

Central Valley Regional Water Quality Control Board

11 March 2013

Chris Littlefield
Kellogg Garden Products
12686 Locke Road
Lockeford, CA 95237

CERTIFIED MAIL
7010 1670 0002 0652 1909

REVISED MONITORING AND REPORTING PROGRAM (MRP), R5-2006-0070 (REV. 1), KELLOGG SUPPLY, INC., SAN JOAQUIN COUNTY

Central Valley Water Quality Control Board (Central Valley Water Board) staff has revised the Monitoring and Reporting Program (MRP) R5-2006-0070 for the Kellogg Supply, Inc. facility located at 12686 Locke Road, Lockeford, San Joaquin County. Revisions to the MRP were prompted by a request from Kellogg Supply Inc., dated 11 February 2013. Because the facility no longer accepts, stores, or processes fly ash, Kellogg Supply, Inc. requested to remove related analytical constituents (hexavalent chromium, molybdenum, and arsenic) from routine monitoring activities. This request was based partly on the elimination of fly ash, historical surface and groundwater monitoring data, and consideration of costs associated with laboratory analysis of these parameters.

Based on the information submitted as part of the February 2013 request letter and compiled in periodic monitoring reports, a reduction in monitored analytes required under the MRP is approved. Hexavalent chromium and molybdenum have been removed from Contact Pond and groundwater monitoring. The requirement for fly ash monitoring was also removed because this material is no longer used or stored on-site. Arsenic will remain as a monitored constituent because of the elevated concentrations in the Contact Pond as compared to groundwater monitoring data. Arsenic is also characteristic of some other agricultural products that may be present at the facility.

You should review the Revised MRP carefully to ensure that all monitoring and reporting activities comply with the Revised MRP. The Revised MRP must be implemented on the **first day of April 2013** such that the April 2013 monitoring report must conform to the requirements of this Revised MRP.

Please contact Scott Armstrong at (916) 464-4616 or sarmstrong@waterboards.ca.gov if you have any questions regarding this revised MRP.

All monitoring reports and related compliance and enforcement questions should be directed to Brendan Kenny at (916) 464-4635 or bkenny@waterboards.ca.gov.



ANNE OLSON, P.E.
Senior Water Resource Control Engineer

Attachment: Revised Monitoring and Reporting Program R5-2006-0070 (Rev. 1)

cc: Mr. Rodney Estrada, San Joaquin County Environmental Health Department, Stockton
Mr. Thomas Butler, Stantec Consulting Services, Inc., Walnut Creek

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION

REVISED MONITORING AND REPORTING PROGRAM R5-2006-0070 (REV. 1)

FOR
KELLOGG SUPPLY, INC.,
SOIL AMENDMENT PACKAGING FACILITY
SAN JOAQUIN COUNTY

This monitoring and reporting program (MRP) incorporates requirements for monitoring of the contact water storage pond, stormwater pond, and groundwater. This MRP is issued pursuant to Water Code Section 13267. The Discharger shall not implement any changes to this MRP unless and until a revised MRP is issued by the Executive Officer.

All samples shall be representative of the volume and nature of the discharge. The time, date, and location of each grab sample shall be recorded on the sample chain of custody form. Field test instruments (such as those used to measure pH and dissolved oxygen) may be used provided that:

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

CONTACT WATER POND MONITORING

Samples shall be collected from an established sampling station located in an area that will provide a sample representative of the water in the contact water pond. Freeboard shall be measured vertically from the surface of the pond water to the lowest elevation of the surrounding berm and shall be measured to the nearest 0.1 foot. Monitoring of the pond shall include, at a minimum, the following:

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Sampling Frequency</u>	<u>Reporting Frequency</u>
Freeboard	feet (± 0.1)	Measurement	Weekly	Monthly
Odors	--	Observation	Weekly	Monthly
Dissolved Oxygen ¹	mg/L	Grab	Weekly ²	Monthly
pH ¹	Std. Unit	Grab	Weekly ²	Monthly
Electrical Conductance	μ mhos/cm	Grab	Weekly ²	Monthly
Total Dissolved Solids	mg/L	Grab	Monthly ^{2,3}	Monthly
Dilution Water Added to Pond	Gallons	Measured	Monthly	Monthly
Water Removed from Pond	Gallons	Measured	Monthly	Monthly
BOD ₅	mg/L	Grab	Monthly ²	Monthly
Nitrate (as N)	mg/L	Grab	Monthly ²	Monthly
Total Kjeldahl Nitrogen	mg/L	Grab	Monthly ²	Monthly
Arsenic	mg/L	Grab	Monthly ^{2,4}	Monthly
Liner Inspection	NA	Observation	Annually ⁵	Annual

- ¹ Samples shall be collected at a depth of one foot from each pond in use, opposite the inlet. Samples shall be collected between 0700 and 0900 hours.
- ² Samples shall be collected when water is present. If no water is present, the report shall so state.
- ³ If TDS concentration exceeds 750 mg/L, additional samples may be collected within the reporting period. All values shall be presented and averaged in the monitoring report.
- ⁴ Contact water samples for metals analysis shall be filtered with a maximum 0.45-micron filter prior to digestion and analysis.
- ⁵ Liner inspection shall be performed when pond is dry or as close to dry as possible.

STORM WATER POND MONITORING

Samples shall be collected from an established sampling station located in an area that will provide a sample representative of the water in the storm water pond. Freeboard shall be measured vertically from the surface of the pond water to the lowest elevation of the surrounding berm and shall be measured to the nearest 0.1 foot. Monitoring of the pond shall include, at a minimum, the following:

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Sampling Frequency</u>	<u>Reporting Frequency</u>
Freeboard	feet (± 0.1)	Measurement	Monthly ¹	Monthly
Odors	--	Observation	Monthly ¹	Monthly
Total Dissolved Solids	mg/L	Grab	Monthly ¹	Monthly

¹ Samples shall be collected when water is present. If no water is present, the report shall so state.

GROUNDWATER MONITORING

Prior to construction and/or sampling of any groundwater monitoring wells, the Discharger shall submit plans and specifications to the Board for approval. For the purpose of groundwater monitoring at the site the following wells shall be monitored for groundwater elevation and quality: MW-1R, MW-2R, MW-3R, and MW-4; the following wells will be monitored only for groundwater elevation data: P-1, P-2, and P-3. Once installed, any new wells shall be added to the monitoring network of the existing wells and shall be monitored according to the schedule below.

Prior to sampling, depth to groundwater measurements shall be measured in each monitoring well to the nearest 0.01 feet. Groundwater elevations shall then be calculated to determine groundwater gradient and flow direction.

Wells to be sampled shall be purged of at least three well volumes until temperature, pH, and electrical conductivity have stabilized. Low or no-purge sampling methods are acceptable, if described in an approved Sampling and Analysis Plan. All samples shall be collected using approved EPA methods. Groundwater monitoring for shall include, at a minimum, the following:

<u>Constituent</u>	<u>Units</u>	<u>Type of Sample</u>	<u>Sampling Frequency</u>	<u>Reporting Frequency</u>
Depth to Groundwater	±0.01 feet	Measurement	Semi-annual	Semiannual
Groundwater Elevation ¹	±0.01 feet	Calculated	Semi-annual	Semiannual
Gradient	feet/foot	Calculated	Semi-annual	Semiannual
Gradient Direction	Degrees	Calculated	Semi-annual	Semiannual
pH	pH units	Grab	Semi-annual	Semiannual
Nitrate Nitrogen	mg/L	Grab	Semi-annual	Semiannual
Total Dissolved Solids	mg/L	Grab	Semi-annual	Semiannual
Total Coliform Organisms	MPN/100 mL	Grab	Semi-annual	Semiannual
Standard Minerals ²	mg/L	Grab	Annual ³	Annual
Arsenic	mg/L	Grab	Annual ^{3,4}	Annual

¹ Groundwater elevations shall be determined based on depth to water measurements from a surveyed measuring point elevation on each well.

² Standard Minerals shall include at least the following compounds: boron, calcium, iron, magnesium, manganese, potassium, sodium, chloride, sulfate, total alkalinity (including alkalinity series), and total hardness as CaCO₃.

³ The annual sampling event shall occur in the second half of the year and the results shall be reported in the second Semi-Annual Monitoring Report.

⁴ Groundwater samples for arsenic analysis shall be filtered with a maximum 0.45-micron filter prior to preservation.

REPORTING

In reporting monitoring data, the Discharger shall arrange the data in tabular form so that the date, sample type (e.g., contact water pond, stormwater pond, or groundwater monitoring well, etc.), and reported analytical result for each sample are readily discernible. The data shall be summarized in such a manner as 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 Monitoring and Reporting Program shall be reported in the next scheduled monitoring report.

As required by the California Business and Professions Code Sections 6735, 7835, and 7835.1, all groundwater monitoring reports shall be prepared under the supervision of a registered professional engineer or geologist and signed by the registered professional.

A. Monthly Monitoring Reports

Monthly reports shall be submitted to the Regional Board by the **1st day of the second month** following the end of the reporting period (i.e., the January monthly report is due by 1 March). The monthly reports shall include the following:

1. Results of contact water pond and storm water pond monitoring;
2. A comparison of monitoring data to the discharge specifications and an explanation of any violation of those requirements. Data shall be presented in tabular format;
3. If requested by staff, copies of laboratory analytical report(s);
4. A calibration log verifying calibration of all hand held monitoring instruments and devices used to comply with the prescribed monitoring program; and
5. A statement whether fly ash was used or stored at the site during the month.

B. Semi-Annual Monitoring Reports

The Discharger shall establish a schedule for groundwater monitoring such that samples are obtained approximately every six months. Quarterly monitoring reports shall be submitted to the Regional Board by the **1st day of the second month after the semester** (i.e. the January-June Semi-Annual Monitoring Report is due by August 1st) each year. The Semi-Annual Report shall include the following:

1. Results of groundwater monitoring.
2. A narrative description of all preparatory, monitoring, sampling, and analytical testing activities for the groundwater monitoring. The narrative shall be sufficiently detailed to verify compliance with the WDR, this MRP, and the Standard Provisions and Reporting Requirements. The narrative shall be supported by field logs for each well documenting depth to groundwater; parameters measured before, during, and after purging; method of purging; calculation of casing volume; and total volume of water purged.
3. 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.
4. 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).
5. A comparison of monitoring data to the groundwater limitations and an explanation of any violation of those requirements.
6. Summary data tables of historical and current water table elevations and analytical results.
7. 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 mean sea level datum.
8. Copies of the laboratory analytical report(s) for groundwater monitoring.

C. Annual Report

An Annual Report shall be submitted to the Regional Board by **1 February** each year. The Annual Report shall include the following:

1. An evaluation of compliance with the requirements of Provision 1.a, a summary of monthly TDS concentrations, and an annual average value calculated for the time period from January through December.
2. The results of the contact water pond liner inspection.
3. If requested by staff, tabular and graphical summaries of all data collected during the year.
4. An evaluation of the effectiveness of the past year's wastewater (contact water) storage and disposal management in terms of odor control and groundwater protection, including consideration of reapplication management practices (i.e.: salinity buildup in the contact water pond, reapplication of contact water to the product, measures implemented to prevent contamination of stormwater with soil amendments), and groundwater monitoring data.

5. An evaluation of the groundwater quality at the facility. The evaluation shall include presentation and discussion of the analytes collected once per year (standard minerals, arsenic, molybdenum, and hexavalent chromium) as well as all other analytes required by the MRP.
6. A discussion of compliance and corrective actions taken, as well as any planned or proposed actions needed to bring the discharge into compliance with the waste discharge requirements.
7. A discussion of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.

A letter transmitting the self-monitoring reports shall accompany each report. The letter shall include a discussion of requirement violations found during the reporting period, and actions taken or planned for correcting noted violations, such as operation or facility modifications. If the Discharger has previously submitted a report describing corrective actions and/or a time schedule for implementing the corrective actions, reference to the previous correspondence will be satisfactory. The transmittal letter shall contain a statement by the Discharger, or the Discharger's authorized agent, under penalty of perjury, that to the best of the signer's knowledge the report is true, accurate and complete.

The Discharger shall implement the above monitoring program as of the date of this Order.

Ordered by: 
for PAMELA C. CREEDON, Executive Officer

3/11/13
(Date)