February 24, 2014

Mr. Donald C. Albin
Rainbow Transport Tank Cleaners
21119 Wilmington Avenue
Carson, CA 90810

REVISED MONITORING AND REPORTING PROGRAM – OZONE INJECTION FOR GROUNDWATER REMEDIATION AT RAINBOW TRANSPORT TANK CLEANERS PROPERTY, 21119 WILMINGTON AVENUE, CARSON, CALIFORNIA (FILE NO. 12-019, WDR ORDER NO. R4-2007-0019, SERIES NO. 189, CI-9820, GLOBAL ID WDR100003825)

Dear Mr. Albin:

On July 6, 2012, Rainbow Transport Tank Cleaners (hereinafter Discharger) was enrolled under the Los Angeles Regional Water Quality Control Board (Regional Board) Order No. R4-2007-0019, "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, for the injection of ozone into injection wells. Upon enrollment of the Waste Discharge Requirements (WDRs), Rainbow was required to implement Monitoring and Reporting Program (MRP) No. CI-9820.

On January 15, 2014, the Discharger proposed to modify the MRP with the following requests:

1) Implement full-scale injection of ozone in accordance with the "*OWR Ozone Sparging Interim Measures Implementation Work Plan*" (Work Plan) dated July 26, 2013 and approved by the Department of Toxic Substances Control (DTSC) on October 14, 2013.

2) Amend the list of constituents and monitoring frequencies to correspond with the DTSC approved Work Plan.

On February 10, 2014, Regional Board staff received an e-mail from DTSC confirming approval of the proposed modifications to the MRP. Regional Board staff concurs with the request, and MRP No. CI-9820 is therefore modified as follows:

1) Change the type of sample for water temperature, specific conductance, dissolved oxygen, pH, oxygen reduction potential, and turbidity from down-well data logger to low-flow sample.

2) Change the minimum frequency of analysis of water temperature, specific conductance, dissolved oxygen, pH, oxygen reduction potential, and turbidity from weekly to quarterly during injection and semi-annual during post injection.

3) Change the analysis of volatile organic compounds (VOCs) according to United States Environmental Protection Agency (USEPA) Method 8260B to include 1,4-dioxane.

4) Change the minimum frequency of analysis of volatile organic compounds (which will now include 1,4-dioxane) from baseline, biweekly, and post-injection to quarterly during the injection period and semi-annual during post-injection period.

5) Change the minimum frequency of analysis of dissolved gases (carbon dioxide and methane) from baseline and post-injection to semi-annual during injection and post-injection.

6) Change the minimum frequency of analysis of hexavalent chromium from "baseline, monthly and post-injection" to "semi-annual during injection and post-injection".

7) Remove the following constituents from the table of constituents to be analyzed: metals, anions, total dissolved solids, boron, ammonia-nitrogen, biochemical oxygen demand, and chemical oxygen demand.

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports and correspondence required under the MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100003825. ESI training video is available at: https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b

Please see Paperless Office Notice for GeoTracker Users, dated December 12, 2011 at: http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20GT%20Users.pdf

If you have any additional questions, please contact the Project Manager, Mr. David Koo at (213) 620-6155 (dkoo@waterboards.ca.gov) or the Unit Chief, Dr. Eric Wu at (213) 576-6683 (ewu@waterboards.ca.gov) regarding this matter.

Sincerely,

Samuel Unger

Samuel Unger, P.E.
Executive Officer

Enclosures: Monitoring and Reporting Program No. CI-9820 revised on February 24, 2014

cc: Mr. Ryan Batty, Department of Toxic Substances Control
Mr. Eddie Arslanian, ENVIRON
Mr. Timothy Cameron, Cameron & Pearlson

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

2ND REVISED MONITORING AND REPORTING PROGRAM NO. CI-9820 FOR RAINBOW TRANSPORT TANK CLEANERS PROPERTY 21119 WILMINGTON AVENUE, CARSON, CA

ENROLLMENT UNDER REGIONAL BOARD
ORDER NO. R4-2007-0019 (SERIES NO. 189)
FILE NO. 12-019

I. REPORTING REQUIREMENTS

A. Rainbow Transport Tank Cleaners Property (hereinafter Discharger) shall implement this revised Monitoring and Reporting Program (MRP) at 21119 Wilmington Avenue, Carson, California, the location of which is shown on Figure 1, on the effective date of this revision (February 24, 2014) under Regional Board Order No. R4-2007-0019. The first monitoring report under this revised monitoring program is due by April 15, 2014.

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.

C. By January 30th of each year, beginning January 30, 2015, 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.

D. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Public Health Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certifications shall be provided each time a new and/or renewal is obtained from ELAP and/or NELAP.

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 Executive Officer. At least once a year, 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.

F. 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. Proper chain of custody procedures must be followed and a copy of the chain of custody documentation shall be submitted with the report.

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 Public Health, 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. For every item where the requirements are not met, the Discharger shall submit a statement of the cause(s), and actions undertaken or proposed which will bring the discharge into full compliance with waste discharge requirements at the earliest possible time, including a timetable for implementation of those actions.

I. The Discharger shall maintain all sampling and analytical results, including strip charts, 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. 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. Any mitigation/remedial activity including any pre-discharge treatment conducted at the site must be reported in the quarterly monitoring report.

L. 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.

M. 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. INJECTION MONITORING REQUIREMENTS

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 ozone injection wells.

2. Written summary defining:
   - Depth of injection;
   - Estimated volume and concentration of the ozone per injection well; and
   - Estimated total mass of ozone injected at site.

3. Quarterly visual inspection at each injection well that is actively injecting ozone shall be conducted to evaluate the well casing integrity. The quarterly report shall include a summary of the visual inspection.

III. GROUNDWATER MONITORING PROGRAM FOR THE REMEDIATION PROJECT

The objective of this Monitoring and Reporting Program is to detect and evaluate impacts associated with the injection activities. The following wells shall constitute the Monitoring and Reporting Program wells: MW-16 (A/B), MW-17 (A/B), MW-18 (A/B), MW-19 (A/B), MW-20 (A/B), MW-23 (A/B), and MW-24 (A/B) (Figure 2 attached), where "A" represents a shallow zone screened interval and "B" represents an intermediate zone screened interval. 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.

CONSTITUENT	UNITS [1]	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Water Temperature	°C	Low-flow sample	Quarterly during injection, and Semi-Annual during Post-Injection[2]
Specific Conductance	µS/cm	Low-flow sample	Quarterly during injection, and Semi-Annual during Post-Injection[2]
Dissolved Oxygen	mg/L	Low-flow sample	Quarterly during injection, and Semi-Annual during Post-Injection[2]
pH	pH units	Low-flow sample	Quarterly during injection, and Semi-Annual during Post-Injection[2]
Oxygen Reduction Potential	mV	Low-flow sample	Quarterly during injection, and Semi-Annual during Post-Injection[2]
Turbidity	NTU	Low-flow sample	Quarterly during injection, and Semi-Annual during Post-Injection[2]
Volatile Organic Compounds (VOCs) including 1,4-dioxane (EPA Method 8260B)	µg/L	Low-flow sample	Quarterly during injection, and Semi-Annual during Post-Injection[2]
Total Dissolved Solids (EPA method 160.1)	mg/L	Low-flow sample	Quarterly during injection, and Semi-Annual during Post-Injection[2]
Boron (EPA Method 200.7)	mg/L	Low-flow sample	Quarterly during injection, and Semi-Annual during Post-Injection[2]
Sulfate (EPA Method 300.0)	mg/L	Low-flow sample	Quarterly during injection, and Semi-Annual during Post-Injection[2]
Chloride (EPA Method 300.0)	mg/L	Low-flow sample	Quarterly during injection, and Semi-Annual during Post-Injection[2]
Dissolved Gases (carbon dioxide, methane) (Method RSK175)	µg/L	Low-flow sample	Semi-Annual during injection and Post-Injection[2]
Hexavalent Chromium (EPA Method 7199)	mg/L	Low-flow sample	Semi-Annual during injection and Post-Injection[2]

[1] mg/L: milligrams per liter; µg/L: micrograms per liter; µS/cm: microsiemens per centimeter; mV: millivolts; °C: degree Celsius; NTU: Nephelometric Turbidity Units.

[2] The post-injection sampling will involve two years of subsequent semi-annual groundwater monitoring events.

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 during each sampling event, 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. Electronic Submittal of Information (ESI) to GeoTracker

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100003825.

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: Samuel Unger

Samuel Unger, P.E.
Executive Officer

Date: February 24, 2014