



Los Angeles Regional Water Quality Control Board

October 21, 2019

Mr. Peleg Amzalag
Rexford Industrial-3150 Ana, LLC
11620 Wilshire Boulevard, 10th Floor
Los Angeles, California 90025

Certified Mail
Return Receipt Required
Claim No. 7018 2290 0001 8905 2893

REVISED MONITORING AND REPORTING PROGRAM NO. CI-10401 FOR IDEMIA AMERICA CORP (FORMER OBERTHUR TECHNOLOGIES OF AMERICA) AND TRANSFER OF WASTE DISCHARGE REQUIREMENTS TO REXFORD INDUSTRIAL-3150 ANA, LLC, 3150 EAST ANA STREET, RANCHO DOMINGUEZ, CALIFORNIA (FILE NO. 18-009, ORDER NO. R4-2014-0187, SERIES NO. 119, CI-10401, GLOBAL ID. WDR 100039854)

Dear Mr. Amzalag:

On June 29, 2018, the Los Angeles Regional Water Quality Control Board (Regional Water Board) enrolled Idemia America Corp under General Waste Discharge Requirements (WDR) for In-Situ Groundwater Remediation and Groundwater Re-injection, Order No. R4-2014-0187, with a Monitoring and Reporting Program (MRP) No. CI-10401 for a pilot test of injection of hydrogen release compound primer, bioaugmentation culture, liquid activated carbon, and pH buffer for groundwater remediation of volatile organic compounds (VOCs) at the subject site

Based on the evaluation of pilot test results, Ramboll US Corporation submitted the *Final Remedial Action Plan and Engineering Design* (Final RAP) dated June 20, 2019 to propose the full-scale implementation of in-situ anaerobic bioremediation/chemical reduction bio-barriers throughout the source area and downgradient extent of the VOCs plume. On July 31, 2019, the Regional Water Board Site Cleanup Unit staff approved the Final RAP.

It is estimated that 63,000 gallons of amendment solution containing 37,800 pounds of emulsified vegetable oil, 88,200 pounds of zero-valent iron, and 66 gallons (250 liters) of bioaugmentation culture (*Dehalococcoides sp.*) will be injected into 125 injection points (RIP-1 through RIP-62 and PIP-63 through PIP-125) at depths approximately from 50 to 65 feet below ground surface.

On October 3, 2019, the new property owner, Rexford Industrial – 3150 Ana, LLC (Discharger) requested transfer of the WDR from the former property owner Idemia

IRMA MUÑOZ, CHAIR | RENEE PURDY, EXECUTIVE OFFICER

America Corp effective on September 27, 2019. The transfer request also identified the new facility name and operator to be Idemia America Corp formerly Oberthur Technologies of America.

The revised MRP for the Idemia America Corp facility, which incorporates the full-scale bio-barriers treatment, is enclosed. The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the revised MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100039854. Please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

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 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: Revised Monitoring and Reporting Program No. CI-10401 dated October 21, 2019

cc: Mr. Leo Rebele, Ramboll
Mr. Justin Marshall, IDEMIA

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

**REVISED MONITORING AND REPORTING PROGRAM NO. CI-10401
FOR**

**IDEMIA AMERICA CORP FACILITY
(former Oberthur Technologies of America)
3150 East Ana Street, Rancho Dominguez, California**

**ENROLLMENT UNDER REGIONAL WATER BOARD
ORDER NO. R4-2014-0187 (SERIES NO. 119)
FILE NO. 18-009**

I. MONITORING AND REPORTING REQUIREMENTS

- A. Rexford Industrial-3150 Ana, LLC (hereinafter Discharger) shall implement this Monitoring and Reporting Program (MRP) on the effective date (October 21, 2019) under Regional Board Water Order No. R4-2014-0187. The next monitoring report under this program shall be received at the Regional Water Board by **January 30, 2020**. 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 emulsified vegetable oil, zero-valent iron, and bioaugmentation culture.
2. Written and tabular summary defining date of injection, depth of injection points, quantity and concentration of emulsified vegetable oil, zero-valent iron, and bioaugmentation culture injected at each injection point, and total amount of emulsified vegetable oil, zero-valent iron, and bioaugmentation culture 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 RMW-01S, RMW-02S, RMW-03S, RMW-04S, RMW-05S, RMW-06S, RMW-08S, and RMW-09S (Figure 1). The Discharger shall conduct a baseline sampling prior to the proposed injection, followed by specified schedules from all eight 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

Constituent	Units	Type of Sample	Minimum Frequency of Analysis
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
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
Volatile Organic Compounds	µg/L	grab	Baseline and quarterly after injection
Dissolved Gases (methane, ethane, and ethene)	µg/L	grab	Baseline and quarterly after injection
<i>Dehalococcoides</i> species	cells/mL	grab	Baseline and quarterly after injection

All groundwater monitoring reports must include, at 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-10401 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.

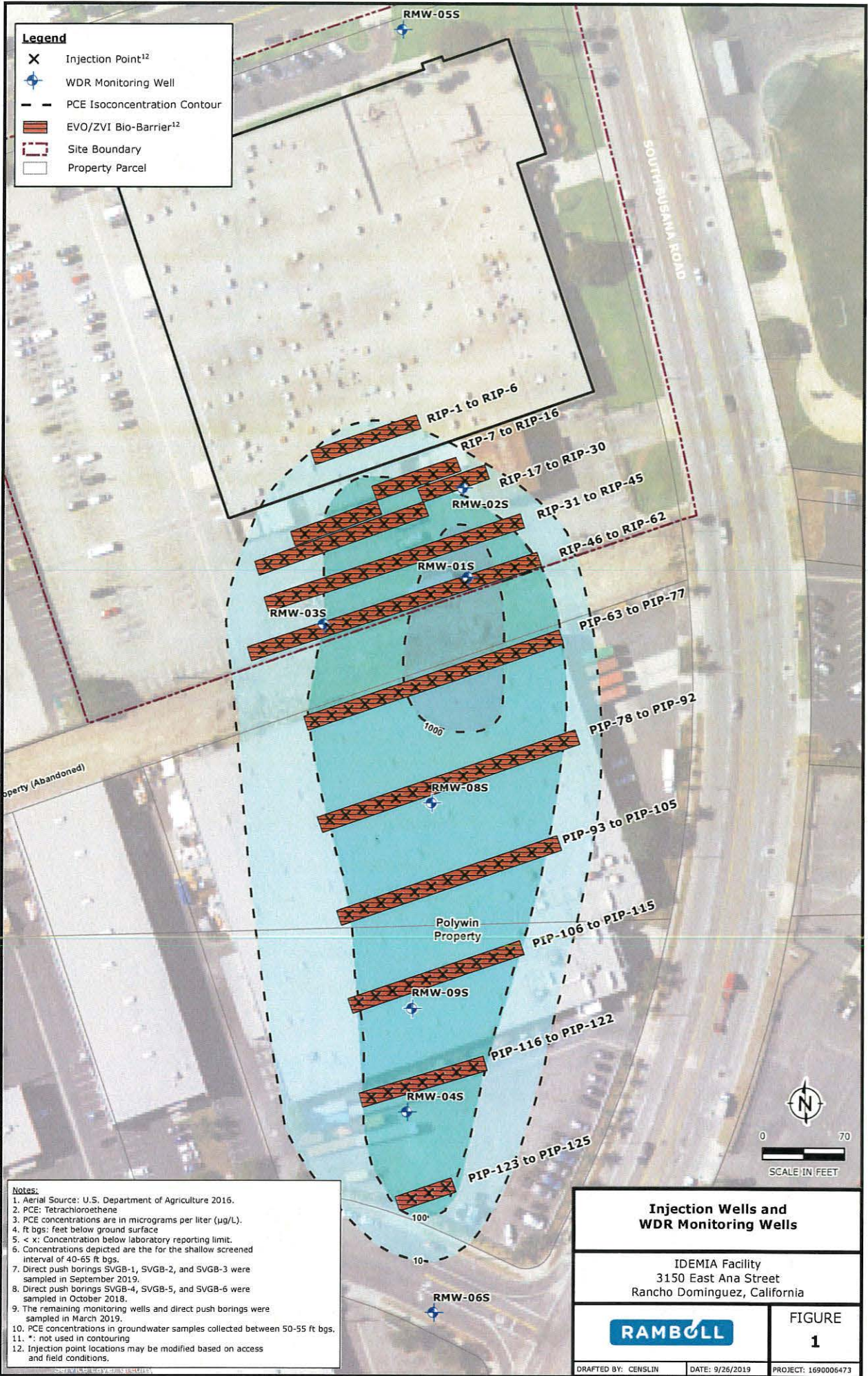
Idemia America Corp Facility (Former Oberthur Technologies of America)
WDR Order No. R4-2014-0187
Revised Monitoring and Reporting Program No. CI-10401

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 WDR100039854.

Ordered by: 
Renee Purdy
Executive Officer

Date: October 21, 2019



Legend

- X Injection Point¹²
- WDR Monitoring Well
- - - PCE Isoconcentration Contour
- EVO/ZVI Bio-Barrier¹²
- Site Boundary
- Property Parcel

Notes:

1. Aerial Source: U.S. Department of Agriculture 2016.
2. PCE: Tetrachloroethene
3. PCE concentrations are in micrograms per liter (µg/L).
4. ft bgs: feet below ground surface
5. < x: Concentration below laboratory reporting limit.
6. Concentrations depicted are the for the shallow screened interval of 40-65 ft bgs.
7. Direct push borings SVGB-1, SVGB-2, and SVGB-3 were sampled in September 2019.
8. Direct push borings SVGB-4, SVGB-5, and SVGB-6 were sampled in October 2018.
9. The remaining monitoring wells and direct push borings were sampled in March 2019.
10. PCE concentrations in groundwater samples collected between 50-55 ft bgs.
11. *: not used in contouring
12. Injection point locations may be modified based on access and field conditions.

Injection Wells and WDR Monitoring Wells	
IDEMIA Facility 3150 East Ana Street Rancho Dominguez, California	
	FIGURE 1
DRAFTED BY: CENSLIN	DATE: 9/26/2019
PROJECT: 1690006473	

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