



California Regional Water Quality Control Board

Los Angeles Region



Linda S. Adams
Cal/EPA Secretary

320 W. 4th Street, Suite 200, Los Angeles, California 90013
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Arnold Schwarzenegger
Governor

October 20, 2010

Mr. Lee Hanley
ExxonMobil Oil Corporation
1464 Madera Road, Suite N. #265
Simi Valley, CA 93065

**REVISED MONITORING AND REPORTING PROGRAM— FORMER EXXONMOBIL
STATION 18KP6, 3102 THOUSAND OAKS BLVD, THOUSAND OAKS (ORDER NO.
R4-2007-0019, SERIES NO. 108; CI NO. 9551)**

Dear Mr. Hanley:

You were issued on October 22, 2009 the General Waste Discharge Requirements, Order No. R4-2007-0019, and the Monitoring and Reporting Program, CI No. 9551, for injecting Fenton's Reagent into groundwater aquifer to remediate the groundwater contamination at the subject site. Subsequently, five injection wells, IW1 through IW5, were installed in May 2010 in accordance with the approved workplan for the project (see Plate 2).

We have received the letter dated August 23, 2010, from your consultant, Environmental Resolutions, Inc., through which you proposed to use RegenOx instead of Fenton's Reagent for the project. The proposed change was approved by Ventura County Division of Environmental Health on April 19, 2010.

We have completed our review of your requests and have revised the Monitoring and Reporting Program CI No. 9551, as enclosed.

You are directed to implement the Revised Monitoring and Reporting Program on October 20, 2010. All monitoring reports shall be sent to the Regional Board, ATTN: Information Technology Unit.

When submitting monitoring or technical reports to the Regional Board per these requirements, please include a reference to Compliance File No. CI-9551, which will assure that the reports are directed to the appropriate file and staff. Do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

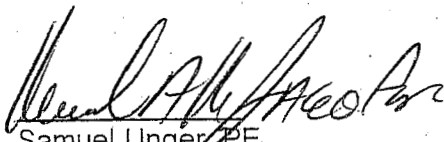
Mr. Lee Hanley
ExxonMobil Oil Corporation

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October 20, 2010

If you have any questions, please contact Dr. Rebecca Chou at (213) 620-6156 or rchou@waterboards.ca.gov for WDRs administration matters, or Mr. Gregg Kwey at (213) 576-6702 or gkwey@waterboards.ca.gov for technical matters.

Sincerely,



Samuel Unger, PE
Executive Officer

Enclosures: Revised Monitoring and Reporting Program No. CI-9551

cc: Mr. David Salter, Ventura County Division of Environmental Health
Mr. James Anderson, Environmental Resolutions, Inc.

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI—9551

FOR

FORMER EXXONMOBIL STATION 18KP6
3102 THOUSAND OAKS BLVD, THOUSAND OAKS

(REGENOX INJECTION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2007-0019, SERIES NO. 108)

I. REPORTING REQUIREMENTS

- A. ExxonMobil Oil 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 to December 2009, shall be received at the Regional Board by January 15, 2011. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
January – June	July 15
July – December	January 15

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 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).
- C. 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.

- D. 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.
- E. 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.
- F. 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.
- G. 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.
- H. 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.
- I. 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.
- J. 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.

- K. The Discharger should not implement any changes to the Monitoring and Reporting Program prior to receiving Executive Officer's written approval.

II. REGENOX INJECTION MONITORING REQUIREMENTS

The Semi-Annually reports shall contain the following information regarding injection activities:

1. Location map showing injection points used for the RegenOx solution. Five off-site injection locations wells, IW-1 to IW-5, are currently proposed (Plate 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. Additional injection points should be reviewed and approved by the County of Ventura, Environmental Health Division (VCEHD) and Regional Board prior to implementations.
2. Written and tabular summary defining the quantity of RegenOx injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site. Groundwater samples shall be collected from two down-gradient cluster monitoring wells MW15A/MW15B & MW16A/MW16B, one source area cluster monitoring well MW09/MW09A, and one up-gradient monitoring wells MW06 (Plate 2) on a semi-annual basis to monitor the effectiveness of the in-situ groundwater remediation. Additional monitoring wells for full scale implementation may be required if VCEHD and Regional Board deemed they are necessary. Groundwater shall be monitored for the duration of the remediation in accordance with the following discharge monitoring program:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd)	µg/L	Grab	• Semi-Annually ¹
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	• Semi-Annually ¹
Methyl tertiary butyl ether	µg/L	Grab	• Semi-Annually ¹

(MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE)			
Ethanol Formaldehyde Acetone	µg/L	Grab	• Semi-Annually ¹
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L	Grab	• Semi-Annually ¹
Oxidation-reduction potential	millivolts		• Semi-Annually ¹
Dissolved Oxygen	µg/L	Grab	• Semi-Annually ¹
Dissolved ferrous iron	µg/L	Grab	• Semi-Annually ¹
Total Chromium and chromium six ²	µg/L	Grab	• Semi-Annually ¹
PH	pH units	Grab	• Semi-Annually ¹
Temperature	⁰ F/ ⁰ C	Grab	• Semi-Annually ¹
Groundwater Elevation	Feet, mean sea level and below ground surface	In situ	• Semi-Annually ¹

¹ One week before injection and Semi-Annually thereafter

² The Discharger is required to monitor for total chromium and chromium six in the baseline, second and fourth Semi-Annually sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored Semi-Annually thereafter.

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. Semi-Annually 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 _____.

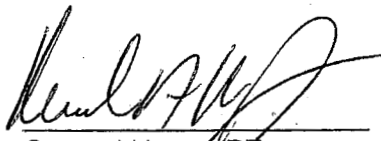
(Signature)

(Title)"

VI. PUBLIC DOCUMENTS

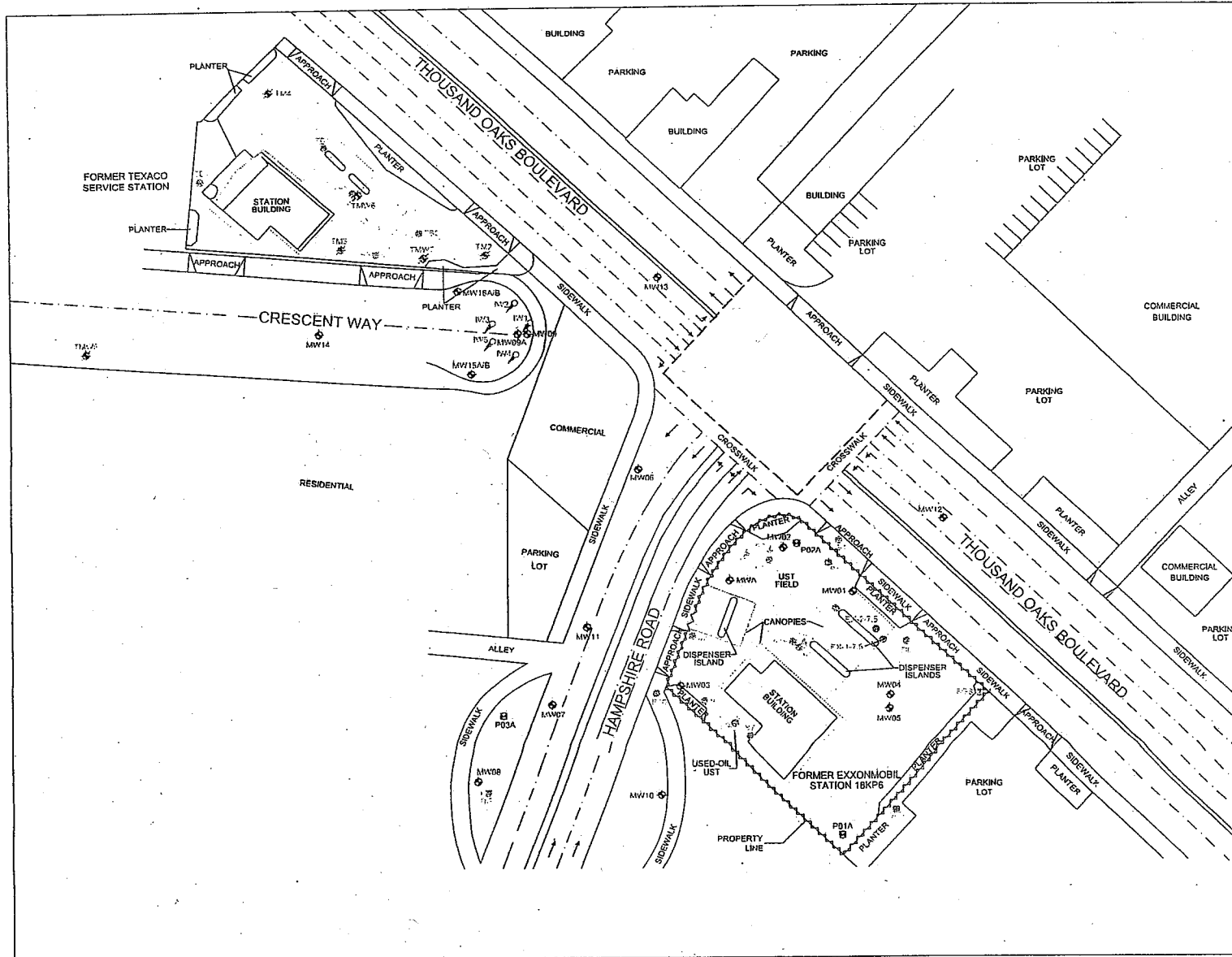
These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

Ordered by:



Samuel Unger, PE
Executive Officer

Date: October 20, 2009



EXPLANATION

	MW16A/B	Groundwater monitoring well
	TMW7	Destroyed Texaco groundwater monitoring well
	P03A	Piezometer nest with four casings
	TBS	Texaco soil boring
	BS	Soil boring
	BLS	Background lead sample
	EX-2-7.5	Excavation verification sample
	SVW	Soil vapor extraction well
	IW5	Injection well
		Underground storage tank

N

SOURCE:
Modified from a map
provided by
GOOGLE EARTH

APPROXIMATE SCALE

GENERALIZED SITE PLAN

FORMER EXXONMOBIL STATION 18KP6
3102 Thousand Oaks Boulevard
Thousand Oaks, California

FN 1007005		PROJECT NO.	1007
REVISED BY		PLATE	2
LNT		DATE:	07/29/10