**Matthew Rodriquez**
*Secretary for*
*Environmental Protection*

# California Regional Water Quality Control Board
## San Francisco Bay Region

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**Edmund G. Brown Jr.**
*Governor*

March 2, 2012

**TO: Municipal Wastewater Dischargers** (attached list)

**SUBJECT: Water Code Section 13267 Technical Report Order Requiring Submittal of Information on Nutrients in Wastewater Discharges**

This order requires municipal wastewater dischargers in the San Francisco Bay Region to monitor and report nutrient (nitrogen and phosphorus) concentrations and mass loadings in their wastewater discharges. The information we require includes a report of historical nutrient data, a sampling plan, quarterly reports, an interim report, and a final report. Details of these requirements, their due dates, and the basis for the requirements are described below.

Please direct your questions to Tong Yin at 510-622-2418, or by e-mail TYin@waterboards.ca.gov.

## Applicability

This order is intended for, and applicable to, all dischargers under an NPDES[1] permit with the following exceptions: discharges to ocean waters, discharges of once through cooling water, discharges consisting solely of industrial process and associated wastewaters, discharges consisting solely of stormwater runoff, and discharges covered under general permits, such as for aggregate mining and sand washing, and solvent and fuels groundwater cleanup. Dischargers subject to one or more of these exceptions that discharge wastewater under an individual NPDES may be subject to a similar California Water Code section 13267 order in the future.

## Purpose and Basis of Requirements

Nitrogen and phosphorus are essential nutrients for the growth of all living organisms in ecosystems. However, excessive nutrients may cause algae blooms in surface waters (eutrophication). Harmful algae blooms reduce or deplete oxygen in the water, produce toxins, stress or kill fish, and block sunlight reaching aquatic plants. There is also some evidence that certain forms of nutrients, e.g., ammonium, may inhibit phytoplankton productivity or have other effects on biota.

The San Francisco Bay estuary has long been recognized as a nutrient-enriched estuary. Despite this, the abundance of phytoplankton in the estuary is lower than would be expected, due to a number of factors, including strong tidal mixing, light limitation due to high turbidity, and grazing by clams. Bay monitoring data are indicating a significant increase in phytoplankton biomass and a small decline in dissolved oxygen concentrations in many areas of the San

[1] National Pollutant Discharge Elimination System

Francisco Bay estuary, suggesting that the historic resilience of the estuary to the effects of nutrient enrichment may be weakening.

Currently, the Regional and State Water Boards are in the process of developing nutrient water quality objectives for the San Francisco Bay estuary, using an approach known as the Nutrient Numeric Endpoint (NNE) framework. The NNE approach will likely require models that link ecological response indicators to nutrient loads and other management controls. This effort must be supported by accurate nutrient loading estimates from a variety of sources, including wastewater.

Wastewater discharges contribute a large portion of the nutrient loadings to the estuary; for example, it may be as high as 80% in such areas as the South Bay during the dry season. Wastewater discharges into tributaries of the Bay may also contribute to nutrient loadings to the Bay. There have been published studies that have developed some loading estimates; however, these studies are outdated, inadequate, or limited geographically. Thus, nutrients loads to the San Francisco Bay estuary from external sources are still poorly understood, and it is important to get an accurate estimate of the loadings.

The information collected under this order will be used by the Regional Water Board to evaluate nutrient loadings from wastewater discharges in comparison to loads from other sources, to support modeling and evaluation of loading reduction scenarios, and to inform the need for additional wastewater treatment to address nutrients. The data may also be used in the future to support development of TMDLs or other regulatory strategies.

The Regional Water Board is working collaboratively with the Bay Area Clean Water Agencies as well as other entities on studies that are being identified as part of a regional nutrient strategy. Loads analysis and modeling are included in this strategy. The San Francisco Estuary Institute (SFEI) is supporting this effort. Therefore, this order includes providing all compiled data to SFEI.

This order also requires influent nutrient monitoring. The influent data will be used to establish existing nutrient levels in raw wastewater, to examine plant performance in removing nutrients from waste streams, and to evaluate the necessity of future plant upgrades to reduce nutrient loadings from wastewater discharges to maintain or restore beneficial uses of the estuary.

**Nutrient Parameters to be Monitored**

Analytically, nitrogen and phosphorus are divided into a number of chemical forms. This order requires monitoring of those forms potentially found in influent or effluent. This order requires influent and effluent monitoring for the following nitrogen and phosphorus forms as well as some ancillary parameters:

- Total Dissolved Nitrogen (TDN)
- Total Kjeldahl Nitrogen (TKN)
- Soluble Kjeldahl Nitrogen (SKN)
- Nitrate ($NO_3^-$)
- Nitrite ($NO_2^-$)
- Total Ammonia ($NH_3$ and $NH_4^+$)

- Urea
- Total Phosphorus
- Total Phosphorus (soluble)
- Orthophosphate (dissolved/total)
- pH
- Temperature
- Total Suspended Solids (TSS)

This list includes pH and temperature, which are required for calculating ammonium ($NH_4^+$) from measured total ammonia concentrations. TSS results may be used to evaluate the correlation between TSS and some nutrient parameters, such as with total phosphorus.

Urea or carbamide ($CO(NH_2)_2$) is the main nitrogen-containing substance in the urine of mammals. Urea breaks down to carbon dioxide ($CO_2$) and ammonium in the aquatic environment. Urea may inhibit nitrogen uptake by algae. The Regional Water Board is currently investigating ambient ammonium inhibition effects on diatom blooms in the Suisun Bay; therefore, data on ammonium discharges will improve understanding of their impacts on primary productivity.

Questions have been raised about the potential quality of the urea data collected from wastewater discharges; however, there is no urea data for wastewater discharges in this region. This order only requires the region's five largest NPDES permittees, East Bay Municipal Utilities District (EBMUD), East Bay Dischargers Authority (EBDA), San Jose/Santa Clara Water Pollution Control Plant (SJSC), San Francisco Southeast Plant (SFSE), and Central Contra Costa Sanitary District (CCCSD), to collect urea data over a one year period. Harmful algal blooms show a preference for urea in ambient waters, and urea could thus be important to measure.

Table 1 lists the required parameters and suggested analytical methods:

**Table 1. Parameters to be Monitored**

| **Parameters** | **Units** | **Influent**(1) | **Effluent**(1) | **Sample type**(2) | **Suggested Analytical Methods**(3)(4) |
|---|---|---|---|---|---|
| Total Dissolved Nitrogen(5) | mg/L and kg/day as Nitrogen (N) | Yes | Yes | 24-hour composite | Standard method 4500-N |
| Total Kjeldahl Nitrogen | mg/L and kg/day as N | Yes | Yes | 24-hour composite | Standard method 4500-N (organic) |
| Soluble Kjeldahl Nitrogen | mg/L and kg/day as N | Yes | Yes | 24-hour composite | Standard method 4500-N (organic) |
| Nitrate | mg/L and kg/day as N | Yes | Yes | 24-hour composite | Standard method 4500-N |
| Nitrite | mg/L and kg/day as N | Yes | Yes | 24-hour composite | Standard method 4500-N |
| Total Ammonia | mg/L and kg/day as N | Yes | Yes | 24-hour composite | Standard method 4500-$NH_3$ |
| Urea | mg/L and kg/day as N | Yes | Yes | 24-hour composite | (6) |
| Total Phosphorus | mg/L and | Yes | Yes | 24-hour composite | Standard method 4500-P |

| Parameters | Units | Influent[1] | Effluent[1] | Sample type[2] | Suggested Analytical Methods[3][4] |
|---|---|---|---|---|---|
| | kg/day as Phosphorus (P) | | | | |
| Total Phosphorus (soluble)[5] | mg/L and kg/day as P | Yes | Yes | 24-hour composite | Standard method 4500-P |
| Orthophosphate (dissolved/total) [5] | mg/L and kg/day as P | Yes | Yes | 24-hour composite | Standard method 4500-P |
| Flow[7] | mgd | Yes | Yes | Continuous | --- |
| pH[8] | Standard unit | Yes | Yes | Continuous/Grab | --- |
| Temperature[8] | Degree C | Yes | Yes | Continuous/Grab | --- |
| TSS | mg/L | Yes | Yes | 24-hour composite | Standard Method 2540D |
| Total nitrogen and phosphorus removal, by concentration | Percent removal | --- | --- | Calculate from influent and effluent monitoring data | --- |

**Footnotes for Table 1:**

(1) Influent and effluent sampling shall be at the compliance monitoring locations currently specified in a discharger's NPDES permit. Sampling for all influent and effluent parameters shall fall on the same dates.
(2) 24-hour composites may be made up of a minimum of four discrete grabs, collected over the course of 24 hours or during a 24-hour period the plant is staffed, and volumetrically or mathematically flow-weighted. Grab samples may be combined prior to analysis. If only one grab sample will be collected, it should be collected during periods of maximum peak flows.
(3) Dischargers may propose other U.S. EPA-approved analytical methods, if available, with detection limits low enough to quantify concentrations in wastewater.
(4) Standard methods for the examination of water and wastewater, American Public Health Association.
(5) Soluble or dissolved is defined as filtering the sample through a 0.45 µm filter.
(6) The five dischargers identified above shall propose an appropriate analytical method for urea in their study plan.
(7) Report daily average flow, which shall correspond to the same time period when the composite samples are collected; also report daily peak flow during which grab samples are collected.
(8) Report daily maximum, minimum and average values.

**Units abbreviations:**

mg/L = milligrams per liter
kg/day = kilograms per day
mgd = million gallons per day

**Equations for calculating mass loadings**

Mass loading (kg/day) = mg/L × mgd × 3.78

## Sampling Frequency and Study Duration

As indicated in Table 2 below, this order requires two years (for major dischargers) or one year (for minor dischargers) of sampling from the date each discharger starts its first sampling event, except the sampling for urea, which is one year for the five dischargers listed below. The Regional Water Board may extend the study period if more data are needed.

This order specifies different sampling requirements (e.g., sampling frequency, urea monitoring, peak wet weather monitoring) for different groups of dischargers as shown in Table 2 based on their average dry weather design flow. The difference in requirements is based on consideration of flow and nutrient mass load contributions. In addition to the once or twice-per-month effluent monitoring, major dischargers shall also conduct two additional effluent peak wet weather samplings during each wet season; the data will be used to evaluate peak wet weather flow influence on plant performance and nutrient loads during peak wet weather flow conditions. Dry season influent and effluent monitoring data will be used to establish baseline conditions and to examine possible seasonal variability. Therefore, dry season monitoring data are also necessary for seasonal dischargers.

Table 2 lists the minimum sampling frequency and duration for different groups of dischargers:

**Table 2. Minimum Sampling Frequency and Study Duration** (1,2,3)

| Dischargers | Year round or Seasonal | Influent | Effluent | Duration |
|---|---|---|---|---|
| Major municipal dischargers (Flow $\geq$ 5 mgd) | Year round | Once during wet season, once during dry season | Twice per month and two additional samples each wet season during peak wet weather flow conditions(4) | Two years |
| | Seasonal | Once during discharge (wet) season, once during non-discharge (dry) season | Twice per month during discharge (wet) season; once during non-discharge (dry) season | Two years |
| Major municipal dischargers (Flow < 5 mgd) | Year round | Once during wet season, once during dry season | Once per month and two additional samples each wet season during peak wet weather flow conditions(4) | Two years |
| | Seasonal | Once during discharge (wet) season, once during non-discharge (dry) season | Once per month during discharge (wet) season; once during non-discharge (dry) season | Two years |
| Minor municipal dischargers (Flow < 1 mgd) | Year round | Once during wet season, once during dry season | Once per month | One year |
| | Seasonal | Once during discharge (wet) season, once during non-discharge (dry) season | Once per month during discharge (wet) season; once during non-discharge (dry) season | One year |
| Urea Only | | | | |
| CCCSD, EBMUD, EBDA, SFSE, and SJSC | Year round | Once during wet season, once during dry season | Once per month | One year |

**Footnotes for Table 2:**

(1) Influent monitoring shall fall on the same dates as effluent monitoring events.
(2) Wet season is normally from November through April, dry season is from May through October. It is preferable to conduct dry season influent sampling during July, August, and September, when the weather is the driest of the year.
(3) Sampling dates shall be as random as feasible, i.e., sampling is not to occur on the same day or weekday of a month except the two wet season events that shall coincide with the peak wet weather flows.
(4) The Dischargers shall estimate the best dates of sampling for peak wet weather flow scenarios; this decision may be based on historical peak wet weather flows, storm forecast, etc.

The Regional Water Board may also require additional sampling, if available data indicate significant variability that cannot be characterized by the current sampling frequency.

**You are hereby required to provide technical information in accordance with the following:**

1. **Technical reports containing available historical nutrient, flow, and other water quality data.**

   a. Many municipal wastewater dischargers were or are required to sample for some nutrient parameters by their NPDES permits. Some or all dischargers also analyze for nutrient parameters not required by their NPDES permits. This order requires each discharger to submit a report that identifies what types and quantity (nutrient parameters from Table 1, number of samples, frequency of data collection, i.e., which calendar years and detection limits) of data that are available for the period of January 1, 1975, through February 29, 2012. This report is due to the Regional Water Board June 1, 2012; submit the report to [Tong Yin, tyin@waterboards.ca.gov or via FTP].

   b. Within 90 days of the date of the report submittal in 1(a) above, each discharger shall compile and submit electronically all nutrient data available for the time period of March 1, 2004, through February 28, 2009, other than data already submitted to the Regional Water Board via the Electronic Reporting System (ERS) for compliance purposes. This submittal shall also include all available effluent flow, pH, temperature, total suspended solids, and salinity data for that time period, and be submitted to the Regional Water Board [Tong Yin, tyin@waterboards.ca.gov or via FTP] and SFEI [David Senn, sfbayeffluent@sfei.org].

   c. Within 90 days of the date of the report submittal in 1(a) above, and only if the data are available electronically as of the date of this order, each discharger shall submit all nutrient data for the time period from January 1, 1975, through February 29, 2012.

2. **A Sampling and Analysis Plan for Collecting Required Information due April 30, 2012.**

   Dischargers shall submit a sampling and analysis plan to the Regional Water Board, [Tong Yin, tyin@waterboards.ca.gov or via FTP]. The sampling plan shall include, but not be limited to, a sampling schedule, contract labs to be used, analytical methods to be used, and detection limits of the methods. The sampling plan shall also clearly identify any proposed deviations from the requirements of this order, such as proposing to monitor for fewer or different parameters, and include the bases for any proposed deviations. Dischargers are encouraged to collectively submit one sampling plan.

   If the Regional Water Board does not provide comments on the sampling plan within 45 days, the discharger shall start monitoring by July 1, 2012.

3. **Quarterly reports due 30 days after the end of each calendar quarter.**

   Monitoring results for the parameters listed in Table 1 shall be tabulated in Excel spreadsheets and reported to the Regional Water Board [Tong Yin, tyin@waterboards.ca.gov or via FTP] and SFEI, [David Senn, sfbayeffluent@sfei.org. The spreadsheets shall include the name of

parameters, units, sampling location, date and times of data collection, analytical method, method detection limit, reporting level, and sampling results. A spreadsheet template will be developed for dischargers use to ensure consistency in data reporting. The Bay Area Clean Water Agencies may develop a spreadsheet template for this purpose and make it available to all dischargers. If not, Regional Water Board staff will provide the template. Dischargers are encouraged to compile their data as a group prior to submittal to the Regional Water Board.

**4. An interim report due July 31, 2013.**

The interim report shall include all data collected through June 30, 2013, for the parameters listed in Table 1, with a cover letter summarizing significant findings, changes or upsets in treatment operations or changes in influent sources that may affect interpretation of the data, and an analysis of any issues identified during data collection effort.

**5. A final report due July 31, 2014.**

The report shall include the information collected under this study, with the same information as required under the "interim report" above.

These requirements are made pursuant to California Water Code section 13267, which allows the Regional Water Board to require technical or monitoring program reports from any person who has discharged, discharges, proposes to discharge, or is suspected of discharging waste that could affect water quality. Failure to respond or late response may subject you to civil liability imposed by the Regional Water Board up to a maximum amount of $1,000 per day. The attached fact sheet provides additional information about these requirements. Any extension in the above deadlines must be confirmed in writing by Regional Water Board staff.

Sincerely,

Digitally signed by Bruce Wolfe
Date: 2012.03.02 10:05:05 -08'00'

Bruce H. Wolfe
Executive Officer

Attachments: Fact Sheet for Section 13267 Orders
Municipal Dischargers Mailing List

# Fact Sheet – Requirements for Submitting Technical Reports

*Under Section 13267 of the California Water Code*

**What does it mean when the Regional Water Board requires a technical report?**
Section 13267[1] of the California Water Code provides that "…the regional board may require that any person who has discharged, discharges, or who is suspected of having discharged or discharging, or who proposes to discharge waste...that could affect the quality of waters...shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires."

**This requirement for a technical report seems to mean that I am guilty of something or at least responsible for cleaning something up. What if that is not so?**
The requirement for a technical report is a tool the Regional Water Board uses to investigate water quality issues or problems. The information provided can be used by the Regional Water Board to clarify whether a given party has responsibility.

**Are there limits to what the Regional Water Board can ask for?**
Yes. The information required must relate to an actual or suspected or proposed discharge of waste (including discharges of waste where the initial discharge occurred many years ago), and the burden of compliance must bear a reasonable relationship to the need for the report and the benefits obtained. The Regional Water Board is required to explain the reasons for its request.

**What if I can provide the information but not by the date specified?**
A time extension may be given for good cause. Your request should be promptly submitted in writing, giving reasons.

**Are there penalties if I don't comply?**
Depending on the situation, the Regional Water Board can impose a fine of up to $5,000 per day, and a court can impose fines of up to $25,000 per day as well as criminal penalties. A person who submits false information or fails to comply with a requirement to submit a technical report may be found guilty of a misdemeanor. For some reports, submission of false information may be a felony.

**Do I have to use a consultant or attorney to comply?**
There is no legal requirement for this, but as a practical matter, in most cases the specialized nature of the information required makes the use of a consultant and/or attorney advisable.

**What if I disagree with the 13267 requirements, and the Regional Water Board staff will not change the requirement and/or date to comply?**
You may ask that the Regional Water Board reconsider the requirement and/or submit a petition to the State Water Resources Control Board. See California Water Code sections 13320 and 13321 for details. A request for reconsideration to the Regional Water Board does not affect the 30-day deadline within which to file a petition to the State Water Resources Control Board.

**If I have more questions, whom do I ask?**
Requirements for technical reports include the name, telephone number, and email address of the Regional Water Board staff contact.

[1] All code sections referenced herein can be found by going to www.leginfo.ca.gov.

**Municipal Dischargers Mailing List**

City of American Canyon
300 Crawford Way
American Canyon, CA 94503
Attn: Peter Lee
(plee@cityofamericancanyon.org)
Wastewater System Manager

City of Benicia
614 East Fifth Street
Benicia, CA 94510
Attn: Jeff Gregory (jgregory@ci.benicia.ca.us)
Superintendent

City of Burlingame
501 Primrose
Burlingame, CA 94010
Attn: Syed Murtuza (smurtuza@burlingame.org)
Director of Public Works

City of Calistoga
414 Washington Street
Calistoga, CA 94515
Attn: Warren Schenstrom
(wschenstrom@ci.calistoga.ca.us)
Water Systems Superintendent

Central Contra Costa Sanitary District
5019 Imhoff Place
Martinez, CA 94553
Attn: Margaret Orr (morr@centralsan.org)
Director of Operations

Central Marin Sanitation Agency
1301 Andersen Drive
San Rafael, CA 94901
Attn: Robert Cole (rcole@centramarinsa.org)
Environmental Services Manager

Port Costa Sanitation Department
Crockett Community Services District
Crockett, CA 94525
Attn: Michael Kirker
(mkirker@town.crockett.ca.us)
Department Manager

Delta Diablo Sanitation District
2500 Pittsburg-Antioch Highway
Antioch, CA 94509
Attn: Gary W. Darling (GaryD@ddsd.org)
General Manager

East Bay Dischargers Authority
2651 Grant Avenue
San Lorenzo, CA 94580
Attn: Mike Connor (mconnor@ebda.org)
General Manager

East Bay Municipal Utilities District
P.O. Box 24055
Oakland, CA 94623-1055
Attn: Ben Horenstein (bhorenst@ebmud.com)
Manager of Environmental Services

Fairfield-Suisun Sewer District
1010 Chadbourne Road
Fairfield, CA 94534
Attn: Meg Herston (mherston@fssd.com)
Senior Environmental Compliance Engineer

Las Gallinas Valley Sanitation District
300 Smith Ranch Rd
San Rafael, CA 94903-1929
Attn: Mark Williams (mwilliams@lgvsd.org)
District Manager

Sanitary District No. 5 of Marin County
P.O. Box 227
Tiburon, CA 94920
Attn: Robert L. Lynch (rlynch@sani5.org)
District Manager

City of Millbrae
621 Magnolia Avenue
Millbrae, CA 94030
Attn: Joe Magner (jmagner@ci.millbrae.ca.us)
Superintendent

Mt. View Sanitary District
P. O. Box 2757
Martinez, CA 94553
Attn: Michael Roe (mroe@mvsd.org)
District Manager

Napa Sanitation District
P.O. Box 2480
935 Hartle Court
Napa, CA 94559
Attn: Tim Healy (thealy@napasan.com)
General Manager/District Engineer

Novato Sanitary District
500 Davidson Street
Novato, CA 94945
Attn: Beverly James (BevJ@novatosan.com)
General Manager

City of Pacifica
700 Coast Highway
Pacifica, CA 94044
Attn: David Gromm, Director of Wastewater
grommd@ci.pacifica.ca.us

City of Palo Alto
2501 Embarcadero Way
Palo Alto, CA 94303
Attn: James Allen, Plant Manager
(James.Allen@CityofPaloAlto.org)

City of Petaluma
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Petaluma, CA 94954
Attn: Lena Cox (lcox@ci.petaluma.ca.us)
Environmental Services Supervisor

City of Pinole
1 Tennant Avenue
Pinole, CA, 94564
Attn: Ken Coppo (kcoppo@ci.pinole.ca.us)
Plant Manager

Rodeo Sanitary District
800 San Pablo Avenue
Rodeo, CA 94572
Attn: Steven S. Beall (bealls@rodeosan.org)
Engineer-Manager

City of St. Helena
1480 Main Street
St. Helena, CA 94574
Attn: John Ferons (JohnF@ci.st-helena.ca.us)
Director of Public Works

San Francisco International Airport
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Attn: Brian Ciappara
(brian.ciappara@flysfo.com)
Superintendent

City and County of San Francisco
1155 Market Street, 11th Floor
San Francisco, CA 94103
Attn: Tommy Moala (tmoala@sfwater.org)
Assistant General Manager

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Water Pollution Control
700 Los Esteros Road
San Jose, CA 95134
Attn: Jim Ervin (james.ervin@sanjoseca.gov)
Supervising Environmental Services Specialist

City of San Mateo
2050 Detroit Drive
San Mateo, CA 94404
Attn: Larry Patterson
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Director of Public Works

Sausalito-Marin City Sanitary District
#1 East Road
P.O. Box 39
Sausalito, CA 94966-0039
Attn: Robert Simmons (bob@smcsd.net)
General Manager

Sewer Agency of Southern Marin
26 Corte Madera Ave.
Mill Valley, CA 94941
Attn: Steve Danehy
(sdanehy@cityofmillvalley.org)
Manager

Sonoma County Water Agency
P.O. Box 11628
Santa Rosa, CA 95406
Attn: Pam Jeane (pam@scwa.ca.gov)
Deputy Chief Engineer - Operations

South Bayside System Authority
1400 Radio Road
Redwood City, CA 94065
Attn: Daniel Child (dchild@sbsa.org)
Manager

South San Francisco-San Bruno Water Pollution Control Plant
195 Belle Air Road
South San Francisco, CA 94080
Attn: David Castagnola
(Dave.Castagnola@ssf.net)
Superintendent

City of Sunnyvale
Sunnyvale Water Pollution Control Plant
P.O. Box 3707
Sunnyvale, CA 94088-3707
Attn: Lorrie Gervin
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Division Manager

San Francisco Bay Area
Navy BRAC PMOW
410 Palm Avenue, Bldg 1, Suite 161
Treasure Island
San Francisco, CA 94130-1807
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(michael.mentink@navy.mil)
Environmental Coordinator

Vallejo Sanitation and Flood Control District
450 Ryder Street
Vallejo, CA 94590
Attn: Humberto Molina (hmolina@vsfcd.com)
Director of Operations and Maintenance

West County Agency
2910 Hilltop Drive
Richmond, CA 94806
Attn: E.J. Shalaby, District Manager
(District.Manager@wcwd.org)

Town of Yountville
6550 Yount Street
Yountville, CA 94599
Attn: Donald Moore (dmoore@yville.com)
Wastewater Systems Supervisor

C&H Sugar
830 Loring Avenue
Crockett, CA 94525
Attn: Tanya R. Akkerman
(tanya.akkerman@chsugar.com)
Environmental Compliance Manager