



# California Regional Water Quality Control Board Los Angeles Region



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Matthew Rodriguez  
Secretary for  
Environmental Protection

Edmund G. Brown Jr.  
Governor

September 6, 2011

Stephen Defibaugh, Senior Specialist – EHS Remediation  
SFPP, L.P. – Norwalk Pump Station  
1100 Town and Country Road  
Orange, CA 92868

Dear Mr. Defibaugh:

**CLARIFICATION OF DUPLICATE SAMPLE FREQUENCY IN MONITORING AND REPORTING PROGRAM (MRP) OF THE WASTE DISCHARGE REQUIREMENTS (WDRs) AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT, FOR SFPP, L.P., NORWALK PUMP STATION, NORWALK, CA (ORDER NO. R4-2011-0095, NPDES NO. CA0063509, CI NO. 7497)**

Your consultant Mr. Dan Jablonski of CH2M Hill raised concerns and/or requested clarification about the monitoring frequency of the duplicate sample required in the General Monitoring Provision of the MRP (NPDES permit Item I.L, Page E-4 of MRP) as specified in the following:

"The Discharger shall have, and implement, an acceptable written quality assurance (QA) plan for laboratory analyses. Duplicate chemical analyses must be conducted on a minimum of ten percent (10%) of the samples, or at least one sample per sampling period, whichever is greater. A similar frequency shall be maintained for analyzing spiked samples."

The finding in general is directed to Dischargers who have and operate their own laboratories. Since your Facility sends the samples out to a contract lab, the Quality Assurance/Quality Control (QA/QC) program as approved by the California Department of Public Health Environmental Laboratory Accreditation Program (ELAP) certification is sufficient.

Alternate compliance language has been developed by Regional Board staff (Dr. Jau Ren Chen) and State Board staff (Mr. William (Bill) Ray) which reads:

*Unless otherwise specified in the analytical method, duplicate samples must be analyzed at a frequency of 5% (1 in 20 samples) with at least one if there is fewer than 20 samples in a batch. A batch is defined as a single analytical run encompassing no more than 24 hours from start to finish. A similar frequency shall be maintained for analyzing spiked samples.*

Stephen Defibaugh  
SFPP, L.P. – Norwalk Pump Station


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The above finding replaces the current finding I.L, on Page E-4 of the MRP. This finding does not alter the sampling frequency as specified in Table E-2 of the MRP.

If you have any questions, please contact Mazhar Ali at (213) 576-6652.

Sincerely,

  
Samuel Unger  
Executive Officer

cc: Mr. Bill Ray, State Water Resources Control Board  
Mr. Dan Jablonski, CH2M Hill  
Dr. Jau Ren Chen, Los Angeles Regional Water Quality Control Board  
Mr. Russell Colby, Los Angeles Regional Water Quality Control Board