STATE OF CALIFORNIA

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

LOS ANGELES REGION

MONITORING AND REPORTING PROGRAM NO. CI-9068

FOR

THE REEVES TRUST

ENROLLMENT UNDER REGIONAL BOARD

ORDER NO. R4-2005-0030

SERIES NO. 041

I. REPORTING REQUIREMENTS

A. The Reeves Trust (hereinafter Discharger) shall implement this monitoring program on the effective date of this enrollment (April 19, 2006) under Regional Board Order No. R4-2005-0030. The first monitoring report under this Program is due by July 15, 2006.

Monitoring reports shall be received by the dates in the following schedule:

Reporting Period	Report Due
January – March	April 15
April – June	July 15
July – September	October 15
October – December	January 15

B. If there is no discharge or injection during any reporting period, the report shall so state. Monitoring reports must be addressed to the Regional Board, Attention: Information Technology Unit.

C. By January 30 of each year, beginning January 30, 2007, 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 explain 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 (WDRs).

D. 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.

E. The Discharger shall comply with requirements contained in Section G of Order No. R4-2005-0030 "*Monitoring and Reporting Requirements*" in addition to the aforementioned requirements.

II. INJECTION MONITORING REQUIREMENTS

Injection of ferrous sulfate and hydrogen peroxide solutions:

The quarterly reports shall contain the following information regarding the injection activities. If there is no injection, during any reporting period, the report shall so state:

1. Location Map showing injection points for the ferrous sulfate and hydrogen peroxide solutions

2. Written summary defining:
   - Depth of injection points;
   - Quantity of ferrous sulfate, hydrogen peroxide, and hydrochloric acid (pH buffer) solutions injected per injection point; and
   - Total amount of ferrous sulfate, hydrogen peroxide, and hydrochloric acid solution (pH buffer) injected at site.

3. Monthly visual inspection at each injection well shall be conducted to evaluate the well casing integrity for a period of three months after each injection. The quarterly report shall include a summary of the visual inspection.

4. As there are sufficient number of groundwater monitoring wells at the site, OW-2C and OW-2S can be used for the pilot testing of the Fenton's reagent injection. No other existing groundwater monitoring wells shall be used as injection points for Fenton's reagent during the pilot or full scale remediation.

III. GROUNDWATER MONITORING PROGRAM

A groundwater-monitoring program shall be designed to detect and evaluate impacts associated with the injection activities (ferrous sulfate, hydrogen peroxide, and hydrochloric acid (pH buffer). The following shall constitute the monitoring program for up-gradient wells SE-1 and SE-5; down-gradient wells SE-3, VEW-1, OW-1, OW-3, SE-5, MW-7, and MW-9; and source wells VEW-2. These sampling stations shall not be changed and any proposed change of monitoring locations shall be identified and approved by the Regional Board Executive Officer (Executive Officer) prior to their use. The Discharger shall conduct baseline sampling from wells SE-1, VEW-2, MW-7, and MW-9 one or two weeks prior to ferrous sulfate, hydrogen peroxide, and hydrochloric acid (pH buffer) solutions injections and regular sampling with the required frequencies from the up-gradient, down-gradient, and source monitoring wells for the following constituents:

CONSTITUENT	UNITS [1]	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
pH [5]	PH units	Grab	Weekly[2]/Monthly [3]/Quarterly [4]
Temperature [5]	^{0}F	grab	Weekly[2]/Monthly [3]/Quarterly [4]
Oxidation-reduction potential [5]	Milivolts	grab	Weekly[2]/Monthly [3]/Quarterly [4]
Specific conductivity [5]	µmhos/cm	grab	Weekly[2]/Monthly [3]/Quarterly [4]
Ferrous iron	µg/L	grab	Weekly[2]/Monthly [3]/Quarterly [4]
Dissolved Oxygen [5]	µg/L	grab	Weekly[2]/Monthly [3]/Quarterly [4]
MTBE	µg/L	grab	Weekly[2] /Monthly [3] /Quarterly [4]
Tert-Butyl Alcohol (TBA)	µg/L	grab	Weekly[2] /Monthly [3] /Quarterly [4]
Di-isopropyl Ether (DIPE)	µg/L	grab	Weekly[2] /Monthly [3] /Quarterly [4]
Ethyl-t-Butyl Ether (ETBE)	µg/L	grab	Weekly[2] /Monthly [3] /Quarterly [4]
Tert-Amyl-Methyl Ether (TAME)	µg/L	grab	Weekly[2] /Monthly [3] /Quarterly [4]
Acetone	µg/L	grab	Weekly[2] /Monthly [3] /Quarterly [4]
Formaldehyde	µg/L	grab	Weekly[2] /Monthly [3] /Quarterly [4]
Total Petroleum Hydrocarbons as gasoline (TPHg)	µg/L	grab	Weekly[2] /Monthly [3] /Quarterly [4]
Carbon tetrachloride	µg/L	grab	Weekly[2] /Monthly [3] /Quarterly [4]
1,2,4-trimethylbenzene	µg/L	grab	Weekly[2] /Monthly [3] /Quarterly [4]
Benzene	µg/L	grab	Weekly[2]/Monthly [3]/Quarterly [4]
Ethylbenzene	µg/L	grab	Weekly[2]/Monthly [3]/Quarterly [4]
Toluene	µg/L	grab	Weekly[2]/Monthly [3]/Quarterly [4]
Total xylenes	µg/L	grab	Weekly[2]/Monthly [3]/Quarterly [4]
Methane	µg/L	grab	Weekly[2]/Monthly [3]/Quarterly [4]
Total organic carbon	µg/L	grab	Weekly[2]/Monthly [3]/Quarterly [4]
Total dissolved solids	mg/L	grab	Quarterly [4]
Sulfate	Mg/l	grab	Quarterly [4]
Chloride	mg/L	grab	Quarterly [4]

Carbon dioxide	mg/L	grab	Quarterly [4]
Manganese	µg/L	grab	Quarterly [4]
Total iron	µg/L	grab	Quarterly [4]
Chromium (VI)	mg/L	grab	Quarterly [6]
Total Chromium	mg/L	grab	Quarterly [6]
Alkalinity	µg/L	grab	Quarterly [4]

[1] mg/L: milligrams per liter; µg/L: micrograms per liter; µmhos/cm: microohms per centimeter; ºF: degree Fahrenheit.
[2] Weekly sampling events are required for the first two weeks from the injection date
[3] Monthly sampling events are required after the two weekly sampling events for a period of six months from the injection date.
[4] Quarterly sampling events are required after the first six months sampling events.
[5] Field instrument will be used to test for this constituent.
[6] One time sampling event is required for this constituent. If detected, quarterly monitoring is required from the same monitoring wells.

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. Quarterly 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)"

All records and reports submitted in compliance with this Order 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.

Ordered by: _____ Date: May 1, 2006
Jonathan S. Bishop
Executive Officer