

Kobe Precision, Inc.
NPDES Permit No. CA 0030112

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

**ORDER NO. R2-2005-XXXX
NPDES PERMIT NO. CA0030112**

WASTE DISCHARGE REQUIREMENTS FOR:

**KOBE PRECISION, INC.
HAYWARD, ALAMEDA COUNTY**

Proposed Adoption Date: September 21, 2005
Proposed Effective Date: December 1, 2005

TABLE OF CONTENTS

FINDINGS..... 1

FACILITY DESCRIPTION 1

PURPOSE OF ORDER..... 1

DISCHARGE DESCRIPTION 1

APPLICABLE PLANS, POLICIES, AND REGULATIONS..... 3

BENEFICIAL USES 3

BASIN PLAN DISCHARGE PROHIBITION 3

GENERAL BASIS FOR EFFLUENT LIMITATIONS..... 4

Applicable WQOs 4

Receiving Water Ambient Background Data 5

Basin Plan and CTR Receiving Water Salinity Policy..... 6

Receiving Water Salinity and Hardness 6

Technology-Based Effluent Limitations..... 6

Water Quality-Based Effluent Limitations (WQBELs) 6

Constituents Identified in the 303 (d) List 7

TMDLs and Waste Load Allocations (WLAs)..... 7

Dilution and Assimilative Capacity 8

SPECIFIC BASIS FOR EFFLUENT LIMITATIONS 9

Reasonable Potential Analysis 9

RPA Methodology..... 9

RPA Determinations 10

Whole Effluent Acute Toxicity 13

MONITORING REQUIREMENTS (SELF-MONITORING PROGRAM)..... 15

A. DISCHARGE PROHIBITIONS..... 17

B. EFFLUENT LIMITATIONS..... 17

C. RECEIVING WATER LIMITATIONS..... 18

D. PROVISIONS..... 18

1. Permit Compliance and Rescission of Previous Waste Discharge Requirements..... 18

2. Effluent Characterization for Selected Constituents 19

3. Ambient Background Receiving Water Study 19

4. Copper Compliance Schedule Requirements 19

5. Optional Metal Translator Study..... 19

6. Optional Hardness Study..... 20

7. Pollutant Minimization Program..... 21

8. Operations and Maintenance Manual..... 22

9. Self-Monitoring Program (SMP) 22

10. Standard Provisions and Reporting Requirements..... 22

11. Change in Control or Ownership..... 22

12. Permit Reopener..... 22

13. NPDES Permit 23

14. Order Expiration and Reapplication..... 23

SELF-MONITORING PROGRAM, PART B..... 1

Kobe Precision, Inc.
NPDES Permit No. CA0030112

I.	DESCRIPTION OF SAMPLING STATIONS	1
II.	SCHEDULE OF SAMPLING, ANALYSIS, AND OBSERVATION	2
IV.	MODIFICATIONS TO PART A OF SELF-MONITORING PROGRAM	4
V.	ADDITIONS TO PART A OF SELF-MONITORING PROGRAM	6
VI.	MISCELLANEOUS REPORTING.....	7
VII.	SELECTED CONSTITUENTS MONITORING	7
VIII.	MONITORING METHODS AND MINIMUM DETECTION LEVELS	8
IX.	SELF-MONITORING PROGRAM CERTIFICATION	8

Kobe Precision, Inc.
NPDES Permit No. CA0030112

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

**TENTATIVE ORDER
NPDES PERMIT NO. CA0030112**

REISSUING WASTE DISCHARGE REQUIREMENTS FOR:

**KOBE PRECISION, INC.
HAYWARD, ALAMEDA COUNTY**

FINDINGS

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

1. Kobe Precision, Inc., hereinafter referred to as the Discharger, has applied to the Board, for reissuance of waste discharge requirements and a permit to discharge wastewater to waters of the State and the United States under the National Pollutant Discharge Elimination System (NPDES).

Facility Description

2. The Discharger reclaims silicon wafers used in research by the high tech industries. It strips coatings, flattens, etches, polishes, and does final cleaning of used silicon wafers prior to returning them to its customers. The facility is located at 1510 Zephyr Avenue, Hayward, California. **Attachment A** of this Order is a site location map.
3. The U.S. Environmental Protection Agency (U.S. EPA) and the Board have classified this Discharger as a minor discharger.

Purpose of Order

4. This NPDES permit regulates the discharge of effluent from the facility, which was previously regulated by waste discharge requirements specified in Order No. 97-141, adopted by the Board on December 17, 1997. This Order rescinds the requirements of Order No. 97-141.

Discharge Description

5. The discharge consists of concentrate (or reject water) from two reverse osmosis (RO) units that remove minerals from potable water. The concentrate is discharged to an onsite storm drain (latitude 122 ° 03 ' 24 '' , longitude 37 ° 04 ' 10 '') that connects with an offsite county storm sewer main. The storm sewer main leads to the wet well of a pump station operated by the county, which lifts storm water to an engineered flood control channel (Line D of the Alameda County Flood Control and Water Conservation District Zone 3, or District Flood Channel). The District Flood Channel is a tributary to Alameda Flood Control Channel, and ultimately to Lower San Francisco Bay. The discharge typically occurs on weekdays.
6. The manufacturing process requires ultra pure water, which is produced, in series, by multi-media filtration, activated carbon filtration, RO, and deionization. An anti-scalant (PermaTreat 191) is added to the filtered water preceding the two RO units. The anti-scalant prevents precipitation of

calcium carbonate and other salts, and reduces the frequency of membrane chemical washing. As protection to the membranes, sodium bisulfite is also added to the filtered water, to remove up to 3 parts per million of residual chlorine. The activated carbon filters also remove a fraction of the residual chlorine, but the exact magnitude is unknown. **Attachment B** shows the process flow diagram.

7. The RO process uses pressure to drive water through semi-permeable membranes, which remove up to 99 percent of the mineral content of the RO feedwater. RO product water is called permeate or product, and the mineral rich waste stream (approximately 25 percent of the influent flow) is termed the concentrate or reject. Two separate RO units are operated. Each RO unit consists of two RO membrane arrays in series, so that product from the first pass array enters the second pass array as feedwater. RO concentrate from the first pass array is discharged while RO concentrate from the second pass array is returned to the feedwater system of the first pass array. Based on a 99 percent removal rate for dissolved solids and a 25 percent reject rate, the RO concentrate would contain approximately four times the mineral content of the potable supply.
8. The raw potable water is supplied by the City of Hayward that purchases most of it from the City and County of San Francisco Public Utilities Commission Water Department. The Hetch Hetchy watershed provides the majority of Hayward's total water needs. The water collected in Cherry and Eleanor Reservoirs, located northwest of Hetch Hetchy Reservoir, is a backup supply, used primarily during draught years. A small amount (about 10 percent) is provided by the Alameda watershed, which is stored in the Calaveras and San Antonio Reservoirs. The water comes either from Sierra Nevada snowmelt that collects at the Hetch Hetchy Reservoir, or from other sources of water that have been treated by the Sunol Valley Water Treatment Plant (Sunol). The incoming City water contains minerals and metals, and residual chlorine, whose concentration varies based on the chlorination dose at the treatment plant as well as the mixing ratio amongbetween the various sourcesSunol treated water and the Hetch Hetchy unfiltered water. Typically, the water from Hetch Hetchy has significantly less minerals than the other sourcesfrom Sunol. The quantity and quality of the incoming City water used are important aspects of the Discharger's production, as well as the water quality of the discharge.
9. The product streams from the RO units are polished by deionization. If the pH of the second pass array water is not in the pH range of 8.4 to 9.0, pH is adjusted with a 10% solution of sodium hydroxide. Treated water is discharged to a holding tank, which supplies the processing operations. The pH treatment of the product water does not influence the pH of the effluent. The facility operation was designed and built to implement a recycling process for rinse water, which has a very low contamination level. This recycling process is presently in operation. In the future, second and third pass process rinse water is to be captured and processed for reuse.
10. All hazardous waste is either treated on site by pH adjustment or shipped off-site to a Treatment, Storage and Disposal (TSD) facility. Hazardous waste treated on site is discharged to the industrial waste sewer under a waste discharge permit issued by the City of Hayward. The Discharger is exempt from the Hazardous Waste Source Reduction and Management Review Act of 1989, because it generates less than 26,400 pounds per year of hazardous waste, and does not utilize extremely hazardous substances in its operation.
11. Prior to 1997, the Discharger used one RO unit, with an average discharge of 49,500 gallons per day. By an application dated April 20, 2001, the Discharger requested to add a second RO unit that was identical to the existing RO unit, in order to meet increased production needs. By letter dated July 25, 2001, the Board approved this request. In 2004, this resulted in an average discharge of 70,000 gpd. In order to meet a further anticipated increase in production over the next five years, the Discharger

Kobe Precision, Inc.
NPDES Permit No. CA0030112

has requested an average monthly flow effluent limitation of 200,000 gpd.

12. *Effluent Characterization.* Tables in the Fact Sheet summarize the effluent quality based on data collected from 2001 to 2004.

Applicable Plans, Policies, and Regulations

13. Water quality objectives (WQOs), water quality criteria (WQC), effluent limitations, and calculations contained in this Order are based on the statutes, documents, and guidance detailed in Section III of the attached Fact Sheet.

Beneficial Uses

14. This NPDES permit intends to protect all beneficial uses of the receiving water (District Flood Channel) and of downstream waterbodies, such as Alameda Flood Control Channel. Protection of the beneficial uses of specifically named waterbodies and its tributaries is based on Chapter 2 of the *Water Quality Control Plan, San Francisco Bay Basin* (the Basin Plan, 1995). Because the Basin Plan does not designate beneficial uses specifically for the District Flood Channel, this Order assigns it the same beneficial uses as designated for the nearby Alameda Creek and its tributaries: ~~The beneficial uses designated in the Basin Plan for Alameda Creek and its tributaries include:~~

- Agricultural Supply
- Cold Freshwater Habitat
- Groundwater Recharge
- Fish Migration
- Water Contact Recreation
- Non-Contact Water Recreation
- Fish Spawning
- Warm Freshwater Habitat
- Wildlife Habitat.

Basin Plan Discharge Prohibition

15. The Basin Plan contains a prohibition against discharging any wastewater that contains constituents of concern to beneficial uses (1) at any point at which the wastewater does not receive a minimum initial dilution of at least 10 to 1, or (2) into any non-tidal water, dead-end slough, similar confined waters, or immediate tributaries thereof. In issuing the previous Order, the Board determined this prohibition would not apply to the discharge, because the discharge did not contain any constituents of concern to beneficial uses. For this Order, the Board has determined that the discharge prohibition still does not apply. Although the reasonable potential analysis indicates reasonable potential for copper, it is triggered by ambient background concentrations. Furthermore, this Order requires a specific compliance schedule for copper to achieve water quality-based effluent limits that are protective of beneficial uses. Because no constituents have been detected in the effluent at levels above WQOs/WQC, there is no evidence to suggest the priority pollutants are present in the discharge at levels of concern to beneficial uses.

General Basis for Effluent Limitations

Applicable WQOs

16. The WQOs and WQC applicable to the receiving water of this discharge are from the Basin Plan, the U.S. EPA's May 18, 2000 *Water Quality Standards; Establishment of Numeric Criteria for Priority Toxic Pollutants for the State of California* (the California Toxics Rule or the CTR), and U.S. EPA's *National Toxics Rule* (the NTR).
 - a. The Basin Plan specifies saltwater and freshwater numeric WQOs for 11 pollutants: arsenic, cadmium, chromium (VI), copper, cyanide, lead, mercury, nickel, silver, zinc, and total PAH.
 - b. The Basin Plan includes narrative WQOs for toxicity and bioaccumulation in order to protect beneficial uses. The narrative toxicity objective states in part, "[a]ll waters shall be maintained free of toxic substances in concentrations that are lethal to or that produce other detrimental responses in aquatic organisms." The bioaccumulation objective states in part, "[c]ontrollable water quality factors shall not cause a detrimental increase in concentrations of toxic substances found in bottom sediments or aquatic life. Effects on aquatic organisms, wildlife, and human health will be considered." Effluent limitations and provisions contained in this Order are designed to implement these objectives, based on available information.
 - c. The CTR specifies numeric aquatic life criteria for 23 priority toxic pollutants and numeric human health criteria for 57 priority toxic pollutants. These criteria apply to inland surface waters and enclosed bays and estuaries and are applicable over specific numeric objectives of the Basin Plan for South San Francisco Bay, south of the Dumbarton Bridge.
 - d. The NTR establishes numeric aquatic life criteria for selenium, numeric aquatic life and human health criteria for cyanide, and numeric human health criteria for 34 toxic organic pollutants for waters of San Francisco Bay upstream to, and including, Suisun Bay and the Sacramento-San Joaquin Delta. The NTR, therefore, includes WQC that are applicable to the receiving water for this Discharger.
17. On January 21, 2004, the Board adopted Resolution No. R2-2004-0003 amending the Basin Plan to (1) update the dissolved WQOs for metals to be identical to the CTR WQC except for cadmium, (2) to change the Basin Plan definitions of marine, estuarine, and freshwater to be consistent with the CTR definitions, (3) to update NPDES implementation provisions to be consistent with the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (the State Implementation Plan, or the SIP), and (4) other editorial changes. Following approval by the State Water Resources Control Board (State Water Board) and the Office of Administrative Law on July 22, 2004, and October 4, 2004, respectively, the U.S. EPA approved the amendment on January 5, 2005.
18. Where numeric effluent limitations have not been established or updated in the Basin Plan, 40 CFR Part 122.44 (d) specifies that water quality-based effluent limitations (WQBELs) may be set based on U.S. EPA criteria, supplemented where necessary by other relevant information, to attain and maintain narrative WQC to fully protect designated beneficial uses. The Fact Sheet for this permit discusses the specific bases and rationales for effluent limitations.

Kobe Precision, Inc.
NPDES Permit No. CA0030112

Receiving Water Ambient Background Data

19. By a letter dated April 22, 2002, the Board staff gave the Discharger an option to use the ambient receiving water data collected by another discharger, Bottling Group, LLC (NPDES Permit No. CA0030058), rather than take measurements immediately upstream of its own outfall. The Discharger selected this option. Bottling Group's outfall is on Line A of the District Flood Channel, about 1.5 miles downstream of the Discharger's outfall. Bottling Group, LLC has analyzed two receiving water samples collected on March 7, 2002 and October 29, 2002, for priority pollutants.

Basin Plan and CTR Receiving Water Salinity Policy

20. The Basin Plan and CTR state that the salinity characteristics (i.e., freshwater vs. saltwater) of the receiving water shall be considered in determining the applicable WQOs/WQC. Freshwater criteria shall apply to discharges to waters with salinities equal to or less than one part per thousand (ppt) at least 95 percent of the time. Saltwater criteria shall apply to discharges to waters with salinities equal to or greater than 10 ppt at least 95 percent of the time in a normal water year. For discharges to water with salinities in between these two categories, or tidally influenced freshwaters that support estuarine beneficial uses, the criteria shall be the lower of the salt or freshwater criteria (the latter calculated based on ambient hardness), for each substance.

Receiving Water Salinity and Hardness

21. *Salinity.* The Discharger has not collected any background salinity data, but has instead relied on Bottling Group's measurements. Bottling Group has collected two measurements 50 feet downstream from its point of discharge: 0.12 ppt (collected on March 7, 2003, during wet weather) and 2.2 ppt (collected on October 29, 2003, during dry weather). Based on these two measurements, the receiving water is estuarine by both the Basin Plan and CTR definitions. This is the best available information that is applicable to this discharge. Therefore, the reasonable potential analysis in this Order for discharges to District Flood Channel are based on the lower of freshwater and saltwater WQOs from the Basin Plan and WQC from CTR and NTR.

Hardness. Some WQOs and WQC depend on hardness. For hardness (as calcium carbonate), the Discharger has again deferred to Bottling Group's measurements: < 1 mg/L (collected on March 7, 2003, during wet weather) and 110 mg/L (collected on October 29, 2003, during dry weather). To ensure protection of the environment with only two available hardness measurements, the Board based the WQOs and WQC on the lower of the two hardness measurements. A hardness of 25 mg/L was used rather than 1 mg/L, because this is the lowest value used by the CTR and Basin Plan in developing the hardness-dependant equations for WQOs and WQC. This Order has a provision that allows the Discharger to collect additional hardness data so that it may evaluate whether an alternative statistically based hardness value is protective of the beneficial uses of receiving water.

Technology-Based Effluent Limitations

22. Section 304 of the Clean Water Act requires that dischargers meet treatment levels based on the U.S. EPA's assessment of treatment technologies that are technically and economically achievable within the discharger's industry. EPA has therefore established national effluent guidelines for many types of dischargers and for many specific types of discharges within more than 50 industrial categories. These effluent guidelines are enforceable only through their incorporation into a NPDES permit. For dischargers in industrial categories for which U.S. EPA has not yet issued effluent guidelines and for types of discharges not covered by an applicable effluent guideline, the Board applies best professional judgment (BPJ), pursuant to authority established by Section 402 (a) (1) of the Clean Water Act and procedures established by U.S. EPA at 40 CFR 125.3 (c and d), to establish technology-based effluent limitations. This Order has retained, from the previous Order, effluent limitations for chlorine and pH, which were established using BPJ.

Water Quality-Based Effluent Limitations (WQBELs)

23. Toxic substances are regulated by WQBELs derived from the Basin Plan, the CTR, and/or the NTR. WQBELs for acute toxicity are retained from the previous Order. Numeric WQBELs are required for all constituents that have a reasonable potential to cause or contribute to an excursion above any State

water quality standard. Reasonable potential is determined and final WQBELs are developed using the methodology outlined in the SIP. If the Board finds that the Discharger has demonstrated that the final limits will be infeasible to meet and has provided adequate justification for a compliance schedule, pursuant to Section 2.1 of the SIP, then interim limits are established with a compliance schedule to achieve the final limits. Further details about the effluent limitations are given below and in the associated Fact Sheet.

a. Maximum Daily Effluent Limitations (MDELs) are used in this permit to protect against acute water quality effects. It is impracticable to use weekly average limitations to guard against acute effects. Although weekly averages are effective for monitoring the performance of biological wastewater treatment plants, the MDELs are necessary for preventing fish kills or mortality to aquatic organisms.

b. NPDES regulations, the SIP, and U.S. EPA's Technical Support Document (TSD) provide the basis to establish MDELs. NPDES regulations at 40 CFR 122.45 (d) state:

"For continuous discharges all permit effluent limitations, standards, and prohibitions, including those necessary to achieve water quality standards, shall *unless impracticable* be stated as:

(1) Maximum daily and average monthly discharge limitations for all discharges other than publicly owned treatment works."

c. The SIP (p. 8, Section 1.4) requires that WQBELs be expressed as MDELs and average monthly effluent limitations (AMELs).

d. The TSD (p. 96) states a maximum daily limitation is appropriate because the 7-day average, which could comprise up to seven or more daily samples, could average out peak toxic concentrations, and therefore the discharge's potential for causing acute toxic effects would be missed. A maximum daily limitation would be toxicologically protective of potential acute toxicity impacts.

Constituents Identified in the 303 (d) List

24. Section 303 (d) of the Clean Water Act requires states to identify waters for which implementation of technology-based effluent limitations have not been stringent enough to attain water quality standards for those waters. On June 6, 2003 the U.S. EPA approved the State's updated list of 303 (d) impaired waters. Alameda Creek and the lower San Francisco Bay are both listed as impaired waterbodies. Alameda Creek is impaired by diazinon, a household pesticide. The Board does not expect the Discharger to be a source of diazinon to Alameda Creek. Alameda Creek is a tributary to Lower San Francisco Bay and may thus contribute to impairment of it. The pollutants impairing Lower San Francisco Bay include mercury, nickel, PCBs total, dioxin and furan compounds, chlordane, DDT, dieldrin, diazinon, dioxin TEQ-like PCBs, and exotic species.

TMDLs and Waste Load Allocations (WLAs)

25. *Schedule for TMDL and WLAs.* Based on the 303(d) list of pollutants impairing Alameda Creek and the Lower San Francisco Bay, the Board plans to adopt TMDLs for these pollutants no later than 2010, with the exception of dioxin and furan compounds. The Board defers development of the TMDL for dioxin and furan compounds to the U.S. EPA. Future review of the 303(d) list for Alameda Creek and Lower San Francisco Bay may result in revision of the schedules and/or provide schedules for other pollutants.

26. TMDLs will include waste load allocations (WLAs) and load allocations for point sources and non-point sources. Final effluent limitations for the 303 (d)-listed pollutants will be based on WLAs that are derived from the TMDLs. The permit will be re-opened, as necessary, to adopt final WQBELs, based on WLAs, as enforceable limitations.

Dilution and Assimilative Capacity

27. Pursuant to Section 1.4.2 of the SIP, the Board may grant mixing zones and dilution credits, which allow applicable priority pollutant criteria and objectives to be met throughout a water body, except within a mixing zone approved by the Board. Here, with insufficient information regarding the receiving water flow, a dilution credit and a mixing zone are not appropriate, and all effluent limitations apply to the end-of-pipe discharge.

Interim Limitations and Compliance Schedules

28. The SIP and the Basin Plan authorize compliance schedules in a permit if an existing discharger cannot immediately comply with a new and more stringent effluent limitation. Compliance schedules for limitations derived from CTR or the NTR WQC are based on Section 2.2 of the SIP, and compliance schedules for limitations derived from Basin Plan WQOs are based on the Basin Plan. Both the SIP and the Basin Plan require the discharger to demonstrate the infeasibility of achieving immediate compliance with the new limitation to qualify for a compliance schedule. The SIP and Basin Plan require the following documentation to be submitted to the Board to support a finding of infeasibility:
- Descriptions of diligent efforts the discharger has made to quantify pollutant levels in the discharge, sources of the pollutant in the waste stream, and the results of those efforts.
 - Descriptions of source control and/or pollution minimization efforts currently under way or completed.
 - A proposed schedule for additional or future source control measures, pollutant minimization, or waste treatment.
 - A demonstration that the proposed schedule is as short as practicable.
29. Until final WQBELs or WLAs are adopted for 303 (d)-listed pollutants, State and Federal anti-backsliding and antidegradation policies and the SIP require that the Board include interim effluent limitations for them. The interim effluent limitations will be the lower of the current performance or the previous permit's limitations.
30. On June 3, 2005, the Discharger submitted a feasibility study (the 2005 Feasibility Study), asserting it is infeasible to immediately comply with the WQBELs, calculated according to SIP Section 1.4, for copper. The Board conducted a comparative analysis of recent data for copper, as further detailed in later findings under the heading Development of Specific Effluent Limitations and also in the attached Fact Sheet. The Board's analysis confirmed the determination of infeasibility. This Order, therefore, establishes a compliance schedule for copper.
31. The Basin Plan provides for 10-year compliance schedules. This provision has been construed as authorizing compliance schedules for new interpretations of existing standards (such as the numeric WQOs specified in the Basin Plan) resulting in more stringent limitations than those in the previous permit. For copper, the compliance schedule extends until December 31, 2014, i.e., 10 years from the 2004 Basin Plan amendment when the new fresh water WQOs for copper became effective. The Board may take appropriate enforcement actions if interim requirements are not met.

32. This Order establishes a compliance schedule that extends beyond one year for copper. Pursuant to the SIP and 40 CFR 122.47, the Board shall establish interim numeric limitations and interim requirements to control the pollutant. There are currently insufficient data to establish a performance-based interim limitation and the previous permit did not include a copper limitation. Monthly monitoring is required for copper to provide data for future development of an interim limitation. This Order also establishes interim compliance schedule requirements for the Discharger to develop and implement plans for reducing and controlling effluent pollutants to achieve compliance with the final limits specified in this Order.
33. Until final WQBELs or WLAs are adopted for 303 (d)-listed pollutants, State and Federal anti-backsliding and anti-degradation policies and the SIP require that the Board include interim effluent limitations for them. The interim effluent limitations will be the lower of the current performance or the previous permit's limitations.

Specific Basis for Effluent Limitations

Reasonable Potential Analysis

34. As specified in 40 CFR 122.44 (d) (1) (i), permits are required to include WQBELs for all pollutants "which the Director determines are or may be discharged at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard." Using the method prescribed in Section 1.3 of the SIP, the Board has analyzed the receiving water and the effluent data to determine whether the discharge has a reasonable potential to cause or contribute to an excursion above a State water quality standard (reasonable potential analysis or RPA). For all parameters that have reasonable potential, numeric WQBELs are required. The RPA compares the receiving water and the effluent data with numeric and narrative WQOs in the Basin Plan and numeric WQC from the U.S. EPA Gold Book, the NTR, and the CTR.

RPA Methodology

35. The method for determining reasonable potential involves identifying the observed maximum pollutant concentration in the effluent (MEC) for each constituent, based on effluent concentration data. Pursuant to Section 1.3 of the SIP, there are three triggers in determining reasonable potential.
- (1) The first trigger (Trigger 1) is activated when the MEC is greater than or equal to the lowest applicable WQO/WQC, which has been adjusted for pH, hardness (for freshwater WQOs/WQC only), and translator data, if appropriate. If the MEC is greater than or equal to the adjusted WQO/WQC, then that pollutant has reasonable potential and a WQBEL is required.
 - (2) The second trigger (Trigger 2) is activated if the observed maximum ambient background concentration (B) is greater than the adjusted WQO/WQC ($B > WQO/WQC$), and the pollutant was detected in the effluent samples and the MEC is less than the adjusted WQO/WQC ($MEC < WQO/WQC$).
 - (3) The third trigger (Trigger 3) is activated if a review of other information determines that a WQBEL is required even though both MEC and B are less than the WQO/WQC, or effluent and background data are unavailable or insufficient (e.g., all nondetects). A limit is required only under certain circumstances to protect beneficial uses.

RPA Determinations

36. Board staff conducted a RPA based on two sets of effluent data collected in 2001 and April 2003, and receiving water data collected in 2002 by Bottling Group for priority pollutants, using the method prescribed in Section 1.3 of the SIP.
37. The MECs, WQOs/WQC, basis for the WQOs/WQC, background concentrations and reasonable potential conclusions are listed in Table 2 for all inorganic constituents analyzed. (Further details about the RPA can be found in the Fact Sheet.) Based on the RPA methodology in the SIP, only copper was found to have reasonable potential to cause or contribute to an excursion above the WQO.

Table 2. Summary of RPA Results

CTR No.	Pollutant	WQO/WQC (µg/L)	Basis ^[1]	MEC (µg/L)	Maximum Ambient Background Conc. (µg/L)	Reasonable Potential (Trigger) ^[2]
1	Antimony	4,300	CTR, hh	<0.3	0.86	No
2	Arsenic	36	BP, sw	1.8	5	No
3	Beryllium	No criteria		<0.04	0.08	Undetermined
4	Cadmium	0.38	BP, fw, H=25	< 0.03	0.23	No
5a	Chromium (III) or total	66	CTR, fw, H=25	<0.2	9.1	No
5b	Chromium (VI)	11	BP, fw	< 5	<5	No
6	Copper	2.9	BP, fw, H=25	2	14	Yes (#2)
7	Lead	0.54	BP, fw, H=25	<0.46	9.3	No
8	Mercury*	0.025	BP, sw	<0.00001	0.0328	No
9	Nickel*	8.3	BP, sw	<0.5	10	No
10	Selenium	5.0	NTR, fw	<0.3	15	No
11	Silver	0.37	BP, fw, H=25	<0.9	0.12	No
12	Thallium	6.3	CTR, hh	<0.2	0.2	No
13	Zinc	37	BP, fw, H=25	<9	110	No
14	Cyanide	1	NTR, sw	< 3	<5	No
	TCDD Dioxin TEQ*	1.4 x 10 ⁻⁸	BP, narrative	NA <1.68 x 10 ⁻⁶	1.26 x 10 ⁻⁷	No
	CTR#s 17-126	Various or NA	CTR, hh	Non-detect, less than WQO, or no WQO	Less than WQO or Not Available	No or Undetermined ^[3]
	Total PAHs ^[4]	15	BP, sw	0	0	No

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* = Pollutants on 303 (d) list

[1] RPA based on the following: BP = Basin Plan; CTR = California Toxics Rule; NTR=National Toxics Rule; fw = fresh water aquatic life; sw = salt water aquatic life; hh = human health, H =hardness, 25 mg/L as CaCO₃; NA=Data not available.

[2] Trigger type is as defined in an above Finding.

[3] Undetermined due to lack of WQOs/WQC or lack of effluent data.

- [4] Total PAHs concentrations were determined using the concentrations of individual PAHs. Since all individual PAHs are non-detect, the total PAHs were determined to be zero for both effluent and receiving water.

Specific Pollutants

38. *Lead, Mercury, Nickel, Selenium and Zinc.* Reasonable potential is triggered (Trigger 2) when ambient background levels exceed the lowest, most stringent WQO/WQC and the constituent has been detected in the effluent. Lead, mercury, nickel, selenium, and zinc have been observed in ambient background samples above the lowest WQO/WQC but not in the effluent. No reasonable potential, therefore, is found for these constituents. However, for these cases, Section 1.3 of the SIP requires the discharger to continue monitoring for these constituents. If any of these constituents are detected in future samples the permit could be reopened to include effluent limits if appropriate.

39. *Dioxin TEQ*

- a. The CTR establishes a numeric human health WQC of 0.013 picograms per liter (pg/L) for 2,3,7,8-tetrachlorinated dibenzo-p-dioxin (2,3,7,8-TCDD) based on consumption of water and aquatic organisms. The preamble of the CTR states that California NPDES permits should use toxicity equivalents (TEQs) where dioxin-like compounds (congeners) have a reasonable potential with respect to narrative criteria. In U.S. EPA's National Recommended WQOs, December 2002, U.S. EPA published the 1998 World Health Organization (WHO) Toxicity Equivalence Factor (TEF)¹ scheme. In addition, the CTR preamble states U.S. EPA's intent to adopt revised WQC guidance subsequent to their health reassessment for dioxin-like compounds. The SIP applies to all toxic pollutants, including dioxins and furans. The SIP ~~requires a limitation for 2,3,7,8-TCDD, if a limitation is necessary, and requires monitoring for a minimum of 3 years by all major NPDES dischargers for the other 16 dioxin and furan compounds, requires minor industrial dischargers to monitor for the presence of the 17 congeners once during dry weather and once during wet weather for one year. The summation of the TEQs of the seventeen 2,3,7,8-TCCD congeners, is referred to as Dioxin TEQ.~~
- b. The Basin Plan contains a narrative WQO for bioaccumulative substances:
"Many pollutants can accumulate on particulates, in sediments, or bioaccumulate in fish and other aquatic organisms. Controllable water quality factors shall not cause a detrimental increase in concentrations of toxic substances found in bottom sediments or aquatic life. Effects on aquatic organisms, wildlife, and human health will be considered."
This narrative WQO applies to dioxin and furan compounds, based in part on the consensus of the scientific community that these compounds associate with particulates, accumulate in sediments, and bioaccumulate in the fatty tissue of fish and other organisms.
- c. U.S. EPA's 303 (d) listing determined that the narrative objective for bioaccumulative pollutants was not met because of the levels of dioxins and furans in the fish tissue.
- d. Background monitoring showed a detected level of ~~d~~Dioxin TEQ higher than the WQC. ~~However, it has not been found in the effluent (no data available). One effluent measurement showed 2,3,7,8-TCDD was not detected, with the minimum detection level above the CTR~~

¹ The 1998 WHO scheme includes TEFs for dioxin-like PCBs. Since dioxin-like PCBs are already included within "Total PCBs," for which the CTR has established a specific standard, dioxin-like PCBs are not included in this Order's version of the TEF scheme.

critterion. Based on the nature of the discharge, dioxins and furans are not expected to be present in the effluent. There is, therefore, based on the Regional Water Board's BPJ, there is no reasonable potential for ~~TCDD~~-Dioxin TEQ. This Order requires Dioxin TEQ measurements once every three years. Monitoring for TCDD TEQ is required by this Order.

40. *Polynuclear Aromatic Hydrocarbons (PAHs)*. This Order implements the policy and regulations of the CTR and SIP in regard to PAHs, i.e., reasonable potential is determined for individual PAHs. The Basin Plan contains a WQO for total PAHs for the protection of saltwater aquatic life of 15 µg/L, as a 24-hour average; therefore, a RPA was also performed for total PAHs. The Discharger has monitoring data collected from one sampling event for all 16 individual PAHs and all concentrations are non-detect with MDLs ranging from 0.05-0.74 µg/L. Therefore, reasonable potential for individual or total PAHs is not triggered by Trigger 1. The PAHs have also not been detected in background monitoring samples. Continued monitoring for these pollutants is required by Provision D.2.
41. *Other Organic Priority Pollutants*. The Discharger has performed effluent sampling and analysis for most organic constituents listed in the CTR. The data were used to perform the RPA. The full RPA is presented as an attachment in the Fact Sheet. Reasonable potential was not identified for any organic compounds on the list of 126 priority toxic pollutants. The Discharger will be required to sample for the 126 pollutants for a minimum of one time during the permit term using analytical methods that provide the best feasible detection limits.
42. *Effluent Monitoring*. This Order does not include interim effluent limitations for the priority pollutants without reasonable potential. But continued monitoring for these pollutants and other priority pollutants is required as described in the associated Self-Monitoring Program and in Provision D.2. If concentrations of the constituents with reasonable potential increase significantly, the Discharger will be required to investigate the source of the increases and establish remedial measures, if the increases result in an excursion above the applicable WQO/WQC. When additional effluent data is available, the permit may be reopened to include effluent limitations, if necessary.
43. *Permit Reopener*. This Order includes a reopener provision to allow numeric effluent limitations to be added or deleted for any constituent that exhibits or does not exhibit reasonable potential. The Board will make this determination based on monitoring results.

Development of Effluent Limitations

44. Copper

- a. *Copper WQOs/WQC.* The freshwater WQOs/WQC for copper in the Basin Plan and CTR are 2.9 µg/L for chronic protection and 3.8 µg/L for acute protection, expressed as total recoverable metal. These freshwater WQOs/WQC are based on a hardness value of 25 mg/L as CaCO₃.
- b. *RPA Results.* This Order establishes effluent limitations for copper because the maximum ambient background concentration of 14 µg/L exceeds the governing WQO of 2.9 µg/L and was detected in the effluent at 2.0 µg/L, demonstrating reasonable potential by Trigger 2.
- c. *WQBELs.* The final WQBELs for copper, calculated according to SIP procedures, are 3.8 µg/L maximum daily (MDEL) and 1.9 µg/L average monthly (AMEL), both expressed as total recoverable metal.
- d. *Immediate Compliance Infeasible.* The Discharger's Feasibility Study requests an interim limit with a compliance schedule, because it determined it cannot immediately comply with the WQBELs. Because the MEC of 2.0 µg/L is above the AMEL of 1.9 µg/L, the Board concurs with the Discharger's determination of infeasibility. The Board finds the measures proposed in the Discharger Feasibility Study satisfy the requirements in Section 2.1 of the SIP, and therefore will provide the Discharger with an interim limit and compliance schedule.
- e. *Interim Limitation.* Numeric interim limits for the pollutant must be based on current treatment facility performance or on a prior Order limit, whichever is more stringent. Because the previous Order does not include a limit for copper, the interim limit should be set to an Interim Performance-Based Limitation (IPBL). Traditionally, the IPBL is set to the 99.87th percentile of the recent performance data. There are, however, insufficient data to establish a performance-based limit at this time. To address this need, this Order includes monitoring requirements for copper, and when more data is available, the permit will be reopened, as appropriate, to include an interim limitation.
- f. *Compliance Schedule Requirements.* In the Final Infeasibility Study, the Discharger has proposed additional pollution prevention and source control measures to reduce copper concentration levels in the discharge. A schedule for achieving compliance with the WQBELs is required by Provision 4 of this Order. Additionally, the Discharger may implement a translator study, as specified in Provision 5 of this Order, to develop information that may be used to establish WQBELs based on a site-specific translator. The Discharger may also implement a hardness study, as specified in Provision 6 of this Order, to develop information that may be used to establish WQBELs based on a statistically based value for the hardness of the receiving water.
- g. *Term of Interim Limit.* The copper IPBL shall remain in force until December 31, 2014, or until the Board amends the limitations based on additional data or site-specific objectives. The final WQBELs will go into effect on January 1, 2015.

Whole Effluent Acute Toxicity

45. *Whole Effluent Acute Toxicity.* This Order includes effluent limits for whole effluent acute toxicity. Compliance evaluation is based on 96-hour static renewal bioassays, using U.S. EPA- approved method in 40 CFR Part 136, currently "Methods for Measuring the Acute Toxicity of Effluents and Receiving Water, 5th Edition." The previous Order included a limit, with quarterly testing required

Kobe Precision, Inc.
NPDES Permit No. CA0030112

for rainbow trout and three-spine stickleback. Because the Discharger's monitoring data indicate that all 2001 - 2004 survival rates for rainbow trout and three-spine stickleback were 100 percent, which complies with the effluent limitations, the test species has been reduced to just rainbow trout, as allowed by the Basin Plan; and the frequency of monitoring is reduced from quarterly to annually.

Whole Effluent Chronic Toxicity

46. Due to the nature of the discharge, the discharge is not expected to constitute a toxicity concern to the receiving water. This permit, therefore, does not include chronic toxicity effluent limitations and requirements. The Basin Plan allows chronic toxicity effluent limitations to be established for individual dischargers based on best professional judgment. The Board finds that a chronic toxicity effluent limitation is not required in this Order, because the discharge is a non-process wastewater discharge that does not contain characteristics of concern to beneficial uses, other than those pollutants addressed by effluent limitations established in this Order.

Storm Water Permit

47. *Regulations.* Federal Regulations for storm water discharges were promulgated by the U.S. EPA on November 19, 1990. The regulations [40 CFR Parts 122, 123, and 124] require specific categories of industrial activity (industrial storm water) to obtain a NPDES permit and to implement Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to control pollutants in industrial storm water discharges.

48. *General Industrial Storm Water Permit.* The Discharger is currently covered by a separate general industrial storm water NPDES permit (Order No. Order 97-03-DWQ), for storm water discharges from it property. Its WDID number under this permit is 2-01S014699. The general permit requires the Discharger to maintain a Storm Water Pollution Prevention Plan, and to monitor its storm water for pollutants. This satisfies the requirements of 40 CFR Parts 122, 123, and 124.

Operations and Maintenance Manual

49. This Order requires the Discharger to have an Operation and Maintenance Manual (O&M Manual), pursuant to 40 CFR 122.41(e) and Standard Provisions and Reporting Requirements for NPDES Surface Water Discharge Permits (August 1993). The O&M Manual should describe all procedures that ensure the Discharger properly operates and maintains all facilities and systems of treatment disposal and control (and related appurtenances), which are installed or used by the discharger to achieve compliance with this Order (e.g., dechlorination system). It should also describe adequate laboratory controls and appropriate quality assurance procedures. In order to remain a useful and relevant document, the manual should be kept updated to reflect significant changes in treatment facility equipment and operation practices. Because this is the first order to establish requirements for an O&M Manual, this Order requires the Discharger to submit its original O&M Manual to the Board, within 180 days from the effective date of this Order.

Pollutant Minimization/Pollution Prevention

50. *Pollution Prevention Plan.* The Basin Plan requires industrial dischargers to implement general pollution prevention programs, for the overall reduction of toxic wastes in the discharge. In cases where water quality problems exist or where beneficial uses are impaired or threatened by direct industrial dischargers, more stringent targeted pollution prevention programs are required. The Board finds the Discharger's coverage under the general industrial NPDES storm water permit (Order No. Order 97-03-DWQ), which requires good housekeeping, spill prevention, and source control,

Kobe Precision, Inc.
NPDES Permit No. CA0030112

satisfies the general pollution prevention program requirements. With a reverse osmosis system that treats municipal potable water, there are unlikely to be significant unknown sources of pollutants to the discharge. The Board finds the compliance schedule requirements established in this Order for copper, satisfy the Basin Plan's targeted pollution prevention program requirements.

51. *Pollution Minimization Program.*

- a. Section 2.4.5 of the SIP specifies under what situations and for which priority pollutant(s) (i.e., reportable priority pollutants) the Discharger shall be required to conduct a Pollutant Minimization Program in accordance with Section 2.4.5.1.
- b. There may be some redundancy between the Pollution Minimization Program and the Compliance Schedule Requirements.
- c. Where the two programs' requirements overlap, the Discharger is allowed to continue, modify, or expand its existing Compliance Schedule Requirements to satisfy the Pollutant Minimization Program requirements.

Optional Studies

52. *Metal Translator Study.* Since NPDES permit limitations for metals must be expressed as a total recoverable metal value, a translator is required to convert the dissolved WQO into a total recoverable objective. The CTR default translator for copper is used to convert the dissolved objectives into total recoverable objectives. An optional metal translator study is included in this permit to allow the Discharger to develop a local translator value for copper in place of the default translator values.

Requirement for Monitoring of Pollutants in Effluent and Receiving Water to Implement New Statewide Regulations and Policy

53. On August 6, 2001, the Board sent a letter to all the permitted dischargers pursuant to Section 13267 of the California Water Code requiring the submittal of effluent and receiving water data on priority pollutants. This formal request for technical information addresses the insufficient effluent and ambient background data, and the dioxin study. The letter (described above) is referenced throughout the permit as the "August 6, 2001 Letter".
54. Pursuant to the August 6, 2001 Letter from Board Staff, the Discharger submitted a proposed Sampling and Analysis Plan to the Board to fulfill the Board's requirement for the monitoring of pollutants in receiving water and in effluent. By letter of November 21, 2001, the Board approved the Discharger's Sampling and Analysis Plan with certain changes and required submittal of an interim report presenting the data generated by May 18, 2003. An interim report dated May 16, 2003 was submitted to the Board. The Discharger will continue the SIP sampling for the effluent and receiving water as proposed in the sampling plan according to Provisions 2 and 3.

Monitoring Requirements (Self-Monitoring Program)

55. *Monitoring Requirements (Self-Monitoring Program).* The Self-Monitoring Program includes monitoring at the outfalls for conventional, non-conventional, toxic pollutants, and acute toxicity. Monitoring for conventional and non-conventional pollutants remains the same as the previous Order, except for total suspended solids and residual chlorine (discussed in the next finding). The monitoring requirements for total suspended solids have been removed because the discharge is the result of municipally supplied potable water that has been filtered, and therefore poses little risk of

having elevated suspended solids; all measurements over the last three years were non-detects. Monthly monitoring is required for copper to provide sufficient data to calculate an interim limitation. As required by Trigger 2 of the SIP, quarterly monitoring is required for lead, nickel, selenium, and zinc, and annual monitoring is required for mercury, to verify no reasonable potential. Annual monitoring for acute toxicity is required to determine compliance with effluent limitations. The monitoring frequency has been reduced from the quarterly monitoring required by the previous Order because acute toxicity has not been observed to date and it is not expected to be found in the effluent. Because the Discharger only monitored 2,3,7,8-TCDD once, and without its sixteen congeners, this Order requires the Discharger to monitor the seventeen 2,3,7,8-TCDD congeners once every three years, so that it will comply with the SIP requirement that minor industrial dischargers monitor twice all 17 congeners. In addition, the Discharger shall perform one complete set of monitoring of the 126 priority pollutants for the effluent and the results shall be submitted 180 days before the permit expires, and the results should be submitted with the permit renewal application.

56. *Residual Chlorine Monitoring Requirements.* The monitoring frequency for residual chlorine has been reduced from daily in the previous Order, to weekly in this Order. The Board finds that weekly monitoring is sufficient for determining compliance. Among the factors considered are: 1) residual chlorine of influent water is relatively low (average of 0.62 mg/L and maximum of 1.0 mg/L, based on a study by Bottling Group), which minimizes the risk of high residual chlorine in effluent; 2) chlorine is not added to the process, eliminating the risk found at traditional wastewater treatment plants, where dosing of chlorine can lead to very high residual chlorine; 3) sodium metabisulfite is added at a rate to treat an influent with 3.0 mg/L of residual chlorine, which is over twice what is normally found in the influent; and 4) there is some evidence that activated carbon filters may further reduce residual chlorine concentrations.

CEQA and Public Hearing

57. *NPDES Permit.* This Order serves as an NPDES permit, adoption of which is exempt from the provisions of Chapter 3 (commencing with Section 21100) of Division 13 of the Public Resources Code [California Environmental Quality Act (CEQA)] pursuant to Section 13389 of the California Water Code.
58. *Notification.* The Discharger and interested agencies and persons have been notified of the Board's intent to reissue requirements for the existing discharges and have been provided an opportunity to submit their written views and recommendations. Board staff prepared a Fact Sheet and Response to Comments, which are hereby incorporated by reference as part of this Order.
59. *Public Hearing.* The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

Kobe Precision, Inc.
NPDES Permit No. CA0030112

IT IS HEREBY ORDERED, pursuant to the provisions of Division 7 of the California Water Code, regulations, and plans and policies adopted thereunder, and to the provisions of the Clean Water Act and regulations and guidelines adopted thereunder, that the Discharger shall comply with the following:

A. DISCHARGE PROHIBITIONS

1. Discharge of treated wastewater at a location or in a manner different from that described in this Order is prohibited.
2. The average monthly discharge shall not exceed 200,000 gallons per day.

B. EFFLUENT LIMITATIONS

Effluent discharged into District Flood Channel (with eventual discharge to the lower San Francisco Bay) shall not exceed the following:

1. **Chlorine Residual:** The instantaneous maximum residual chlorine of the discharge shall not exceed 0.0 mg/L.¹

¹ The Discharger may elect to use a continuous on-line monitoring system(s) for measuring flows, residual chlorine concentration, and sulfite concentration (which could be interpolated) to prove that chlorine residual exceedances are false positives. If convincing evidence is provided, the Executive Officer may conclude that chlorine residual exceedances are false positives and not violations of this permit limit.

2. **pH:** The pH of the discharge shall not exceed 8.5 nor be less than 6.5.

Toxic Pollutants

3. **Whole Effluent Acute Toxicity:** Representative samples of the effluent shall meet the following limits for acute toxicity:

- a. The survival of bioassay test organisms in 96-hour bioassays of undiluted effluent shall be:
 - (1) A three-sample median value of not less than 90 percent survival; and
 - (2) A single value of not less than 70 percent survival.
- b. These acute toxicity limits are further defined as follows:
 - (1) **3-sample median limit:** Any bioassay test showing survival of 90 percent or greater is not a violation of this limit. A bioassay test showing survival of less than 90 percent represents a violation of this effluent limit, if one of the past two or fewer bioassay tests also show less than 90 percent survival.
 - (2) **1-sample limit:** A bioassay test showing survival of less than 70 percent represents a violation of this effluent limit.
- c. Bioassays shall be conducted in compliance with methods in 40 CFR 136, currently "Methods for Measuring the Acute Toxicity of Effluents and Receiving Water to Freshwater and Marine Organisms, 5th Edition" (EPA-R-02-012 (2002)), with exceptions granted to the Discharger by the Executive Officer and the Environmental Laboratory Accreditation Program (ELAP).

C. RECEIVING WATER LIMITATIONS

1. The discharge of waste shall not cause the following conditions to exist in waters of the State at any place:
 - a. Floating, suspended, or deposited macroscopic particulate matter or foam.
 - b. Bottom deposits or aquatic growths to the extent that such deposits or growths cause nuisance or adversely affect beneficial uses.
 - c. Alteration of temperature, turbidity, or apparent color beyond present natural background levels.
 - d. Visible, floating, suspended, or deposited oil or other products of petroleum origin.
 - e. Toxic or other deleterious substances to be present in concentrations or quantities that will cause deleterious effects on wildlife, waterfowl, or other aquatic biota, or which render any of these unfit for human consumption, either at levels created in the receiving waters or as a result of biological concentration.

2. The discharge of waste shall not cause the following limitations to be exceeded in waters of the State at any one place within 1 foot of the water surface:
 - a. Dissolved Oxygen: 7.0 mg/L, minimum
The median dissolved oxygen concentration for any three consecutive months shall not be less than 80 percent of the dissolved oxygen content at saturation. When natural factors cause concentrations less than that specified above, then the discharge shall not cause further reduction in ambient dissolved oxygen concentrations.
 - b. Dissolved Sulfide: 0.1 mg/L, maximum.
 - c. pH: the pH shall not be depressed below 6.5 nor raised above 8.5, nor caused to vary from normal ambient pH levels by more than 0.5 units.
 - d. Un-ionized Ammonia: 0.025 mg/L as N, annual median,
0.4 mg/L as N, maximum.
 - e. Nutrients: Waters shall not contain biostimulatory substances in concentrations that promote aquatic growths to the extent that such growths cause nuisance or adversely affect beneficial uses.

3. The discharge shall not cause a violation of any particular water quality standard for receiving waters adopted by the Board or the State Water Board as required by the Clean Water Act and regulations adopted thereunder. If more stringent applicable water quality standards are promulgated or approved pursuant to Section 303 of the Clean Water Act, or amendments thereto, the Board will revise and modify this Order in accordance with such more stringent standards.

D. PROVISIONS

1. **Permit Compliance and Rescission of Previous Waste Discharge Requirements.**
The Discharger shall comply with the limitations, prohibitions, and other provisions of this Order on the effective date of this NPDES Permit. Requirements prescribed by this Order supersede the requirements prescribed by Order No. 97-141. Order No. 97-141 is hereby rescinded upon the effective date of this Order.

Special Studies

2. Effluent Characterization for Selected Constituents

The Discharger shall monitor and evaluate the discharge from Outfall E-001 for the constituents listed in Enclosure A of the Board's August 6, 2001, Letter, according to its approved sampling plan. The Discharger shall monitor the 126 priority pollutants for a minimum of one sampling event, during the permit term.

Reporting: The Discharger shall submit a report that presents all the data to the Board with the application for permit reissuance.

3. Ambient Background Receiving Water Study

The Discharger shall monitor and evaluate District Flood Channel for the constituents listed in Enclosure A of the Board's August 6, 2001, Letter, according to its approved sampling plan, with the following exceptions: within 180 days from the effective date of this Order, the Discharger shall propose a sampling location for the priority pollutants that is located in the receiving water upstream of the point of discharge; and a sampling location for pH, hardness, and salinity in the receiving water downstream of the point of discharge, where the effluent and receiving water are fully mixed. These locations will be subject to the approval of the Executive Officer. The Discharger shall monitor the 126 priority pollutants for a minimum of one sampling event, during the permit term.

Final Report: The Discharger shall submit a final report that presents all the data to the Board, at least 180 days prior to permit expiration. This final report shall be submitted with the application for permit reissuance.

4. Copper Compliance Schedule Requirements

Task	Schedule
a. Discharger shall submit a report acceptable to the Executive Officer that identifies sources of copper at the plant based on additional source monitoring, and that proposes a work plan for how those sources may be reduced and controlled in order to achieve compliance with the final limits specified in this Order. Discharger may evaluate the feasibility of effluent reclamation and reuse projects, site-specific translators, and statistically based values for hardness. Based on this information, the Board may reopen this Permit to establish additional interim requirements.	December 1, 2006
b. Submit annual report describing status of the work accomplished towards compliance with the WQBELs for copper.	June 1 of each year
c. Full compliance with final WQBELs for copper.	January 1, 2015

Optional Studies

5. Optional Metal Translator Study

The purpose of this study is to develop information that may be used to establish WQBELs based on dissolved criteria for copper, nickel, lead, and zinc. Optionally, the Discharger may implement a sampling plan to collect data for development of dissolved-to-total translators for these pollutants. If the Discharger chooses to proceed with the study, which may be conducted in cooperation with other Dischargers, the work shall be performed in accordance with the following tasks:

Task	Schedule
a. Metal Translator Study Plan: Submit a the study plan, shall be acceptable to the Executive Officer, that and shall outlines data collection for establishment of dissolved-to-total copper, as discussed in the findings. The study plan shall provide for development of translators in accordance with the State Board's SIP, U.S. EPA guidelines, and any relevant portions of the Basin Plan, as amended. <u>The study plan shall propose a sampling location downstream of the discharge point and in its vicinity, or as otherwise approved.</u>	At the Discharger's discretion during the permit term.
b. Implementation Of The Plan: <u>Following approval by the Executive Officer, commence work in accordance with the study plan.</u> if the Discharger conducts a translator study, it will use field sampling data approximate to the discharge point and in the vicinity of the discharge point, or as otherwise provided for in the approved workplan.	As specified in the study plan.
c. Final Report: Submit a A final report, acceptable to the Executive Officer, that should be submitted, documenting the results of the metal translator study.	As specified in the study plan, but at least 180 days prior to permit expiration in order to be used for next permit reissuance.

6. Optional Hardness Study

The purpose of this study is to more accurately characterize the hardness of the receiving water, so the Discharger may determine whether an alternative hardness value may be used to calculate the Water Quality Objectives for metals, an alternative hardness value (to be used in calculating hardness based WQOs and WQC for metals). The proposed hardness value shall be protective of the beneficial uses of the receiving water, and consistent with the CTR and SIP. If the Discharger chooses to proceed with the study, which may be conducted in cooperation with other Dischargers, the work shall be performed in accordance with the following tasks:

Task	Schedule
a. Hardness Study Plan: Submit a the study plan, shall be acceptable to the Executive Officer, that and shall outlines data collection to characterize the hardness (as calcium carbonate) of the receiving water. <u>The plan shall propose a sampling location for hardness that is downstream of the discharge point and in its vicinity, or as otherwise approved.</u>	At the Discharger's discretion during the permit term.
b. Implementation of The Plan: <u>Following approval by the Executive Officer, commence work in accordance with the study plan.</u> if the Discharger conducts a hardness study, it will use field sampling data downstream of the discharge point and in the vicinity of the discharge point, or as otherwise provided for in the approved workplan.	As specified in the study plan.
c. Final Report: Submit a A final report, acceptable to the Executive Officer, that shall documents the results of the hardness study. The report should propose a statistically based hardness value, with an explanation of why it is protective of the beneficial uses of the receiving water, which is acceptable	As specified in the study plan, but at least 180 days prior to permit expiration in order to be used for next permit reissuance.

to the Executive Officer.	
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7. Pollutant Minimization Program

- a. According to Section 2.4.5 of the SIP, when there is evidence that a priority pollutant is present in the effluent above an effluent limitation and either:
 - i. A sample result is reported as detected, but not quantified (less than the ML) and the effluent limitation is less than the reported ML; or
 - ii. Sample result is reported as not detected (less than the MDL) and the effluent limitation is less than the MDL,the Discharger shall be required to complete and implement a Pollutant Minimization Program.

- b. If triggered by the reasons in (a) above and notified by the Executive Officer, the Discharger shall submit within 6 months of notification, the following:
 - i. An annual review and semiannual monitoring of potential sources of the reportable priority pollutant(s), which may include fish tissue monitoring and other bio-uptake sampling, or alternative measures approved by the Executive Officer when it is demonstrated that source monitoring is unlikely to produce useful analytical data.
 - ii. Quarterly monitoring for the reportable priority pollutant(s) in the influent to the wastewater treatment system, or alternative measures approved by the Executive Officer when it is demonstrated that influent monitoring is unlikely to produce useful analytical data.
 - 1. Submittal of a control strategy designed to proceed toward the goal of maintaining concentrations of the reportable priority pollutant(s) in the effluent at or below the effluent limitation.
 - 2. Development of appropriate cost-effective control measures for the reportable priority pollutant(s), consistent with the control strategy.
 - 3. An annual status report that shall be sent to the Board including the following:
 - (1) All Pollution Prevention monitoring results for the previous year
 - (2) A list of potential sources of the reportable priority pollutant(s)
 - (3) A summary of all actions undertaken pursuant to the control strategy
 - (4) A description of actions to be taken in the following year.

- c. To the extent that the requirements of the Pollutant Minimization Program, and the Compliance Schedule Requirements overlap, the Discharger is allowed to continue, modify, or expand its existing Compliance Schedule Requirements to satisfy the Pollutant Minimization Program requirements.

- d. These Pollutant Minimization Program requirements are not intended to fulfill the requirements in the Clean Water Enforcement and Pollution Prevention Act of 1999 (Senate Bill 709)

8. Operations and Maintenance Manual

- a. The Discharger shall submit an Operation and Maintenance Manual (O&M Manual) for its wastewater facilities, acceptable to the Executive Officer, within 180 days from the effective date of this Order. The O&M Manual shall be consistent with the findings of this Order. The O&M Manual shall be maintained in usable condition, and available for reference and use by all applicable personnel.
- b. The Discharger shall regularly review, revise, or update, as necessary, the O&M Manual(s) so that the document(s) may remain useful and relevant to current equipment and operation practices. Reviews shall be conducted annually, and revisions or updates shall be completed as necessary. For any significant changes in treatment facility equipment or operation practices, applicable revisions shall be completed within 90 days of completion of such changes.
- c. The Discharger shall provide the Executive Officer, upon his or her request, a copy of its O&M Manual, or a report describing the current status of its O&M Manual, including any recommended or planned actions and an estimated time schedule for these actions. The Discharger shall also include, in each Annual Self-Monitoring Report, a description or summary of review and evaluation procedures, and applicable changes to its O&M Manual.

9. Self-Monitoring Program (SMP)

The Discharger shall comply with the SMP for this Order as adopted by the Board. The SMPs may be amended by the Executive Officer pursuant to U.S. EPA regulation 40 CFR122.63.

10. Standard Provisions and Reporting Requirements

The Discharger shall comply with all applicable items of the attached Standard Provisions and Reporting Requirements for NPDES Surface Water Discharge Permits, August 1993 (the Standard Provisions), or any amendments thereafter. Where provisions or reporting requirements specified in this Order are different from equivalent or related provisions or reporting requirements given in the Standard Provisions, the specifications of this Order shall apply.

11. Change in Control or Ownership

In the event of any change in control or ownership of land or waste discharge facilities presently owned or controlled by the Discharger, the Discharger shall notify the succeeding owner or operator of the existence of this Order by letter, a copy of which shall be immediately forwarded to the Board. To assume responsibility for and operations under this Order, the succeeding owner or operator must apply in writing to the Executive Officer requesting transfer of the Order (see Standard Provisions and Reporting Requirements, August 1993, Section E.4.). Failure to submit the request shall be considered a discharge without requirements, a violation of the California Water Code.

12. Permit Reopener

The Board may modify or reopen this Order and Permit prior to its expiration date in any of the following circumstances:

- a. If present or future investigations demonstrate that the discharge(s) governed by this Order and permit will or have a reasonable potential to cause or contribute to adverse impacts on water quality and/or beneficial uses of the receiving waters;

Kobe Precision, Inc.
NPDES Permit No. CA0030112

- b. If new or revised WQOs come into effect for the San Francisco Bay estuary and contiguous waterbodies (whether statewide, regional, or site specific). In such cases, effluent limitations in this Permit, if there will be any, will be modified as necessary to reflect updated WQOs. Adoption of effluent limitations contained in this Order and Permit is not intended to restrict in any way future modifications based on legally adopted WQOs or as otherwise permitted under Federal regulations governing NPDES permit modifications;
- c. If translator or other water quality studies provide a basis for determining that a permit condition(s) should be modified.

The Discharger may request permit modification based on (2) and (3) above. The Discharger shall include in any such request an antidegradation and antibacksliding analysis.

13. NPDES Permit

This Order shall serve as an NPDES permit pursuant to Section 402 of the Clean Water Act or amendments thereto, and shall become effective on December 1, 2005, provided the U.S. EPA Regional Administrator has no objection. If the Regional Administrator objects to its issuance, the permit shall not become effective until such objection is withdrawn.

14. Order Expiration and Reapplication

- a. This Order expires November 30, 2010.
- b. In accordance with Title 23, Chapter 3, Subchapter 9 of the California Administrative Code, the Discharger must file a report of waste discharge no later than 180 days before the expiration date of this Order as application for reissue of this permit and waste discharge requirements. The application shall be accompanied by a summary of all available water quality data including conventional pollutant data from no less than the most recent three years, and of toxic pollutant data no less than from the most recent five years, in the discharge and receiving water. Additionally, the Discharger must include with the application the final results of any studies that may have bearing on the limits and requirements of the next permit. Such studies include dilution studies, translator studies and alternate bacteria indicator studies.

I, Bruce H. Wolfe, 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 21, 2005.

BRUCE H. WOLFE
Executive Officer

Attachments

- A. Discharge Facility Location Map
- B. Discharge Facility General Layout
- C. Self-Monitoring Program, Part B
- D. Fact Sheet

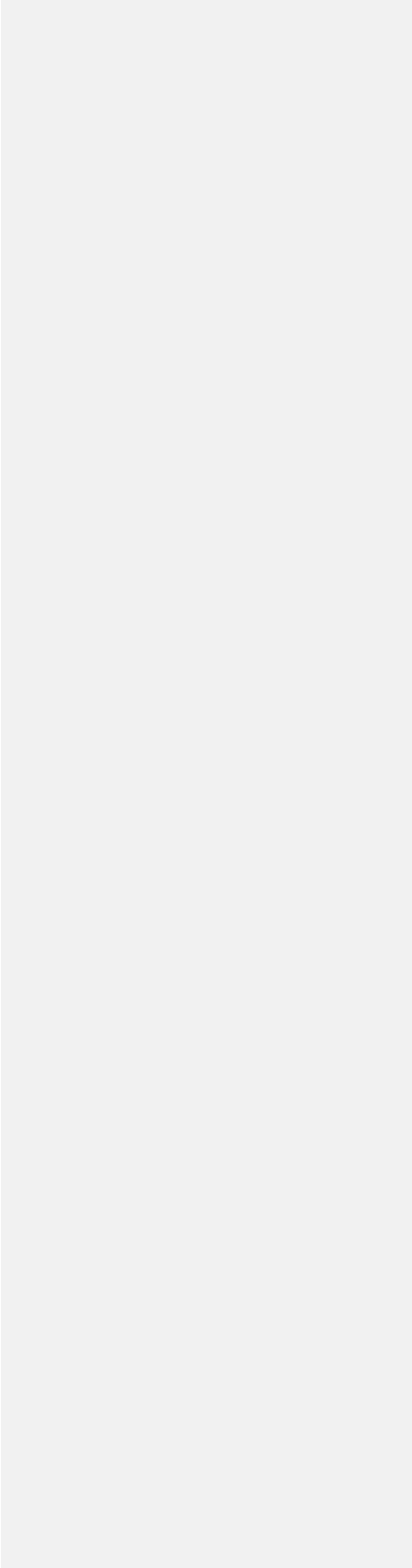
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NPDES Permit No. CA0030112

F. The following documents are part of this Permit, but are not physically attached due to volume. They are available on the web at: www.waterboards.ca.gov/sanfranciscobay/Download.htm

- Self-Monitoring Program, Part A (August 1993)
- Board Resolution No. 74-10
- Standard Provisions and Reporting Requirements, August 1993
- August 6, 2001 Letter

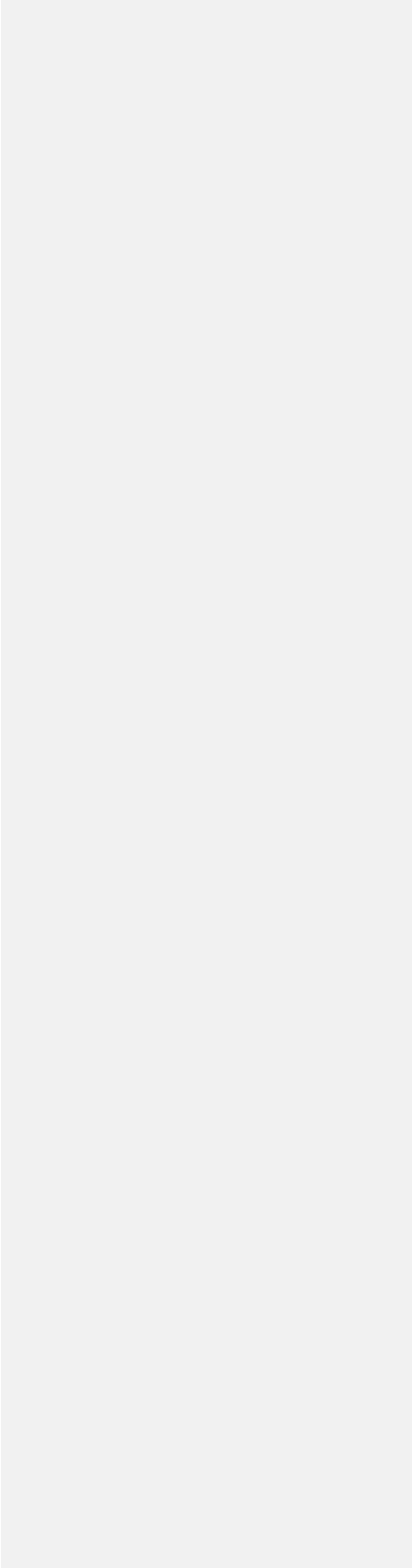
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Attachment A
Discharge Facility Location Map



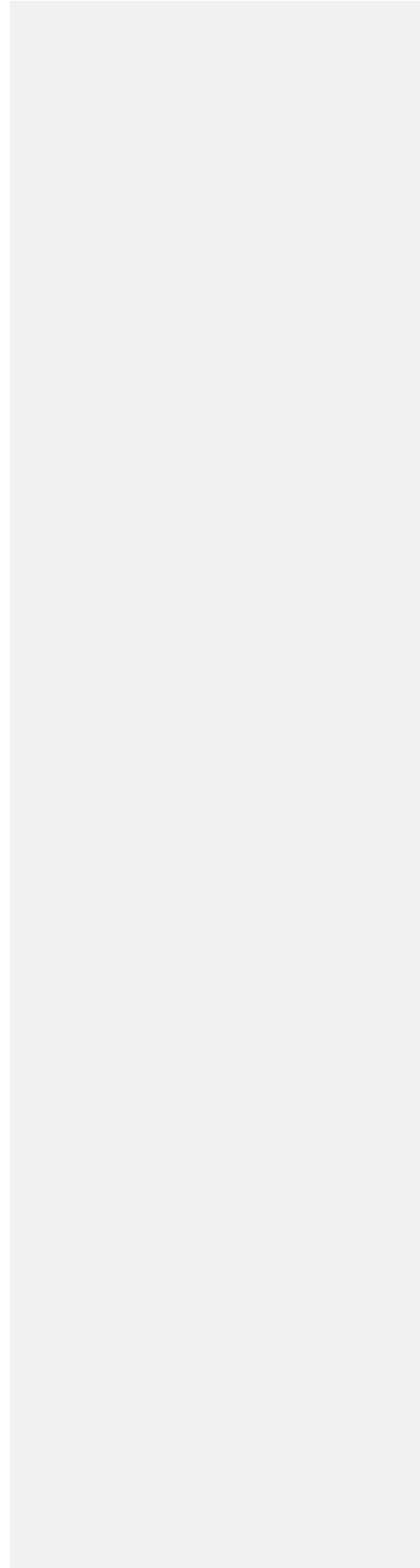
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Attachment B
Process Flow Diagram



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Attachment C
Self-Monitoring Program



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NPDES Permit No. CA0030112

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

SELF-MONITORING PROGRAM

FOR

KOBE PRECISION, INC.
HAYWARD, ALAMEDA COUNTY

NPDES PERMIT NO. CA0030112
ORDER NO. R2-2005-XXXX

Consists of:

Part A (not attached)
Adopted August 1993

and

Part B (Attached)
Adopted: XX 2005
Effective: December 1, 2005

Note: Part A, Standard Provisions and Reporting Requirements for NPDES Surface Water Discharger Permits (dated August 1993), and Resolution No. 74-10 referenced in this Self-Monitoring Program are not attached but are available for review or download on the Board's website at <http://www.waterboards.ca.gov/sanfranciscobay/Download.htm>

SELF-MONITORING PROGRAM, PART B

I. DESCRIPTION OF SAMPLING STATIONS

A. INFLUENT

<u>Station</u>	<u>Description</u>
I-001	Located at any point in the pipe, which delivers raw water to the Discharger's reverse osmosis plant, prior to any point of treatment or use. If more than one pipe is involved in supplying raw water, the influent sample shall consist of a flow-proportioned composite from each of the sources.

B. EFFLUENT

<u>Station</u>	<u>Description</u>
E-001	At a point in the outfall between the point of discharge and the point at which all wastes tributary to the discharge are present, prior to mixing of this discharge with other wastewater discharges not permitted by this Order.

C. RECEIVING WATER STATIONS

<u>Station</u>	<u>Description</u>
C-001	In the District Flood Channel, upstream from where the Discharger's storm sewer drains to the channel.
C-002	In the District Flood Channel, downstream from where the Discharger's storm sewer drains to the channel.

II. SCHEDULE OF SAMPLING, ANALYSIS, AND OBSERVATION

This schedule of sampling, analyses, and observations shall be that given in Table 1 of this self-monitoring program.

**TABLE 1
 SCHEDULE FOR SAMPLING, MEASUREMENTS, AND ANALYSES [1]**

Sampling Station Type of Sample Parameter (units) [notes]	I-001		E-001		C-001
	G	Co	G	Co	
Flow rate (mgd) [2]		D		D	
Chlorine residual (mg/L) [3]			W		
Total Dissolved Solids (mg/L)			M		
Acute Toxicity (% Survival)[4]			Y		
pH (standard units)			D		
Temperature (°C)			D		
Copper (µg/L) [5]			M		
Lead (µg/L) [5]			Q		
Mercury (µg/L) [6]			Y		
Nickel ((µg/L) [5]			Q		
Selenium (µg/L) [5]			Q		
Zinc (µg/L) [5]			Q		
<u>2,3,7,8-TCDD and Congeners (µg/L)</u> <u>[5] [7]</u>			<u>1/3Y</u>		
Standard Observations			W		
All priority pollutants (except those listed above)			In accordance with Provisions D.3 and D.4		

LEGEND FOR TABLE 1

<u>Type of Stations:</u> I = treatment influent E = treatment facility effluent	<u>Frequency of Sampling:</u> D = once each day W = once each week M = once each month Y = once each calendar year, timing of sampling should vary from year to year 2/Y = twice per year <u>1/3Y = once every 3 years</u> <u>1/5Y = once every 5 years</u>	<u>Types of Samples:</u> Co = continuous sampling G = grab sample
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FOOTNOTES FOR TABLE 1

- [1] The Discharger shall use approved USEPA Methods with the lowest Minimum Levels specified in Table 2 below.
- [2] Flow Monitoring: Flows shall be measured continuously and recorded daily, except on weekends and holidays when Discharger’s facility has limited staff to take measurements. Over these periods, an average flow may be reported by dividing the total flow volume by the period, with a note indicating the values are averages taken over multiple days. The following information shall also be reported quarterly:

Kobe Precision, Inc.
 NPDES Permit No. CA0030112

Average Daily Flow (mgd)
 Maximum Daily Flow (mgd)
 Minimum Daily Flow (mgd)

- [3] **Chlorine Residual:**
 The Discharger shall use an analytical method with a method detection limit no greater than 0.08 mg/L. The residual chlorine level is considered in violation if it is at or above 0.08 mg/L.
- [4] **Bioassays**
 - a) Compliance with the acute toxicity effluent limits of this Order shall be evaluated by measuring survival of test organisms exposed to 96-hour static renewal bioassays.
 - b) The test organisms shall be rainbow trout.
 - c) All bioassays shall be performed according to the “Methods for Measuring the Acute Toxicity of Effluents and Receiving Water to Freshwater and Marine Organisms” (currently 5th Edition).
 - d) Bioassays: Monitoring of the bioassay water shall include, on a daily basis, the parameters specified in the U.S. EPA-approved method, such as pH, dissolved oxygen, ammonia nitrogen, and temperature. These results shall be reported. Effluent used for fish bioassays must be undiluted, dechlorinated effluent.
- [5] Copper, lead, mercury, nickel, selenium, ~~and zinc~~, and 2,3,7,8-TCDD samples may be grabs or 24-hour composites. Composite samples may be from a continuous compositing sampler, or may be made up of discrete grabs collected through out the day.
- [6] Ultra-clean sampling techniques, to the maximum extent practicable, and low-level analytical Method 1631B shall be used.
- [7] The seventeen 2,3,7,8-TCDD congeners shall be analyzed using the latest version of U.S. EPA Method 1613. Alternative methods of analysis must be approved by the Executive Officer.

Table 2 lists the MLs (based on the SIP) of the priority constituents included in Table 1. For compliance monitoring, analyses shall be conducted using the lowest commercially available and reasonably achievable detection levels.

Table 2. Minimum Levels (µg/l or ppb)

CTR #	Constituent [1]	Types of Analytical Methods [2]											
		GC	GC MS	LC	Color	FAA	GFA A	ICP	ICP MS	SPGF AA	HYD RIDE	CVA A	DCP
6.	Copper [3]								0.5	2			
7.	Lead								0.5	2			
8.	Mercury [4]								0.5			0.2	
9.	Nickel						5		1	5			
10.	Selenium						5	10	2	5	1		
13.	Zinc								1	10			
16.	2, 3, 7, 8-TCDD and 16 Congeners [5]												

FOOTNOTES FOR TABLE 2

[1] According to the SIP, method-specific factors (MSFs) can be applied. In such cases, this additional factor must be applied in the computation of the reporting limit. Application of such factors will alter the reported ML (as described in section 2.4.1). Dischargers are to instruct laboratories to establish calibration standards so that the

ML value is the lowest calibration standard. At no time is the discharger to use analytical data derived from the extrapolation beyond the lowest point of the calibration curve.

- [2] Laboratory techniques are defined as follows: GC = Gas Chromatography; GCMS = Gas Chromatography/Mass Spectrometry; LC = High Pressure Liquid Chromatography; Color = Colorimetric; FAA = Flame Atomic Absorption; GFAA = Graphite Furnace Atomic Absorption; Hydride = Gaseous Hydride Atomic Absorption; CVAA = Cold Vapor Atomic Absorption; ICP = Inductively Coupled Plasma; ICPMS = Inductively Coupled Plasma/Mass Spectrometry; SPGFAA = Stabilized Platform Graphite Furnace Atomic Absorption (i.e. EPA 200.9); DCP = Direct Current Plasma.
- [3] For copper, the Discharger shall use either of the following laboratory techniques with the associated minimum levels: ICPMS with a minimum level of 0.5 µg/L, or SPGFAA with a minimum level of 2 µg/L. These minimum levels allow measurements to be compared with the calculated maximum daily effluent limitation for copper (3.8 µg/L).
- [4] Use ultra-clean sampling (EPA 1669) to the maximum extent practicable, and ultra-clean analytical methods (EPA 1631) for mercury monitoring. The Discharger may use alternative methods of analysis (such as EPA 245), if that alternate method has a Minimum Level of 2 ng/l or less.
- [5] The SIP does not contain an ML for this constituent. ~~Use Method 1613 for TCDD analysis and test for the seventeen congeners. The analysis of the seventeen 2,3,7,8-TCDD congeners, shall be capable of achieving one half the EPA method 1613 MLs. The Board and BACWA have agreed on the MLs for 17 TCDD congeners (see BACWA letter dated April 23, 2002).~~

III. REPORTING REQUIREMENTS

- A. General Reporting Requirements are described in Section E of the Board's *Standard Provisions and Reporting Requirements for NPDES Surface Water Discharge Permits*, dated August 1993.
- B. Any overflow, bypass, or any significant noncompliance incident that may endanger health or the environment shall be reported within 24 hours in accordance with Sections F.1 and F.2 of SMP Part A. The date, time, duration, location, estimated volume of wastewater discharged, and corrective actions taken for these events shall be reported in monthly self-monitoring reports.

IV. MODIFICATIONS TO PART A OF SELF-MONITORING PROGRAM

- A. If any discrepancies exist between Part A and Part B of the SMP, Part B prevails.
- B. Modify Section F.1 as follows:

Spill Reports

A report shall be made of any spill of oil or other hazardous material. The spill shall be reported by telephone as soon as possible and no later than 24 hours following occurrence or Discharger's knowledge of occurrence. Spills shall be reported by telephone as follows:

During weekdays, during office hours of 8 am to 5 pm, to the Board.

During non-office hours, to the State Office of Emergency Services:
Current telephone number: (800) 852-7550.

A report shall be submitted to the Board within five (5) working days following telephone notification, unless directed otherwise by Board staff. A report submitted by facsimile transmission is acceptable for this reporting. The written report shall contain information relative to: . . .

C. Modify Section F.4 as follows:

Self-Monitoring Reports

For each quarter, a self-monitoring report (SMR) shall be submitted to the Board in accordance with the requirements listed in Self-Monitoring Program, Part A. The purpose of the report is to document performance, effluent quality and compliance with waste discharge requirements prescribed by this Order, as demonstrated by the monitoring program data and the Discharger's operation practices. **The report shall be submitted to the Board on a quarterly basis, by the first day of the second month after the quarter, on February 1, May 1, August 1, and November 1...**

[And add at the end of Section F.4.a the following:]

- 5) If the Discharger wishes to invalidate any measurement taken within the reporting period, the letter of transmittal for the reporting period in question shall include: a formal request by the Discharger to invalidate the measurement; the original measurement in question; the reason for invalidating the measurement; all relevant documentation that supports the invalidation (e.g., laboratory sheet, log entry, test results, etc.); and discussion of the corrective actions taken or planned (with a time schedule for completion), to prevent recurrence of the sampling or measurement problem. The invalidation of a measurement requires the approval of Board staff, and shall be based solely on the documentation submitted with the letter of transmittal.

D. Add at the end of Section F.5, Annual Reporting, the following:

- d. A plan view drawing or map showing the Discharger's facility, flow routing and sampling and observation station locations.

E. Replace Sections E.1 and E.2 with the following:

1. Recording Requirements – Records to be Maintained

Written reports, electronic records, strip charts, equipment calibration and maintenance records, and other records pertinent to demonstrating compliance with waste discharge requirements including SMP requirements, shall be maintained by the Discharger in a manner and at a location (e.g., wastewater treatment plant or discharger offices) such that the records are accessible to Board staff. These records shall be retained by the Discharger for a minimum of 3 years. The minimum period of retention shall be extended during the course of any unresolved litigation regarding the subject discharges, or when requested by the Board or by the Regional Administrator of U.S. EPA, Region IX.

Records to be maintained shall include the following:

a. Parameter Sampling and Analyses, and Observations

For each sample, analysis, or observation conducted, records shall include the following:

- 1) Identity of the parameter.
- 2) Identity of the sampling or observation station, consistent with the station descriptions given in this SMP.
- 3) Date and time of the sampling or observation.

- 4) Method of sampling (grab, composite, other method).
- 5) Date and time the analysis was started and completed, and name of personnel or contract laboratory performing the analysis.
- 6) Reference or description of the procedure(s) used for sample preservation and handling, and analytical method(s) used.
- 7) Calculations of results.
- 8) Analytical method detection limits and related quantitation parameters.
- 9) Results of the analyses or observations.

b. Flow Monitoring Data

For all required flow monitoring (e.g., influent and effluent flows), records shall include the following:

- 1) Total flow or volume for each day.
- 2) Maximum, minimum, and average daily flows for each calendar month.

V. ADDITIONS TO PART A OF SELF-MONITORING PROGRAM

Reporting Data in Electronic Format:

The Discharger has the option to submit all monitoring results in electronic reporting format approved by the Executive Officer. If the discharger chooses to submit the SMRs electronically, the following shall apply:

- a. Reporting Method: The discharger shall submit SMRs electronically via the process approved by the Executive Officer in a letter dated December 17, 1999, Official Implementation of Electronic Reporting System (ERS).
- b. Modification of reporting requirements: Reporting requirements F.4 in the attached Self-Monitoring program, Part A, dated August 1993, shall be modified as follows. In the future, the Board intends to modify Part A to reflect these changes.
- c. Quarterly Report Requirements: For each calendar quarter, a self-monitoring report (SMR) shall be submitted to the Board in accordance with the following:
 - i. The report shall be submitted to the Board no later than the first day of the second month after the reporting period ends.
 - ii. Letter of Transmittal: Each report shall be submitted with a letter of transmittal. This letter shall include the following:
 - (1) Identification of all violations of effluent limits or other discharge requirements found during the monitoring period;
 - (2) Details of the violations: parameters, magnitude, test results, frequency, and dates;
 - (3) The cause of the violations;
 - (4) Discussion of corrective actions taken or planned to resolve violations and prevent recurrence, and dates or time schedule of action implementation. If previous reports have been submitted that address corrective actions, reference to such reports is satisfactory;
 - (5) If the Discharger wishes to invalidate any measurement taken within the reporting period, the letter of transmittal for the reporting period in question shall include: a formal request by the Discharger to invalidate the measurement; the original measurement in

question; the reason for invalidating the measurement; all relevant documentation that supports the invalidation (e.g., laboratory sheet, log entry, test results, etc.); and discussion of the corrective actions taken or planned (with a time schedule for completion), to prevent recurrence of the sampling or measurement problem. The invalidation of a measurement requires the approval of Board staff, and shall be based solely on the documentation submitted with the letter of transmittal.

- (6) Signature: The letter of transmittal shall be signed by the discharger's principal executive officer or ranking elected official, or duly authorized representative, and shall include the following certification statement:

"I certify under penalty of law that this document and all attachments have been prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

- (7) Compliance evaluation summary: Each report shall include a compliance evaluation summary. This summary shall include the number of samples in violation of applicable effluent limits.
- (8) Tabulations of all required analyses and observations, including parameter, sample date, sample station, and test result.
- (9) If any parameter is monitored more frequently than required by this permit and SMP, the results of this additional monitoring shall be included in the monitoring report, and the data shall be included in data calculations and compliance evaluations for the monitoring period.
- (10) Calculations for all effluent limits that require averaging of measurements shall utilize an arithmetic mean, unless specified otherwise in this permit or SMP.

VI. MISCELLANEOUS REPORTING

- A. The Discharger shall retain and submit (when required by the Executive Officer) the following information concerning the monitoring program for organic and metallic pollutants:
1. Description of sample stations, times, and procedures.
 2. Description of sample containers, storage, and holding time prior to analysis.
 3. Quality assurance procedures together with any test results for replicate samples, sample blanks, and any quality assurance tests, and the recovery percentages for the internal surrogate standard.

VII. SELECTED CONSTITUENTS MONITORING

- A. Effluent monitoring shall include evaluation for all constituents listed in Table 1 by sampling and analysis of final effluent.

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NPDES Permit No. CA0030112

- B. Analyses shall be conducted using the lowest commercially available and reasonably achievable detection levels. The objective is to provide quantification of constituents sufficient to allow evaluation of observed concentrations with respect to respective WQOs.

VIII. MONITORING METHODS AND MINIMUM DETECTION LEVELS

The Discharger may use the methods listed in Table 2, above, or alternative test procedures that have been approved by the U.S. EPA Regional Administrator pursuant to 40 CFR 136.4 and 40 CFR 136.5 (revised as of May 14, 1999).

IX. SELF-MONITORING PROGRAM CERTIFICATION

I, Bruce H. Wolfe, Executive Officer, hereby certify that the foregoing Self-Monitoring Program:

- 1. Has been developed in accordance with the procedure set forth in this Board's Resolution No. 73-16 in order to obtain data and document compliance with waste discharge requirements established in Board Order No. R2-2005-XXXX.
- 2. May be reviewed at any time subsequent to the effective date upon written notice from the Executive Officer or request from the Discharger, and revisions will be ordered by the Executive Officer.
- 3. Is effective as of December 1, 2005.

BRUCE H. WOLFE
EXECUTIVE OFFICER

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NPDES Permit No. CA 0030112

Attachment D
Fact Sheet

