The Former Rawson/McKesson Drug Facility (Site) at 2189 Acoma Street in Sacramento, Sacramento County, is situated on the southwest corner of Acoma Street and Arden Way. The Site is currently used as an office furniture warehouse, and surrounding land use is predominantly industrial and commercial. A petroleum discharge from a past underground tank system was discovered while the property was leased and operated by McKesson Corporation. The property is currently owned by and was owned by The Garbero Family Trust when the tank system was removed in 1986.

The Garbero Family Living Trust, as the owner of the property, and McKesson Corporation as the leaseholder at the time of discovery, are jointly considered Dischargers. The Garbero Family Living Trust owns the property where the waste is located and the evidence contained in the Regional Water Board files indicates that the activities at the Site produced waste and those wastes are present at the Site. Therefore, the Dischargers are required to monitor groundwater, the vadose zone, and extraction/injection systems as specified in this Order.

Groundwater is first encountered at approximately 33 feet below ground surface (bgs). Groundwater samples have contained petroleum hydrocarbon constituents at maximum concentrations of: total petroleum hydrocarbons (TPH-G) 250,000 micrograms per liter (ug/l), benzene 20,000 ug/l, toluene 31,000 ug/l, ethylbenzene 2,600 ug/l, xylenes 15,000 ug/l, methyl tert butyl ether (MTBE) 2.9 ug/l, 1,2-dichloroethane (1,2-DCA) 220 ug/l, tetrachloroethene (PCE) 69 ug/l, and trichloroethene (TCE) 380 ug/l. During the fourth quarter 2007 groundwater monitoring event, concentrations of petroleum constituents were detected at maximum concentrations of: TPH-G 12,000 ug/l, benzene 350 ug/l, toluene 150 ug/l, ethylbenzene 470 ug/l, total xylenes 1,100 ug/l, MTBE 2.9 ug/l, and 1,2-DCA 30 ug/l. This pollution has impaired the beneficial uses of the underlying water resource.

This Monitoring and Reporting Program (MRP) is issued pursuant to Section 13267 of the California Water Code and is necessary to delineate waste discharged from the Former Rawson/McKesson Facility, characterize pollutant plumes and determine whether remediation efforts are effective. Existing data and information about the Site show the presence of various chemicals, including TPH-G; benzene, toluene, ethylbenzene, and xylenes (BTEX); MTBE; and 1,2-DCA, emanating from the property resulting from past operations at the Site. The Dischargers shall not implement any changes to this MRP unless and until a revised MRP is issued by the Executive Officer of this Regional Water Board.
Prior to construction of any new groundwater monitoring or extraction wells, and prior to destruction of any groundwater monitoring or extraction wells, the Dischargers shall submit plans and specifications to the Regional Water Board for review and approval. Once installed, all new wells shall be added to the monitoring program and shall be sampled and analyzed according to the schedule below.

**GROUNDWATER MONITORING**

1. As shown on Figure 1, there are 7 groundwater monitoring wells, MW-1, MW-2, MW-3, MW-4, MW-5, MW-6, and MW-7, associated with the Former Rawson/McKesson Facility. The groundwater monitoring program for the 7 monitoring wells and any wells installed subsequent to the issuance of this MRP, shall follow the schedule below.

2. Monitoring wells with free phase petroleum product or visible sheen shall be monitored, at a minimum, for product thickness and depth to water.

3. Sample collection and analysis shall follow standard Environmental Protection Agency (EPA) protocol. All wells shall be monitored semi-annually for water levels and the presence and thickness of free product. The volume of extracted groundwater also shall be provided in semi-annual monitoring reports.

<table>
<thead>
<tr>
<th>Constituents</th>
<th>EPA Analytical Method</th>
<th>Maximum Practical Quantitation Limit ($\mu g/l$)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Depth to Groundwater</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>TPH-G</td>
<td>8015M</td>
<td>50</td>
</tr>
<tr>
<td>Benzene</td>
<td>8020 or 8260B</td>
<td>0.5</td>
</tr>
<tr>
<td>Toluene</td>
<td>8020 or 8260B</td>
<td>0.5</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>8020 or 8260B</td>
<td>0.5</td>
</tr>
<tr>
<td>Xylenes</td>
<td>8020 or 8260B</td>
<td>0.5</td>
</tr>
<tr>
<td>MTBE$^4$</td>
<td>8260B</td>
<td>0.5</td>
</tr>
<tr>
<td>TBA$^4$</td>
<td>8260B</td>
<td>5.0</td>
</tr>
<tr>
<td>TAME$^4$</td>
<td>8260B</td>
<td>0.5</td>
</tr>
<tr>
<td>DIPE$^4$</td>
<td>8260B</td>
<td>0.5</td>
</tr>
<tr>
<td>ETBE$^4$</td>
<td>8260B</td>
<td>0.5</td>
</tr>
<tr>
<td>1,2-Dichloroethane$^4$</td>
<td>8260B</td>
<td>0.5</td>
</tr>
<tr>
<td>Ethanol$^4$</td>
<td>8260B</td>
<td>50</td>
</tr>
<tr>
<td>Methanol$^4$</td>
<td>8260B</td>
<td>100</td>
</tr>
</tbody>
</table>

1 Wells shall be sampled during the first and third quarters.
**Constituents**

<table>
<thead>
<tr>
<th>Constituents</th>
<th>EPA Analytical Method</th>
<th>Maximum Practical Quantitation Limit (μg/l)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Lead</td>
<td>7421/6010B</td>
<td>0.5</td>
</tr>
<tr>
<td>Naphthalene</td>
<td>8260B</td>
<td>0.5</td>
</tr>
</tbody>
</table>

2 Report all discrete peaks identified during the normal course of analysis for chemicals of concern.
3 All concentrations between the Method Detection Limit and the Practical Quantitation Limit shall be reported as trace.
4 Analysis may be discontinued after two consecutive monitoring events of non-detect results with Regional Water Board staff concurrence.
5 If total lead is detected, groundwater samples must be analyzed for tetraethyl lead.

### REPORTING

4. When reporting data, the Dischargers shall arrange the information in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized in such a manner as to illustrate clearly the compliance with this Order.

5. Groundwater monitoring shall be coordinated between the Former Rawson/McKesson Facility (2189 Acoma Street, Sacramento), and the former Continental Chemical (2175 Acoma Street, Sacramento). Data generated from each site is to be shared between Responsible Parties. The monitoring report should include a regional evaluation of the groundwater contamination. Site maps must show all data from all four sites.

6. As required by the California Business and Professions Code Sections 6735, 7835, and 7835.1, all reports shall be prepared by a registered professional or their subordinate and signed by the registered professional.

7. The Dischargers shall submit a paper copy of the semi-annual monitoring report to this Regional Water Board office and submit the semi-annual electronic data reports, which conform to the requirements of the California Code of Regulations, Title 23, Division 3, Chapter 30, electronically over the internet to the State Water Board’s Geotracker database system. Both the paper copy and the electronic submittal are due by the 1st day of the second month following the end of the calendar quarter by **1 May, and 1 November**, until such time as the Executive Officer determines that the reports are no longer necessary. Each semi-annual monitoring report shall include the following minimum information:

   (a) A description and discussion of the groundwater sampling event and results, including trends in the concentrations of pollutants and groundwater elevations in the wells, how and when samples were collected, and whether the pollutant plume(s) is delineated.

   (b) Field logs that contain, at a minimum, water quality parameters measured before, during, and after purging, method of purging, depth of water, volume of water purged, etc.

   (c) Groundwater contour maps for all groundwater zones.
(d) Concentration contour maps for all groundwater zones for TPH-G, benzene, 1,2-DCA, TCE, and PCE.

(e) A table showing well construction details such as well number, groundwater zone being monitored, ground surface elevation, screen interval, bentonite interval, filter pack interval, and total depth of the well.

(f) A table describing historical lateral and vertical (if applicable) down-gradient directions and gradients.

(g) Cumulative data tables containing water quality analytical results and depth to groundwater.

(h) A copy of the laboratory analytical data report.

(i) If applicable, the status of any ongoing remediation, including cumulative information on the mass of pollutant removed from the subsurface, system operating time, the effectiveness of the remediation system, and any field notes pertaining to the operation and maintenance of the system.

(j) If applicable, the reasons for and duration of all interruptions in the operation of any remediation system, and actions planned or taken to correct and prevent interruptions.

8. The First Quarter Semi-Annual Groundwater Monitoring Report, due 1 May of each year, shall be an expanded report and will include the following additional information/items:

(a) Tabular summaries of all data obtained during the year.

(b) Graphical summaries, of TPH-G, benzene, 1,2-DCA, TCE, and PCE, concentrations, groundwater elevation data, and remediation system operation versus time for site wells.

(c) A rose diagram presenting groundwater flow direction and magnitude data.

(d) Contaminant concentration contour maps for TPH-G, benzene, 1,2-DCA, TCE, and PCE, for each monitoring event from the previous year.

(e) A discussion of the long-term trends in the concentrations of the pollutants in the groundwater monitoring wells.

(f) An analysis of whether the pollutant plume is being captured by an extraction system or is continuing to spread.

(g) A description of all remedial activities conducted during the year, an analysis of their effectiveness in removing the pollutants, and plans to improve remediation system
effectiveness.

(h) An identification of any data gaps and potential deficiencies/redundancies in the monitoring system or reporting program.

(i) If desired, a proposal and rationale for any revisions to the groundwater sampling plan frequency and/or list of analytes.

9. The results of any monitoring done more frequently than required at the locations specified in the MRP also shall be reported to the Regional Water Board.

The Dischargers shall implement the above monitoring program as of the date of the Order.

Ordered by: ________________________________

PAMELA C. CREEDON,
Executive Officer

________________________________________
(Date)

January 12, 2009
LEGEND

GROUNDWATER MONITORING WELL
HYDROPUNCH LOCATION (1999)
SOIL BORING LOCATION

FIGURE 1
SITE PLAN

FORMER RAWSON FACILITY
2189 ACOMA STREET
SACRAMENTO, CALIFORNIA
PROJECT NO. 10-548