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CENTRAL VALLEY REGION

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Redding, CA 96002

[Regional Board Website](https://www.waterboards.ca.gov/centralvalley) (<https://www.waterboards.ca.gov/centralvalley>)

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**MONITORING & REPORTING PROGRAM (MRP) R5-2024-0049**

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**ORDER INFORMATION**

|                         |                                      |
|-------------------------|--------------------------------------|
| <b>Order Type(s):</b>   | Monitoring & Reporting Program (MRP) |
| <b>Status:</b>          | Adopted                              |
| <b>Program:</b>         | Site Cleanup                         |
| <b>Region 5 Office:</b> | Fresno                               |
| <b>Discharger(s):</b>   | Dunavant Enterprises, Inc            |
| <b>Facility:</b>        | Producers Cotton Oil Company         |
| <b>Address:</b>         | 2925 South Maple, Fresno             |
| <b>County:</b>          | Fresno County                        |
| <b>Parcel Nos.:</b>     | 330-200-15S                          |
| <b>GeoTracker ID:</b>   | SL185224250                          |
| <b>Prior Order(s):</b>  | WDR 92-195                           |

## **CERTIFICATION**

I, PATRICK PULUPA, Executive Officer, hereby certify that the following is a full, true, and correct copy of the order adopted by the California Regional Water Quality Control Board, Central Valley Region, on 18 October 2024.

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PATRICK PULUPA,  
Executive Officer

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## GLOSSARY

|                        |                                                                                                                                      |
|------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| AMR .....              | Annual Monitoring Report                                                                                                             |
| CalRecycle .....       | California Department of Resources Recycling and Recovery                                                                            |
| CAMP .....             | Corrective Action Monitoring Program                                                                                                 |
| C.F.R.....             | Code of Federal Regulations                                                                                                          |
| CIWQS .....            | California Integrated Water Quality System Project                                                                                   |
| COCs .....             | Constituents of Concern                                                                                                              |
| DMP .....              | Detection Monitoring Program                                                                                                         |
| DWR.....               | California Department of Water Resources                                                                                             |
| EC .....               | Electrical Conductivity                                                                                                              |
| ELAP .....             | State Water Board's Environmental Laboratory Accreditation Program (formerly administered by California Department of Public Health) |
| EMP .....              | Evaluation Monitoring Program                                                                                                        |
| Five-Year COCs .....   | Five-Year Constituents of Concern                                                                                                    |
| GeoTracker .....       | State Water Board's Data Management System for Sites with Potential Groundwater Impact                                               |
| MDL.....               | Method Detection Limit                                                                                                               |
| Method TO-15 VOCs..... | Volatile Organic Compounds associated with USEPA Method TO-15                                                                        |
| MRP .....              | Monitoring and Reporting Program                                                                                                     |
| N/A .....              | Not Applicable                                                                                                                       |
| PID .....              | Photo Ionization Detector                                                                                                            |

DUNAVANT ENTERPRISES

PRODUCERS COTTON OIL COMPANY

FRESNO COUNTY

**GLOSSARY**

POC .....Point of Compliance for Water Quality Protection  
Standard

QA/QC.....Quality Assurance/Quality Control

Qualified Professional .....Professional Civil Engineer or Geologist licensed by  
the State of California

RL.....Reporting Limit

ROWD.....Report of Waste Discharge

SCAP .....Sample Collection and Analysis Plan

SGP.....Soil Pore Gas

SI.....Surface Impoundment

SMR .....Semiannual Monitoring Report

SPRRs / Standard Provisions .....Standard Provisions and Reporting Requirements for  
Nonhazardous Solid Waste Discharges Regulated by  
Subtitle D and/or Title 27 Municipal Solid Waste  
Facilities, December 2015 Edition

TDS.....Total Dissolved Solids

Title 27 .....California Code of Regulations, Title 27

USEPA.....United States Environmental Protection Agency

VOCs.....Volatile Organic Compounds

WDRs.....Waste Discharge Requirements

WMU .....Waste Management Unit

WQPS .....Water Quality Protection Standard

**UNITS**

ft<sup>3</sup> / min .....Cubic Feet per Minute

°F .....Degrees Fahrenheit

Gallons/Day.....Gallons per Day

mg/L .....Milligrams per Liter

µg/L .....Micrograms per Liter

µmhos/cm.....Microsiemens per Centimeter

µg/cm<sup>3</sup> .....Micrograms per Cubic Centimeter

NTUs .....Nephelometric Turbidity Units

% Vol.....Percent by Volume

Inches Hg .....Inches of Mercury (Barometric Pressure)

MM Hg Vacuum .....Millimeters of Mercury (Barometric Pressure)

## **PREFACE**

Adopted by the California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) pursuant to Water Code section 13267, subdivision (b)(1), this Order establishes a Monitoring and Reporting Program (MRP) for Dunavant Enterprises, Inc. (Discharger), which own and operate the Producers Cotton Oil Company (Facility) in Fresno County. Additional information regarding the Facility is set forth in the enumerated findings of Waste Discharge Requirements Order R5-2024-0049 (WDRs Order). Except as otherwise provided in the following MRP, these findings are incorporated herein.

The MRP also contains supplemental findings related to monitoring and reporting activities, and/or Facility conditions. For the purposes of California Code of Regulations, title 27 (Title 27) (e.g., §§ 21720, 20380-20435), the findings and provisions of this Order are conversely incorporated as part of the WDRs Order as well.

Although adopted with the WDRs Order, this is a separate order subject to subsequent revision by the Executive Officer in accordance with delegated authority per Water Code section 13223. For the purposes of Title 27, such revisions shall be automatically incorporated as part of the WDRs Order.

## **MONITORING & REPORTING PROGRAM**

**IT IS HEREBY ORDERED**, pursuant to Water Code section 13267: that all previously issued Monitoring and Reporting Program(s) for the discharge of solid waste at the Facility are rescinded (except for enforcement purposes); and that the Discharger, their agents, employees and successors shall comply with the following Monitoring and Reporting Program (MRP). The Discharger shall not implement any changes until another revised MRP is issued by the Central Valley Water Board or its Executive Officer.

### **A. General Provisions**

#### **1. Incorporation of Standard Provisions**

The Discharger shall comply with all relevant provisions of the *Standard Provisions and Reporting Requirements for Nonhazardous Solid Waste Discharges Regulated by Subtitle D and/or Title 27 Municipal Solid Waste Facilities, April 2016 Edition* (SPRRs or Standard Provisions), which are incorporated herein. See, e.g., SPRRs section I (*Standard Monitoring Specifications*) and section J (*Response to Release*).

#### **2. Monitoring Provisions in WDRs Order**

The Discharger shall comply with all "Monitoring Provisions" in the Facility's operative Title 27 WDRs Order, which are also incorporated herein.

#### **3. Compliance with Title 27**

The Discharger shall comply with all of Title 27 provisions as they pertain to activities described in this MRP (including SPRRs).

#### **4. Sample Collection and Analysis Plan (SCAP)**

All samples shall be collected, preserved and transported in accordance with the approved Sample Collection and Analysis Plan (SCAP) and the Quality Assurance/Quality Control (QA/QC) standards specified therein. The Discharger may use alternative analytical test methods (including new USEPA-approved methods), provided that the alternative methods have method detection limits (MDLs) equal to or lower than the analytical methods specified in this MRP and are identified in the approved SCAP.

## B. Detection Monitoring Program (DMP)

To detect a release at the earliest possible time (see Title 27, § 20420, subd. (b)), the Discharger shall implement a Detection Monitoring Program (DMP) for groundwater, surface water, and the unsaturated zone in accordance with the provisions of Title 27, particularly sections 20415 and 20420.

Groundwater, unsaturated zone, and surface water<sup>1</sup> detection monitoring networks shall be revised (as needed).

### 1. Groundwater

#### a. Required Network

The Facility's groundwater monitoring well network consists of the wells listed in **Table 1**.<sup>2</sup> As of the date of this Order, the network meets the requirements of Title 27. (Title 27, § 20415, subd. (b).)

**Table 1—Groundwater Monitoring Network**

| Well  | Program    | Point of Compliance (WQPS) |
|-------|------------|----------------------------|
| MW-1R | Background | Yes                        |
| MW-2R | Detection  | Yes                        |
| MW-3R | Planned    | Yes                        |
| MW-4R | Detection  | Yes                        |
| MW-5R | Planned    | Yes                        |

See Glossary for definitions of terms and abbreviations in table.

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<sup>1</sup> I.e., to the extent that surface water detection monitoring is required under this Order.

<sup>2</sup> Non-background monitoring wells at the Point of Compliance constitute "Monitoring Points" for purposes of the Water Quality Protection Standard (WQPS).

**b. Sample Collection and Analysis**

Groundwater samples shall be collected from each well and analyzed for Monitoring Parameters listed in **Table 2** (Physical Parameters) and **Table 3** (Constituent Parameters), in accordance with the specified schedule for each parameter. (Title 27, § 20420, subds. (e)-(f).)

**Table 2—Groundwater Detection Monitoring, Physical Parameters**

| Physical Parameter                  | Units      | Sampling Frequency | Reporting Frequency |
|-------------------------------------|------------|--------------------|---------------------|
| Temperature                         | °F         | Semiannual         | Semiannual          |
| Electrical Conductivity             | µmhos/cm   | Semiannual         | Semiannual          |
| pH                                  | pH Units   | Semiannual         | Semiannual          |
| Turbidity                           | NTUs       | Semiannual         | Semiannual          |
| Oxidation/Reduction Potential (ORP) | millivolts | Semiannual         | Semiannual          |
| Dissolved Oxygen                    | -          | Semiannual         | Semiannual          |

See Glossary for definitions of terms and abbreviations in table.

**Table 3—Groundwater Detection Monitoring, Constituent Parameters**

| Constituent Parameter | Units | Sampling Frequency | Reporting Frequency |
|-----------------------|-------|--------------------|---------------------|
| TDS                   | mg/L  | Semiannual         | Semiannual          |
| Sulfate               | mg/L  | Semiannual         | Semiannual          |
| Nitrogen              | mg/L  | Semiannual         | Semiannual          |
| Nitrate               | mg/L  | Semiannual         | Semiannual          |
| Fluoride              | mg/L  | Semiannual         | Semiannual          |
| Chlorine              | mg/L  | Semiannual         | Semiannual          |
| Alkalinity            | mg/L  | Semiannual         | Semiannual          |
| Calcium               | mg/L  | Semiannual         | Semiannual          |
| Magnesium             | mg/L  | Semiannual         | Semiannual          |

| Constituent Parameter | Units | Sampling Frequency | Reporting Frequency |
|-----------------------|-------|--------------------|---------------------|
| Sodium                | mg/L  | Semiannual         | Semiannual          |
| Potassium             | mg/L  | Semiannual         | Semiannual          |
| Lead                  | mg/L  | Semiannual         | Semiannual          |
| Copper                | mg/L  | Semiannual         | Semiannual          |
| Zinc                  | mg/L  | Semiannual         | Semiannual          |
| Manganese             | mg/L  | Semiannual         | Semiannual          |
| Hardness              | mg/L  | Semiannual         | Semiannual          |

See Glossary for definitions of terms and abbreviations in table.

**c. Groundwater Conditions**

Each quarter, the Discharger shall monitor the Groundwater Conditions specified in **Table 4**, with the result of such monitoring being reported semiannually per **Section E.1.**<sup>3</sup> (Title 27, § 20415, subd. (b)(1).)

**Table 4—Groundwater Detection Monitoring,  
Groundwater Conditions**

| Groundwater Condition     | Monitoring Frequency | Reporting Frequency |
|---------------------------|----------------------|---------------------|
| Elevation (Well-Specific) | Quarterly            | Semiannual          |
| Gradient                  | Quarterly            | Semiannual          |
| Flow Rate                 | Quarterly            | Semiannual          |

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<sup>3</sup> To the extent feasible, this information shall be determined separately for: (1) the uppermost aquifer; (2) any zones of perched water; and (3) any additional zone of saturation monitored based upon water level elevations taken prior to the collection of the water quality data submitted in the report. (Title 27, § 20415, subd. (e)(15).)

**2. Unsaturated Zone**

As of the date of this Order, there are no unsaturated zone monitoring requirements for the Facility.

**3. Surface Water**

As of the date of this Order, there are no surface water monitoring requirements for the Facility.

**4. Summary of Water Quality Protection Standard (WQPS) Components**

The Water Quality Protection Standard (WQPS) is the Title 27 analytical framework through which an individual WMU is monitored for releases and impacts to water quality, i.e., the Detection Monitoring Program (DMP). (See Title 27, § 20390, subd. (a).) As explained in further detail below, for the duration of the Compliance Period, the Monitoring Points situated at a WMU's Point of Compliance are sampled and analyzed for Monitoring Parameters indicative of a release. If concentrations of Constituents of Concern exceed Concentration Limits, the results are confirmed through Retesting Procedures.

**a. Compliance Period**

The "compliance period" is the minimum time for which a water quality monitoring will be required—i.e., equal to the sum of active years and the closure period. (Title 27, § 20410.) The period restarts each time an Evaluation Monitoring Program (EMP) is initiated for a given WMU. (Id., §§ 20410(a), 20415, 20425.) If a WMU is in corrective action, the period continues until it is demonstrated that the WMU has been in continuous compliance with its WQPS for at least three years. (Id., § 20410, subd. (c).)

**b. Monitoring Points**

For WQPS purposes, a "monitoring point" is any well, device, or location where monitoring is conducted, and is specified in the Facility's WDRs and subject to the WQPS. (Title 27, § 20164.) Monitoring Points are listed in **Section B** (Detection Monitoring Program)—specifically **Table 1** (Groundwater).

**c. Point of Compliance (POC)**

The Point of Compliance (POC) is a vertical plane at the WMU's hydraulically downgradient limit, extending through the uppermost

underlying aquifer. (Title 27, §§ 10164, 20405(a).) The Facility's POC monitoring wells are listed below in **Table 1**.

**d. Constituents of Concern (COCs)**

Constituents of Concern (COCs) are waste constituents, reaction products, and hazardous constituents that are reasonably expected to be in or derived from waste contained in a WMU. (Title 27, §§ 20164, 20395.)

**e. Monitoring Parameters**

Monitoring Parameters are a predetermined set of COCs and measurable physical characteristics (e.g., temp., electrical conductivity, pH), which serve as reliable indicators of a WMU release, and for which samples will therefore be routinely analyzed. (Title 27, §§ 20164, 20395(a), 20420(e)-(f).) For the purposes of this MRP, the Monitoring Parameters are:

i. For **Groundwater**, those in **Table 2** and **Table 3**;

**f. Concentration Limits**

The Concentration Limit for each COC is the "background concentration," as determined by the statistical methods outlined in subdivision (e)(8) of Title 27, section 20415.<sup>4</sup> (Title 27, § 20400, subds. (a), (b).)

Concentration Limits shall be proposed and/or updated by the Discharger on an annual basis, in the Annual Monitoring Report (AMR) submitted per **Section E.2** here.

Unless expressly rejected by the Executive Officer in writing, these Concentration Limits shall be incorporated as part of this Order.

If the Discharger fails to submit periodically updated concentration limits, as provided in this MRP, the existing concentration limits shall remain operative, provided that, where appropriate, the

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<sup>4</sup> Concentration Limits are initially proposed by the discharger, then reviewed and approved by the Central Valley Water Board (subject to any necessary revisions). The limits specified herein are approved and incorporated as part of the Facility's WDRs.

Executive Officer may revert to lower concentrations where warranted based on existing monitoring data.

**g. Retesting Procedures**

If monitoring results indicate measurably significant evidence of a release, as described in Section I.45 of the SPRRs (Standard Monitoring Specifications), the Discharger shall apply the following:

- ii. **Non-Statistical Retesting Procedures (SPRRs, § I.46)** for analytes detected in less than 10 percent of background samples (e.g., non-naturally occurring COCs); and
- iii. **Statistical Retesting Procedures (SPRRs, § I.46)** for analytes detected in at least 10 percent of background samples (e.g., naturally occurring COCs).

**C. Corrective Action Monitoring Program (CAMP)**

There are no additional CAMP monitoring requirements other than compliance with the DMP monitoring requirements to demonstrate the effectiveness of ongoing correction action at the Facility.

**D. Additional Facility Monitoring**

**1. Regular Visual Inspection**

The Discharger shall perform regular visual inspections at the Facility in accordance with **Table 5** (Criteria) and **Table 6** (Schedule). Results of these regular visual inspections shall be included in Semiannual Monitoring Reports per **Section E.1**.

**Table 5—Criteria for Regular Visual Inspections**

| Category    | Criteria                                                                                                                                                              |
|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Within Unit | <ul style="list-style-type: none"><li>• Evidence of ponded water at any point on unit outside of any storm water structures.</li><li>• Evidence of erosion.</li></ul> |

| Category         | Criteria                                                                                                                                                                                                                                                 |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Receiving Waters | <ul style="list-style-type: none"> <li>Floating and suspended materials of waste origin—presence or absence, source and size of affected areas.</li> <li>Discoloration and turbidity—description of color, source and size of affected areas.</li> </ul> |

**Table 6—Regular Visual Inspection Schedule**

| Category                 | Wet Season<br>(1 Oct. to 30 April) | Dry Season<br>(1 May to 30 Sept.) |
|--------------------------|------------------------------------|-----------------------------------|
| Inactive or Closed Units | Monthly                            | Quarterly                         |

## 2. Annual Facility Inspections

Prior to **30 September** of each year, the Discharger shall inspect the Facility to assess repair and maintenance needs for drainage control systems, cover systems and groundwater monitoring wells; and preparedness for winter conditions (e.g., erosion and sedimentation control). If repairs are made as result of the annual inspection, problem areas shall be photographed before and after repairs. Any necessary construction, maintenance, or repairs shall be completed by 31 October. See **Section E.3** for Reporting Requirements.

## 3. Major Storm Events

Within seven days of any storm event capable of causing damage or significant erosion (Major Storm Event), the Discharger shall inspect the Facility for damage to any precipitation, diversion and drainage facilities, and all landfill side slopes. Necessary repairs shall be completed within 30 days of the inspection. The Discharger shall take photos of any problem areas before and after repairs. See **Section E.4** for Reporting Requirements.

## 4. Annual Iso-Settlement Surveys

Every year, the Discharger shall conduct an iso-settlement survey of each closed unit and produce an iso-settlement map accurately depicting the

estimated total change in elevation of each portion of the final cover's low-hydraulic-conductivity layer. This map shall show the total lowering of the surface elevation of the final cover, relative to the baseline topographic map. (Title 27, § 21090, subd. (e)(1)-(2).) See **Section E.5** for Reporting Requirements.

## E. Reporting Requirements

**Table 7—Summary of Required Reports**

| Section | Report                                       | Deadline                                                                                                                                                                   |
|---------|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| § E.1   | Semiannual Monitoring Reports (SMRs)         | <b>1 August</b><br>(1 January to 30 June)<br><b>1 February</b><br>(1 July to 31 December)                                                                                  |
| § E.2   | Annual Monitoring Reports (AMRs)             | <b>1 February</b>                                                                                                                                                          |
| § E.3   | Annual Facility Inspection Reports           | <b>15 November</b>                                                                                                                                                         |
| § E.4   | Major Storm Reporting                        | <b>Immediately after<br/>Damage Discovery</b><br>( <i>staff notification</i> )<br><br><b>Within 14 Days of<br/>Completing Repairs</b><br>( <i>written report, photos</i> ) |
| § E.5   | Survey and Iso-Settlement Mapping            | <b>15 November</b><br>(Next Due in 2025)                                                                                                                                   |
| § E.6   | Financial Assurances Reports                 | <b>1 June</b>                                                                                                                                                              |
| § E.7   | Water Quality Protection<br>Standard Reports | <b>Proposed Revisions</b><br>(excluding Concentration<br>Limits)                                                                                                           |

### 1. Semiannual Monitoring Reports (SMRs)

The Discharger shall submit Semiannual Monitoring Reports (SMRs) on 1 August (1 Jan. to 30 June) and 1 February (1 July to 31 Dec.). SMRs shall contain the following materials and information:

- a. A statement affirming that all sampling activities referenced in the report were conducted in accordance with the approved SCAP (see § A.4).
- b. Map(s)/aerial photograph(s) depicting locations of all observation stations, monitoring points referenced in the report.
- c. In tabulated format, all monitoring data required to be reported on a semiannual basis, including Groundwater Conditions and Monitoring Parameters. (See **Section E.8.b** for additional requirements.)
- d. For each groundwater monitoring point referenced in the SMR:
  - i. The times each water level measurement was taken;
  - ii. The type of pump or other device used to purge and elevate pump intake level relative to screening interval;
  - iii. The purging methods used to stabilize water in the well bore before sampling (including pumping rate);
  - iv. The equipment and methods used for monitoring pH, temperature and electrical conductivity (EC) during purging activity, and the results of such monitoring;
  - v. Methods for disposing of purged water; and
  - vi. The type of device used for sampling, if different than the one used for purging.
- e. Evaluation of concentrations for all Constituent Parameters, comparison to current Concentration Limits, and results of any Retesting Procedures per Section B.4.g.
- f. In the event of a verified exceedance of Concentration Limit(s), any actions taken per Section J of the SPRRs (*Response to Release*) for wells and/or constituents not already specifically addressed in Corrective Action Monitoring under this MRP.
- g. Evaluation as to effectiveness of existing runoff/run-on control facilities.
- h. Summaries of all Regular Visual Inspections conducted per **Section D.3** during the reporting period.

- i. For closed units, summaries of inspections, leak searches and final cover repairs conducted in accordance with an approved Post-Closure Maintenance Plan per Standard Provisions G.26-29 (*Standard Closure and Post-Closure Maintenance Specifications*).
- j. Laboratory statements of results of all analyses evaluating compliance with the WDRs.

## **2. Annual Monitoring Reports (AMRs)**

On 1 February of each year,<sup>5</sup> the Discharger shall submit an Annual Monitoring Report (AMR) containing following materials and information:

- a. In tabulated format, all monitoring data for which annual reporting is required under this MRP. (See **Section E.8.b** for additional requirements for monitoring reports.)
- b. Graphs of historical trends for all Monitoring Parameters (if such analyses were performed) with respect to each monitoring point over the five prior calendar years.<sup>6</sup>
- c. An evaluation of Monitoring Parameters with regard to the cation/anion balance, and graphical presentation of same in a Stiff diagram, Piper graph or Schoeller plot.
- d. All historical monitoring data for which there are detectable results, including data for the previous year, shall be submitted in tabular form in a digital file.
- e. For each groundwater well, quarterly hydrographs showing the elevation of groundwater with respect to the top and bottom of the screened interval, and the elevation of the pump intake,

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<sup>5</sup> The Annual Monitoring Report may be combined with the Semiannual Monitoring Report for 1 July through 31 December of the same year, provided that the combination is clearly indicated in the title.

<sup>6</sup> Each graph shall contain individual data points (not mean values) and be appropriately scaled to accurately depict statistically significant trends or variations in water quality.

- f. A comprehensive discussion of the Facility's compliance record, and the result of any corrective actions taken or planned which may be needed to attain full compliance with the WDRs.
- g. A summary of the monitoring results, indicating any changes made or observed since the previous AMR.
- h. Annual updates to the Concentration Limits for all Monitoring Parameters and WQPS Monitoring Points, in accordance with **Section B.4.g** of this Order.

### **3. Annual Facility Inspection Report**

By **15 November**, the Discharger shall submit a report with results of the Annual Facility Inspection per **Section D.2**. The report shall discuss any repair measures implemented, any preparations for winter, and include photographs of any problem areas and repairs.

### **4 Major Storm Event Reports**

Immediately following each post-storm inspection described in **Section D.3**, the Discharger shall notify Central Valley Water Board staff of any damage or significant erosion (upon discovery). Subsequent repairs shall be reported to the Central Valley Water Board (together with before and after photos of the repaired areas) within 14 days of completion.

### **5. Survey and Iso-Settlement Map**

The Discharger shall submit all iso settlement maps prepared in accordance with **Section D.6**. (Title 27, § 21090, subd. (e).)

### **6. Financial Assurances Report**

**By 1 June** of each year, the Discharger shall submit a copy of the annual financial assurances report due to the California Department of Resources Recycling and Recovery (CalRecycle) that updates the financial assurances for closure, post-closure maintenance, and corrective action. (See WDRs Order.)

## 7. Water Quality Protection Standard Report

Any proposed changes<sup>7</sup> to the Water Quality Protection Standard (WQPS) components (§ B.4), other than periodic update of the Concentration Limits (§ B.4.g), shall be submitted in a WQPS Report for review and approval. The report shall be certified by a “Qualified Professional” (§ B), and contain the following:

- a. *Potentially Affected Waterbodies*—An identification of all distinct bodies of surface water and groundwater potentially affected by a WMU release (including, but not limited to, the uppermost aquifer and any permanent or ephemeral zones of perched groundwater underlying the Facility);
- b. *Map of Monitoring Points*—A map of all groundwater, surface water<sup>8</sup> and unsaturated zone monitoring points (including all background/upgradient and Point of Compliance monitoring points);
- c. *Groundwater Movement*—An evaluation of perennial direction(s) of groundwater movement within the uppermost zone(s);
- d. *Statistical Method for Concentration Limits*—A proposed statistical method for calculating Concentration Limits for Monitoring Parameters detected in at least 10 percent of the background data (naturally-occurring constituents) using a statistical procedure from subdivisions (e)(8)(A)-(D) or (e)(8)(E) of Title 27, section 20415; and
- e. *Retesting Procedure*—A retesting procedure to confirm or deny measurably significant evidence of a release (Title 27, §§ 20415(e)(8)(E), 20420(j)(1)-(3)).

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<sup>7</sup> If subsequent sampling of the background monitoring point(s) indicates significant water quality changes due to either seasonal fluctuations or other reasons unrelated to onsite waste management activities, the Discharger may request modification of the WQPS.

<sup>8</sup> To the extent that surface water monitoring is included in the Detection Monitoring Program.

## **8. General Reporting Provisions**

### **a. Transmittal Letters**

Each report submitted under this MRP shall be accompanied by a Transmittal Letter providing a brief overview of the enclosed report, as well as the following:

- i. Any violations found since the last report was submitted, a description of all actions undertaken to correct the violation (referencing any previously submitted time schedules for compliance), and whether the violations were corrected; and
- ii. A statement from the submitting party, or its authorized agent, signed under penalty of perjury, certifying that, to the best of the signer's knowledge, the contents of the enclosed report are true, accurate and complete.

### **b. Monitoring Data and Reports**

#### **i. Electronic Submission via GeoTracker**

All reports with monitoring data (e.g., SMRs and AMRs) shall be submitted electronically via the State Water Board's [Geotracker Database](https://geotracker.waterboards.ca.gov) (<https://geotracker.waterboards.ca.gov>). After uploading a report, the Discharger shall notify Central Valley Water Board staff via email at [CentralValleyFresno@WaterBoards.ca.gov](mailto:CentralValleyFresno@WaterBoards.ca.gov). The following information shall be included in the body of the email:

|                       |                                     |
|-----------------------|-------------------------------------|
| Attention:            | Site Cleanup                        |
| Report Title:         | [ <a href="#">Title of Report</a> ] |
| GeoTracker Upload ID: | SL185224250                         |
| Facility Name:        | Producers Cotton Oil Company        |
| County:               | Fresno County                       |
| CIWQS Place ID:       | 249260                              |

#### **ii. Data Presentation and Formatting**

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, the concentrations, and the units are readily discernible. Additionally, data shall be summarized in a manner that clearly illustrates compliance/noncompliance with WDRs.

**iii. Non-Detections / Reporting Limits**

Unless the reporting limits (RL) are specified in the same table, non-detections and sub-RL concentrations shall be reported as "< [limit]" (e.g., "< 5 µg/L").

**iv. Units**

Absent specific justification, all monitoring data shall be reported in the units specified herein.

**c. Compliance with SPRRs**

All reports submitted under this MRP shall comply with applicable provisions of the SPRRs, including those in Section I (Standard Monitoring Specifications) and Section J (Response to Release).

**d. Additional Requirements for Monitoring Reports**

Every monitoring report submitted under this MRP (e.g., SMRs [§ E.1], AMRs [§ E.2]) shall include a discussion of relevant field and laboratory tests, and the results of all monitoring conducted at the site shall be reported to the Central Valley Water Board in accordance with the reporting schedule above for the calendar period in which samples were taken or observations made.

**F. Record Retention Requirements**

The Discharger shall maintain permanent records of all monitoring information, including without limitation: calibration and maintenance records; original strip chart recordings of continuous monitoring instrumentation; copies of all reports required by this MRP; and records of all data used to complete the application for WDRs. Such records shall be legible, and show the following for each sample:

1. Sample identification and the monitoring point or background monitoring point from which it was taken, along with the identity of the individual who obtained the sample;
2. Date, time and manner of sampling;
3. Date and time that analyses were started and completed, and the name of the personnel and laboratory performing each analysis;
4. A complete list of procedures used (including method of preserving the sample, and the identity and volumes of reagents used);

5. A calculation of results; and
6. The results of all analyses, as well as the MDL and PQL for each analysis (all peaks shall be reported).

### **ENFORCEMENT**

If, in the opinion of the Executive Officer, the Discharger fails to comply with the provisions of this Order, the Executive Officer may refer this matter to the Attorney General for judicial enforcement, may issue a complaint for administrative civil liability, or may take other enforcement actions. Failure to comply with this Order may result in the assessment of Administrative Civil Liability of up to \$10,000 per violation, per day, depending on the violation, pursuant to the Water Code, including sections 13268, 13350 and 13385. The Central Valley Water Board reserves its right to take any enforcement actions authorized by law.

### **ADMINISTRATIVE REVIEW**

Any person aggrieved by this Central Valley Water Board action may petition the State Water Board for review in accordance with Water Code section 13320 and California Code of Regulations, title 23, section 2050 et seq. To be timely, the petition must be received by the State Water Board by 5:00 pm on the 30th day after the date of this Order; if the 30th day falls on a Saturday, Sunday or state holiday, the petition must be received by the State Water Board by 5:00 pm on the next business day. The law and regulations applicable to filing petitions are available on the [State Water Board website](http://www.waterboards.ca.gov/public_notices/petitions/water_quality) ([http://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality](http://www.waterboards.ca.gov/public_notices/petitions/water_quality)). Copies will also be provided upon request.