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California Regional Water Quality Control Board

Los Angeles Region

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320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: <http://www.swrcb.ca.gov/rwqcb4>

April 23, 2003

Ms. Sharon F. Rubalcava
Weston Benshoof Rochefort Rubalcava MacCuish LLP
333 South Hope Street, Sixteenth Floor
Los Angeles, California 90071

AHMANSON RANCH WELL M-1 GROUNDWATER SAMPLING WORK PLAN APPROVAL, AND RESPONSE TO SITE USE INFORMATION – AHMANSON RANCH, VENTURA COUNTY, CALIFORNIA

Dear Ms. Rubalcava:

Los Angeles Regional Water Quality Control Board (Regional Board) staff have reviewed your *Revised Draft Work Plan Groundwater Sampling Well M-1 Located Near Ahmanson Ranch, Ventura County California* (Work Plan), dated February 2003. In addition, the Regional Board has reviewed the information you provided on the historic use of the site and on chemicals used at the site. The Work Plan and site information were provided in response to the Regional Board's California Water Code Section 13267, request for historic and current site information, dated December 23, 2002. Portions of the Work Plan were developed during a February 20, 2003 meeting held at the Regional Board office among representatives of the Regional Board, Ahmanson Land Company, the Department of Toxic Substances Control, the Department of Health Services, and the US Environmental Protection Agency.

The Regional Board received numerous comments on the Work Plan. A set of specific responses to those comments is being developed. Many comments reflected a concern that the existing well condition is not ideal and that the use of a bailer for sample collection will not yield a sample that is suitable for analysis. In particular, a consistent theme of the comments is that the well's condition is not ideal for assessing the distribution of chemicals in groundwater. The re-sampling directed by the Regional Board is principally intended to verify the presence of perchlorate in the well. For this limited purpose, the well's current condition is adequate for this purpose since the sample collection is intended to verify a perchlorate detection that was obtained from a sample collected from the well in its existing condition. However, the comments that we received have prompted the inclusion of specific measures intended to reduce the uncertainty that might otherwise be associated with sample collection.

After reviewing the Work Plan and other information, considering public comments, and discussing the Work Plan with other interested agencies, as noted above, the Regional Board requires the Work Plan to include the following additional elements:

1. The Regional Board will provide all laboratories analyzing samples for this project with spiked samples containing perchlorate at precise concentrations known only to the Regional Board. These samples are being provided to better assure quality control by the laboratories that will be conducting the analyses.

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2. For each sampling event a split sample will be sent to the Regional Board's laboratory (the State Hazardous Materials Lab in Berkeley, California) and held for a limited time. This will allow reanalysis and confirmation of results without the need to collect additional samples should reanalysis become necessary.
3. Evaluate and record the current casing condition utilizing a downhole wireline video logging device.
4. Evaluate and record the flow of groundwater into, out of, and within the well, using a downhole wireline device. Samples should be collected in such a manner as to obtain samples from discrete groundwater producing intervals.
5. The use of an alternative to the use of a bailer sampling device should be used such that the samples are representative of the groundwater producing zone.

With the incorporation of these requirements, and the protocols already proposed in the Work Plan, the Regional Board believes that quality assurance and quality control provided for this round of sampling will be sufficient to replicate, and most likely, enhance the integrity of the samples collected for analysis (as compared to those samples collected in July and August 2002), thereby providing a greater degree of assurance that the verification analysis will reflect actual water quality conditions in the groundwater from which the samples are collected. The protocols developed for this well are sufficiently rigorous as they provide multiple samples replicating the conditions existing when the single sample that identified perchlorate was obtained. The protocol provides for independent sample analysis, multiple samples over time, pre-measured quality control samples, and it provides clear direction for sample collection, handling, preparation and analysis, and retention of duplicate samples for re-analyses in the case of suspect results.

The site use and chemical use information you provided indicate that there is no record of perchlorate use on the property, or of activities that can reasonably be inferred to have used significant quantities of perchlorate. Because there is no reason to believe that Ahmanson Ranch is a source of perchlorate, no assessment of source areas will be required at this time. Should new information be found, indicating perchlorate has been used on the property, the need for additional assessment will be reevaluated.

Your technical report containing the results from the sampling and testing program for Ahmanson Well No. 1 is due to the Regional Board by **June 13, 2003**. I appreciate your cooperation in the collection and analysis of the samples as required by my previous direction. Should you have any questions or concerns, I can be reached at (213) 576-6605.

Sincerely,

Dennis A. Dickerson
Executive Officer

California Environmental Protection Agency

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cc: Congressman Henry A. Waxman
Assemblymember Hannah Beth-Jackson
Assemblymember Fran Pavely
Regional Board Members
The Honorable Steve Bennett, Ventura County Board of Supervisors
The Honorable John Flynn, Ventura County Board of Supervisors
The Honorable Kathy Long, Ventura County Board of Supervisors
The Honorable Judy Mikels, Ventura County Board of Supervisors
The Honorable Frank Schillo, Ventura County Board of Supervisors
The Honorable Lesley Devine, Mayor City of Calabasas
Kevin Mayer, USEPA Region 9-Remedial Project Manager Superfund Division
Jim Papas, DTSC Sacramento
Gerard Abrams, DTSC Sacramento
Dr. Lowell Preston, Ventura County Public Works Agency
Steve Lafflam, The Boeing Company
Katherine Stone, Meyers, Widders, Gibson, Jones, & Schneider, LLP
Rob Reiner, Ralley to Save Ahmanson Ranch
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