

California Regional Water Quality Control Board
North Coast Region

MONITORING AND REPORTING PROGRAM NO. R1-2007-0031

FOR

WILLITS ENVIRONMENTAL REMEDIATION TRUST
934 SOUTH MAIN STREET
WILLITS, CALIFORNIA

Mendocino County

This Monitoring and Reporting Program is issued pursuant to California Water Code Section 13267(b) and requires monitoring of groundwater and submission of technical reports. Reports are required on a semiannual basis. The objective of monitoring conducted under this monitoring program is to provide the Discharger and the Regional Water Board with information concerning groundwater quality and contaminant trends at the site. This Monitoring and Reporting Program rescinds Monitoring and Reporting Program Orders R1-2005-0017 for the Hexavalent Chromium Interim Remedial Action (Chrome IRA), and R1-2004-0078 for the routine groundwater monitoring activities at the site. The monitoring for the interim remedial action (Chrome IRA and routine groundwater monitoring) is incorporated into this monitoring program.

Under the authority of the California Water Code Section 13267, the Discharger named above is required to comply with the following:

Storm Drain and Surface Water Monitoring

Catch basins, SWD Nos. 1 through 7 should be inspected weekly during the rainy season and following storm events. Observations regarding presence or absence of inflow to each basin, flow rates into each basin as well as the presence/absence of flow within the storm drain shall be recorded. Daily rainfall shall be recorded. A summary of the observations shall be provided.

Grab samples shall be collected from the storm drain system and Baechtel Creek according to the following schedule:

SWD-7, SWD-9, and RW-1, and RW-2, shall be sampled during or immediately after the first significant rainfall event of the wet season. SWD-2R, SWD-3R, SWD-4, SWD-5, SWD-6, SWD-7, SWD-9, RW-1, and RW-2 shall be sampled annually during the month of February. (Figure 1)

The grab samples shall be unfiltered and analyzed for Total Chromium (EPA Method 6010), volatile organic compounds (EPA Method 8260), pH, total organic carbon (Method 415.1 or 9060), total suspended solids (EPA Method 2540D gravimetric), temperature, conductivity, and specific conductance. Filtered samples shall be analyzed for total dissolved chromium using EPA Method 6010, and hexavalent chromium using EPA Method 7199.

Water levels in the storm drain piezometers should be checked weekly, and during and immediately after storm events. The storm drain sump pump shall be checked to verify whether it is on or off during the piezometer measurements and the total flow reported on a weekly basis.

Reported information shall include a map of the storm drain and sumps, elevation of top of casing, depth to water, water table elevation, elevation of storm drain invert, depth to water table and water table elevation of the nearest monitoring wells W18A, W17A, W14A, and W8A.

Groundwater Monitoring

Groundwater levels from all monitoring wells shall be measured semiannually. Current and historical data should be tabulated and provide the following: top of casing elevation, depth to water, and water table elevation above mean sea level. Damage or water intrusion into the well head vault shall be reported and corrected. Groundwater gradient maps for each aquifer zone will be prepared. Vertical gradients shall be calculated and presented.

Groundwater samples shall be collected from each monitoring well in Table 1, attached to this Monitoring Program. Table 1 lists the frequency of sampling, and the constituents to be analyzed.

Prior to sampling, the well shall be properly purged. Purging, sampling and decontamination protocols, and field sampling logs will be submitted. Logs will include equilibrium measurements, pumping rates, and other pertinent information.

Hexavalent chromium analyses must be performed within 24 hours of sample collection. Sample time and time of analysis shall be reported.

Hexavalent chromium samples will be filtered at the time of collection, prior to transport to the laboratory. Total dissolved chromium samples will be filtered and preserved by acidification at the time of collection, prior to transport to the laboratory.

Maintenance

The discharger shall conduct facility inspections and maintenance as specified in the September 1, 1998 Maintenance, Inspection and Discharge Contingency Plan, or

modifications thereof. Records of inspection and maintenance shall be included with the monitoring reports.

Interim Remedial Actions

Interim remedial actions underway at the facility include groundwater extraction, a water treatment system, control of groundwater infiltration into the storm drain, performance monitoring, and the reduction of hexavalent chromium in soil and groundwater (Chrome IRA). Monitoring of the Chrome IRA is currently regulated under this Monitoring and Reporting Program.

Groundwater Treatment System

The groundwater treatment system will be operated, and sampled in accordance with the January 26, 1999 Monitoring Plan for the Interim Remedial Action Groundwater and Treatment System prepared by Henshaw Associates, Inc., or revision thereof. Monitoring reports shall contain the following information: summary of time on-line and off-line; influent, midpoint and effluent concentration for hexavalent and total chromium, volatile organic compounds and arsenic, total flows and flow rates discharged to the sanitary sewer on a weekly basis; and summary of carbon change-outs.

REPORTING

Groundwater monitoring reports shall be submitted to the Regional Water Board semiannually on or before February 15 and August 15 of each year. Reports shall present the data in tabular format, and contain any information from monitoring performed more frequently than required, or at locations not required, by this program.

Groundwater elevation contour maps and isoconcentration maps for the A-zone, B-zone, and C-zone shall be submitted for each set of measurements. All detections are to be contoured. The following is a list of the isoconcentration maps required as part of this Order:

A-Zone

- Total Summed VOCs
- Acetone
- 2-Butanone
- Dissolved Arsenic
- Vinyl Chloride
- Freon 113
- 1,4-Dioxane
- Hexavalent Chromium
- Total Dissolved Chromium

B-Zone

- Total Summed VOCs
- 1,4-Dioxane
- Dissolved Arsenic
- Hexavalent Chromium
- Total Dissolved Chromium

Groundwater monitoring data and reports shall also be submitted electronically to the State Water Resources Control Board's Geographic Environmental Information Management System database (GeoTracker) as required by Title 23, Division 3, Chapter 30, Article 2, Sections 3890-3895 of the California Code of Regulations).

Each report shall also contain copies of the chain of custody including the date and time of sample collection, the name of the person collecting the samples, and the signed lab sheets including QA/QC.

Ordered by _____

Catherine E. Kuhlman
Executive Officer

April 11, 2007

Table 1

Aquifer Zone	Well ID	VOC's (1)	1,4-Dioxane	TPH-g	TPH-d/mo	Hexavalent Chromium	Total Dissolved Chromium	Dissolved Arsenic
A	B3	BA						
A	GMX-1A	A	A			A	A	A
A	GMX-2A	Q				A	A	A
A	GMX-3A	SA	SA					
A	GMX-7A	Q						Q
A	TW-2	SA	A			A	A	SA
A	TW-5	SA				A	A	SA
A	W7	SA	A			A	A	A
A	W8A	SA	A			A	A	
A	W9A	SA	A			A	A	SA
A	EW1A	SA	A			A	A	A
A	W10A	BA						
A	W11A	A	A			BA	BA	
A	W12A	SA	A					
A	W14A	SA	SA			A	A	Q
A	W16A	BA						
A	W17A	SA	SA			A	A	
A	W18A	SA	A					
A	W19A	SA	A					
A	W20A	SA	A					
A	W21A	SA	A			A	A	SA
A	W22A	A	A			A	A	A
A	W23A	A	SA					
A	W24A	SA	SA			A	A	A
A	W26A	SA	SA					
A	W27A	SA	A					
A	W28A	SA	SA					
A	W29A1	SA	SA					
A	W32A	BA						
A	W33A	BA	BA					
A	W34A	A	A					
A	W35A	SA	A					
A	W36A	A	A					
A	W37A	SA	A			A	A	A
A	W38A	SA	SA					
A	W39A	SA	SA					
A	W40A	SA	SA					
A	W41A	SA	SA			SA	SA	SA
A	W42A	A	BA			A	A	A
A	W43A	BA					BA	
A	W48A	A	A					
A	W49A	A	A					
A	RMW3		BA					
A	EM-01	SA						

Aquifer Zone	Well ID	VOC's (1)	1,4-Dioxane	TPH-g	TPH-d/mo	Hexavalent Chromium	Total Dissolved Chromium	Dissolved Arsenic
A	EM-02	A	SA					
A	EM-03	A						
A	EM-04	A						
A	W50A	Q	Q	Q	Q			
A	W51A	Q	Q	Q	Q			
A	W52A	Q	Q	Q	Q			
B	W4	A	A			A	A	A
B	W8B	A	A			A	A	
B	EW1B	A	A			A	A	
B	W11B	A	A					
B	W17B	A	A			A	A	
B	W18B	A	A					
B	W19B	A	A					
B	W27B	A	A					
B	W28B	SA	SA					
B	W29B1	SA	SA					
B	W31B	A	A			A	A	A
B	W47B	A	SA			A	A	
B	GMX-6B	A	A					A
C	W3C	A	A			A	A	
C	W5	A	A			A	A	
C	W6	A	A			A	A	
C	W8C					A	A	
C	W29B2	A	A					
C	W31C	A	A			A	A	

(1) VOC analysis shall include analysis for 2-Butanone