CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

TENTATIVE MONITORING AND REPORTING PROGRAM R5-2026-00XX
FOR
CITY OF TRACY AND LEPRINO FOOD COMPANY
LAND DISPOSAL UNITS OF THE CITY OF TRACY
WASTEWATER TREATMENT PLANT
SAN JOAQUIN COUNTY

This Monitoring and Reporting Program (MRP) for the City of Tracy and Leprino Foods Company (Dischargers) Land Disposal Units of the City of Tracy Wastewater Treatment Plant (Facility) is issued pursuant to Wat. Code section 13267. This MRP establishes monitoring and reporting requirements related to the waste discharges regulated under Waste Discharge Requirements (WDR) **R5-2026-00XX**. Each of the Findings set forth in the WDRs Order, including those pertaining to the need for submission of reports, are hereby incorporated as part of this MRP.

The City of Tracy owns the Facility and the City of Tracy and the Leprino Foods Company operate land disposal units (referred to as the industrial treatment system). The industrial treatment system is subject to WDRs Order **R5-2026-00XX**. The Dischargers shall not implement any changes to this MRP unless and until the Central Valley Regional Water Quality Control Board (Central Valley Water Board) adopts, or the Executive Officer issues, a revised MRP.

A glossary of terms used in this MRP is included on the last page.

This MRP may be separately revised by the Executive Officer, in accordance with their delegated authority under Wat. Code section 13223.

I. GENERAL MONITORING REQUIREMENTS

A. FLOW MONITORING

Hydraulic flow rates shall be measured at the monitoring points specified in this MRP. The Central Valley Water Board Executive Officer shall approve any proposed changes to flow monitoring locations prior to implementation of the change. All flow monitoring systems shall be appropriate for the conveyance system and liquid type. Unless otherwise specified, each flow meter shall be equipped with a flow totalizer to allow reporting of cumulative volume as well as instantaneous flow rate. Flow meters shall be calibrated at the frequency recommended by the manufacturer; typically, at least once per year, and records of calibration shall be maintained for review upon request.

B. MONITORING AND SAMPLING LOCATIONS

Samples and measurements shall be obtained at the monitoring points specified in this MRP. Central Valley Water Board staff shall approve any proposed changes to sampling locations prior to implementation of the change. The Dischargers shall monitor the following locations to demonstrate compliance with the requirements of this MRP as shown in the table below. Wastewater samples collected in addition to the required sampling location shown below shall be included in the associated monitoring report.

Table 1. Monitoring Location Designations

Monitoring Location	Description
LGN-002	Influent to the Lagoons (sample location and flow meter)
EFF-002	Wastewater sample collected prior to discharging to the first unlined treatment pond (currently Treatment Pond 002)
INF-002	Wastewater sample collected from the last unlined wastewater pond prior to discharging to the WWTP
MW-1 to MW-8	Groundwater monitoring wells

C. SAMPLING AND ANALYSIS

All samples and measurements shall be representative of the volume and nature of the discharge or matrix of material sampled. Except as specified otherwise in this MRP, grab samples will be considered representative of wastewater, solids/sludges, and groundwater. The time, date, and location of each sample shall be recorded on the sample chain of custody form.

Field test instruments (such as those used to measure pH, electrical conductivity, dissolved oxygen (DO), wind speed, and precipitation) may be used provided that:

1. The operator is trained in proper use and maintenance of the instruments;
2. The instruments are field calibrated at the frequency recommended by the manufacturer;
3. The instruments are serviced and/or calibrated at the manufacturer's recommended frequency; and
4. Field calibration reports are submitted as described in the "Reporting" section of the MRP.

Laboratory analytical procedures shall comply with the methods and holding times specified in the following (as applicable to the medium to be analyzed):

- Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater (EPA);
- Test Methods for Evaluating Solid Waste (EPA);
- Methods for Chemical Analysis of Water and Wastes (EPA);
- Methods for Determination of Inorganic Substances in Environmental Samples (EPA);
- Standard Methods for the Examination of Water and Wastewater (APHA/AWWA/WEF); and
- Soil, Plant, and Water Reference Methods for the Western Region (WREP 125).

Approved editions shall be those that are approved for use by the U.S. Environmental Protection Agency (EPA) or the State Water Resources Control Board's Environmental Laboratory Accreditation Program (ELAP). The Discharger may propose alternative methods for approval by the Executive Officer. Where technically feasible, laboratory reporting limits shall be lower than concentrations that implement applicable water quality objectives/limits for the constituents to be analyzed.

II. SPECIFIC MONITORING REQUIREMENTS

A. INFLUENT MONITORING (LGN-002)

1. Flows into the Lagoons shall be monitored and reported as follows.

Table 2. Influent Wastewater Flow Monitoring

Parameter	Units	Sample Type	Monitoring Frequency	Reporting Frequency
Flow	MGD	Meter	Continuous	Quarterly
Cumulative Annual flow	MG	Calculated	--	Annually

2. Wastewater samples shall be collected from sample locations LGN-002, EFF-002, and INF-002 and analyzed for the following constituents. Any additional sampling and analysis, such as required by the industrial pretreatment program or other samples collected from the ponds, shall be included in the annual monitoring report.

Table 3. Influent Wastewater Sampling

Constituents	Units	Sample Type	Monitoring Frequency	Reporting Frequency
BOD_5	mg/L	Grab	Monthly	Quarterly
EC	µmhos/cm	Grab	Monthly	Quarterly
FDS	mg/L	Grab	Monthly	Quarterly
Total nitrogen	mg/L	Calculated	Monthly	Quarterly
TKN	mg/L	Grab	Monthly	Quarterly
Nitrate as N	mg/L	Grab	Monthly	Quarterly
Ammonia as N	mg/L	Grab	Monthly	Quarterly
Chloride	mg/L	Grab	Monthly	Quarterly
Sodium	mg/L	Grab	Monthly	Quarterly
Standard Minerals (Note 1)	mg/L	Grab	Annually	Annually

Note 1. For a list of standard minerals, see the Glossary.

B. POND MONITORING

1. All ponds used for treatment, storage, or disposal of wastewater shall be monitored when water is present for the parameters listed in the table below and meet the following conditions below.
    a. Freeboard shall be measured vertically from the water surface to the lowest elevation of pond berms (or spillway/overflow pipe invert) and shall be measured to the nearest 0.10 feet. Samples shall be collected at a depth of one foot, opposite the inlet. If any pond is dry, the monitoring report shall so state.
    b. Pond berms shall be observed for signs of seepage or surfacing water.
    c. Dissolved oxygen (DO) monitoring applies to any pond containing more than two feet of standing water and shall be collected at a depth of one foot, near the pond outlet.
2. Sampling and monitoring shall be conducted from permanent locations, when practical, that will provide samples reasonably representative of wastewater quality in the ponds and observations of the ponds.

3. Ponds to be monitored as shown in Table 7 include the two lagoons, Treatment Pond 002, and Holding Ponds 001, 003, 004, and 005.

Table 7. Pond Monitoring Requirements

Constituent/ Parameter	Units	Sample Type	Monitoring Frequency	Reporting Frequency
Freeboard (note 1)	0.1 feet	Measurement	1/Week	Quarterly
Odors	--	Observation	1/Week	Quarterly
DO	mg/L	Grab	1/Month	Quarterly
pH	std. units	Grab	1/Month	Quarterly
Berm Condition	--	Observation	1/Week	Quarterly
Solids/Sludge Depth	inches	Measurement	1/3 years	Annually

I. BIOSOLIDS MONITORING

1. For the purpose of this MRP, “generated” means produced as a separate waste stream by sludge wasting or pond cleanout. It does not apply to sludge that accumulated in treatment or storage ponds until the sludge is removed for dewatering and/or disposal.

2. The Discharger shall inspect the lined sludge drying beds monthly for berm condition, freeboard, and evidence of seepage. The Discharger shall maintain records of sludge loading and removal events, including volumes and off-site disposal locations.

K. GROUNDWATER MONITORING

1. The Discharger shall maintain the groundwater monitoring well network. If a groundwater monitoring well is dry or has insufficient water for sampling for more than four consecutive sampling events or is damaged, the Discharger shall submit to the Central Valley Water Board a workplan and proposed time schedule for its replacement, and the well shall be replaced following approval of the workplan. Alternatively, the Discharger shall submit a report with supporting evidence that a replacement well is not necessary.

2. Prior to construction of any additional groundwater monitoring wells, the Discharger shall submit plans and specifications to the Central Valley Water Board for review and approval. Once installed, all new monitoring wells shall be appropriately incorporated into monitoring conducted under this MRP.

3. The groundwater monitoring program applies to groundwater monitoring wells listed in Table 2, and any wells subsequently installed under approval of the Central Valley Water Board.

4. Prior to sampling, depth to groundwater measurements shall be measured in each monitoring well to the nearest 0.01 feet.

5. Groundwater elevations shall be calculated to determine groundwater gradient and flow direction. Groundwater elevation shall be determined based on depth-to-water measurements using a surveyed measuring point elevation on the well and a surveyed reference elevation.

6. For constituents with Secondary MCLs listed in California Code of Regulations Title 22 Table 64449-A (e.g., iron and manganese), samples shall be filtered with a 1.5- micron filter prior to preservation, digestion, and analysis. For all other constituents, samples shall be filtered with a 0.45-micron filter prior to preservation, digestion, and analysis. MW-1 is only required to be monitored for depth to groundwater, elevation, gradient, and gradient direction (no analytical sampling required at this time).

Table 14. Groundwater Monitoring

Constituent/ Parameter	Units	Type of Sample	Sampling and Reporting Frequency
Depth to Groundwater	0.01 feet	Measurement	Quarterly
Groundwater Elevation	feet	Calculated	Quarterly
Gradient	feet/feet	Calculated	Quarterly
Gradient Direction	degrees	Calculated	Quarterly
EC	µmhos/cm	Grab	Quarterly
TDS	mg/L	Grab	Quarterly
Nitrate as N	mg/L	Grab	Quarterly
TKN	mg/L	Grab	Quarterly
Total Nitrogen	mg/L	Grab	Quarterly
Sodium	mg/L	Grab	Quarterly
Chloride	mg/L	Grab	Quarterly
Standard Minerals (note 1)	mg/L	Grab	Quarterly

Note 1: A list of standard minerals is included in the Glossary.

7. If monitoring consistently shows no significant variation in a constituent concentration or parameter after at least eight consecutive groundwater monitoring events, the Discharger may request this MRP be revised to reduce monitoring frequency, constituent analyses, or monitoring parameters. The proposal must include adequate technical justification for a reduction in monitoring frequency. The Discharger shall not implement any changes to this MRP unless and until the Central Valley Water Board adopts, or the Executive Officer issues, a revised MRP.

III. Reporting Requirements

The Discharger must submit all monitoring reports and analytical monitoring results to the State Water Resources Control Board's (State Water Board's) GeoTracker database. GeoTracker is an Internet-accessible database system used by the State Water Board, regional boards, and local agencies to track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks. This system consists of a relational database, online compliance reporting features, a geographical information system (GIS) interface, and other features that are utilized by regulatory agencies, regulated industries, and the public to input, manage, or access compliance and regulatory tracking data.

GeoTracker Electronic Reporting Requirements: All monitoring reports and monitoring results shall be submitted to GeoTracker in accordance with the timeframes specified below and in searchable Portable Document Format (PDF). The Discharger shall follow the applicable Electronic Submittal of Information (ESI) requirements under the Facility-specific Global Identification Number WDRXX at the GeoTracker database.

(https://geotracker.waterboards.ca.gov/esi/login.asp)

In order to submit reports electronically, the Discharger shall create a secure GeoTracker Electronic Submittal of Information (ESI) account and log in credentials, claim their facility by requesting access in GeoTracker, and finally uploading PDF copies of the required reports via the ESI portal as outlined in the GeoTracker ESI Beginner's Guide for Responsible Parties (Beginner's Guide) linked below. The Discharger may complete the above tasks by accessing the 'Getting Started' section on the GeoTracker ESI webpage.

(https://www.waterboards.ca.gov/ust/electronic_submittal/index.html)

Additional GeoTracker support information can be found at the following:

a. 'Guides/Resources' document link in the "Tools" on the Discharger's GeoTracker ESI account.

b. Resources on the GeoTracker ESI website, such as the Beginner's Guide (https://www.waterboards.ca.gov/ust/electronic_submittal/docs/geotracker_esi_rp_beginner s_guide_revisedoct2019.pdf)

c. General GeoTracker Help Desk contact information: Phone: 1-866-480-1028, Email: geotracker@waterboards.ca.gov

A transmittal letter shall accompany each monitoring report. The letter shall include a discussion of all violations of the WDRs and this MRP during the reporting period and actions taken or planned for correcting each violation. If the Discharger has previously submitted a report describing corrective actions taken and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. The transmittal letter shall contain the following penalty of perjury and shall be signed by the Discharger or the Discharger's authorized agent.

> *I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., effluent, pond, etc.), and reported analytical result for each sample are readily discernible. The data shall be summarized in such a manner to clearly illustrate compliance with waste discharge requirements and spatial or temporal trends, as applicable. The results of any monitoring done more frequently than required at the locations specified in the MRP shall be reported to the Central Valley Water Board.

Contract laboratory analysis reports shall be included in the monitoring reports. All laboratory reports must be retained for a minimum of three years in accordance with Section C.3 of the 1 March 1991 SPRRs. For a Discharger conducting any of its own analyses, reports must also include a letter signed by the chief of the laboratory that certifies the results completed by the Discharger's laboratory.

All monitoring reports that involve planning, investigation, evaluation or design, or other work requiring interpretation and proper application of engineering or geologic sciences, shall be prepared under the direction of persons registered to practice in California pursuant to California Business and Professions Code Business and Professions Code sections 6735, 7835, and 7835.1.

A. MONITORING REPORT DUE DATES

Monitoring reports are due as described in the table below.

Table 15. Monitoring Report Due Dates

Monitoring Report	Monitoring Period	Report Due Date
First Quarter	1 January to 31 March	1 May
Second Quarter	1 April to 30 June	1 August
Third Quarter	1 July to 30 September	1 November
Fourth Quarter	1 October to 31 December	1 February
Annual Report (to be included in the Fourth Quarter Report)	1 January to 31 December	1 February

B. QUARTERLY MONITORING REPORTS

Daily, weekly, monthly, and quarterly monitoring data shall be reported in the quarterly monitoring report. At a minimum, the quarterly report shall include:

1. Results of the inflow volumes (LGN-002) and results of sampling in tabular format.
    a. Calculation of the average daily flow for each month and cumulative flow to date.
2. Results of Pond Monitoring (two lagoons, Treatment Pond 002, and Holding Ponds 001, 003, 004, and 005) in tabular format.
3. Calculated flow-weighted average annual EC effluent concentration using the following formula:

$$C_a = \frac{\sum_{1}^{12}[(C_{Pi} \times V_{Pi})}{\sum_{1}^{12}(V_{Pi})}$$

Where:

C_a = Flow-weighted average annual EC concentration in mg/L

i = the number of the month (e.g., January = 1, February = 2, etc.)

C_{Pi} = Monthly average process wastewater EC concentration for calendar month *i* in mg/L

V_{Pi} = volume of wastewater during calendar month *i* in million gallons

6. Results of Pond Sludge/Biosolids Monitoring parameter results in tabular form.

7. Results of the Groundwater Monitoring:

   a. A narrative description of all preparatory, monitoring, sampling, handling, and analytical testing for groundwater monitoring.

   b. A field log for each well documenting depth to groundwater; method of purging, parameters measured before, during, and after purging; sample preparation (e.g., filtering); and sample preservation.

   c. Groundwater monitoring results for the reported quarter in tabular format.

8. Copies of the contract laboratory analytical data reports.

C. ANNUAL MONITORING REPORT

The annual monitoring report shall be included in the fourth quarter monitoring report and shall include the following:

1. Total annual flows.

2. Results of influent and effluent sampling for standard minerals.

3. Results of pond monitoring for solids/sludge depth.

4. Results of biosolids monitoring.

5. Wastewater Flow Monitoring

   a. Total annual flow discharged to the treatment ponds and determination of compliance with the annual flow limitation in the WDRs.

6. Result of supply water monitoring and supplemental irrigation water monitoring in tabular form and a narrative description of changes in water quality over time, if any, and the potential impact on the wastewater quality.

7. Groundwater Monitoring
    a. Calculation of groundwater elevations, an assessment of groundwater flow direction and gradient on the date of measurement, comparison of previous flow direction and gradient data, and discussion of seasonal trends if any.
    b. A narrative discussion of the analytical results for all groundwater locations monitored including spatial and temporal trends, with reference to summary data tables, graphs, and appended analytical reports (as applicable).
    c. A scaled map showing relevant structures and features of the Facility, the locations of monitoring wells and any other sampling stations, and groundwater elevation contours referenced to an appropriate datum (e.g., NGVD29).
    d. Summary data tables of historical and current water table elevations and analytical results.
    e. An evaluation of the groundwater quality beneath the site and determination of compliance with the Groundwater Limitations, based on statistical analysis for each constituent monitored for each well. Include all calculations and data input/analysis tables derived from use of statistical software, as applicable.
8. Additional Reporting
    a. A summary of any changes in wastewater processing that might affect waste characterization and/or discharge flow rates.
    b. A comparison of monitoring data to the flow limitations, effluent limitations, and discharge specifications and an explanation of any violation of those requirements
    c. A discussion of compliance and the corrective action taken, as well as any planned or proposed actions needed to bring the discharge into full compliance with the WDRs.
    d. Monitoring equipment maintenance and calibration records, as described in Section C.4 of the 1 March 1991 SPRRs, shall be maintained by the Discharger and provided upon request by the Central Valley Water Board. Calibration records shall verify calibration of all handheld monitoring instruments and devices used to comply with the prescribed monitoring program.
    e. A discussion of the following:
        i. Waste constituent reduction efforts implemented in accordance with any required workplan.

ii. Other treatment or control measures implemented during the calendar year either voluntarily or pursuant to the WDRs, this MRP, or any other Order applicable to Facility discharges.

iii. Based on monitoring data, an evaluation of the effectiveness of the treatment or control measures implemented to date.

f. A discussion of any data gaps and potential deficiencies/ redundancies in the monitoring network or reporting program.

ENFORCEMENT

If, in the opinion of the Executive Officer, the Discharger fails to comply with the provisions of this Order, the Executive Officer may refer this matter to the Attorney General for judicial enforcement, may issue a complaint for administrative civil liability, or may take other enforcement actions. Failure to comply with this Order may result in the assessment of Administrative Civil Liability of up to $1,000 per violation, per day, depending on the violation, pursuant to the Wat. Code, including sections 13268. The Central Valley Water Board reserves the right to take any enforcement actions authorized by law.

ADMINISTRATIVE REVIEW

Any person aggrieved by this Central Valley Water Board action may petition the State Water Board for review in accordance with Wat. Code section 13320 and California Code of Regulations, title 23, section 2050 et seq. To be timely, the petition must be received by the State Water Board by 5:00 pm on the 30th day after the date of this Order; except that if the 30th day falls on a Saturday, Sunday or State Holiday, the petition must be received by the State Water Board by 5:00 pm on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet on the Water Boards Public Notice webpage. (http://www.waterboards.ca.gov/public_notices/petitions/water_quality).

I, PATRICK PULUPA, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of the Monitoring and Reporting Program adopted by the California Regional Water Quality Control Board, Central Valley Region on XX Month 2026.

PATRICK PULUPA, Executive Officer

GLOSSARY

40 CFR	Code of Federal Regulations, Title 40
BOD_5	Five-day Biochemical Oxygen Demand
Dischargers	City of Tracy and Leprino Foods Company
DO	Dissolved Oxygen
EC	Electrical Conductivity at 25° C
EPA	U.S. Environmental Protection Agency
ELAP	State Water Resources Control Board's Environmental Laboratory Accreditation Program
FDS	Fixed Dissolved Solids
gpd	gallons per day
MDL	Method Detection Limit
mgd	million gallons per day
mg/L	milligrams per liter
MRP	Monitoring and Reporting Program
MW	Monitoring Well
MCL	Maximum Contaminant Level per Title 22
N	Nitrogen
NGVD29	National Geodetic Vertical Datum of 1929
PQL	Practical Quantitation Limit
RL	Reporting Limit
std. units	standard units (for pH)
SPRRs	Standard Provisions and Reporting Requirements
Title 22	California Code of Regulations, Title 22
Title 23	California Code of Regulations, Title 23
TKN	Total Kjeldahl Nitrogen
TDS	Total Dissolved Solids
TOC	Total Organic Carbon
Wat. Code	Water Code
WDRs Order	Waste Discharge Requirements Order R5-2026-00XX
µg/L	micrograms per liter
µmhos/cm	micromhos per centimeter

Standard Minerals

Analysis shall include, at a minimum, arsenic, iron, lead, manganese, mercury, molybdenum, nickel, selenium, zinc, total alkalinity (including alkalinity series), and hardness. For constituents with Secondary MCLs listed in California Code of Regulations, title 22 (Title 22), Table 64449-A (e.g., iron and manganese), samples shall be filtered with a 1.5-micron filter prior to preservation, digestion, and analysis. For all other constituents, samples shall be filtered with a 0.45-micron filter prior to preservation, digestion, and analysis.