
Los Angeles Regional Water Quality Control Board

May 24, 2013

Mr. John DeFrance
Glendale/Goodwin Realty I, LLC
1100 West Artesia Boulevard
Compton, California 90220

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9837 – FORMER EXCELLO PLATING FACILITY, 4057 GOODWIN AVENUE, LOS ANGELES, CALIFORNIA (FILE NO. 11-158, ORDER NO. R4-2007-0019, SERIES NO. 192, CI-9837, GLOBAL ID. WDR100001842)

Dear Mr. DeFrance:

On August 24, 2012, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) enrolled you under general Waste Discharge Requirements (WDR Order No. R4-2007-0019) with a Monitoring and Reporting Program (MRP) No. CI-9837 for the application of calcium polysulfide (CaSx) and cement to treat hexavalent chromium impacted soil.

Based on the 1st Quarter 2013 monitoring report, the onsite soil remediation activities started on January 23, 2013 have caused a significant increase in concentrations of total chromium and hexavalent chromium in groundwater. Therefore, the *Proposed Enhancement to Site Remediation* (Enhancement Work Plan) dated May 21, 2013, for the groundwater and soil remediation of hexavalent chromium was prepared and submitted by Kleinfelder on your behalf.

The Enhancement Work Plan includes a pilot test at injection point TIW-2 to determine the effectiveness of CaSx in degrading hexavalent chromium in groundwater, followed by daily injection at six locations for approximately one month to protect the drinking water well GS-3. In addition, CaSx will be injected at LDA/ISCR area to mitigate the source soil and groundwater contamination. A total of 7,200 gallons of 29% CaSx solution and 14,400 gallons of water will be injected into the subsurface at depths ranged from 53 to 60 feet below ground surface through 24 injection points. The locations of additional 12 contingent injection points shall be submitted for the Regional Board approval when information becomes available.

We are hereby issuing a revised MRP, which incorporates the CaSx injection into soil and groundwater. The next monitoring report shall be received by the Regional Board by **June 15, 2013** as required in the revised MRP. Please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

The revised MRP requires you to submit a groundwater monitoring work plan by **June 28, 2013**, to identify additional locations for groundwater monitoring wells to fully delineate the groundwater contamination caused by the migration of hexavalent chromium from LDA/ISCR area vertically and horizontally. The proposed work plan shall be prepared by or under the

direction of a professional civil engineer or geologist registered in the State of California and is subject to the approval of the Executive Officer of this Regional Board.

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100001842. ESI training video is available at: <https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b>

For all parties who upload electronic documents to State Database GeoTracker, it is no longer necessary to email a copy of these documents to losangeles@waterboards.ca.gov or submit hard copies to our office. The Regional Board will no longer accept documents (submitted by either hard copy or email) already uploaded to GeoTracker. Please see Electronic Submittal to the Los Angeles Regional Board for GeoTracker Users dated December 12, 2011 for further details at:

<http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20OGT%20Users.pdf>

To avoid paying future annual fees, please submit a written request for termination of your enrollment under the general WDR in a separate letter when the project is completed and the WDR is no longer needed. Be aware that the annual fee covers the fiscal year billing period beginning July 1 and ending June 30, the following year. You will pay the full annual fee if your request for termination is made after the beginning of the new fiscal year beginning July 1.

If you have any questions, please contact the Project Manager, Dr. Ann Chang at (213) 620-6122 (achang@waterboards.ca.gov), or the Chief of Groundwater Permitting Unit, Dr. Eric Wu at (213) 576-6683 (ewu@waterboards.ca.gov).

Sincerely,


Samuel Unger, P.E.

Executive Officer

Enclosure: Revised Monitoring and Reporting Program No. CI-9837 dated May 24, 2013

Cc: David V. Jenkins, Kleinfelder
Alex Lapostol, John Lindquist, and Karen Meade, CH2M Hill
Matt Salazar, USEPA
Thomas Tsui and Chi Diep, California Department of Public Health
Ramon Abueg, City of Glendale

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9837
FOR
FORMER EXCELLO PLATING FACILITY
4057 GOODWIN AVENUE, LOS ANGELES, CALIFORNIA

ENROLLMENT UNDER REGIONAL BOARD
ORDER NO. R4-2007-0019 (SERIES NO. 192)
FILE NO. 11-158

I. MONITORING AND REPORTING REQUIREMENTS

A. Glendale/Goodwin Realty I, LLC (hereinafter Discharger) shall implement this Monitoring and Reporting Program (MRP) on the effective date (May 24, 2013) under Regional Board Order No. R4-2007-0019. The next monitoring report under this program shall be received at the Regional Board by **June 15, 2013**.

i. Effective immediately, monthly monitoring reports shall be received by the Regional Water Quality Control Board, Los Angeles Region (Regional Board) by 15th of each month until December 15, 2013. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

<u>1. Monitoring Period</u>	<u>Report Due</u>
2. January – March	April 15
3. April – June	July 15
4. July – September	October 15
5. October – December	January 15

B. If there is no discharge or injection, during any reporting period, the report shall so state. By March 1 of each year, the Discharger shall submit an annual summary report to the Regional Board. The report shall contain both tabular and graphical summaries of the monitoring data obtained during the previous calendar year. In addition, the Discharger shall discuss the compliance record and the corrective actions taken or planned, which may be needed to bring the discharge into full compliance with the waste discharge requirements.

C. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Public Health Environmental Laboratory Accreditation Program (ELAP). An exception is for the Dissolved Gasses (ethene, ethane, methane) and Volatile Fatty Acids (VFAs) that may be analyzed by Microseeps, Inc. of Pittsburgh, Pennsylvania which is certified by the National Environmental Laboratory Accreditation Program (NELAP). A copy of the laboratory certifications shall be

provided each time a new analysis is used and/or renewal is obtained from ELAP and/or NELAP.

- D. The method limits (MLs) employed for analyses shall be lower than the permit limits established for a given parameter, unless the Discharger can demonstrate that a particular ML is not attainable and obtains approval for a higher ML from the Executive Officer. At least once a year, the Discharger shall submit a list of the analytical methods employed for each test and the associated laboratory quality assurance/quality control (QA/QC) procedures.
- E. All QA/QC samples must be run on the same dates when samples were actually analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request by Regional Board staff. Proper chain of custody procedures must be followed and a copy of the chain of custody documentation shall be submitted with the report.
- F. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the California Department of Public Health ELAP or NELAP, and in accordance with current United States Environmental Protection Agency (USEPA) guideline procedures or as specified in this Monitoring Program." Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report.
- G. For every item where the requirements are not met, the Discharger shall submit a statement of the cause(s), and actions undertaken or proposed which will bring the discharge into full compliance with waste discharge requirements at the earliest possible time, including a timetable for implementation of those actions.
- H. The Discharger shall maintain all sampling and analytical results, including strip charts, date, exact place, and time of sampling, dates analyses were performed, analyst's name, analytical techniques used, and results of all analyses. Such records shall be retained for a minimum of three years. This period of retention shall be extended during the course of any unresolved litigation regarding this discharge, or when requested by the Regional Board.
- I. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements and, where applicable, shall include results of receiving water observations.

- J. Any mitigation/remedial activity including any pre- or post-discharge treatment conducted at the Site must be reported in the monitoring report.
- K. Each monitoring report shall contain a separate section titled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that may be needed to bring the discharge into full compliance with WDRs. This section shall be located at the front of the report and shall clearly list all non-compliance with discharge requirements, as well as all excursions of effluent limitations.
- L. The Discharger shall comply with requirements contained in Section G of Order No. R4-2007-0019 "*Monitoring and Reporting Requirements*" in addition to the aforementioned requirements.

II. DISCHARGE MONITORING PROGRAM

The monitoring reports shall contain the following information regarding the remedial activities:

- 1. Location map showing injection points used for the calcium polysulfide solution.
- 2. Written and tabular summary defining depth of injection points, quantity of the calcium polysulfide solution injected at each injection point, and total amount of the calcium polysulfide solution injected at the Site.
- 3. Visual inspection at each injection point shall be conducted and recorded during the injection.

III. GROUNDWATER MONITORING PROGRAM

- 1. Pilot Test: Groundwater samples shall be collected at MW-2R, MW-PO-VPB-02 and GS-3 for all parameters specified in Table 2 within 24 hours after pilot test injection at injection point TIW-2 is completed.
- 2. Soil and Groundwater Remediation: A groundwater monitoring program shall be implemented to evaluate impacts associated with the injection activity. Groundwater samples shall be collected from monitoring wells MW-1, MW-2R, MW-3R, MW-4, MW-5, MW-6, RM-1, RM-2A, RM-2B, MW-PO-VPB-02, and GS-3 (Figure 1). The Discharger shall conduct a baseline sampling prior to the proposed injection, followed by specified schedules separately for monitoring wells in LDA/ISCR Work area (Table 1), in the hexavalent chromium migrating area (Table 2), and at up-gradient and off-site locations (Table 3) for the following groundwater parameters:

Table 1: Sampling Requirements for RM-1, RM-2A, RM-2B and MW-3R

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Dissolved Oxygen	mg/L	grab	Baseline, daily for the first week after injection, weekly for the next three weeks, and monthly thereafter
Oxidation-Reduction Potential	millivolts	grab	Same as specified above
pH	pH units	grab	Same as specified above
Specific Conductivity	mS/cm	grab	Same as specified above
Temperature	°C	grab	Same as specified above
Turbidity	NTU	grab	Same as specified above
Total Organic Carbon	mg/L	grab	Same as specified above
Total Dissolved Solids	mg/L	grab	Same as specified above
Sulfate	mg/L	grab	Same as specified above
Chloride	mg/L	grab	Same as specified above
Boron	mg/L	grab	Same as specified above
Nitrate and Nitrite	mg/L	grab	Same as specified above
Volatile Organic Compounds	µg/L	grab	Same as specified above
Title 22 Metals	µg/L	grab	Same as specified above
Hexavalent Chromium	µg/L	grab	Same as specified above
Sulfide	µg/L	grab	Same as specified above

Table 2: Sampling Requirements for MW-2R, GS-3 and MW-PO-VPB-02

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Dissolved Oxygen	mg/L	grab	Baseline; daily during the period of injection, additional two more daily samplings after injection; weekly for the next three weeks, and monthly thereafter
Oxidation-Reduction Potential	millivolts	grab	Same as specified above
pH	pH units	grab	Same as specified above
Specific Conductivity	mS/cm	grab	Same as specified above
Temperature	°C	grab	Same as specified above
Turbidity	NTU	grab	Same as specified above
Total Organic Carbon	mg/L	grab	Same as specified above
Total Dissolved Solids	mg/L	grab	Same as specified above
Sulfate	mg/L	grab	Same as specified above
Chloride	mg/L	grab	Same as specified above
Boron	mg/L	grab	Same as specified above
Nitrate and Nitrite	mg/L	grab	Same as specified above
Volatile Organic Compounds	µg/L	grab	Same as specified above
Title 22 Metals	µg/L	grab	Same as specified above
Hexavalent Chromium	µg/L	grab	Same as specified above
Sulfide	µg/L	grab	Same as specified above

Table 3: Sampling Requirements for MW-1, MW-4, MW-5 and MW-6

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Dissolved Oxygen	mg/L	grab	Baseline and monthly after injection
Oxidation-Reduction Potential	millivolts	grab	Same as specified above
pH	pH units	grab	Same as specified above
Specific Conductivity	mS/cm	grab	Same as specified above
Temperature	°C	grab	Same as specified above
Turbidity	NTU	grab	Same as specified above
Total Organic Carbon	mg/L	grab	Same as specified above
Total Dissolved Solids	mg/L	grab	Same as specified above
Sulfate	mg/L	grab	Same as specified above
Chloride	mg/L	grab	Same as specified above
Boron	mg/L	grab	Same as specified above
Nitrate and Nitrite	mg/L	grab	Same as specified above
Volatile Organic Compounds	µg/L	grab	Same as specified above
Title 22 Metals	µg/L	grab	Same as specified above
Hexavalent Chromium	µg/L	grab	Same as specified above
Sulfide	µg/L	grab	Same as specified above

All groundwater monitoring reports must include, at a minimum, the following:

- a. Well identification, date and time of sampling;
 - b. Sampler identification, and laboratory identification;
 - c. Quarterly observation of groundwater levels, recorded to 0.01 feet mean sea level and groundwater flow direction.
3. Additional Groundwater Monitoring Wells: By **June 28, 2013**, Discharger shall submit a groundwater monitoring work plan, identifying additional locations of the groundwater monitoring well to fully delineate the groundwater contamination caused by the migration of total chromium and hexavalent chromium from LDA/ISCR area vertically and horizontally. The proposed work plan shall be prepared by or under the direction of a geologist or civil engineer registered in the State of California and is subject to the approval of the Executive Officer of this Regional Board.

IV. MONITORING FREQUENCIES

Specifications in this monitoring program are subject to periodic revisions. Monitoring requirements may be modified or revised by the Executive Officer based on review of monitoring data submitted pursuant to this Order. Monitoring frequencies may be adjusted to a less frequent basis or parameters and locations dropped by the Executive Officer if the Discharger makes a request and the request is backed by statistical trends of monitoring data submitted.

V. CERTIFICATION STATEMENT

Each 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)"


Former Excello Plating Facility
WDR Order No. R4-2007-0019
Revised Monitoring and Reporting Program No. CI-9837

VI. PUBLIC DOCUMENTS

All records and reports submitted in compliance with Order No. R4-2007-0019 and Monitoring and Reporting Program No. CI-9837 are public documents and will be made available for inspection during business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region, upon request by interested parties. Only proprietary information, and only at the request of the Discharger will be treated as confidential.

VII. ELECTRONIC SUBMITTAL OF INFORMATION

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data in Electronic Deliverable Format, discharge location data, and searchable Portable Document Format of monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100001842.

Ordered by: 
Samuel Unger, P.E.
Executive Officer

Date: May 24, 2013