponds close to freeboard) is appropriate. However, Board staff feel that the twice monthly

water balance calculation is sufficient. During unusual conditions, pond staff gauge measurement readings are adequate for more immediate decision making. Board staff have made the following additions:

SMP II, 2.f: **"**In the event of unusually high rain events combined with freeboard levels being at or close to the minimum freeboard, Board staff should be notified and measures taken to minimize the chance of pond(s) overflowing."

WDR, 2) Pond Operation Specifications. Same language as above.

Comment 5.5: ***"Water Board staff needs to pay site visit following the irrigation field breaching in order to verify and document correctness of the action."***

Board staff concur and feel that this is an important activity, along with the annual irrigation and sludge field spreading. As always, timing of site inspections is based on Board staff priorities and availability.

Comment 5.6: ***"Millerton Gulch Creek should be monitored more frequently than proposed. Once a month is insufficient."*** **In addition Mr. Fox recommends: more constituent analysis (total coliform, e-coli, dissolved oxygen, & nitrogen); additional monitoring sites upstream and downstream; and third party sampling.**

Board staff assert that more frequent than monthly monitoring and increased analysis of Millerton Gulch Creek would be excessive. Please see Response to Comment 1.1 (Julie Monson)

Comment 5.7: ***"A copy of the annual report should be sent to the Marin County free public library at Point Reyes Station."***

All documents required for the Facility, including annual reports, are public information and available to the public upon request.

Comment 5.8: ***"Our earlier request that operators of privately owned and operated facilities be held to the same standards as publicly operated facility still holds."***

While Water Board staff do not have the authority to require more than the existing regulations, we recommend that a private operator such as that at the Borello Ponds be a certified operator and follow the same standards to that of a publicly operated facility. The State Water Resources Control Board is in the process of revising the regulations that would require privately owned facilities to have certificated operators.

Comment Letter No. 6: Thomas G. Baty; Box 534, Inverness, CA 94937; September 14, 2007 (via email).

Comment 6.1.: Mr. Baty's first comment is related to his concern of the geographical origin (not content) of wastes that are hauled to the facility.

The Water Board regulates wastewater treatment operations as related to water quality, but cannot regulate which County the waste originates from. The County of Marin has two separate permits related to the Borello Ponds, one for the haulers and one for the facility. It is our understanding that Marin County regulates waste origins and has not restricted the geographical origins of waste to the Borello Ponds.

Comment 6.2.: *"The draft characterizes Millerton Creek Gulch as a seasonal and ephemeral stream. This is a blue line stream that has through both permitted and un-permitted water impoundments has been reduced to seasonal flows. It is important that this legal document accurately reflects the USGS classification of this stream".*

See response to Comment 5.1.

Comment 6.3.: In this comment Mr. Baty challenges the premise that the facility is a treatment facility.

Although a very simplistic design, the fundamental primary and secondary sewage treatment phases performed by the Borello facility are fairly similar to other treatment facilities, including lagoon systems. Lagoon systems are shallow basins which hold wastewater for several months to allow for the natural degradation of sewage. These systems take advantage of natural aeration, evaporation and microorganisms in the wastewater to renovate sewage. In addition to the passive lagoon system, the Borello ponds have active aeration bubblers.

Basically, a) septage arrives at the facility by haulers; b) plastics and large materials are screened first before 3) entering the sequential order of ponds (Ponds 1, 2 and 3) where physical, chemical and biological processes occur to remove contaminants and to produce a waste stream (or treated effluent). Ponds 2 and 3 have aerators to assist in biological breakdown. The Borello facility has the luxury of being located on a large and remote (864-acre) property, and having an 8-acre irrigation field, and 40+-acre sludge field.

The Borello facility includes the following treatment processes, which are also commonly found at other sewage treatment facilities throughout the world:

1) Preliminary treatment to remove large solids by physical screening;
2) Primary treatment to remove heavy solids by sedimentation and light materials by floatation;
3) Secondary treatment to purify the separated liquid by biological oxidation of dissolved organic materials; and
4) Dewatering of separated solids by evaporation.
5) Further attenuation of suspended or dissolved substances by physical, chemical and biological processes occurring in the vegetation and in the underlying soil of the grassy hillside dispersal field.

Comment 6.4.: The Water Balance, as required in the Cleanup and Abatement Order (97-080) was generally ignored by the discharger, and proposed requirements are inadequate.

The discharger has submitted acceptable water balances at the facility. We feel that the required annual water balance is adequate for water quality concerns, given current methodologies to assess wastewater treatment process flows. Should improved methodologies for a water balance at the facility emerge, we can update the requirement as appropriate.

Comment 6.5.: ***"Improved oversight by the Board staff and any independent verification of operational standards and system function would be very useful."***

Board staff agree that additional oversight and presence by regulatory staff (Board and County staff) would be useful, and our staff has increased oversight during a limited time basis. During 2002-2004, Board staff increased oversight significantly and performed numerous inspections and sampling. See also responses to Comment No.1.

Comment Letter No. 7: Thor Spargo, Borello Sewage Treatment Facility, 421 Northlake Drive #35, San Jose, CA 95117; via email 9-18-07.

Mr. Spargo, representing Judy Borello and the treatment facility, has several comments about the Tentative Order. In general, he offers very supportive comments about monitoring, notification and coordination with County, State and Federal regulatory agencies. Board staff appreciate Mr. Spargo's positive, supportive comments, and the proactive facility improvements that have been initiated at the facility over the last several years including: aeration pump installation; overall property clean-up; and, being responsive to various regulatory agency staff requests for site visits and other aspects of facility operations. Mr. Spargo, however, does not agree with the requirement for monthly sampling of Millerton Gulch Creek as listed below:

Comment 7.1.: ***"However, we do not concur with Creek sampling when we conclusively show good results from actual runoff and testing of the Borello Pond facility (see 1-3 monitoring and testing above) - it should also be known to the public and oyster growers that when there is this big concern about runoff during rainy season/first rains that the Ponds are basically empty- this kind of testing offers nothing/no added value for the Ponds facility."***

Board staff carefully considered several factors in making the proposed requirements for monthly surface water sampling at Millerton Gulch Creek including: the nature of the facility; site topography and proximity to Millerton Gulch Creek; Tomales Bay being listed as an impaired water body for pathogens; the presence of oyster farmers near Millerton Gulch Creek; and, numerous public comments requesting that there be creek monitoring. Upon review, we have eliminated the requirement for the third downstream

surface water sampling station, as it would be more reflective of a discharge from the neighboring dairy, which is not the responsibility of the Borellos.

To address Mr. Spargo's concern's, language in the Tentative Order now states:

"Modifications of the monitoring practices specified in this SMP may be authorized, acceptable to the Executive Officer, in consideration of accumulated data and/or an acceptable alternate means of monitoring. Options for modifications to monitoring requirements may include: reducing the frequency of monitoring based on established and well characterized surface water conditions adjacent to the facility; or, the Discharger can propose to participate in a regional third party sampling program in Tomales Bay."

As mentioned in other responses, we support an independent monitoring program and will continue to explore such an option for the Tomales Bay Watershed. However currently there is not a program for an independent agent to conduct such a monitoring effort.

Comment Letter No. 8: Angelo "Marc" Commanatore; California Department of Public Health, Environmental Management Branch, State Shellfish Branch; September 19, 2007 (via email).

>>> "Commandatore, Angelo (CDPH)" <Angelo.Commandatore@cdph.ca.gov> 9/19/2007 7:52 AM >>>
John....the only thing I forgot in the letter was to add that CDPH wanted access any time to sample the creek.....Could you add that to the permit? This is very important since if there is a spill there is no other way to assess impacts if Borello does not monitor....Please let me know ASAP....MARC

Provision C., #13 (see below*) was included so that there's more flexibility with other agency coordination and support. Under specific conditions, your agency and others (County, CDF&G, etc.) could be the Water Board's authorized representative. If you would like to propose specific conditions, we can discuss and as appropriate set up an interagency agreement.

**The Discharger shall allow the Water Board, or an authorized representative upon the presentation of credentials and other documents as may be required by law, to:*

a. *Enter upon the Discharger's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Order;*
b. *Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order;*
c. *Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order; and*
d. *Sample or monitor at reasonable times, for the purposes of assuring compliance with this order or as otherwise authorized by the California Water Code, any substances or parameters at any location. [CWC Section 13267]*