

STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT

STAFF: Cleet Carlton

MEETING DATE: June 14, 2017

ITEM: 5B

SUBJECT: Mrs. Lois and Mr. Greg Tonnesen, Tonnesen Pet Cemetery, Suisun City, Solano County – Update of Waste Discharge Requirements and Rescission of Order No. R2-2009-0034

CHRONOLOGY: 1987 – Waste Discharge Requirements (WDRs) adopted
2009 – WDRs updated

DISCUSSION: This Revised Tentative Order (Appendix A) would update WDRs for the Tonnesen Pet Cemetery. The Tonnesen Pet Cemetery is a small, family-owned business that has been used since 1980 for the disposal of animal bodies and cremated animals under permit from Solano County. The facility is owned by Mrs. Lois Tonnesen and operated by Mr. Greg Tonnesen. The site is located south of Highway 12, about two miles southeast of Suisun City and immediately north of the Potrero Hills Landfill, a large regional municipal waste landfill. The facility is classified under State regulations as a non-municipal waste disposal facility and is not permitted to receive municipal wastes. The waste stream had been restricted to small animal bodies and cremation remains, primarily from veterinary clinics and animal shelters. However, animal bodies ceased to be buried at the site in 2015, and, in January 2016, the Discharger decided to no longer accept animal bodies and to only accept cremation ash for disposal. This change in operations affects our classification and regulation of the facility.

The Revised Tentative Order would do the following:

- Require the area where any animal bodies were buried (called the Modified Phase 1 Area) to be formally closed under a final cap to promote lateral runoff and prevent ponding;
- Limit disposal to only animal cremation ash in other portions of the site;
- Terminate the self-monitoring program and require the proper destruction of all monitoring wells at the site;
- Require a deed restriction for the Modified Phase 1 Area to prohibit any use that disturbs the final cap or drainage features; and
- Rescind the outdated WDRs.

We circulated a draft order to interested parties and received no written comments. We made minor changes to the tentative order, primarily to address staff-generated comments and make minor editorial and formatting changes.

**RECOMMEN-
DATION:**

Adoption of the Revised Tentative Order

APPENDIX A:

Revised Tentative Order

APPENDIX A

REVISED TENTATIVE ORDER

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

REVISED TENTATIVE ORDER

**UPDATED WASTE DISCHARGE REQUIREMENTS and
RESCISSION OF ORDER No. R2-2009-0034 for:**

**MRS. LOIS AND MR. GREG TONNESEN
TONNESEN PET CEMETARY
SUISUN CITY, SOLANO COUNTY**

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

1. **Site Location:** The Tonnesen Pet Cemetery is located in Solano County, approximately one mile south of Travis Air Force Base and two miles southeast of Suisun City (Figure 1). The site is at the end of Scally Road, approximately one-half mile south of Highway 12 at the base of the Potrero Hills. The site occupies about 15 acres with a surface elevation between 10 and 20 feet above sea level. The site occurs within the Secondary Management Area of the Suisun Marsh, and much of the area surrounding the site is protected under the Suisun Marsh Preservation Act, which was adopted by the California Legislature in 1977. This area is under developmental restrictions enforced by the San Francisco Bay Conservation and Development Commission. Land uses near the site are predominantly seasonal cattle grazing and open space (marsh and wetlands). However, one active municipal waste landfill (Potrero Hills Landfill) and one closed landfill (Solano Garbage Company Landfill) occur within one-half mile of the site (Figure 1).
2. **Named Dischargers:** The Tonnesen Pet Cemetery is owned by Mrs. Lois Tonnesen and operated by Mr. Greg Tonnesen. Lois and Greg Tonnesen are hereinafter referred to as the Discharger.
3. **Operational and Regulatory History:** The Tonnesen Pet Cemetery is not a cemetery in the conventional sense but rather is an animal waste disposal facility. The facility is permitted to receive only the remains of small animals (e.g., cats and dogs). The facility was never permitted to receive typical municipal solid wastes (MSW) and has not been used for that purpose. The 15-acre site is divided into three adjacent 5-acre burial areas (Figure 2). The original site design approved by Solano County called for site development to occur in three phases, with each phase consisting of filling a 5-acre plot. Filling began in the easternmost 5-acre segment, which is referred to as Phase 1 (Burial Area 1, Figure 2). The facility was first regulated by the Regional Water Board under Waste Discharge Requirements (WDRs) Order No. 87-105, which was adopted on August 19, 1987. Groundwater monitoring began in 1987. In 2009, the WDRs were updated in anticipation of the completion of Phase 1 operations and initiation of filling in the Phase 2 portion of the site. By this time, the waste stream consisted of approximately 90% cremated animal remains (ash) and 10% whole animal bodies. Disposal of cremation ash and animal carcasses began in Phase 2 the spring of 2013 after the last burial pits in Phase 1 were filled. However, animal carcasses ceased to be buried at the site in 2015. In January 2016, the Discharger decided to no longer accept animal carcasses and to operate the facility for disposal

of cremation ash only. This change in operations affects the classification and regulation of the facility.

4. **Facility Classification:** Because the animal wastes buried at the facility have been deemed to pose a potential threat to water quality, the facility has been classified under California Code of Regulations (CCR) Title 27 guidance as a non-MSW, Class III Nonhazardous Solid Waste Disposal Facility, and the type of waste containment system that has been required for the facility was based upon this classification. However, this classification as a Class III facility is no longer appropriate for the site, in accordance with CCR Title 27, section 20200(a)(1), because the potential threat to water quality (upon which the Class III classification was based) no longer exists. For the portion of the site where animal carcasses have been buried (i.e., the Phase 1 area and the small adjacent portion of Phase 2 that was used between 2013 and 2015, henceforth called the “Modified Phase 1 Area”), the Discharger has demonstrated, through 29 years of groundwater monitoring showing no indication of water quality impacts, that the disposal unit will not pose a threat to water quality, particularly after final closure has been completed. The remainder of the site (Phases 2 and 3) will be operated as an ash monofill disposal facility and will be regulated by the Local Enforcement Agency (Solano County Department of Resource Management, Environmental Health Division) as a Nonhazardous Ash Disposal/Monofill Facility under a Standardized Nonhazardous Ash Solid Waste Facility Permit, along with the existing Solano County Use Permit. Upon adequate demonstration of closure of the Modified Phase 1 portion of the facility, these WDRs will be rescinded and the site will no longer be regulated by the Regional Water Board.
5. **Purpose of Order Update:** This Order updates the facility’s WDRs to reflect a change in operations that affects the classification and regulation of the site and rescinds Order No. R2-2009-0034. This Order re-classifies the site as a non-Class III facility and allows the Discharger to terminate groundwater monitoring. Current operations allow only the disposal of cremation ash, which does not pose a threat to water quality. Furthermore, the long history of groundwater monitoring at the facility has established that any residual wastes contained within the Modified Phase 1 Area do not pose a significant risk to groundwater beneficial uses. This Order directs the Discharger to formally close the Modified Phase 1 Area, which requires the Discharger to submit and implement a revised closure plan and a post-closure maintenance plan. This Order includes provisions related to site closure, including the destruction and proper abandonment of groundwater monitoring wells, the construction of final cap and drainage features, and the recording of a deed restriction to prevent disturbance to the waste disposal area as appropriate to protect human health and the environment.
6. **Adjacent Site Land Use:** Land use on the west side of the facility is an occupied ranch owned by the Discharger. The property to the south, east, and north sides of the facility is open space used for cattle grazing. This open space was established as the Griffith Ranch Parcel Mitigation Area in 2011, as part of the Potrero Hills Landfill Mitigation and Monitoring Plan. Seasonal wetlands (ponds) were constructed in this mitigation area to the north (downslope) of the facility. The closest pond is approximately 120 feet north of the site.
7. **Site Geologic and Hydrogeologic Setting:** The site is located on the north side of the Potrero Hills anticline. Geologic strata dip to the north beneath the site. The nearest active fault is the Green Valley Fault, which is located approximately 10 miles west of the site. The Hayward-

Rodgers Creek Fault is located approximately 26 miles west of the site, and the San Andreas Fault is located 43 miles west of the site. The site is underlain by estuarine Holocene Bay Mud and Pleistocene alluvial deposits derived from exposed bedrock in the Potrero Hills.

The site is located in an area that slopes gently to the north. The southern boundary of the site is about 15 feet higher than the northern boundary. Surface runoff from the Potrero Hills south of the disposal area is diverted around the site by a 1-1/2 foot high berm constructed along the southern edge of the site. Surface runoff from the site flows northwestward into Suisun Marsh. Surface water north of the site is tidally-influenced and saline (containing high total dissolved solids [TDS] content) and is not considered a potential source of drinking water.

Groundwater is present in the alluvial sediments beneath and adjacent to the site. The water table is typically encountered at a depth of 15 to 30 feet below ground surface. The predominant groundwater flow direction is primarily north-northwestward toward the marsh from the base of the Potrero Hills. The hydraulic conductivity of the water-bearing material is estimated to be 5×10^{-4} centimeters per second. Groundwater flow velocity beneath the site is calculated to be about 19 feet per year.

During an April 2017 site inspection, Regional Water Board staff observed that there was no evidence of channelized surface water flow (i.e., no run-on of stormwater onto the site or runoff from the site onto the downslope area), in spite of well-above-average rainfall during the preceding months. Only small temporary ponding was observed in a few low spots across the site. A drainage diversion berm was constructed along the southern, upslope side of the Phase 2 portion of the site in accordance with Specification 12 of Order No. R2-2009-0034. There was no evidence of surface water flow directed by this berm.

8. **Water Quality and Site Contamination:** There have been no confirmed impacts to groundwater or surface water quality from disposal operations at this facility. Coliform bacteria and low levels of certain volatile organic compounds were detected in 2006-2007 in site groundwater monitoring wells, including the background well located upslope of the site. These contaminants do not appear to be sourced from the facility, as explained in the Coliform Investigation (2006-2007) and Comprehensive Groundwater Assessment (2007) documented in Order No. R2-2009-0034.

At the request of Regional Water Board staff, the Discharger submitted groundwater quality studies dated April 22, June 8, and September 27, 2016. The purpose of these studies was to update the 2007 assessment and determine whether future groundwater monitoring was required at the site or if the historical groundwater data was sufficient to eliminate concerns for a future release at the site. Collectively, the studies conclude that, based on 29 years of groundwater monitoring, there is no evidence of an impact to, or future threat to, groundwater quality as a result of animal disposal operations.

9. **Monitoring Programs:** From 1987 to 2011, groundwater beneath the facility was monitored by four groundwater monitoring wells on the facility perimeter (MW-1 through MW-4). In 2011, three additional groundwater monitoring wells (MW-5 through MW-7) were added to the monitoring program to include the Phase 2 area. Groundwater samples have been analyzed semi-annually for pH, turbidity, electrical conductivity, TDS, dissolved oxygen, chloride,

sodium, potassium, calcium, magnesium, bicarbonate, carbonate, sulfate, nitrate, total Kjeldahl nitrogen, total organic carbon, and total coliform. No water quality impacts indicating a release from the disposal area were ever detected.

This Order allows the Discharger to terminate groundwater monitoring, and Provision C.8 requires the Discharger to properly destroy the seven monitoring wells.

10. **Closure:** On January 6, 2015, *Revised Final Closure Plan for Burial Area 1, and Preliminary Closure Plan for Burial Areas 2 and 3* (Closure Plans) were submitted to the Solano County Department of Resource Management, Environmental Health Division (Solano County) on behalf of the Discharger. The Closure Plans were prepared in response to comments by Solano County on March 26, 2014, on the site's Solid Waste Facility Permit application, as well as to provide updates in operational timelines. The Closure Plans provide specific requirements for a final cap system, site drainage, a closure cost estimate, and final reporting.

Regional Water Board staff approved the Closure Plans on March 11, 2015. The Closure Plans were determined by the Department of Resources Recycling and Recovery (CalRecycle) to be technically adequate in meeting the requirements of CCR Title 27 by letter on March 12, 2015. CalRecycle required the operator to demonstrate financial assurances for the Plans' costs prior to issuing approval. However, the Plans pre-dated the decision by the Discharger to cease accepting animal carcasses.

Regional Water Board staff has concluded that because the Discharger has ceased operations that are regulated by Order No. R2-2009-0034, closure requirements only apply to areas where animal carcasses were buried. Provision C.3 of this Order requires submittal of a Revised Final Closure Plan for the Modified Phase 1 Area, as described in Finding 4.

11. **Post-Closure Maintenance, Financial Assurance, and Land Use:** On April 29, 2015, West Associates, on behalf of the Discharger, submitted a Water Release Corrective Action Cost Estimate, which concluded that there are no "known or reasonably foreseeable releases from the solid waste landfill to water" at this disposal site. Hence there are no anticipated costs associated with post-closure corrective actions. Due to re-classification as a non-Class III facility, post-closure financial assurance is no longer required. It is our understanding that, with the exception of the continued cremation burial operation in the ash monofill portion of the site, post-closure land use will be limited to cattle grazing.
12. **Basin Plan:** The Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is the Board's master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. The Basin Plan was duly adopted by the Regional Water Board and approved by the State Water Resources Control Board (State Water Board), U.S. EPA, and the Office of Administrative Law where required.

The beneficial uses of groundwater beneath the facility include:

- a. Municipal and domestic water supply

- b. Agricultural supply
- c. Industrial process and service supply
- d. Discharge to Suisun Marsh

The beneficial uses of surface water in Suisun Marsh include:

- a. Wildlife and estuarine habitat
- b. Contact and non-contact water recreation
- c. Fish migration and spawning
- d. Preservation of rare and endangered species
- e. Groundwater recharge
- f. Agricultural supply

13. **Safe Drinking Water Policy:** It is the policy of the State of California that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes. This Order promotes that policy by requiring discharges to meet maximum contaminant levels to protect human health and ensure that water is safe for domestic use.
14. **Anti-degradation Policy:** Code of Federal Regulations, Title 40, part 131.12, requires that state water quality standards include an anti-degradation policy consistent with federal policy. The State Water Board established California's anti-degradation policy through State Water Board Resolution 68-16, which incorporates the federal anti-degradation policy where federal policy applies. Resolution 68-16 requires that existing water quality be maintained unless degradation is justified based on specific findings. This Order complies with the anti-degradation policy by prohibiting degradation of existing water quality in the vicinity of the site.
15. **CEQA, Notification, and Public Hearing:** Adoption of this Order is exempt from the California Environmental Quality Act (CEQA). Under CEQA guidelines §15061(b)(3), CEQA applies only to projects that have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA. This Order requires the Discharger to continue site monitoring and maintenance activities, and these will not result in any additional actions that may have an effect on the environment beyond the existing baseline conditions.

The Regional Water Board has notified the Discharger and interested agencies and persons of its intent to amend the facility's WDRs and has provided them with an opportunity for a public hearing and an opportunity to submit their written views and recommendations. The Regional Water Board, in a public meeting, heard and considered all comments pertaining to this update of WDRs.

16. **Authority:** All technical reports required by this Order are required pursuant to California Water Code (CWC) section 13267. The burden, including costs, of these reports bears a reasonable relationship to the need for the reports and benefits to be obtained, namely to account for actions taken to properly close the facility. Failure to submit reports in accordance with schedules established by this Order or failure to submit a report of sufficient technical quality acceptable to the Executive Officer may subject the Discharger to enforcement action pursuant to CWC section 13268.

IT IS HEREBY ORDERED that the Discharger, its agents, successors and assigns shall meet the applicable provisions contained in CCR Title 27, Division 2, Subdivision 1 and CWC Division 7 and shall comply with the following:

A. PROHIBITIONS

1. No further disposal of animal remains shall occur in the Modified Phase 1 Area. No disposal of animal remains, other than cremation ash, shall be allowed in other portions of the site.
2. Wastes shall not be placed in or allowed to contact ponded water from any source whatsoever. Wastes shall not be placed in any location where they can be discharged into waters of the State or of the United States.
3. Leachate and ponded water containing leachate or in contact with waste shall not be discharged to waters of the State or of the United States unless specifically authorized under an NPDES permit.
4. The Discharger shall not excavate within or reconfigure any existing burial area without prior Executive Officer approval.
5. Disposal of waste shall not degrade the quality of groundwater beneath and in the vicinity of the site.
6. The Discharger, or any future owner or operator of the site, shall not cause the following conditions to exist in waters of the State at any place outside the facility:
 - a) Floating, suspended, or deposited macroscopic particulate matter or foam;
 - b) Bottom deposits or aquatic growths;
 - c) Alteration of temperature, turbidity, or apparent color beyond natural background levels;
 - d) Visible, floating, suspended, or deposited oil, or other petroleum products; or
 - e) Toxic or other deleterious substances to be present in concentrations or quantities that may cause deleterious effects on aquatic biota, wildlife, or waterfowl or which render any of these unfit for human consumption either at levels created in the receiving waters or as a result of biological concentrations.

B. SPECIFICATIONS

1. All reports pursuant to this Order shall be prepared under the supervision of a California registered professional civil engineer, professional geologist, or certified engineering geologist.
2. The Discharger shall maintain existing containment and drainage systems to prevent erosion of the existing cap and run-off prohibited in Prohibition A.6. The site shall be protected from any washout or erosion of wastes or cover material and from inundation that could occur as a result of a 100-year, 24-hour precipitation event or as the result of flooding with a return frequency of 100 years.
3. The Discharger shall remove and relocate any wastes that are discharged at this site in violation of these WDRs.
4. Upon closure of the Modified Phase 1 Area, the disposal areas shall be graded and covered with a final cap system consisting of a minimum of two feet of cover material. The cover material shall include a minimum of two foot of soil with 10^{-6} cm/sec permeability, above buried animal remains.
5. Upon closure of the Modified Phase 1 Area, the final cap system shall be constructed and maintained to promote lateral runoff and prevent significant ponding and infiltration of water. The elevation of the final capped surface must be at least as high as the ground surface outside the disposal area.
6. The Discharger shall comply with all applicable provisions of CCR Title 27 that are not specifically referred to in this Order.

C. PROVISIONS

1. **Duty to Comply:** The Discharger shall comply immediately, or as prescribed by the time schedule below, with all Prohibitions, Specifications, and Provisions of this Order. All required submittals must be acceptable to the Executive Officer. The Discharger must also comply with all requirements of these WDRs. Violations may result in enforcement actions, including Regional Water Board orders or court orders requiring corrective action or imposing civil monetary liability or in modification or revocation of these WDRs by the Regional Water Board.
2. **Authority:** All technical reports required by this Order are required pursuant to CWC section 13267. Failure to submit reports in accordance with schedules established by this Order or failure to submit a report of sufficient technical quality acceptable to the Executive Officer may subject the Discharger to enforcement action pursuant to CWC section 13268.
3. **Revised Closure and Post-Closure Maintenance Plan:** The Discharger shall submit a technical report, acceptable to the Executive Officer, with a revised detailed plan for the final closure of Phase 1 and the portion of Phase 2 where animal carcasses have been buried (Modified Phase 1 Area) according to Specifications B.4 and B.5 of this Order. The report shall include an accurate plot of the aerial extent of the Modified Phase 1 Area and a plan for its post-closure maintenance. The report shall also include evidence that funds are available for proper closure of the facility. As

noted in Finding 11, post-closure financial assurance is no longer required due to re-classification as a non-Class III facility.

WORK PLAN DUE DATE: August 14, 2017

4. **Final Closure Report:** The Discharger shall submit a technical report, acceptable to the Executive Officer, documenting completion of all tasks associated with Provision C.3.

REPORT DUE DATE: June 14, 2018

5. **Proposed Deed Restriction:** Submit a proposed deed restriction applied to the Modified Phase 1 Area acceptable to the Executive Officer. The proposed deed restriction shall prohibit any use that disturbs the required final cap or drainage features. The proposed deed restriction shall not prohibit the existing seasonal grazing or other uses that will not disturb the required final cap or drainage features. The proposed deed restriction shall name the Regional Water Board as a beneficiary and shall anticipate that the Regional Water Board will be a signatory. The current land owner, Mrs. Lois Tonnesen, shall be responsible for this task.

COMPLIANCE DATE: August 14, 2017

6. **Recordation of Deed Restriction:** Record the approved deed restriction and submit a technical report, acceptable to the Executive Officer, documenting that the deed restriction has been duly signed by all parties and has been recorded with the appropriate County Recorder. The report shall include a copy of the recorded deed restriction. The current land owner, Mrs. Lois Tonnesen, shall be responsible for this task.

COMPLIANCE DATE: 60 days after Executive Officer Approval of the proposed deed restriction

7. **Electronic Reporting Format:** In addition to print submittals, all reports submitted pursuant to this Order must be submitted as electronic files in PDF format. Electronic files shall be submitted via the Regional Water Board's file transfer protocol (FTP) site, email (if the file size is less than 3 MB), or on CD. CD submittals may be included with the print report. Email notification should be provided to Regional Water Board staff whenever a file is uploaded to the Regional Water Board's FTP site. All reports must also be entered electronically into the Regional Water Board's GeoTracker database (<http://geotracker.waterboards.ca.gov>).
8. **Well Destruction Report:** The Discharger shall submit a technical report, acceptable to the Executive Officer, which provides well destruction details and Department of Water Resources well destruction reports for all seven groundwater monitoring wells at the site.

REPORT DUE DATE: 60 days following well destruction

9. **Change In Site Conditions:** The Discharger shall immediately notify the Regional Water Board of any flooding, ponding, settlement, exposure of waste, or other change in site conditions that could impair the integrity of the facility cap and/or drainage control structures and shall immediately make repairs. Within 30 days, the Discharger shall prepare and submit a technical report, acceptable to the Executive Officer, documenting the corrective measures taken.

NOTIFICATION DUE DATE: Immediately upon occurrence
REPORTING DUE DATE: 30 days after initial notification

10. **Availability:** A copy of these WDRs shall be maintained by the Discharger and shall be made available by the Discharger to all personnel performing work (maintenance, repair, construction, etc.) at the site.
11. **Change in Ownership:** The Discharger must notify the Executive Officer, in writing, at least 30 days in advance of any proposed transfer of ownership of the site. The new owner then must apply for an amendment to this Order for the Regional Water Board to acknowledge the transfer of ownership and responsibilities under the Order.
12. **Revision:** This Order is subject to review and revision by the Regional Water Board.
13. **Vested Rights:** This Order does not convey any property rights of any sort or any exclusive privileges. The requirements prescribed herein do not authorize the commission of any act causing injury to persons or property, nor do they create a vested right for the Discharger to continue the waste discharge.
14. **Severability:** Provisions of this Order are severable. If any provision of these WDRs is determined to be invalid by the State Water Board or a court, the remainder of these WDRs shall not be affected.
15. **Operation and Maintenance:** The Discharger shall, at all times, properly operate and maintain all systems of control that are used by the Discharger to achieve compliance with conditions of this Order. Proper operation and maintenance includes effective performance, adequate funding, and adequate operator staffing and training.
16. **Reporting of Hazardous Substance Release:** If any hazardous substance is discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, the Discharger shall report such discharge to the Regional Water Board by calling (510) 622-2369. A written report shall be mailed or submitted electronically to the Regional Water Board within five business days. The report shall describe: the nature of the hazardous substance, estimated quantity involved, duration of incident, cause of release, estimated size of affected area, nature of effect, corrective actions taken or planned, schedule of corrective actions planned, and persons/agencies notified.
17. **Entry and Inspection:** The Discharger shall allow the Regional Water Board, or an authorized representative upon the presentation of credentials and other documents as may be required by law, to:
 - a. Enter upon a Discharger's premises where a regulated facility or activity is located or conducted or where records must be kept under the conditions of this Order;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control

equipment), practices, or operations regulated or required under this Order; and

- d. Sample or monitor at reasonable times, for the purposes of assuring compliance with this Order or as otherwise authorized by the CWC, any substances or parameters at any location.

18. **Endangerment of Health or the Environment:** The Discharger shall report any event of noncompliance that may endanger human health or the environment. Any such information shall be provided orally to the Executive Officer, or an authorized representative, within 24 hours from the time the Discharger becomes aware of the circumstances by calling (510) 622-2369. A written submission to the Regional Water Board shall also be provided within five days of the time a Discharger becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times; and, if the noncompliance has not been corrected, the anticipated time it is expected to continue and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Executive Officer, or an authorized representative, may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

19. **Document Distribution:** Copies of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be provided to the following agencies:

- a. Regional Water Board;
- b. Solano County Department of Resource Management, Environmental Health Division (Local Enforcement Agency); and
- c. California Department of Resources Recycling and Recovery (CalRecycle).

The Executive Officer may modify this distribution list as needed.

20. **Reporting Requirements:** All reports submitted pursuant to this Order must be in accordance with the State Water Board-adopted regulations requiring electronic report and data submittal to the State's GeoTracker database (CCR §§ 3890-3895). Email notification should be provided to Regional Water Board staff whenever a file is uploaded to GeoTracker. In addition, the Discharger shall submit hard copies of reports to Regional Water Board staff upon request.

The Discharger is responsible for submitting the following via GeoTracker:

- a. All chemical analytical results for soil, water, and vapor samples;
- b. The latitude and longitude of any sampling point for which data is reported, accurate to within 1 meter and referenced to a minimum of two reference points from the California Spatial Reference System, if available;
- c. The surveyed elevation relative to a geodetic datum of any permanent sampling point;
- d. The elevation of groundwater in any permanent monitoring well relative to the surveyed elevations;
- e. A site map or maps showing the location of all sampling points;
- f. The depth of the sampling point or depth and length of screened interval for any permanent monitoring well;

- g. PDF copies of boring logs; and
- h. PDF copies of all reports, workplans, and other documents (the document, in its entirety [signature pages, text, figures, tables, etc.], must be saved to a single PDF file) including the signed transmittal letter and professional certification by a California registered professional civil engineer, professional geologist, or certified engineering geologist.

Upon request, monitoring results shall also be provided electronically in Microsoft Excel® to allow for ease of review of site data and to facilitate data computations and/or plotting that Regional Water Board staff may undertake during the review process. Electronic tables shall include the following information:

- a. Well designations;
- b. Well location coordinates (latitude and longitude);
- c. Well construction (including top of well casing elevation, total well depth, screen interval depth below ground surface, screen interval elevation, and a characterization of geology of subsurface the well is located in);
- d. Groundwater depths and elevations (water levels);
- e. Current analytical results by constituent of concern (including detection limits for each constituent);
- f. Historical analytical results (including the past five years unless otherwise requested); and
- g. Measurement dates.

21. This Order supersedes and rescinds Order No. R2-2009-0034.

I, Bruce H. Wolfe, Executive Officer, do hereby certify the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Region on **DATE**.

Bruce H. Wolfe
Executive Officer

Attachments:

Figure 1 - Site Location
Figure 2 – Site Layout

Figure 1 - Site Location

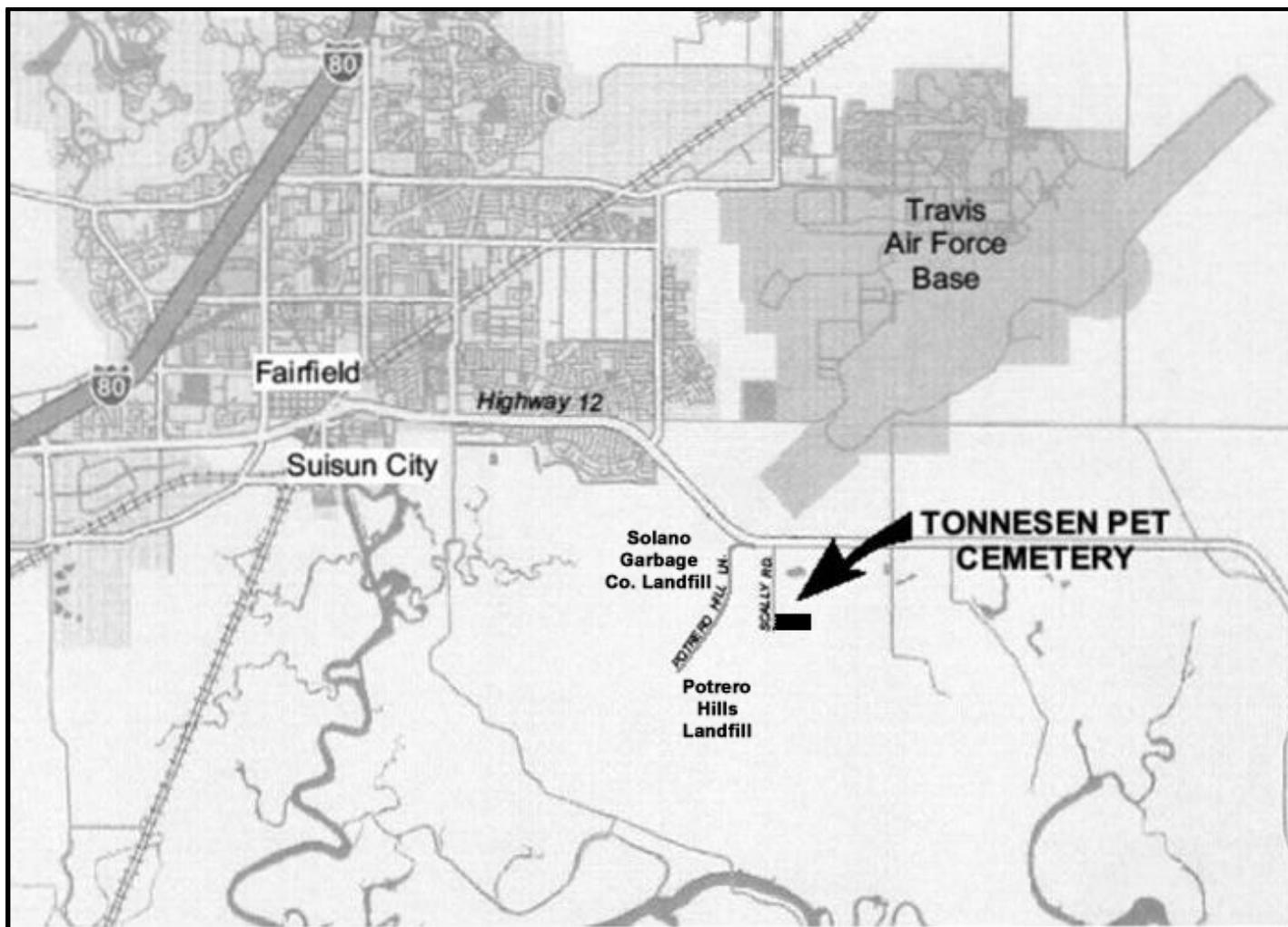


Figure 2 - Site Layout

