



Los Angeles Regional Water Quality Control Board

September 25, 2019

The Michael J. Quagletti and Peggy M. Quagletti Family Trust, Dated May 10, 1980
The Administrative Trust under The Stephen Claman and Renee Claman Trust, Dated March 16, 1999
The Stephen Claman Exempt and Non-Exempt Trusts established under the Florence Claman Living Trust of 1976
CDMJ, LLC

c/o Sedina L. Banks, Esq.
Greenberg Glusker Fields
Claman & Machtinger LLP
1900 Avenue of the Stars, 21st Floor
Los Angeles, California 90067

Certified Mail
Return Receipt Required
Claim No. 7018 2290 0001 8905 2831

GENERAL WASTE DISCHARGE REQUIREMENTS FOR INJECTION OF SODIUM PERMANGANATE – FORMER ANCO METAL IMPROVEMENT COMPANY, 417 WEST 164TH STREET, GARDENA, CALIFORNIA (FILE NO. 19-021, ORDER NO. R4-2014-0187, SERIES NO. 089, CI-10294, GLOBAL ID. WDR100039612)

Dear Ms. Banks:

The Los Angeles Regional Water Quality Control Board (Regional Water Board) is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura Counties, including the referenced property above.

C&Q Investments (hereinafter Discharger) is the responsible party for the subject property located at 417 West 164th Street, Gardena, California. The May 2019 groundwater monitoring results indicated that tetrachloroethylene and trichloroethylene were detected at concentrations up to 911 micrograms per liter ($\mu\text{g/L}$) and 804 $\mu\text{g/L}$, respectively.

On September 7, 2016, Regional Water Board Site Cleanup Program approved the *Remedial Action Plan for Down-Gradient Groundwater* dated May 1, 2015. It is estimated

IRMA MUÑOZ, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

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that 1,530,000 gallons of 1% sodium permanganate solution will be injected into 15 injection wells (INJ-1 through INJ-15) at depths from approximately 45 to 90 feet below ground surface. The injection activities are expected to take approximately two years.

Regional Water Board staff has completed the review of your application for coverage under General Waste Discharge Requirements (WDR) for injection of sodium permanganate for groundwater remediation of volatile organic compounds. Regional Water Board staff has determined that the proposed discharge meets the conditions specified in General WDRs Order No. R4-2014-0187, General Waste Discharge Requirements for In-Situ Groundwater Remediation and Groundwater Re-Injection, adopted by this Regional Water Board on September 11, 2014.

Enclosed are your General Waste Discharge Requirements, consisting of General WDRs Order No. R4-2014-0187 (Series No. 089), Standard Provisions Applicable to Waste Discharge Requirements, and Monitoring and Reporting Program (MRP) No. CI-10294. The proposed discharge shall not cause the mineral constituents of the receiving groundwater at the compliance point, downgradient outside the application area, to be in excess of applicable limits (West Coast Subbasin of the Coastal Plain of Los Angeles Groundwater Basin) given in Attachment B of General WDRs Order No. R4-2014-0187. The groundwater quality objectives are 800 milligrams per liter (mg/L) for total dissolved solids, 250 mg/L for sulfate, 250 mg/L for chloride, and 1.5 mg/L for boron.

MRP No. CI-10294 requires you to implement the monitoring program on the effective date of this enrollment under Regional Water Board Order No. R4-2014-0187. When submitting monitoring or technical reports to the Regional Water Board per these requirements, please do not combine other reports with your monitoring reports. Submit each type of report as a separate document. 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 WDR100039612.

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 Water 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 Water Board for GeoTracker Users dated December 12, 2011 at:

<http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20GT%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 (ann.chang@waterboards.ca.gov), or the Chief of Groundwater Permitting Unit, Dr. Eric Wu at (213) 576-6683 (eric.wu@waterboards.ca.gov).

Sincerely,



Renee Purdy
Executive Officer

Enclosures: General Waste Discharge Requirements Order No. R4-2014-0187
Standard Provisions Applicable to Waste Discharge Requirements
Monitoring and Reporting Program No. CI-10294

cc: Ms. Leeann Davis, San Pasqual Fiduciary Trust Company
Mr. Charles F. Lindeman, Leymaster Environmental Consulting, LLC

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

MONITORING AND REPORTING PROGRAM NO. CI-10294
FOR
FORMER ANCO METAL IMPROVEMENT COMPANY
417 WEST 164TH STREET, GARDENA, CALIFORNIA

ENROLLMENT UNDER REGIONAL WATER BOARD
ORDER NO. R4-2014-0187 (SERIES NO. 089)
FILE NO. 19-021

I. MONITORING AND REPORTING REQUIREMENTS

- A. C&Q Investments (hereinafter Discharger) shall implement this Monitoring and Reporting Program (MRP) on the effective date (September 25, 2019) under Regional Water Board Order No. R4-2014-0187. The first monitoring report shall be received at the Regional Water Board by **October 30, 2019**. Subsequent monitoring reports shall be received at the Regional Water Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
January – March	April 30
April – June	July 30
July – September	October 30
October – December	January 30

- 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 Water 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. The Discharger shall comply with requirements contained in Section G of Regional Water Board Order No. R4-2014-0187 "*Monitoring and Reporting Requirements*".

II. DISCHARGE MONITORING PROGRAM

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

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

III. GROUNDWATER MONITORING PROGRAM

A groundwater monitoring program shall be implemented to evaluate impacts associated with the injection activity. Groundwater samples shall be collected from monitoring wells GE-8, GE-9, GE-10, GE-11, MW-10A, MW-10B, MW-10C, OW-4A, OW-4B, and OW-4C (Figure 1). The Discharger shall conduct a baseline sampling prior to the proposed injection, followed by a monitoring frequency specified in the schedule below from all 10 monitoring wells for the following groundwater parameters:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Dissolved Oxygen	mg/L	grab	Baseline and quarterly after injection
Oxidation-Reduction Potential	millivolts	grab	Baseline and quarterly after injection
pH	pH units	grab	Baseline and quarterly after injection
Specific Conductivity	mS/cm	grab	Baseline and quarterly after injection
Temperature	°C	grab	Baseline and quarterly after injection
Turbidity	NTU	grab	Baseline and quarterly after injection
Total Organic Carbon	mg/L	grab	Baseline and quarterly after injection

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total Dissolved Solids	mg/L	grab	Baseline and quarterly after injection
Sulfate	mg/L	grab	Baseline and quarterly after injection
Chloride	mg/L	grab	Baseline and quarterly after injection
Boron	mg/L	grab	Baseline and quarterly after injection
Nitrate and Nitrite	mg/L	grab	Baseline and quarterly after injection
Manganese	mg/L	grab	Baseline and quarterly after injection
Volatile Organic Compounds	µg/L	grab	Baseline and quarterly after injection

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. Observation of groundwater levels, recorded to 0.01 feet mean sea level and groundwater flow direction.

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)"

VI. PUBLIC DOCUMENTS

All records and reports submitted in compliance with Regional Water Board Order No. R4-2014-0187 and Monitoring and Reporting Program No. CI-10294 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 WDR100039612.

Ordered by:



Renee Purdy
Executive Officer

Date: September 25, 2019

