

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
MONITORING AND REPORTING PROGRAM NO. CI-9276
FOR
HOOD CORPORATION YARD
8201 S. SORENSEN AVENUE, SANTA FE SPRINGS
(REGENOX & ORC ADVANCED INJECTION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2007-0019, SERIES NO. 018)

I. REPORTING REQUIREMENTS

- A. Hood Corporation (hereinafter Discharger) shall implement this monitoring program on the effective date of Regional Board Order No. R4-2007-0019. The first monitoring report under this program, for July – September 2007, shall be received at the Regional Board by October 15, 2007. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
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 July 1st 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 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. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Health Services Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certification shall be provided each time a new and/or renewal certification is obtained from ELAP.

June 22, 2007

- E. The method limits (MLs) employed for effluent 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 Regional Board Executive Officer (Executive Officer). 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 upon request by the Regional Board.
- F. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136. 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.
- G. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the California Department of Health Services, 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.
- H. 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 WDRs, as well as all excursions of effluent limitations.
- I. The Discharger shall maintain all sampling and analytical results: 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.
- J. If the Discharger performs analyses on any groundwater samples more frequently than required by this Order using approved analytical methods, the results of those analyses shall be included in the report.
- K. 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.

II. INORGANICS/NUTRIENTS INJECTION MONITORING REQUIREMENTS

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

1. The injection points proposed for the RegenOx & ORC Advanced are identified in figures 1 & 2. Groundwater monitoring wells shall not be used as injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging and alteration. The injection points should be more than five feet away from groundwater monitoring wells (MW-1 & MW-2) where free product was detected.
2. Written and tabular summary defining the quantity of RegenOx & ORC Advanced injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total RegenOx, RegenOx & ORC Advanced delivered per injection point, respectively	pounds/day	--	Quarterly

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from groundwater monitoring well MW-3 and -19 (proposed) (up-gradient); MW-17 and -18 (source area); MW-6, -8 and -9 (cross-gradient); MW-12 (down-gradient) on a quarterly basis to monitor the effectiveness of the in-situ groundwater remediation (refer to attached Figure 3). RegenOx & ORC Advanced injection points shall not be used as monitoring points. Groundwater shall be monitored for the duration of the remediation in accordance with the following discharge monitoring program:

<u>CONSTITUENT</u>	<u>UNITS</u> ¹	<u>TYPE OF SAMPLE</u>	<u>MINIMUM FREQUENCY OF ANALYSIS</u>
pH ³	pH units	grab	Bi-weekly/Quarterly ²
Temperature ³	⁰ F	grab	Bi-weekly/Quarterly ²
Oxidation-reduction potential ³	millivolts	grab	Bi-weekly/Quarterly ²
Specific conductivity ³	µmhos/cm	grab	Bi-weekly/Quarterly ²
Ferrous iron	µg/L	grab	Bi-weekly/Quarterly ²

Dissolved Oxygen ³	µg/L	grab	Bi-weekly/Quarterly ²
Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE)	µg/L	grab	Bi-weekly/Quarterly ²
Formaldehyde	µg/L	grab	Bi-weekly/Quarterly ²
Benzene	µg/L	grab	Bi-weekly/Quarterly ²
Ethylbenzene	µg/L	grab	Bi-weekly/Quarterly ²
Toluene	µg/L	grab	Bi-weekly/Quarterly ²
Total xylenes	µg/L	grab	Bi-weekly/Quarterly ²
Acetone	µg/L	grab	Bi-weekly/Quarterly ²
Methane	µg/L	grab	Bi-weekly/Quarterly ²
Total petroleum hydrocarbon as gasoline (TPH _G)	µg/L	grab	Bi-weekly/Quarterly ²
Total organic carbon	µg/L	grab	Bi-weekly/Quarterly ²
Total dissolved solids	mg/L	grab	Bi-weekly/Quarterly ²
Sulfate	mg/l	grab	Bi-weekly/Quarterly ²
Chloride	mg/L	grab	Bi-weekly/Quarterly ²
Boron	mg/L	grab	Bi-weekly/Quarterly ²
Sodium	mg/L	grab	Bi-weekly/Quarterly ²
Carbon dioxide	mg/L	grab	Bi-weekly/Quarterly ²
Manganese	µg/L	grab	Bi-weekly/Quarterly ²
Total iron	µg/L	grab	Bi-weekly/Quarterly ²
Total Chromium and chromium six ⁴	µg/L	Grab	Bi-weekly/Quarterly ²
Alkalinity	µg/L	grab	Bi-weekly/Quarterly ²

¹ mg/L: milligrams per liter; µg/L: micrograms per liter; µmhos/cm: microohms per centimeter; °F: degree Fahrenheit.

² One week before injection; Bi-weekly for the first month following injection; and Quarterly thereafter

³ Field instrument will be used to test for this constituent.

⁴ One time sampling event for the first monitoring event. If detected, quarterly monitoring is required from the same monitoring wells.

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.

IV. MONITORING FREQUENCIES

Monitoring frequencies may be adjusted to a less frequent basis or parameters dropped by the Executive Officer if the Discharger makes a request and the Executive Officer determines that the request is adequately supported by statistical trends of monitoring data submitted.

V. CERTIFICATION STATEMENT

Each report shall contain the following 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

These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

Ordered by: _____
Deborah J. Smith
Interim Executive Officer

Date: June 22, 2007