



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

April 10, 2017

Mr. John Dang
Polynt Composites USA, Inc.
99 East Cottage Avenue
Carpentersville

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7016 1370 0001 2479 8060

REVISED MONITORING AND REPORTING PROGRAM – POLYNT COMPOSITES USA, INC., LYNWOOD FACILITY, 2801 LYNWOOD ROAD, LYNWOOD, CALIFORNIA (FILE NO. 12-093, CI-9871, ORDER NO. R4-2014-0187, SERIES NO. 030, GLOBAL ID WDR100007622)

Dear Mr. Dang:

The Regional Water Quality Control Board, Los Angeles Region (Regional Board), is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within major portions of Los Angeles and Ventura Counties, including the facility mentioned above.

On July 29, 2015, Polynt Composites USA, Inc. (hereinafter Discharger), was enrolled under Regional Board Order No. R4-2014-0187 which authorized the injection of municipal water and tracer dye solution for implementation of the April 30, 2015, "Revised Interim Measure Work Plan," as approved by the California Department of Toxic Substances Control (DTSC) on February 4, 2015.

In 2015, municipal water and tracer dye solution were injected using two injection wells (LIN-1 and LIN-2) and were subsequently extracted from extraction well (LEX-1). Injections for the pilot test concluded in December 2015. The data collected from the pilot study is being used to design a full-scale remedial system that will be reviewed by DTSC. No additional injections will be performed until the full-scale remedial system is approved by DTSC and installed.

On September 6, 2016, Arcadis U.S. Inc., submitted the *Request to Modify Monitoring and Reporting Program for Waste Discharge Requirements Permit* (Request), on behalf of Polynt Composites USA, Inc., in which they requested a reduction of the monitoring and reporting frequency.

Based on the review of site groundwater monitoring data, the concentrations of constituents of concern are relatively stable and the injected dye is no longer detectable. Therefore, the reduction of monitoring and reporting frequency proposed in the Request is approved. If additional future injection is necessary, you are required to submit a work plan for that activity, receive written approval of the work plan from DTSC, and implement the revised Monitoring and Reporting Program (MRP) provided by the Regional Board for that injection.

Under the revised MRP the monitoring network will include one upgradient well (N-6), two cross-gradient wells (N-7 and DGRMW-1), and one downgradient well (N-9). The constituents and frequencies of sampling are provided in the revised Monitoring and Reporting Program (MRP) No. CI-9871 dated April 10, 2017.

The revised MRP No. CI-9871 requires you to implement the monitoring program on the effective date of this enrollment under Regional Board Order No. R4-2014-0187. When submitting monitoring or technical reports to the Regional Board per these requirements, please do not combine other reports with your monitoring reports. Submit each type of report as a separate document. Quarterly and Annual reports must be submitted as individual documents, or, if combined, the title shall so state.

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the revised MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100007622.

Please see Electronic Submittal for GeoTracker Users, dated December 12, 2011 at:
<http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%200GT%20Users.pdf>.

To avoid paying future annual fees, please submit a written request for termination of your enrollment under the general permit in a separate letter, when your project has been completed and the permit is no longer needed. Be aware that the annual fee covers the fiscal year billing period beginning July 1 and ending June 30, the following year. You will pay the full annual fee if your request for termination is made after the beginning of the new fiscal year beginning July 1.

If you have any additional questions, please contact the Project Manager, Mr. Peter Raftery at (213) 620-6156 (peter.raftery@waterboards.ca.gov) or the Groundwater Permitting Unit Chief, Dr. Eric Wu at (213) 576-6683 (eric.wu@waterboards.ca.gov).

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosure:

- 1) Revised Monitoring and Reporting Program No. CI-9871

cc: Mr. Marcelo Garbiero, Arcadis
Ms. Lisa Pultz, Hexion Inc.
Mr. Paul Ruffin, Department of Toxic Substances Control
Mr. Kristen Stevens, Arcadis
Mr. Robert Usab, Polynt Composites USA, Inc.

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

**REVISED MONITORING AND REPORTING PROGRAM NO. CI-9871
FOR
POLYNT COMPOSITES USA, INC.
2801 LYNWOOD ROAD, LYNWOOD, CA**

**ENROLLMENT UNDER GENERAL WASTE DISCHARGE REQUIREMENTS
ORDER NO. R4-2014-0187 (SERIES NO. 030)
FILE NO. 12-093**

I. REPORTING REQUIREMENTS

- A. Polynt Composites USA, Inc. (hereinafter Discharger) shall implement this revised Monitoring and Reporting Program (MRP) at 2801 Lynwood Road, Lynwood, California (Figure 1), under Regional Board Order No. R4-2014-0187. The first semi-annual monitoring report under this monitoring program is due by July 30, 2017.

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

| <u>Reporting Period</u> | <u>Report Due</u> |
|-------------------------|-------------------|
| January – June | July 30 |
| July – December | January 30 |

- B. If there is no discharge or injection of treated groundwater during any reporting period, the report shall so state.
- C. By January 30th of each year, beginning January 30, 2018, 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/or toxicity analyses shall be conducted at a laboratory certified for such analyses by the State Water Resources Control Board, Division of Drinking Water (SWRCB-DDW) Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certifications shall be provided each time a new analysis is used and/or renewal is obtained from ELAP.
- E. The method limits (MLs) employed for 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 SWRCB-DDW ELAP, 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- or post-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 Waste Discharge Requirements (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. R4-2014-0187 "Monitoring and Reporting Requirements" in addition to the aforementioned requirements.

II. POST-INJECTION GROUNDWATER MONITORING REQUIREMENTS

The injection of municipal water and tracer dye solution ended in December 2015. The table in this section identifies the constituents that will be analyzed in the wells for post-injection groundwater monitoring events during the monitoring period for the purpose of evaluating any effect to water quality and site constituents of concern (COCs) as part of the tracer study.

The objective of this Monitoring and Reporting Program is to detect and evaluate impacts associated with the injection activities. The following wells, shown on Figure 2, shall be sampled for the pilot study at the frequency specified in the table below: N-6 (up-gradient), N-7 (cross-gradient), N-9 (down-gradient), and DGRMW-1 (cross-gradient). 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 | Semiannually |
| Specific Conductance | µS/cm | Low-flow sample | Semiannually |
| Dissolved Oxygen | mg/L | Low-flow sample | Semiannually |
| pH | pH units | Low-flow sample | Semiannually |
| Oxidation-Reduction Potential | mV | Low-flow sample | Semiannually |
| Turbidity | NTU | Low-flow sample | Semiannually |
| Total Dissolved Solids (TDS) (EPA Method 160.1) | mg/L | Low-flow sample | Semiannually |
| Sulfate (EPA Method 300) | mg/L | Low-flow sample | Semiannually |
| Chloride (EPA Method 300) | mg/L | Low-flow sample | Semiannually |
| Boron (EPA Method 200.7) | mg/L | Low-flow sample | Semiannually |
| Total Petroleum Hydrocarbons (TPH) (EPA Method 8015M) | µg/L | Low-flow sample | Semiannually |
| Volatile Organic Compounds (VOCs) (EPA Method 8260B) | µg/L | Low-flow sample | Semiannually |
| 1,4-dioxane and | µg/L | Low-flow | Semiannually |

| | | | |
|---|------|--------------------|--------------|
| bis(2ethylhexyl)phthalate (EPA Method 8270C) | | sample | |
| Metals (EPA Method 6010B) | mg/L | Low-flow sample | Semiannually |

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.

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. Monthly observation of groundwater levels, recorded to 0.01 feet mean sea level and groundwater flow direction.

III. 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.

IV. 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)"

V. ELECTRONIC SUBMITTAL OF INFORMATION (ESI) TO GEOTRACKER

The Discharger shall comply with the ESI requirements by submitting all reports required under the MRP, including groundwater monitoring data, discharge location data, correspondence, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100007622.

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.

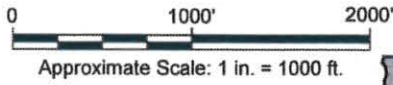
Ordered by: Samuel Unger
Samuel Unger, P.E.
Executive Officer

Date: April 10, 2017

CITY: (Reep) DIV: GROUP (Reep) DB: (Reep) LD: (Op) PIC: (Op) PM: (Reep) TM: (Op) LVR: (Op) ON: OFF=REP-
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REFERENCE: GOOGLE EARTH PRO



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|---|--------------------|
| PCCR FACILITY 2801 LYNWOOD ROAD LYNWOOD, CALIFORNIA | |
| SITE LOCATION MAP | |
| | FIGURE 1 |

