

California Regional Water Quality Control Board  
Santa Ana Region

May 19, 2000

**STAFF REPORT**

**ITEM:** 17

**SUBJECT:** Revision of Waste Discharge Requirements for Minnesota Mining and Manufacturing (3M) Company, Order No. 00-45

**DISCUSSION:**

3M Company (hereinafter discharger), owns and operates a quarry and roofing granule manufacturing facility located in the City of Corona, Riverside County.

The facility generates a number of waste streams including non-contact cooling water and cooling water from coloring coolers and cooler scrubbers. These waste streams are all contained within the on-site surface impoundments.

The facility is currently regulated under Waste Discharge Requirements, Order No. 84-28. The discharger has upgraded the surface impoundments to meet the liner standards required by the California Code of Regulations, Title 27, and has made other modifications. The revised Order regulates the discharge of wastewater to the surface impoundments as well as its limited use for dust control on the facility roads. The discharger is required to monitor the integrity of the liner, quality of groundwater in the on-site supply wells and wastewater in the surface impoundments. These requirements are consistent with Title 27, the Basin Plan and other State and Federal laws and regulations.

The requirements specified in the revised Order should ensure protection of the beneficial uses of the receiving waters and the environment.

**RECOMMENDATION:**

Adopt Order No. 00-45 as presented.

**COMMENTS WERE SOLICITED FROM THE FOLLOWING:**

U.S. Environmental Protection Agency, Permits Issuance Section (WTR-5) - Terry Oda  
State Water Resources Control Board, Office of Chief Counsel - Ted Cobb  
State Water Resources Control Board, Division of Clean Water Program – Elizabeth Babcock  
State Department of Health Services - San Bernardino  
State Department of Fish and Game - Long Beach  
U.S. Fish and Wildlife Service - Carlsbad  
State Department of Water Resources - Glendale  
South Coast Air Quality Management District, Diamond Bar – Rick Gluck  
3M Company – Reynold A. Mack

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SANTA ANA REGION**

**ORDER NO. 00-45**

**WASTE DISCHARGE REQUIREMENTS  
FOR  
MINNESOTA MINING AND MANUFACTURING (3M) COMPANY  
ROOFING GRANULE PLANT  
CORONA, RIVERSIDE COUNTY**

The California Regional Water Quality Control Board, Santa Ana Region (hereinafter Board), finds that:

1. The Minnesota Mining and Manufacturing Company (3M, Industrial Minerals Division), (hereinafter discharger), owns and operates a quarry and roofing granule plant located at 18750 Minnesota Road in the City of Corona. The facility is located at latitude N33°50'50" and longitude 117°30'40", in portions of Section 4, Township 4S, Range 6W, San Bernardino Baseline & Meridian, as shown on Attachment A, which is hereby made a part of this Order.
2. On April 13, 1984, the Board adopted Order No. 84-28, NPDES No. CA0001244, to regulate the discharge of sanitary wastes to two subsurface disposal systems; the discharge of wastewater from the granule coloring process to the concrete settling basin and two lined evaporation ponds, and its subsequent use for on-site dust control; and to regulate the discharge of non-contact cooling water to Temescal Wash. The discharge of non-contact cooling water to Temescal Creek has been eliminated. Therefore, NPDES No. CA 0001244 is no longer necessary. Also, the discharge of sanitary wastes to the septic tank-subsurface disposal system does not pose a significant threat to water quality. Therefore, this discharge need not be regulated under waste discharge requirements. Order No. 84-28 is being updated to reflect these changes and to include the following:
  - a. To incorporate requirements specified in California Code of Regulations (CCR), Title 27;
  - b. To reflect the changes in the State and Regional Boards policies and plans, including the Basin Plan; and
  - c. To incorporate the changes made to the evaporation ponds; the evaporation ponds have been retrofitted with new liners to meet current regulatory standards.

The layout of the facility is shown on attachment B, which is hereby made a part of this Order.

3. The facility is located within the Bedford - Upper Temescal I Groundwater Subbasin, the beneficial uses of which are:
  - a. Municipal and Domestic Supply,
  - b. Agricultural Supply,
  - c. Industrial Service Supply, and
  - d. Industrial Process Supply.
4. Water Quality Objectives for the Bedford - Upper Temescal I Subbasin are as follows:
  - a. Total dissolved solids (TDS), 840 parts per million (ppm),

- b. Hardness, 440 ppm,
  - c. Sodium, 80 ppm,
  - d. Chloride, 100 ppm,
  - e. Nitrate as N, 9 ppm, and
  - f. Sulfate, 200 ppm.
5. Temescal Creek, Reach 2, flows adjacent to the site. Temescal Creek and the surface and subsurface flows of the surrounding Temescal Wash represent the receiving waters. The beneficial uses of Temescal Creek, Reach 2, are:
- a. Agricultural Supply,
  - b. Industrial Service Supply,
  - c. Groundwater Recharge,
  - d. Water Contact Recreation,
  - e. Non-contact Water Recreation,
  - f. Warm Water Fishery, and
  - g. Wildlife Habitat.
6. The Water Quality Objectives for Temescal Creek are as follows:
- a. TDS, 800 ppm,
  - b. Hardness, 400 ppm,
  - c. Sodium, 100 ppm,
  - d. Chloride, 200 ppm,
  - e. Total Inorganic Nitrogen (TIN), 6 ppm, and
  - f. Sulfate, 70 ppm.
7. The plant operations include mining, crushing, milling, coloring, and processing of rocks. In addition to the fines and soluble material created by the milling process, oxides and pigments are also added to the process water for coloring the granules. A chart of wastewater flows is shown on Attachment C, which is hereby made a part of this Order. These activities result in discharge of wastes which contain elevated levels of TDS and are considered to be Class II designated wastes pursuant to Title 27.
- a. Approximately 111,600 gallons per day (GPD) of groundwater is used for contact cooling of rock granules in the coloring coolers. The groundwater is supplied from two on-site production (supply) wells. Most of the water in the coloring coolers is boiled off and vented to the cooler scrubber where it is condensed and discharged to the two lined surface impoundments (ponds).
  - b. Approximately 6,300 GPD of groundwater is used to cool the scrubber which captures dust generated by granule processing. Once used in the scrubber, the water drains to the concrete settling basin (south pond). South pond overflow to the adjacent evaporation pond (north pond). Approximately 101,700 GPD of the wastewater is recycled back to the scrubber.
  - c. Approximately 6,000 GPD of groundwater is used in the coloring mixers.
8. The South Coast Air Quality Management District has required the 3M Company to maintain dust control throughout their facility in compliance with Rule 403 for PM-10 particulates. As part of the current practices at the site, approximately 9,400 gallons per day of wastewater from the north pond is used for dust control around the site.

9. Both ponds have been constructed with a liner system to minimize the likelihood of leakage, rupture, or overflow, in compliance with Title 27.

The design for the south pond, shown on Attachment D which is hereby made a part of this Order, includes:

- a. A compacted subgrade soil covered with a layer of granular fill,
- b. Two 80-mil layers of high density polyethylene (HDPE) liner material with a layer of drainage net between them, and a leak detection monitoring sump,
- c. Compacted cohesive fill,
- d. A layer of granular fill, and
- e. Reinforced concrete with a ramp that allows access for removal of settled debris.

The design for the north pond, shown on Attachment E which is hereby made a part of this Order, includes:

- a. A compacted subgrade soil covered with a layer of granular fill,
- b. Two 80-mil layers of HDPE liner material with a layer of drainage net between them, and a leak detection monitoring pipe.

10. Both ponds are equipped with a drainage net constructed between the primary (upper) and the secondary (lower) liners. This drainage net allows for detection of any leaks from the primary liner, and aids in early detection of any potential releases to the environment from the liner system. This leak detection system will serve in lieu of detection monitoring wells in detecting any release from the ponds. If leakage or a release from the liner system (primary liner) is detected, the discharger is required to implement all sections of the detection monitoring program required by Title 27.
11. Waste fines from the milling operation are placed on the facility grounds. These fines are mixed with wastewater from the north pond in cement trucks. The clay and silicates in the wastewater aid in the consolidation of the waste mineral fines into hard beads. These beads are then hauled from the site. This practice results in the control of dust from the waste fines at the site.
12. Truck washing at the site is performed on a concrete surface which drains to a sump with an oil-water separator prior to discharge to a large concrete settling/ evaporation basin.
13. The project involves the continued operation of an existing facility and as such, is exempt from provisions of the California Environmental Quality Act (Public Resources Code, Section 21000 et seq.) in accordance with Section 15301, Chapter 3, Title 14 of the California Code of Regulations.
14. The Board has notified the discharger and interested agencies of its intent to update waste discharge requirements for the facility, and has provided them with an opportunity to submit their written views and recommendations.
15. The Regional Board, in a public meeting, heard and considered all comments pertaining to the adoption of this order.

**IT IS HEREBY ORDERED** that the discharger, in order to meet the provisions contained in Division 7 of the California Water Code and regulations adopted thereunder, shall comply with the following.

**A. WASTE DISCHARGE SPECIFICATIONS**

1. The discharger shall implement the attached Monitoring and Reporting Program (M&RP) No. 00-45 in order to detect, at the earliest opportunity, any unauthorized discharge of wastes from the ponds, or any unreasonable impairment of beneficial uses associated with or caused by discharge of wastes.
2. The discharge of wastewater to the ponds shall not cause or threaten to cause a nuisance or pollution as defined in Section 13050 of the California Water Code.
3. A minimum of 24 inches of freeboard must be maintained at all times in the on-site ponds. If the pond's wastewater level threatens to exceed the freeboard specification, water shall be removed from the ponds and properly disposed of.
4. All wastewater discharges to the ponds shall be contained. Reuse of wastewater from the ponds for dust control shall not cause or contribute to the impairment of the beneficial uses of the receiving waters (including groundwater). Reuse of wastewater is limited to the wastewater from the north pond only.
5. No sodium chloride-based dust suppressants shall be used on the facility grounds because of their potential adverse impact on ground and surface water quality.
6. Truck washing can be performed only at the designated area, on an impervious surface with adequate containment to prevent discharges to the waters of the Region. On-site engine cleaning is prohibited.
7. Discharges to the ponds shall not cause the concentration of any Constituent of Concern<sup>1</sup> or monitoring parameter to exceed its respective background value in the supply wells, or any monitoring wells which may be required in the future.
8. Any modifications to the disposal ponds, or any proposed change in the operation of the ponds, must be submitted in writing to the Executive Officer of the Board for review and approval before the proposed pond modifications or change in operations is implemented.

**B. PROVISIONS**

1. The discharger shall comply with all waste discharge specifications, provisions, and monitoring and reporting requirements of this order immediately upon its adoption.
2. If leakage or a release from the primary liner is detected, the discharger shall implement all sections of the detection monitoring program required by Title 27.

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<sup>1</sup> "Constituents of Concern" are those constituents that are likely to be in the waste or which are likely to be derived from waste constituents in the event of a release.

3. The three applicable parts of the Water Quality Protection Standards of Title 27, §20390 are as follows:
  - a. Constituents of Concern (COC) [§ 20395] - The list of COCs for the pond water and the supply well water consists of constituents listed in EPA Priority Pollutants, and TDS, EC, sulfate, carbonate, pH, sodium, and chloride. EPA Priority Pollutants are listed on Attachment F, which is hereby made a part of this Order. After the first round of sampling, testing for EPA Priority Pollutants shall be performed every five years, while the testing for the remaining constituents shall be performed semi-annually, unless anomalies are discovered or until instructed otherwise by the Executive Officer.
  - b. Concentration Limits [§ 20400] - The Concentration Limit for each Constituent of Concern or Monitoring Parameter shall be its background value in the supply wells, which will be established during the first round of the supply well sampling analysis.
  - c. Compliance Period [§ 20405] - The estimated duration of the Compliance Period for the ponds is until they are no longer used and have been properly closed. Any time a release is discovered during the time the ponds are in use, the discharger must begin an Evaluation Monitoring Program.
4. The discharger shall permit Board staff:
  - a. Entry upon the premises for inspection of the facilities;
  - b. To copy any records required to be kept by the discharger under the terms and conditions of this order;
  - c. To sample any discharge; and
  - d. To take photographs and videotapes at the facility.
5. The discharger shall notify Board staff by telephone within 24 hours of any discharge of facility wastewater outside the ponds, or any discharges from the primary liner to the leachate collection and recovery system (LCRS). This notification shall be followed within 5 days by a written report, which must include the following information:
  - a. The approximate date and time of the discharge;
  - b. Flow rate and duration of the discharge;
  - c. Type and source of the discharge;
  - d. Location(s) where discharge(s) occurred;
  - e. Water sample collection points, with chain of custody records;
  - f. Cause of the discharge; and
  - g. Description of corrective actions implemented.

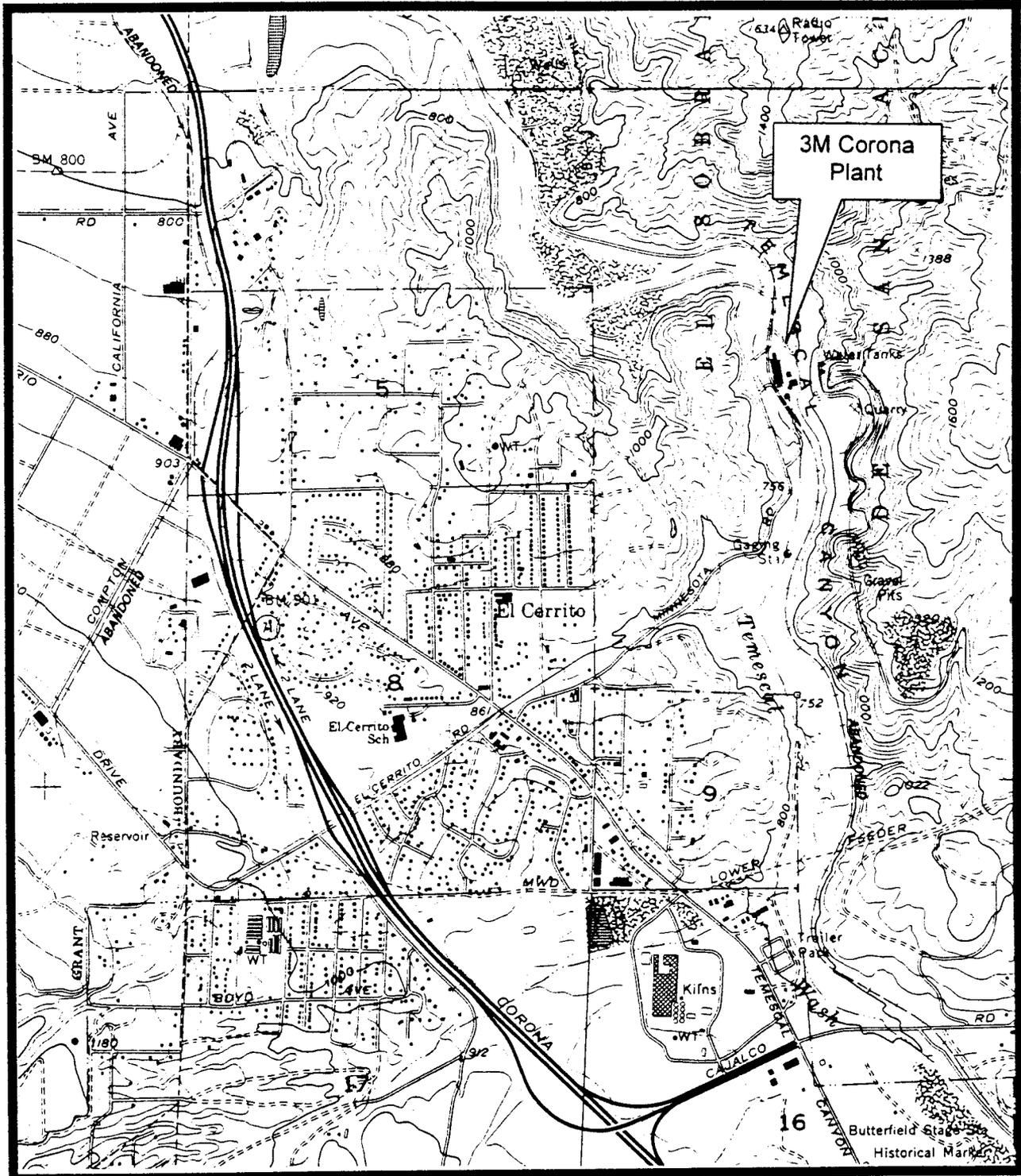
A summary report of all accidental discharges shall be included in the annual report.

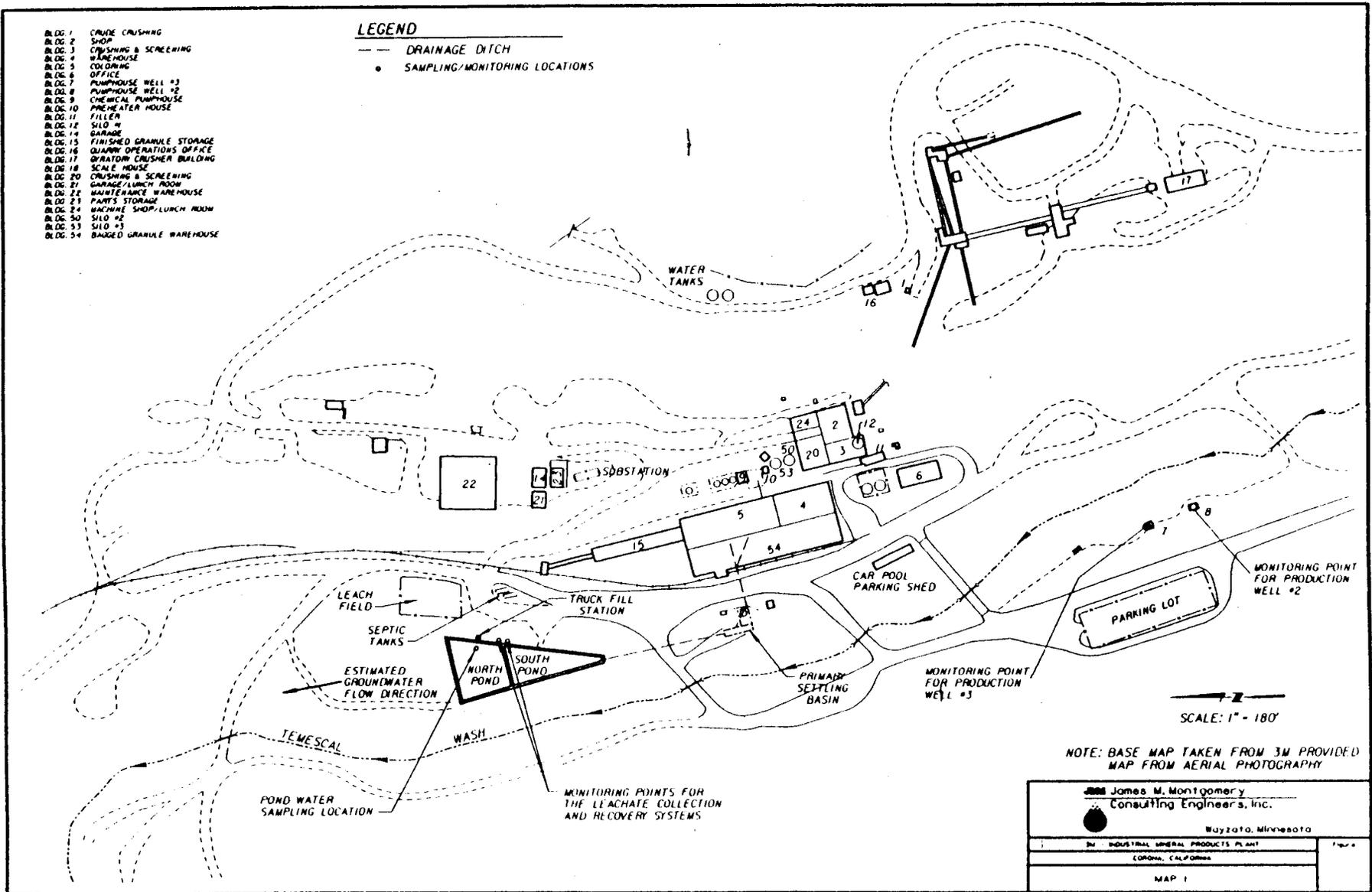
6. The discharger shall notify the Executive Officer of the Board in writing of any proposed change in ownership or responsibility for construction, operation, closure or post-closure maintenance of this facility. This notification shall be given prior to the effective date of the change and shall include a statement by the new discharger that construction, operation, closure, and post-closure maintenance will be in compliance with any existing waste discharge requirements and any revisions thereof.
7. In the event of any change in control or ownership of land or waste discharge facilities presently 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 this office.
8. Ninety days prior to the cessation of the operations at the facility, the discharger shall submit a workplan, subject to approval of the Executive Officer, for assessing the extent, if any, of contamination of natural geologic materials and surface waters (including ephemeral stream channels) by wastes. Within 120 days following workplan approval, the discharger shall submit an engineering report presenting results of the contamination assessment. A California registered civil engineer or certified engineering geologist must prepare the workplan, contamination assessment, and engineering report.
9. The discharger shall obtain and maintain Financial Assurance until the end of the Post-Closure Maintenance Period in accordance with Title 27, §§ 22200 et seq. The discharger shall submit an annual report that validates the maintenance of the financial assurance mechanism or proposes and substantiates any needed changes.
10. Order No. 84-28 is hereby rescinded.

I, Gerard J. Thibeault, 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, Santa Ana Region, on May 19, 2000.

  
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Gerard J. Thibeault  
Executive Officer

Attachment A - loc. Map

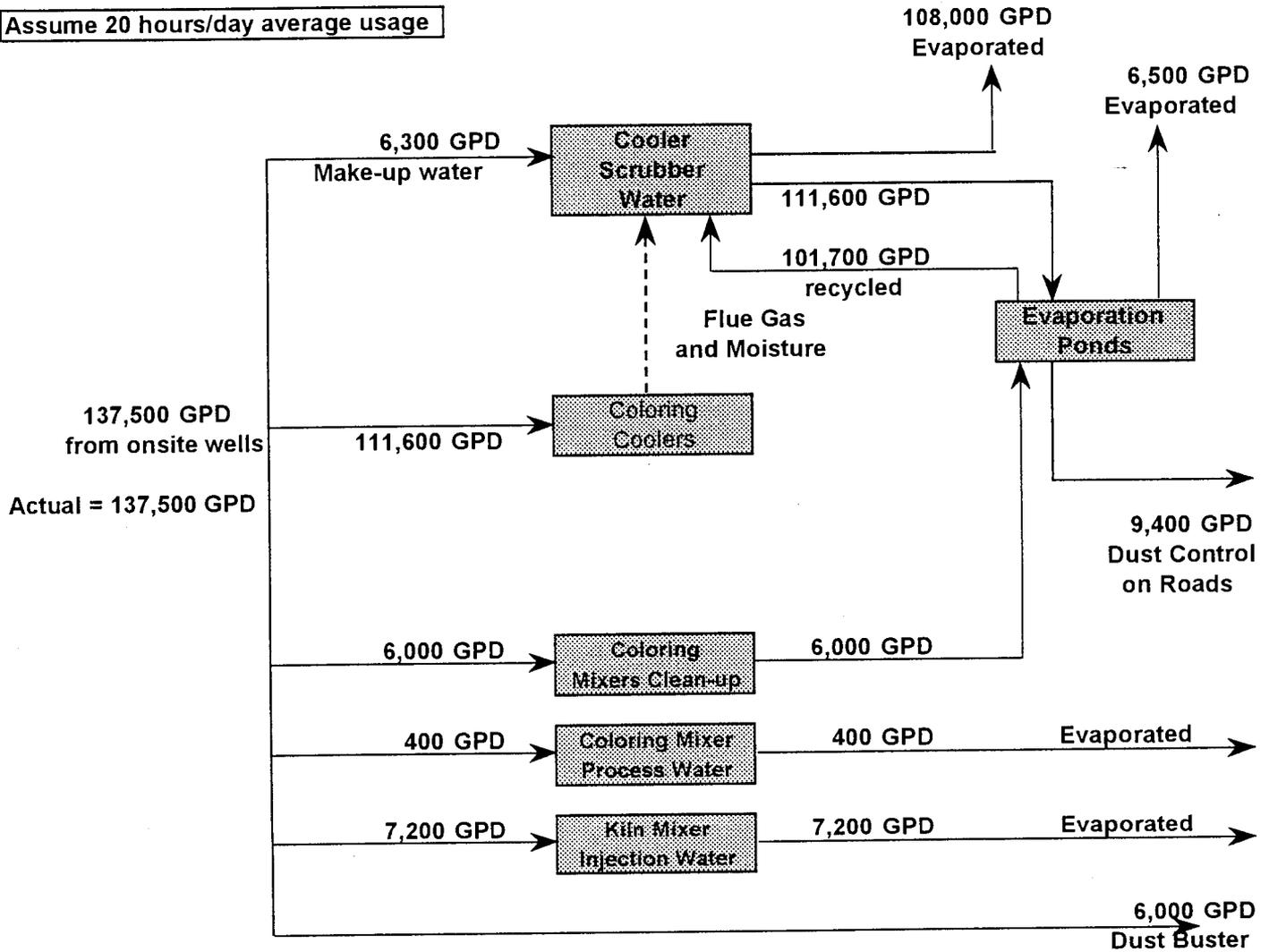




Attachment B - site map

**Attachment C – wastewater flowchart**

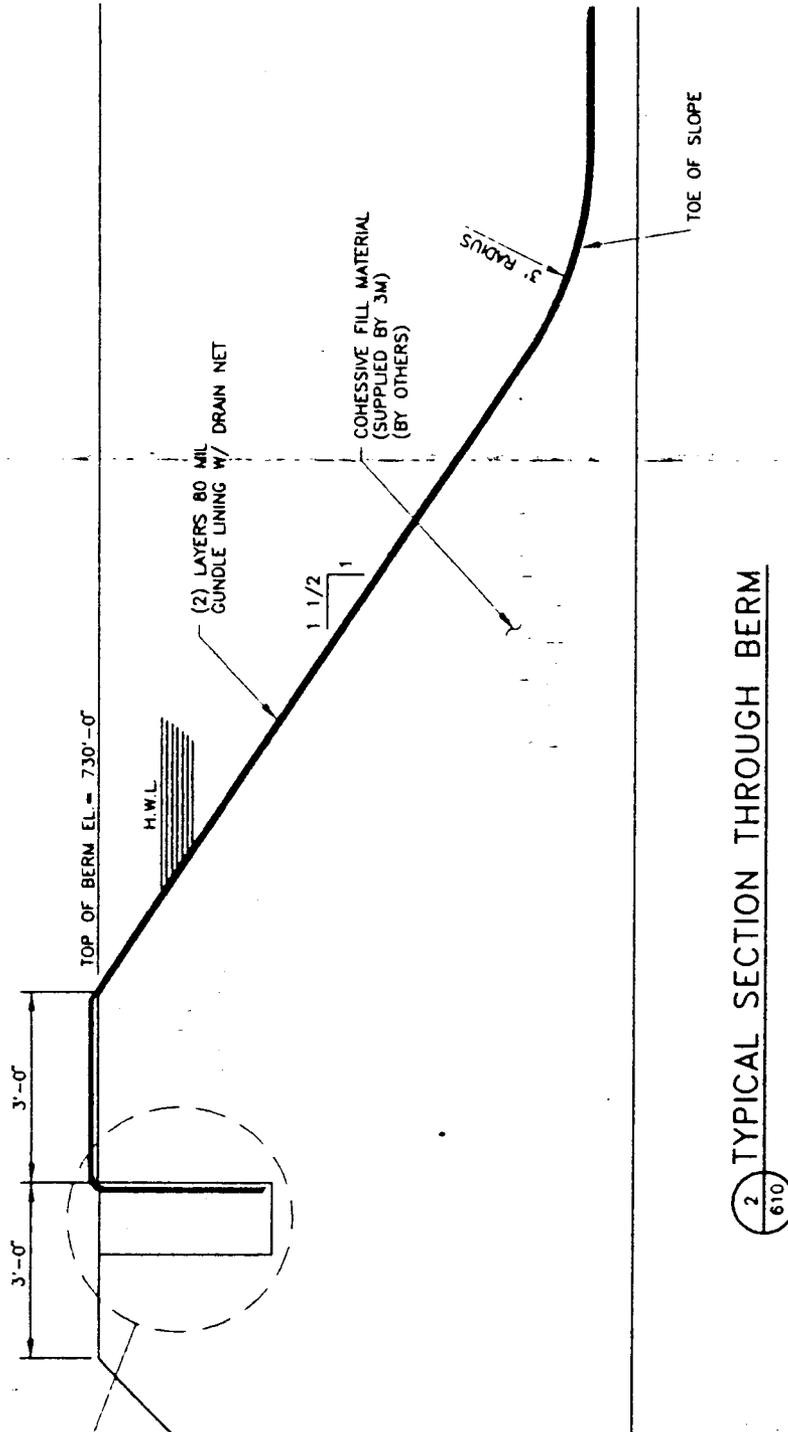
Assume 20 hours/day average usage



**WASTEWATER MANAGEMENT AT THE  
 3M CORONA, CALIFORNIA FACILITY**



Attachment E – north pond design



**Attachment F – EPA Priority Pollutants**

EPA PRIORITY POLLUTANT LIST					
Metals	Method	Base/Neutral Extractables	Method	Acid Extractables	Method
Antimony	ICP	Acenaphthene	8270	2-Chlorophenol	8270
Arsenic	GF/AA	Acenaphthylene	"	2,4-Dichlorophenol	"
Beryllium	ICP	Anthracene	"	2,4-Dimethylphenol	"
Cadmium	ICP	Benzidine	"	4,6-Dinitro-O-Cresol	"
Chromium	ICP	Benzo (a) Anthracene	"	2,4-Dinitrophenol	"
Copper	GF/AA	Benzo (a) Pyrene	"	2-Nitrophenol	"
Lead	GF/AA	Benzo (b) Fluoranthene	"	4-Nitrophenol	"
Mercury	CV/AA	Benzo (g,h,i) Perylene	"	P-Chloro-M-Cresol	"
Nickel	ICP	Benzo (k) Fluoranthene	"	Pentachlorophenol	"
Selenium	GF/HYDRIDE	Bis (2-Chloroethoxy) Methane	"	Phenol	"
Silver	ICP	Bis (2-Chloroethyl) Ether	"	2, 4, 6 - Trichlorophenol	"
Thallium	ICP	Bis (2-Chloroisopropyl) Ether	"		
Zinc	ICP	Bis (2-Ethylhexyl) Phthalate	"		
		4-Bromophenyl Phenyl Ether	"		
		Butyl Benzyl Phthalate	"	<b>Volatile Organics</b>	<b>Method</b>
<b>Miscellaneous</b>	<b>Method</b>	2-Chloronaphthalene	"	Acrolein	8030
Cyanide	335.2/9010	Chrysene	"	Acrylonitrile	"
Asbestos (not required unless requested)		Dibenzo (a,h) Anthracene	"	Benzene	8010/8020
2,3,7,8-Tetrachlorodibenzo-P-Dioxin (TCDD)	8280	4-Chlorophenyl Phenyl Ether	"	Bromoform	"
		1,2-Dichlorobenzene	"	Carbon Tetrachloride	"
<b>Pesticides</b>	<b>Method</b>	1,3-Dichlorobenzene	"	Chlorobenzene	"
Aldrin	8080	1,4-Dichlorobenzene	"	Chlorodibromomethane	"
Chlordane	"	3,3-Dichlorobenzidine	"	Chloroethane	"
Dieldrin	"	Diethyl Phthalate	"	2-Chloroethyl Vinyl Ether	"
4, 4' - DDT	"	Dimethyl Phthalate	"	Chloroform	"
4, 4' - DDE	"	Di-N-Butyl Phthalate	"	Dichlorobromomethane	"
4, 4' - DDD	"	2,4-Dinitrotoluene	"	1,1-Dichloroethane	"
Alpha Endosulfan	"	2-6-Dinitrotoluene	"	1,2-Dichloroethane	"
Beta Endosulfan	"	1,2-Dipenyhydrazine (as Azobenzene)	"	1,1-Dichloroethylene	"
Endosulfan Sulfate	"	Di-N-Octyl Phthalate	"	1,2-Dichloropropane	"
Endrin	"	Fluoranthene	"	1,3-Dichloropropylene	"
Endrin Aldehyde	"	Fluorene	"	Ethylbenzene	"
Heptachlor	"	Hexachlorobenzene	"	Methyl Bromide	"
Heptachlor Epoxide	"	Hexachlorobutadiene	"	Methyl Chloride	"
Alpha BHC	"	Hexachlorocyclopentadiene	"	Methylene Chloride	"
Beta BHC	"	Hexachloroethane	"	1,1,2,2-Tetrachloroethane	"
Delta BHC	"	Indeno (1,2,3-cd) Pyrene	"	Tetrachloroethylene	"
Gamma BHC	"	Isophorone	"	Toluene	"
Toxaphene	"	Naphthalene	"	1,2-Trans-Dichloroethylene	"
PCB 1016	"	Nitrobenzene	"	1,1,1-Trichloroethane	"
PCB 1221	"	N-Nitrosodimethylamine	"	1,1,2-Trichloroethane	"
PCB 1232	"	N-Nitrosodi-N-Propylamine	"	Trichloroethylene	"
PCB 1242	"	N-Nitrosodiphenylamine	"	Vinyl Chloride	"
PCB 1248	"	Phenanthrene	"		
PCB 1254	"	Pyrene	"		
PCB 1260	"	1,2,4-Trichlorobenzene	"		

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SANTA ANA REGION**

**ORDER NO. 00-45**

**MONITORING AND REPORTING PROGRAM  
FOR  
MINNESOTA MINING AND MANUFACTURING (3M) COMPANY  
ROOFING GRANULE PLANT  
CORONA, RIVERSIDE COUNTY**

**A. GENERAL**

1. This Monitoring and Reporting Program (M&RP) establishes the requirements for monitoring and reporting associated with the lined surface impoundments (ponds) and groundwater supply wells at the 3M facility located in Corona, Riverside County.
2. The discharger shall perform the monitoring activities in compliance with the water quality protection standards, and requirements of both Title 27, § 20405 and 40 CFR §§ 258.50 et seq.
3. Sample collection, storage, and analysis shall be performed according to the most recent version of Standard USEPA Methods (USEPA Publication "SW-846" and 40 CFR Part 136). Samples collected from the pond may be filtered prior to analysis.
4. Pursuant to Section 13176, Article 4, Chapter 3, Division 7 of the California Water Code, a certified laboratory registered by the State Department of Health Services shall perform all analyses. Specific methods of analysis must be identified.
5. All reports shall be maintained by the discharger and shall be retained for a minimum of five years.

**B. SITE MONITORING**

1. Record each pond's freeboard in a permanent log on a weekly basis. A summary of these observations shall be included in the semi-annual report submittal. The permanent log shall be kept on site, and made available to Regional Board staff upon request.
2. The integrity of the ponds shall be inspected monthly for damage or failure, and the findings recorded in the permanent log. For any damage or failure noted, repairs must be made immediately and a summary detailing such repairs shall be submitted with the subsequent monitoring report.
3. On a monthly basis, record the total volume of wastewater discharged to the ponds, as well as the volumes used for dust control or recycled back through the process from the north pond.
4. Monitor and record the presence and level of any liquids in each of the pond's LCRS standpipes on a monthly basis. A summary of these observations shall be included in the semi-annual report submittal. If either the discharger or the Regional Board determines that there is significant physical evidence of a release from the ponds, the discharger shall perform the following steps to confirm that a release has occurred:

- a. Pump out all liquid from the LCRS sump;
- b. Inspect the LCRS sump daily for a period of seven consecutive days for evidence of liquid;
- c. If no additional liquid has accumulated in the LCRS sump within the seven-day period, then the discharger can return to the monthly inspection program;
- d. If liquid has accumulated in the LCRS sump within the seven-day period, then the discharger shall immediately notify the Regional Board of this fact and shall submit a corrective action proposal and an implementation schedule within 30 days.

**C. WATER AND WASTEWATER MONITORING AND SAMPLING**

1. If any liquid is discovered during the monthly inspections of the LCRS standpipes, the discharger shall collect a sample of the liquid and analyze it for the monitoring parameters in Section D. of this M&RP.
2. Semi-annually, during Spring and Fall, the discharger shall collect water samples from each of the on-site water supply wells, and a wastewater sample from the north pond. These samples shall be analyzed for the monitoring parameters in Section D. of this M&RP. [Note: Winter/Spring and Summer/Fall reporting periods end on March 31 and September 30, respectively.]

**D. MONITORING PARAMETERS**

All samples shall be analyzed for the following constituents:

Monitoring Parameters	Unit
Total Dissolved Solids (TDS)	mg/l
Electrical Conductivity (EC)	umho/cm
Nitrate as N	mg/l
Sulfate	mg/l
Chloride	mg/l
Sodium	mg/l
Carbonate	mg/l
PH	pH units

**E. REPORTING**

**1. MONITORING REPORTS**

Written monitoring reports shall be submitted semi-annually in accordance with Item 4. of this section, Reporting Schedule. The reports shall include at a minimum the following:

- a. A summary and discussion of all violations that occurred during the past monitoring period, and all actions taken or planned for correcting these violations.

- b. A summary and interpretation of all monitoring data collected from the on-site supply wells, wastewater ponds, and the LCRS sumps during the past monitoring period;
- c. A map showing the locations of observation stations and monitoring points;
- d. Tabulated results of all analyses performed to demonstrate compliance with the requirements of this Order;
- e. An evaluation of the effectiveness of the monitoring and containment facilities;
- f. A summary and certification of completion of all visual monitoring and observations for the ponds; and
- g. The volume of wastewater discharged to the pond since the submittal of the last report.

## 2. ANNUAL REPORT

- a. On October 31 of each year, the discharger shall submit an annual report to the Board covering the previous year's monitoring. This report may be submitted along with the October 31 semi-annual monitoring report. The annual report shall contain:
  - b. A summary of the previous year's activities, including a summary of any violations of the requirements contained in this Order.
  - c. A summary and interpretation of the analytical results of water and wastewater chemistry;
  - d. A summary of the status of the ponds, including estimated volumes of wastewater discharged to the ponds and a summary of all repairs and maintenance;
  - e. A summary of the observations noted during routine surface impoundment inspections;
  - f. A summary of any changes made to the design or operation of the ponds since the previous annual report; and
  - g. A report that validates the maintenance of the financial assurance mechanism, or proposes and substantiates any needed changes.

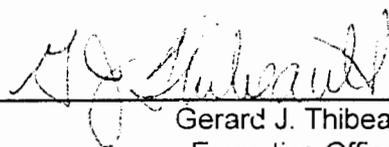
## 3. CONTINGENCY REPORTING

- a. Immediately upon discovery, the discharger shall report by telephone any seepage from the ponds, including the presence of any liquids in the LCRS. A written report containing at least the following information shall be filed with the Board within seven days of the initial report:
  - i. A map showing the location(s) of seepage, if known;
  - ii. An estimate of the flow rate;

- iii. A description of the nature of the discharge (i.e., all pertinent observations and analyses); and
- iv. Corrective measures underway or proposed, along with a time schedule for their implementation, if necessary.

4. **REPORTING SCHEDULE**

Reports	Date due
Analyses of Monitoring Parameters	Semi-annually on April 30 and October 31
Annual Summary	Annually on October 31 of each year
Contingency Reporting:	
Verbal	Within 24 hours of discovery
Written	Within 5 days of discovery

Ordered by:   
Gerard J. Thibeault  
Executive Officer

Date: May 19, 2000