Attachment E

MONITORING AND REPORTING PROGRAM NO. CI-9259
FOR
CITY OF SANTA PAULA
(SANTA PAULA WATER RECYCLING FACILITY)
(File No. 06-189)

TENTATIVE

This Monitoring and Reporting Program (MRP) No. CI-9259 is issued pursuant to California Water Code section 13267, which authorizes the Regional Water Quality Control Board, Los Angeles Region (Regional Board) to require the City of Santa Paula (City), who discharges tertiary-treated wastewater generated from the Santa Paula Water Recycling Facility (SPWRF) to groundwater via three percolation ponds, to furnish technical or monitoring reports.

The reports required herein are necessary to:

- Determine compliance with Waste Discharge Requirements (WDRs) Order No. R4-2017-XXXX and assure protection of the waters of the state and their beneficial uses.
- Assess treatment plant performance, identify operational problems, and improve plant performance.
- Assess effectiveness of the City's Pretreatment Program.
- Provide information on wastewater characteristics and flows for use in interpreting water quality and biological data.
- Determine total maximum daily load (TMDL) effectiveness.

The evidence that supports the need for the reports is set forth in the WDRs and the Regional Board record.

I. SUBMITTAL OF REPORTS

A. The City shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under this MRP, including electronic data format (EDF) groundwater and surface water monitoring data, injection location data, and monitoring reports. These reports shall be received by the Regional Board via the State Water Resources Control Board's (State Water Board) GeoTracker database under Global ID WDR100000849 on the dates indicated as follows:

1. **Quarterly Monitoring Reports** shall be received by the Regional Board by the 30th day of the month following the end of each quarterly monitoring period according to Table 1 below. The first Quarterly Monitoring Report under this program must be received by the Regional Board by January 30, 2018.

Table 1 – Reporting Period and Due	
Reporting Period	**Report Due**
January ~ March	April 30
April ~ June	July 30
July ~ September	October 30
October ~ December	January 30

2. **Annual Summary Report** shall be received by the Regional Board by March 1 of each year. The first Annual Summary Report under this program must be received by the Regional Board no later than March 1, 2018.

B. If there is no discharge during any reporting period, the report shall still be submitted and so state.

C. Data collected from monitoring wells shall be included in the quarterly monitoring reports and annual summary report. The data shall include the well specifications, ordinances, well heads elevation to mean sea level (MSL) and the method to develop the well. The California Department of Water Resources sets standards for the construction of groundwater wells, as described in *California Well Standards Bulletin 74-90* (June 1991) and *Water Well Standards: State of California Bulletin 74-81* (December 1981). These well standards, and any more stringent standards adopted by the state or county pursuant to Water Code section 13801, apply to all monitoring wells used to monitor the impacts of wastewater storage or disposal governed by waste discharge or monitoring and reporting requirements.

D. In accordance with California Business and Profession Code sections 6735, 7835, and 7835.1, engineering and geologic evaluations and judgments shall be performed by or under the direction of registered professionals competent and proficient in the fields pertinent to the required activities. All reports submitted to the Regional Board pursuant to waste discharge or monitoring and reporting requirements that contain work plans for investigations and studies, that describe the conduct of investigations and studies, or that contain technical conclusions and recommendations concerning engineering and geology shall be prepared by or under the direction of appropriately qualified professional(s), such a licensed engineer or a certified hydrogeologist in the State of California, even if not explicitly stated. Each report must submitted by the Discharger shall bear the professional's signature and stamp.

E. All monitoring reports must include, at minimum, the following:

1. Well or location identification, date and time of sampling;

2. Sampler identification, laboratory identification, and chain of custody;

3. Quarterly observation of groundwater levels, recorded to 0.01 feet mean sea level (MSL), and flow direction; and

4. Calculation of vertical separation of the water table from the bottom of the disposal system.

II. MONITORING REQUIREMENTS

A. Monitoring shall be used to determine compliance with waste discharge requirements and shall include, but is not limited to, implementation and documentation of the following:

1. Locations of each groundwater well where representative samples can be obtained and the rationale for the selection. The City must include a map, at a scale of 1 inch equals 1,200 feet or less, that clearly identifies the locations of the SPWRF, and all groundwater monitoring wells.

2. Sampling protocols (specified in 40 C.F.R. Part 136 or American Water Works Association standards where appropriate) and chain of custody procedures.

3. For groundwater monitoring, outline the methods and procedures to be used for measuring water levels; purging wells; collecting samples; decontaminating equipment; containing, preserving, and shipping samples; and maintaining appropriate documentation. Also include the procedures for handling, storing, testing, and disposing of purge and decontamination waters generated from the sampling events.

4. Laboratory or laboratories, which conducted the analyses. Include copy or copies of laboratory certifications by the Environmental Laboratory Accreditation Program (ELAP) of the State Water Board's Division of Drinking Water (DDW) every year or when the City changes their contract laboratory.

5. Analytical test methods used and the corresponding Detection Limits for Purposes of Reporting (DLR) for unregulated and regulated chemicals. Please see the DDW's website at http://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/EDT.shtml for unregulated and regulated chemicals.

6. Quality assurance and control measures.

B. The samples shall be analyzed using analytical methods described in 40 C.F.R. Part 136; or where no methods are specified for a given pollutant, by commercially available methods approved by the United State Environmental Protection Agency (USEPA) or DDW, Regional Board and/or State Board. The City shall select the analytical methods that provide reporting detection limits (RDLs) lower than the limits prescribed in waste discharge requirements.

C. The City shall instruct its laboratories to establish calibration standards so that the RDLs (or its equivalent if there is a different treatment of samples relative to calibration standards) are the lowest calibration standard. At no time shall the City use analytical data derived from extrapolation beyond the lowest point of the calibration curve.

D. Upon request by the City, the Regional Board, in consultation with the USEPA or DDW and the State Board Quality Assurance Program, may establish RDLs in any of the following situations:

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1. When the pollutant has no established method under 40 C.F.R. Part 136 (revised May 14, 1999, or subsequent revision);

2. When the method under 40 C.F.R. Part 136 for the pollutant has a RDL higher than the limit specified in this Order; or

3. When the City agrees to use a test method that is more sensitive than those specified in 40 C.F.R. Part 136 and is commercially available.

E. Samples of influent and disinfected effluent must be analyzed within allowable holding time limits as specified in 40 C.F.R. section 136.3. All quality assurance/quality control (QA/QC) analyses must be run on the same dates when samples were actually analyzed. The City shall make available for inspection and/or submit the QA/QC documentation upon request by the Regional Board. Proper chain of custody procedures must be followed and a copy of that documentation shall be submitted with the quarterly monitoring report.

F. Constituents of emerging concern (CECs): In recent years, the Regional Board has required monitoring of a select group of anthropogenic chemicals, particularly pesticides, pharmaceuticals and personal care products, known collectively as CECs, into monitoring and program requirements to better understand the propensity, persistence and effects of CECs in our environment. Recently adopted permits in this region contain requirements for CEC effluent monitoring, including identification of the CECs to be monitored in the effluent, sample type, sampling frequency, and sampling methodology.

1. The City shall monitor a selective list of CECs identified in Attachment C in the SPWRF's effluent discharge and in the groundwater. The reporting limits in Attachment C shall be used for these constituents.

2. The City shall select methods according to the following approach:

   i. Use USEPA drinking water methods, if available;

   ii. Use DDW-recommended methods for CECs, if available;

   iii. If there is no DDW-recommended drinking water method for a chemical, and more than a single USEPA-approved method is available, use the most sensitive USEPA-approved method;

   iv. If there is no USEPA-approved method for a chemical, and more than one method is available from the scientific literature and commercial laboratory, after consultation with DDW, use the most sensitive method; or

   v. If no approved method is available for a specific chemical, the City's laboratory may develop or use its own methods and should provide the analytical methods to DDW or the Regional Board for review and approval. Those methods may be used until DDW-recommended or USEPA-approved methods are available.

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vi. In the event that subsections II.F.2.i. or II.F.2.v. are applicable, the City shall inform the Regional Board.

3. CECs identified in Attachment C shall be monitored once within six months from the effective date of this Order (by May 2, 2018) and once every five years thereafter. The Regional Board Executive Officer may add or delete chemicals from Attachment C as new analytical methods become available and may also make revisions to approved analytical methods as needed. A revised CECs list will be made available to the City when changes occur. The City shall request (and submit a justification for) any deviation from the attached list for Executive Officer approval, if a change is required, before collecting samples.

4. Monitoring results shall be reported as part of the annual report. Analysis under this section is for monitoring purposes only as there are currently no standards for these constituents.

III. REPORTING REQUIREMENTS

The City shall submit all reports to the Regional Board by the dates indicated in Section I. All quarterly and annual reports shall clearly list all non-compliance with WDRs, as well as all excursions of effluent limits. All quarterly and annual monitoring reports shall contain a separate section titled “Summary of Non-Compliance”, which discusses the compliance records and corrective actions taken or planned that may be needed to bring the discharge into full compliance with WDRs.

A. Quarterly Monitoring Reports

1. These reports shall include, at a minimum, the following information:

i. The volume of the effluent used for land disposal via percolation.

ii. The date and time of sampling and analyses on the influent, effluent, and groundwater.

iii. All analytical results of samples collected during the monitoring period of the influent, effluent, and groundwater.

iv. Documentation of all QA/QC procedures that were followed during sampling and laboratory analyses.

v. Records of any operational problems, plant upset and equipment breakdowns or malfunctions, and any discharge(s) used for land disposal via percolation.

vi. Discussion of compliance, non-compliance, or violation of waste discharge requirements.

vii. All corrective and/or preventive action(s) taken or planned with schedule of implementation, if any violation occurs.

2. For the purpose of reporting compliance with numerical limitations, analytical data shall be reported using the following reporting protocols:

    i. Sample results greater than or equal to the RDL must be reported "as measured" by the laboratory (i.e., the measured chemical concentration in the sample);

    ii. Sample results less than the RDL, but greater than or equal to the laboratory's method detection limit (MDL), must be reported as "Detected, but Not Quantified" (DNQ). The laboratory must write the estimated chemical concentration of the sample next to DNQ as well as the words "Estimated Concentration" (may be shortened to Est. Conc.); or

    iii. Sample results less than the laboratory's MDL must be reported as "None-Detected" (ND).

3. If the City samples and performs analyses (other than for process/operational control, startup, research, or equipment testing) on any sample more frequently than required in this MRP using approved analytical methods, the results of those analyses shall be included in the report. These results shall be included in the calculation of the average used in demonstrating compliance with average effluent limits, receiving groundwater limits, etc.

4. The Regional Board may request supporting documentation, such as daily logs of operations.

B. Annual Summary Reports

These reports shall include, at a minimum, the following information:

1. Tabular and graphical summaries of the monitoring data (quality of influent, effluent, and groundwater; quantity of influent and effluent to percolation ponds,) obtained during the previous calendar year. A comparison of laboratory results against effluent limits contained in these WDRs and notations of any exceedances of limits or other requirements shall be summarized and submitted at the beginning of the report.

2. Discussion of the compliance record and corrective and/or preventive action(s) taken or planned that may be needed to bring the treated effluent, including the treated effluent used for recycled water, into full compliance with the requirements in the WDRs.

3. An in-depth discussion of the results of the final effluent monitoring and groundwater monitoring conducted during the previous year includes:

    i. Any change of receiving groundwater resulting from effluent discharges at percolation ponds; and

    ii. Any change of groundwater flow pattern resulting from discharge via percolation ponds.

Temporal and spatial trends in the data shall be analyzed, with particular reference to comparisons between stations with respect to distances from the monitoring wells and comparisons to data collected during previous years. Appropriate statistical tests and indices, subject to approval by the Regional Board Executive Officer, shall be calculated and included in the annual report.

4. The description of any changes and anticipated changes including any impacts in operation of any unit processes or facilities shall be provided.

5. A list of the analytical methods employed for each test and associated laboratory QA/QC procedures shall be included. The report shall restate the laboratories used by the City to monitor compliance with the accompanying Order, their status of certification, and provide a summary of analyses.

6. The report shall confirm operator certification and provide a list of current operating personnel, their responsibilities, and their corresponding grade of certification.

7. The report shall also summarize any change of the Operation, Maintenance, and Monitoring Plan (OMM Plan) due to the optimization of the existing SPWRF operation. The summary shall discuss conformance with the SPWRF's OMM Plan for operations, maintenance, and monitoring of the SPWRF, and whether the OMM Plan requires revision for the current facilities.

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IV. WATER QUALITY MONITORING REQUIREMENTS

A. Influent Monitoring

1. The City shall monitor influent to the SPWRF at Influent Pump Station located in the main stream of the influent channel prior to the headworks as specified in Table 2 below.

Table 2 – Influent Monitoring

Constituents	Units[1]	Type of Sample	Minimum Frequency of Analysis
Total waste flow	gpd	Recorder	Continuous[2]
$BOD_{5@20^oC}$	mg/L	Grab	Monthly
Total Suspended Solids	mg/L	Grab	Monthly
Chloride	mg/L	24-hour composite	Monthly
Sulfate	mg/L	Grab	Monthly
Boron	mg/L	Grab	Monthly
Total Dissolved Solids	mg/L	Grab	Monthly
Metals[3]	µg/L	Grab	Quarterly
Temperature	Fahrenheit	Recorder	Continuous[2]

Table Notes:

[1] gpd: gallons per day
mg/L: milligrams/liter
μg/L: micrograms/liter

[2] The City shall report the daily minimum, maximum, and average values.

[3] Metals include antimony, arsenic, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, thallium, and zinc.

B. **Effluent Monitoring**

1. The City shall monitor its discharge of tertiary-treated effluent at downstream of all treated effluent passing through the effluent sampling station, including the final disinfection process.

2. The following shall constitute the effluent monitoring program, specified in Table 3 below:

Table 3 – Effluent Monitoring

Constituent	Unit[1]	Type of Sample[2]	Minimum Frequency of Analysis
Total Flow	gpd	Recorder	Continuous[3]
Temperature	Fahrenheit	Recorder	Continuous[3]
UV	mW-s/cm[2]	Recorder	Continuous[3]
Turbidity	NTU	Recorder	Continuous[3][4]
pH	pH units	Grab	Daily
Fecal Coliform	MPN/100mL	Grab	Daily
Total Coliform	MPN/100mL	Grab	Daily
Enterococcus	MPN/100mL	Grab	Weekly
Total Suspended Solids	mg/L	24-hour composite	Monthly
$BOD_{5@20^oC}$	mg/L	24-hour composite	Monthly
Oil and Grease	mg/L	Grab	Monthly
Ammonia Nitrogen	mg/L	Grab	Monthly
Nitrate as Nitrogen	mg/L	Grab	Monthly
Nitrite as Nitrogen	mg/L	Grab	Monthly
Organic as Nitrogen	mg/L	Grab	Monthly
Residual Chlorine	mg/L	Grab	Monthly
Total Dissolved Solids	mg/L	Grab	Monthly
Sulfate	mg/L	Grab	Monthly
Chloride	mg/L	Grab	Weekly
Boron	mg/L	Grab	Monthly

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Table 3 – Effluent Monitoring			
Constituent	**Unit[1]**	**Type of Sample[2]**	**Minimum Frequency of Analysis**
MBAS[5]	mg/L	24-hour composite	Quarterly
CTAS[6]	mg/L	24-hour composite	Quarterly
Total hardness	mg/L	24-hour composite	Quarterly
Total Phosphorus	mg/L	24-hour composite	Quarterly
Constituents listed in Attachments A-1 to A-6	various	Grab/24-hour composite	Quarterly
CECs in Attachment C	various	Grab	Once within 6 Months and every 5 Years thereafter[7]
Remaining Priority Pollutants in Attachment D	µg/L	Grab/24-hour composite	Annually

Table Notes:

[1] NTU: nephelometric turbidity unit
mW-s/cm^2: milli-watts seconds per square centimeter
MPN/100mL: Most Probable Number/100 milliliter
µg/L: micrograms/liter

[2] Grab sample is an individual sample collected in a short period of time not exceeding 15 minutes. Grab samples shall be collected during normal peak loading conditions for the parameter of interest, which may or may not be during hydraulic peaks. When an automatic composite sampler is not used, composite sampling shall be done as follows. If the duration of the discharge is equal to or less than 24 hours but greater than eight (8) hours, at least eight (8) flow-weighted samples shall be obtained during the discharge period and composited. For discharge duration of less than eight (8) hours, individual "grab" sample may be substituted. 24-hour composite is for semi-volatile and volatile chemicals.

[3] The City shall report the daily minimum, maximum, and average values.

[4] In the event the continuous turbidity meter and recorder fail, grab sampling may be substituted for a period of up to 24 hours. The turbidity samples must be taken at intervals of no more than 1.2 hours over a 24-hour period to determine compliance for turbidity.

[5] MBAS: Methylene Blue Active Substances

[6] CTAS: Cobalt Thiocyanate Active Substances

[7] CECs shall be monitored once within six months from the effective date of this Order (by May 2, 2018) and once every five years thereafter.

C. Groundwater Monitoring

1. The City shall monitor the groundwater at and surrounding the SPWRF to assess the water quality impact of the SPWRF's discharges to groundwater.

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2. The City shall continue to conduct groundwater monitoring from all existing wells, including MW-1, MW-2a, MW-3, MW-4, MW-5, MW-6, MW-7, and MW-8, until such time as the City's work plan proposing a modified groundwater monitoring network, described in Section IV.C.3 below, is approved by the Executive Officer and is implemented by the City.

3. By March 1, 2018, the City shall submit to the Regional Board a work plan proposing a modified groundwater monitoring network for compliance determination with the groundwater limitations. The proposed groundwater monitoring network shall include groundwater monitoring wells upgradient, cross gradient, and downgradient to the percolation pond. In addition to installation of new wells, the City may propose continuing to use some or all of the existing groundwater monitoring wells (MW-1, MW-2a, MW-3, MW-4, MW-5, MW-6, MW-7, and MW-8). For compliance determination with the groundwater limitation for chloride, the City's proposed modified groundwater monitoring network shall include wells at approximately 150 feet downgradient from the percolation pond. The work plan shall be submitted to the Regional Board for the Executive Officer's review and approval. If the City proposes to use existing wells (such as water supply or irrigation wells) not owned by the City, or proposes to install new wells on property not owned by the City, the City shall include as part of its work plan any access agreements between the City and property owner(s) to use and/or install groundwater wells on non-City-owned property. The City shall implement the work plan, by completing installation of any new wells and commencing monitoring from them, within 60 days after the Executive Officer's approval.

4. The required groundwater monitoring of constituents/parameter with sample type and frequencies is specified in Table 4 below.

Table 4 – Groundwater Monitoring

Constituents	Units	Type of Sample	Minimum Frequency of Analysis[2]
Water level elevation[1]	Feet	Recorder	Monthly
pH	pH units	Grab	Monthly
Total Coliform	MPN/100mL	Grab	Monthly
Fecal Coliform	MPN/100mL	Grab	Monthly
Enterococcus	MPN/100mL	Grab	Monthly
Ammonia nitrogen	mg/L	Grab	Monthly
Nitrate as nitrogen	mg/L	Grab	Monthly
Nitrite as nitrogen	mg/L	Grab	Monthly
Organic Nitrogen	mg/L	Grab	Monthly
Total Dissolved Solids	mg/L	Grab	Monthly
Sulfate	mg/L	Grab	Monthly
Chloride	mg/L	Grab	Monthly

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Table 4 – Groundwater Monitoring			
Constituents	**Units**	**Type of Sample**	**Minimum Frequency of Analysis[2]**
Boron	mg/L	Grab	Monthly
Constituents listed in Attachments A-1 to A-5	Various	Grab	Annually
CECs in Attachment C	µg/L	Grab	Once within 6 Months and every 5 Years thereafter
Priority Pollutants in Attachment D	µg/L	Grab	Annually

Table Notes:

[1] Annual samples shall be collected during the dry season each year.

[2] Water level elevations must be measured to the nearest 0.01 feet, and referenced to mean sea level.

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D. **Monitoring of Effluent Flow to Percolation Ponds**

The City shall record the volume in gallons per day (GPD) of treated wastewater discharged to the three percolation ponds. This information shall be submitted as part of the quarterly monitoring reports.

V. GENERAL MONITORING AND REPORTING REQUIREMENTS

A. The City shall comply with all Standard Provisions (Attachment B) related to monitoring, reporting, and recordkeeping.

B. For every requirement not met, the City shall submit a statement of the actions undertaken or proposed that will bring the treated effluent into full compliance with requirements at the earliest possible time, and submit a timetable for implementation of the corrective measures.

C. Monitoring reports shall be signed by either the principal Executive Officer or ranking elected official. A duly authorized representative of the aforementioned signatories may sign documents if:

1. The authorization is made in writing by the signatory;

2. The authorization specifies the representative as either an individual or position having responsibility for the overall operation of the regulated facility or activity; and

3. The written authorization is submitted to the Regional Board Executive Officer.

D. The monitoring report shall contain the following completed declaration:

"I certify under penalty of law that this document, including all attachments and supplemental information, was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, 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 a fine and imprisonment."

Executed on the ___ day of _____ at _____
_____ Signature
_____ Title

E. The City shall retain records of all monitoring information, including all calibration and maintenance, monitoring instrumentation, and copies of all reports required by this Order, for a period of at least three (3) years from the date of sampling measurement, or report. This period may be extended by request of the Regional Board at any time and shall be extended during the course of any unresolved administrative proceeding or judicial litigation regarding the regulated activity.

F. Records of monitoring information shall include:

1. The date, exact place, and time of sampling or measurements;

2. The individual(s) who performed the sampling or measurements;

3. The date(s) analyses were performed;

4. The individual(s) who performed the analysis;

5. The analytical techniques or methods used; and

6. The results of such analyses.

G. The City shall submit to the Regional Board, together with the first monitoring report required by this Order, a list of all chemicals and proprietary additives that could affect the quality of the treated effluent. Any subsequent changes in types and/or quantities shall be reported promptly. An annual summary of the quantities of all chemicals, listed by both trade and chemical names that are used in the treatment process shall be included in the annual report.

VI. WASTE HAULING REPORTING

In the event that waste sludge, septage, or other wastes are hauled offsite, the name and address of the hauler shall be reported, along with types and quantities hauled during the reporting period and the location of final point of disposal. In the event that no wastes are hauled during the reporting period, a statement to that effect shall be submitted in the quarterly monitoring report.

VII. PRETREATMENT REPORTING

The City shall submit annual reports to the Regional Board, with copies to the State Board, and USEPA Region 9, describing the City's pretreatment activities over the period.

A. The annual reports shall identify:

1. All significant industrial users (SIUs) that violated any standards or reporting requirements during that year;

2. The violations committed;

3. The enforcement actions undertaken; and

4. The status of active enforcement actions from previous periods, including closeouts (facilities under previous enforcement actions that attained compliance during the quarter).

B. By March 1 of each year, beginning January 1, 2018, the City shall submit an annual summary report to the Regional Board describing the pretreatment activities within the service area during the previous year. In the event that any control authority within the service area is not in compliance with any conditions or requirements of this Order or their approved pretreatment program (such as due to industrial user discharges, interjurisdictional agency agreement implementation issues, or other causes,) then the City shall also include the reasons for noncompliance and state how and when the City and the control authority shall comply with such conditions and requirements. The report shall contain, but not be limited to, the following information:

1. A summary of analytical results from representative, flow-proportioned, 24-hour composite sampling of the SPWRF's influent and effluent wastewaters for those pollutants that are known or suspected to be discharged by industrial users (IUs) as identified by the pretreatment program.

2. The summary shall include the result of annual full priority pollutant scan, with quarterly samples analyzed only for those pollutants detected in the full scan.

3. The City shall also provide any influent or effluent monitoring data for non-priority pollutants that the City believes may be causing or contributing to Interference, Pass Through or adversely impacting sludge quality.

4. Sampling and analysis shall be performed in accordance with the techniques prescribed in pretreatment program and amendments thereto.

5. A discussion of any upset, interference, or pass-through incidents at the treatment plant (if any), which the City knows or suspects were caused by IUs of the SPWRF system. The discussion shall include the following:

i. The reasons why the incidents occurred, the corrective actions taken, and, if known, the name and address of the IU(s) responsible.

ii. A review of the applicable pollutant limitations to determine whether any additional limitations, or changes to existing requirements, may be

necessary to prevent pass through, interference or noncompliance with sludge disposal requirements, if any.

6. A complete and updated list of the City's significant industrial users (SIUs), including names, Standard Industrial Classification code(s) and addresses, and a list of any SIU deletions and/or additions.

7. The City shall provide a brief explanation for each deletion. The SIU list shall identify the SlUs equivalent to Federal Categorical Standards by specifying which standards are applicable to each SIU. The list shall also indicate which SlUs are subject to local limitations and those that are not subject to local limits.

8. A list or table characterizing the industrial compliance status of each SIU, including:

   i. SIU name and address;

   ii. Industrial category;

   iii. The type (processes) of wastewater treatment in place;

   iv. Number of samples taken by the SPWRF during the year;

   v. Number of samples taken by the SIU during the year;

   vi. Whether all needed certifications (if allowed) were provided by SlUs that have limits for total toxic organics;

   vii. Regional Standards violated during the year, reported separately;

   viii. whether the SIU at any time in the year was in Significant Noncompliance (SNC), equivalent to that defined in 40 C.F.R. section 403.12(f)(2)(vii);

   ix A summary of enforcement actions against the SIU taken during the year, including the type of action, final compliance date, and amount of fines assessed/collected (if any). Proposed actions, if known, should be included; and

   x. Number of inspections conducted at each SIU during the year.

9. A compliance summary table that includes:

   i. SIU's which were in SNC at any time during the year;

   ii. The total number of SlUs that are in SNC with pretreatment, compliance schedules during the year; and

   iii. The total number of notices of violation and administrative orders issued against SlUs during the year:

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a. The total number of civil and criminal judicial actions filed against SIUs during the year;

b. The number of SIUs that were published as being in SNC during the year; and

c. The number of IUs from which penalties were collected during the year.

10. A short description of any significant changes in operating the pretreatment program that differ from the previous year including, but not limited to changes concerning:

    i. The program's administrative structure;

    ii. Local industrial discharge limitations;

    iii. Monitoring program or monitoring frequencies;

    iv. Legal authority or enforcement policy;

    v. Funding mechanisms; and

    vi. Resource requirements and/or staffing levels.

11. A summary of the annual pretreatment budget, including the cost of pretreatment program functions and equipment purchases.

12. A summary of public participation activities to involve and inform the public.

13. A description of any changes in sludge disposal methods and a discussion of any concerns not described elsewhere in the report.

14. The cumulative number of industrial users that the City has notified regarding Baseline Monitoring Reports and the cumulative number of industrial user responses.

15. The City shall submit the quarterly compliance status reports and the annual pretreatment report to the Regional Board.

VIII. MONITORING FREQUENCIES

The Regional Board Executive Officer is delegated authority to revise this Monitoring and Reporting Program, including monitoring frequencies and parameters. The City may make a request (with justification) to reduce the monitoring frequency or to modify the list of monitoring constituents. The City shall not make any adjustment until the Executive Officer provides written approval after determining that the request is adequately justified.