



Linda S. Adams
Agency Secretary

California Regional Water Quality Control Board

Los Angeles Region



Arnold Schwarzenegger
Governor

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

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October 24, 2007

Mr. Bill Teller
Trimark Pacific – Mandalay Bay, LLC
31111 Agoura Road, Suite 210
Westlake Village, CA 91361

GENERAL WASTE DISCHARGE REQUIREMENTS (ORDER NO. R4-2007-0019, SERIES NO. 024, MRP NO. CI-9295) FOR PLACEMENT OF ZERO VALENT IRON AND PROCESSED PLANT CHAFF IN SHALLOW GROUNDWATER – NORTH SHORE AT MANDALAY BAY (FORMER JNJ LANDFILL), 198 SOUTH HARBOR BLVD., OXNARD, CALIFORNIA (SLIC NO. 457, DTSC SITE CODE 301242, FILE NO. 98-197)

Dear Mr. Teller:

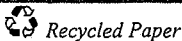
Los Angeles Regional Water Quality Control Board (Regional Board) staff have completed our review of your application for coverage under General Waste Discharge Requirements (WDR) for the placement of zero valent iron and processed plant chaff in shallow groundwater as part of site remediation. We have determined that the proposed discharge meets the conditions specified in Regional Board Order No. R4-2007-0019, "*Revised General Waste Discharge Requirements for Groundwater Remediation at Petroleum Hydrocarbon Fuel, Volatile Organic Compound, and/or Hexavalent Chromium Impacted Sites,*" adopted by this Regional Board on March 1, 2007.

You may begin to mix a maximum of 800,000 pounds of Daramend (zero valent iron and processed plant chaff) with site sandy soil. The Daramend placement is to occur at the approximate locations and depths indicated in the *Feasibility Study and Remedial Action Plan (FS/RAP)*, dated August 31, 2006, as approved by the Department of Toxic Substances Control (DTSC) in a letter dated August 31, 2006, and the *Remedial Design and Implementation Plan (Version 6) (RDIP)*, dated June 6, 2007, as approved by the DTSC in a letter dated July 11, 2007. The Regional Board concurred with the approvals in a letter dated July 23, 2007.

Enclosed are your Waste Discharge Requirements, consisting of Regional Board Order No. R4-2007-0019 (Series 024) and Monitoring and Reporting Program No. CI-9295. Please note that the discharge limits in Attachment A [DWR Basin No. 4-4 (Oxnard Plain – Unconfined and Perched Aquifers)] of this Order No. R4-2007-0019 are applicable to your discharge.

The "Monitoring and Reporting Program" requires you to implement the monitoring program on the effective date of this enrollment (October 24, 2007) under Regional Board Order No. R4-2007-0019. All monitoring reports shall be sent to the Regional Board, ATTN: Information Technology Unit.

California Environmental Protection Agency



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Mr. Bill Teller
Trimark Pacific – Mandalay Bay, LLC

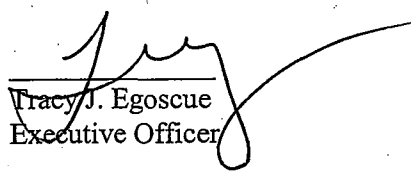
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October 24, 2007

When submitting monitoring or technical reports to the Regional Board per these requirements, please include a reference to "Compliance File No. CI-9295", which will assure that the reports are directed to the appropriate file and staff. Also, please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

If you have any questions, please contact Mr. Peter Raftery at (213) 576-6724.

Sincerely,


Tracy J. Egoscue
Executive Officer


Enclosures:

- 1) General Waste Discharge Requirements, Order No. R4-2007-0019
- 2) Monitoring and Reporting Program, CI No. 9295

cc: Poonam Acharya, DTSC, Glendale
Charles Robinson, LFR, Costa Mesa
Michael Lauffer, State Water Resources Control Board, Office of Chief Counsel
Kurt Souza, State Department of Health Services, Drinking Water Field Operations Branch, Carpinteria
Jessie Altstatt, Santa Barbara Channel Keeper
Barbara Carey, California Coastal Commission, South Central Coast Office Vicki Clark, Environmental Defense Center
Allison Detmer, California Coastal Commission, Energy and Ocean Resources Division
Mary Meyer, California Department of Fish & Game
Heal the Bay
Doug Beach, Ventura County Environmental Health
Glen Luscomb, Ventura County Public Works

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California Environmental Protection Agency

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

MONITORING AND REPORTING PROGRAM NO. CI-9295
FOR
NORTH SHORE AT MANDALAY BAY
OXNARD, CALIFORNIA

ORDER NO. R4-2007-0019 (Series No. 024)
FILE NO. 98-197

I. Monitoring and Reporting Requirements

Trimark Pacific-Mandalay Bay, LLC, (hereinafter Discharger) shall implement this monitoring program on the effective date of this enrollment (October 24, 2007) under Regional Board Order No. R4-2007-0019. Monthly monitoring reports shall be submitted within 3 weeks following the monitoring month's end, for the first 3 months following injection. Following 3 months of monthly reporting, quarterly reporting will begin. Quarterly reports will be due the 15th of the month following the end of the quarter. The month beginning the quarters will be based on the first placement of Daramend, rather than calendar quarters. If the first Daramend is placed in the ground in October, then the first month of the reporting period shall be October. If all wells are not initially installed or accessible for other reasons, the reports shall be submitted with the available information.

- A. 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.
- B. 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. 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

The Discharger may use existing data for background groundwater characteristics. For ongoing monitoring the Discharger shall sample from upgradient post-remediation groundwater monitoring well RW10, and from the following wells within or downgradient of the treatment zone, Post-Remediation Groundwater Monitoring Wells RW1 through RW9, and Remedial Extraction/Post Remediation Monitoring Wells 2, 3, 5, 6, 10, 14, 16, 18, 19, 21, 22, 24, and 25 (Figure 1). Sampling and analytical requirements are:

<u>CONSTITUENT</u>	<u>UNITS</u>	<u>TYPE OF SAMPLE</u>	<u>MINIMUM FREQUENCY OF ANALYSIS</u> ^[1]
Total pounds Daramend placed in excavation	pounds	Not Applicable	Daily during placement
Chlorinated Volatile Organic Compounds (EPA Method 8260B)	µg/l	Grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Methane, ethane, and ethane (RSK-175)	µg/l	Grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Volatile fatty acids (EPA 300.0M)			<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Total Organic Carbon (EPA Method 9060 Modified)	µg/l	grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Total dissolved solids and Total suspended solids	mg/l	grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Specific Conductance	µmhos/cm	grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Turbidity	NTU	grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
pH	pH units	grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Oxidation-reduction potential	millivolts	grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Temperature	°F/°C	grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Groundwater Elevation	Feet, above mean sea level (msl) and below ground surface (bgs)	In situ	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Dissolved Oxygen	µg/l	grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Major Anions (bromide, chloride, sulfate, nitrate, nitrite, O-phosphate, and sulfide)	µg/l	grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Major Cations (barium, calcium, magnesium, manganese, potassium and sodium)	µg/l	grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter
Metals in Priority pollutant scan as listed in attachment A, plus hexavalent chromium	µg/L	grab	<ul style="list-style-type: none"> • Monthly first through sixth month after placement • Quarterly thereafter

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 for all site monitoring wells.

III. 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)

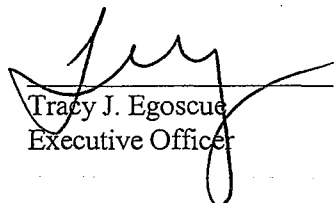
(Title)"

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.

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:


Tracy J. Egoscue
Executive Officer

Date: October 24, 2007

PRIORITY POLLUTANTS

Metals

- (1) Antimony
- (2) Arsenic
- (3) Beryllium
- (4) Cadmium
- (5) Chromium
- (6) Copper
- (7) Lead
- (8) Mercury
- (9) Nickel
- (10) Selenium
- (11) Silver
- (12) Thallium
- (13) Zinc

Miscellaneous

- (14) Cyanide
- (15) Asbestos
- (16) 2,3,7,8-TCDD (Dioxin)

Volatile Organics

- (17) Acrolein
- (18) Acrylonitrile
- (19) Benzene
- (20) Bromoform
- (21) Carbon tetrachloride
- (22) Chlorobenzene
- (23) Chlorodibromomethane
- (24) Chloroethane
- (25) 2-Chloroethyl vinyl ether
- (26) Chloroform
- (27) Dichlorobromomethane
- (28) 1,1-Dichloroethane
- (29) 1,2-Dichloroethane
- (30) 1,1-Dichloroethylene
- (31) 1,2-Dichloropropane
- (32) 1,3-Dichloropropylene
- (33) Ethylbenzene
- (34) Methyl bromide
- (35) Methyl chloride
- (36) Methylene chloride
- (37) 1,1,2,2-Tetrachloroethane
- (38) Tetrachloroethylene
- (39) Toluene
- (40) trans-1,2-Dichloroethylene
- (41) 1,1,1-Trichloroethane
- (42) 1,1,2-Trichloroethane
- (43) Trichloroethylene
- (44) Vinyl chloride
- Xylenes^(A)

Base/Neutral Extractables

- (56) Acenaphthene
- (57) Acenaphthylene
- (58) Anthracene
- (59) Benzidine
- (60) Benzo[a]anthracene
- (61) Benzo[a]pyrene
- (62) Benzo[b]fluoranthene
- (63) Benzo[ghi]perylene
(1,12-Benzoperylene)^(B)
- (64) Benzo[k]fluoranthene
- (65) bis(2-Chloroethoxy) methane
- (66) bis(2-Chloroethyl) ether
- (67) bis(2-Chloroisopropyl) ether
- (68) bis(2-Ethylhexyl)phthalate
- (69) 4-Bromophenyl phenyl ether
- (70) Butyl benzyl phthalate
- (71) 2-Chloronaphthalene
- (72) 4-Chlorophenyl phenyl ether
- (73) Chrysene
- (74) Dibenzo[a,h]anthracene
(1,2,5,6-Dibenzanthracene)^(B)
- (75) 1,2-Dichlorobenzene
- (76) 1,3-Dichlorobenzene
- (77) 1,4-Dichlorobenzene
- (78) 3,3'-Dichlorobenzidine
- (79) Diethyl phthalate
- (80) Dimethyl phthalate
- (81) Di-n-butyl phthalate
- (82) 2,4-Dinitrotoluene
- (83) 2,6-Dinitrotoluene
- (84) Di-n-octyl phthalate
- (85) 1,2-Diphenylhydrazine
- (86) Fluoranthene
- (87) Fluorene
- (88) Hexachlorobenzene
- (89) Hexachlorobutadiene
- (90) Hexachlorocyclopentadiene
- (91) Hexachloroethane
- (92) Indeno[1,2,3-cd]pyrene
- (93) Isophorone
- (94) Naphthalene
- (95) Nitrobenzene
- (96) N-nitrosodimethylamine
- (97) N-nitrosodi-n-propylamine
- (98) N-nitrosodiphenylamine
- (99) Phenanthrene
- (100) Pyrene
- (101) 1,2,4-Trichlorobenzene

Acid Extractables

- (45) 2-chlorophenol
- (46) 2,4-dichlorophenol
- (47) 2,4-dimethylphenol
- (48) 2-Methyl-4,6-dinitrophenol
(4,6-dinitro-o-cresol)^(B)
- (49) 2,4-dinitrophenol
- (50) 2-nitrophenol
- (51) 4-nitrophenol
- (52) 4-Chloro-3-methylphenol
(P-chloro-m-cresol)^(B)
- (53) Pentachlorophenol
- (54) Phenol
- (55) 2,4,6-trichlorophenol

Pesticides & PCBs

- (102) Aldrin
- (103) alpha-BHC
- (104) beta-BHC
- (105) gamma-BHC (Lindane)
- (106) delta-BHC
- (107) Chlordane
- (108) 4,4'-DDT
- (109) 4,4'-DDE
- (110) 4,4'-DDD
- (111) Dieldrin
- (112) alpha-Endosulfan
- (113) beta-Endosulfan
- (114) Endosulfan sulfate
- (115) Endrin
- (116) Endrin aldehyde
- (117) Heptachlor
- (118) Heptachlor epoxide
- (119) PCB 1016
- (120) PCB 1221
- (121) PCB 1232
- (122) PCB 1242
- (123) PCB 1248
- (124) PCB 1254
- (125) PCB 1260
- (126) Toxaphene

(X) 40 CFR 131.38(b)(1) number

A. Xylenes are to be analyzed in addition to the priority pollutants

B. Synonym