



EDMUND G. BROWN JR.
GOVERNOR



MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

May 27, 2016

Mr. Steven Schoenlein
Cintas Corporation
6800 Cintas Boulevard
Cincinnati, Ohio 45262

Certified Mail
Return Receipt Required
Claim No. 7014 2870 0001 4613 3409

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9984 – FORMER UNITOG FACILITY, 1351 ORIZABA AVENUE, LONG BEACH, CALIFORNIA (FILE NO. 11-109, ORDER NO. R4-2014-0187, SERIES NO. 042, CI-9984, GLOBAL ID. WDR 100013053)

Dear Mr. Schoenlein:

On behalf of Cintas Corporation (Discharger), ARCADIS U.S., Inc. submitted the *Groundwater Interim Remedial Action Plan and Pre-Design Work Plan* (IRAP), dated March 4, 2015 to propose a phased approach for implementing a directed groundwater recirculation (DGR) system with in-situ chemical oxidation (ISCO) treatment for groundwater remediation. The DGR system consists of groundwater extraction, aboveground treatments including a series of filters to remove suspended solids and granular activated carbon to remove volatile organic compounds (VOCs), and injection of treated groundwater. In addition, low dosing of ISCO amendment is added to the treated groundwater prior to injection to provide in situ treatment of VOCs and enhance overall remedial effectiveness as pumping occurs and groundwater is continuously directed towards the extraction well. On May 29, 2015, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) Site Cleanup staff approved the IRAP.

On October 28, 2015, Cintas Corporation was enrolled under the General Waste Discharge Requirements (WDR Order No. R4-2014-0187) with a Monitoring and Reporting Program (MRP) No. CI-9984 for a short term pilot test for injection of treated groundwater only. The November 2015 groundwater monitoring results indicated that tetrachloroethylene and trichloroethylene were detected at concentrations up to 8,000 micrograms per liter ($\mu\text{g/L}$) and 100 $\mu\text{g/L}$, respectively.

On February 9, 2016, the Discharger submitted the WDR/MRP modification request for implementing Phase 1 operation of the DGR system with ISCO treatment as outlined in the approved IRAP. It is estimated that daily maximum volume of 50,400 gallons of treated groundwater will be injected into three injection wells (DGR-2, DGR-3, and DGR-4) at depths from approximately 20 to 60 feet below ground surface. In addition, sodium permanganate, at a dosage not to exceed 15 pounds/day, will be added to the treat groundwater. The DGR system with ISCO treatment will be in operation for approximate two years.

IRMA MUÑOZ, CHAIR | SAMUEL ÜNGER, EXECUTIVE OFFICER

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♻️ RECYCLED PAPER

The proposed discharge shall not cause the mineral constituents of the receiving groundwater at the compliance point, downgradient outside the application area, in excess of applicable limits (West Coast Basin of the Los Angeles Coastal Plain Groundwater Basin) given in Attachment B of General WDRs Order No. R4-2014-0187. The groundwater quality objectives are 800 milligrams per liter (mg/L) for total dissolved solids, 250 mg/L for sulfate, 250 mg/L for chloride, and 1.5 mg/L for boron.


The revised MRP, which reflects Phase 1 operation of the DGR system with ISCO treatment, is enclosed. 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 WDR100013053. Please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

For all parties who upload electronic documents to State Database GeoTracker, it is no longer necessary to email a copy of these documents to losangeles@waterboards.ca.gov or submit hard copies to our office. The Regional Board will no longer accept documents (submitted by either hard copy or email) already uploaded to GeoTracker. Please see Electronic Submittal to the Los Angeles Regional Board for GeoTracker Users dated December 12, 2011 at: <http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20OGT%20Users.pdf>

To avoid paying future annual fees, please submit a written request for termination of your enrollment under the general WDR in a separate letter when the project is completed and the WDR 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 questions, please contact the Project Manager, Dr. Ann Chang at (213) 620-6122 (ann.chang@waterboards.ca.gov), or the Chief of Groundwater Permitting Unit, Dr. Eric Wu at (213) 576-6683 (eric.wu@waterboards.ca.gov).

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosure: Revised Monitoring and Reporting Program No. CI-9984 dated May 27, 2016

cc: Mr. Robert Ruscitto, Arcadis U.S., Inc.

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9984
FOR
FORMER UNITOG FACILITY
1351 ORIZABA AVENUE, LONG BEACH, CALIFORNIA

ENROLLMENT UNDER REGIONAL BOARD
ORDER NO. R4-2014-0187 (SERIES NO. 042)
FILE NO. 11-109

I. MONITORING AND REPORTING REQUIREMENTS

- A. Cintas Corporation (hereinafter Discharger) shall implement the revised Monitoring and Reporting Program (MRP) on the effective date (May 27, 2016) under Regional Board Order No. R4-2014-0187. The next monitoring report shall be received at the Regional Board by **July 30, 2016**. 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 30
April – June	July 30
July – September	October 30
October – December	January 30

- B. If there is no discharge or injection, during any reporting period, the report shall so state. 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 Regional Board Order No. R4-2014-0187 "*Monitoring and Reporting Requirements*".

II. DISCHARGE MONITORING PROGRAM

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

1. Location map showing injection points used for treated groundwater.
2. Written and tabular summary defining depth of discharge points and quantity of treated groundwater injected at each injection point per day and a summary describing the days on which the system is in operations.
3. Written and tabular summary indicating quantity of sodium permanganate addition per day.
4. The Discharger shall conduct an effluent monitoring on the treated groundwater before injecting it to the aquifer. Treated groundwater samples shall be collected from the effluent tank for the following chemical analyses:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total Dissolved Solids	mg/L	grab	Weekly for the first 12 weeks and monthly thereafter
Sulfate	mg/L	grab	Weekly for the first 12 weeks and monthly thereafter
Chloride	mg/L	grab	Weekly for the first 12 weeks and monthly thereafter
Boron	mg/L	grab	Weekly for the first 12 weeks and monthly thereafter
Volatile Organic Compounds	µg/L	grab	Weekly for the first 12 weeks and monthly thereafter

III. GROUNDWATER MONITORING PROGRAM

A groundwater monitoring program shall be implemented to evaluate impacts associated with the injection activity. Groundwater samples shall be collected from monitoring wells MW-4, MW-8, MW-13, MW-14, MW-15, and MW-16 (Figure 1). The Discharger shall conduct a baseline sampling prior to the proposed injection, followed by a monitoring frequency specified in the schedule below from all six monitoring wells for the following groundwater parameters:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Dissolved Oxygen	mg/L	grab	Baseline and quarterly after injection
Oxidation-Reduction Potential	millivolts	grab	Baseline and quarterly after injection
pH	pH units	grab	Baseline and quarterly after injection
Specific Conductivity	mS/cm	grab	Baseline and quarterly after injection
Temperature	°C	grab	Baseline and quarterly after injection
Turbidity	NTU	grab	Baseline and quarterly after injection
Total Organic Carbon	mg/L	grab	Baseline and quarterly after injection
Total Dissolved Solids	mg/L	grab	Baseline and quarterly after injection
Sulfate	mg/L	grab	Baseline and quarterly after injection
Chloride	mg/L	grab	Baseline and quarterly after injection
Boron	mg/L	grab	Baseline and quarterly after injection
Nitrate and Nitrite	mg/L	grab	Baseline and quarterly after injection
Manganese	mg/L	grab	Baseline and quarterly after injection
Volatile Organic Compounds	µg/L	grab	Baseline and quarterly after injection

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. Observation of groundwater levels, 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)"

Former Unitog Facility
WDR Order No. R4-2014-0187
Revised Monitoring and Reporting Program No. CI-9984


VI. PUBLIC DOCUMENTS

All records and reports submitted in compliance with Regional Board Order No. R4-2014-0187 and Monitoring and Reporting Program No. CI-9984 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.

VII. ELECTRONIC SUBMITTAL OF INFORMATION

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data in Electronic Deliverable Format, discharge location data, and searchable Portable Document Format of monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100013053.

Ordered by:


Samuel Unger, P.E.
Executive Officer

Date: May 27, 2016

CITY: LONG BEACH, CA DIV: GROUP: ENVCAD DB: R. HUBATCH
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