

**STATE OF CALIFORNIA  
REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES REGION  
MONITORING AND REPORTING PROGRAM NO. CI-10314  
FOR  
LAND TREATMENT OF PETROLEUM HYDROCARBON CONTAMINATED SOIL  
DEFENSE FUEL SUPPORT POINT SAN PEDRO  
3171 NORTH GAFFEY STREET, SAN PEDRO, CALIFORNIA  
(ORDER NO. 90-148, Series No. 151)**

Defense Logistics Agency Installation Management for Energy (Discharger) shall implement this Monitoring and Reporting Program (MRP), No. CI-10314, at the Defense Fuel Support Point San Pedro (Site) pursuant to Order No. 90-148 (Order) adopted by the Regional Water Quality Control Board, Los Angeles Region (Regional Water Board), on October 22, 1990.

**I. REPORTING REQUIREMENTS**

- A. The Discharger shall submit monitoring reports to the Regional Water Board on a quarterly basis. The first monitoring report under this MRP is due on July 15, 2020. Thereafter, monitoring reports shall be submitted by the date in the following schedule:

| <u>Reporting Period</u> | <u>Report Due</u> |
|-------------------------|-------------------|
| January - March         | April 15          |
| April - June            | July 15           |
| July - September        | October 15        |
| October - December      | January 15        |

- B. Within 30 days of completing all post treatment sampling, a "Final Project Completion Report" shall be submitted to the Regional Water Board verifying that all bioremediation operations at the Site are complete. The report shall include all data collected to date, the quantity and the final disposition of all treated soil, and verify that all cleanup goals have been met. A statement shall be included stating that the land treatment was completed in accordance with the Order. All other signed statements required by under the Order shall also be included.

**II. GROUNDWATER MONITORING**

The Discharger is currently implementing an Interim Remediation Action Plan (IRAP) at the Site that includes soil vapor extraction, groundwater extraction, LNAPL removal, and groundwater monitoring under the Regional Water Board Site Cleanup Program (SCP). Since the proposed bioremediation cells will be lined with high density polyethylene (HDPE) liners and covered with heavy duty plastic sheets, they are not expected to release additional pollutants to groundwater. As such, groundwater monitoring dedicated to the bioremediation piles is not required. Nevertheless, the Discharger may be required to conduct additional groundwater monitoring for the bioremediation project if the Regional Water Board Executive Officer (Executive Officer) determines that such requirements are warranted.

**III. LAND TREATMENT MONITORING**

- A. Progress monitoring – Progress samples shall be collected at least monthly following the initiation of bioremediation operations to evaluate the effectiveness of soil treatment. Soil samples shall be collected at a rate of at least one sample per 500 cubic yards (CY), or at

**MONITORING AND REPORTING PROGRAM NO. CI-10314**  
**Defense Fuel Support Point San Pedro**

an alternative rate determined under the SCP, of soil being treated. Sampling locations shall be determined by subdividing each batch into approximately equal grid cells. One sample shall be collected at a randomly selected location from each grid cell during each successive sampling event. Progress monitoring samples shall be analyzed for the following constituents:

| <u>Parameter</u>  | <u>Units</u>        | <u>Frequency</u> |
|---|---------------------|------------------|
| Bacteria Plate Count                                    | Colonies/gram       | Monthly          |
| Soil Moisture Content                                   | %                   | Monthly          |
| Total Petroleum Hydrocarbons (TPH)<br>(EPA Method 8015) | micro gram/kilogram | Monthly          |

- B. Acceptance sampling – At the end of each treatment cycle, prior to removal from the treatment stockpile, acceptance samples shall be taken at a rate of 35 samples per each treatment stockpile of approximately 750 CY, or at an alternative rate determined under the SCP. Sampling locations shall be evenly distributed along the length, width, and depth of each treatment stockpile. All acceptance samples shall be analyzed for the following constituents:

| <u>Parameter</u>                                    | <u>Units</u>       |
|---|--------------------|
| Total Petroleum Hydrocarbons (EPA Method 8015)      | milligram/kilogram |
| Volatile Organic Compounds (VOCs, EPA Method 8260B) | microgram/kilogram |

The Discharger shall verify that concentrations of all contaminants are below their respective cleanup goals prior removal and reuse treated soil. Treated soil that exceeds cleanup goals shall either be re-treated until the cleanup goals are achieved or be properly disposed of offsite. No treated soil shall be reused or backfilled unless all cleanup goals are met.

- C. Post-treatment sampling – Following the completion of bioremediation operations, the Discharger shall inspect all liners for any damages that may have resulted in the release of pollutants from the treatment rows to the underline soil. A minimum of three surface samples shall be taken at each treatment row and analyzed for TPH (EPA Method 8015) and VOCs (EPA Method 8260B). Any soil that exceeds cleanup goals shall be excavated and properly disposed of offsite or treated onsite if a treatment cell is still active.
- D. Inspections - Throughout the duration of bioremediation operations, the Discharger shall conduct visual inspections at least weekly at the treatment cells to ensure that all liners, covers, and vapor and moisture control systems are properly maintained. Any damages shall be repaired immediately. Records of such inspections shall be included in the quarterly reports submitted to the Regional Water Board.

**IV. GENERAL PROVISIONS FOR SAMPLING AND ANALYSIS**

- A. All sampling, sample preservation, and analysis, shall be performed in accordance with the latest editions of "Guidelines Establishing Test Procedure for Analysis of Pollutants," promulgated by the United States Environmental Protection Agency (U.S. EPA) and U.S. EPA SW-846 Methods (dated December 1996).
- B. All chemical, bacteriological, and bioassay analyses, shall be conducted at a laboratory certified for such analyses by the State Water Resources Control Board Division of

**MONITORING AND REPORTING PROGRAM NO. CI-10314**  
**Defense Fuel Support Point San Pedro**

Drinking Water Program Environmental Laboratory Accreditation Program (ELAP), or approved by the Executive Officer. No changes shall be made in sampling points without prior approval of the Executive Officer.

- C. Written and verbal notice must be made to the Regional Water Board a minimum of seven days in advance of the sampling event so that staff may participate, if they choose.
- D. The Discharger shall maintain all sampling and analytical results, including strip charts, date, exact location, and time of sampling, date analysis was performed, name of analyst, analytical techniques used, and results of all analysis. Such results 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 Water Board.

**V. GENERAL PROVISIONS FOR REPORTING**

- A. When applicable, all reports shall contain the following minimum information:
  - 1. Quantity of waste material treated during the reporting period;
  - 2. Analytical results from all soil sampling and any groundwater monitoring, if required;
  - 3. Quantity of water and nutrients added to the land treatment units during the report period;
  - 4. Records of bioremediation operations and facility inspections conducted during the report period;
  - 4. A statement certifying that storm water runoff was prevented from entering the land treatment area, other than rainfall directly on the land treatment units, and that no waste material was carried away from the land treatment area by stormwater runoff; and
  - 5. Color photographs of the bioremediation operations shall be taken at least monthly and be included in the quarterly and final reports.
- B. All technical reports prepared for submittal to the Regional Water Board shall be signed by a California registered Professional Engineer or Professional Geologist.
- C. For every item where requirements in the Order are not met, the Discharger shall submit a statement of the actions undertaken or proposed, together with a timetable, to bring the Discharger back into full compliance with the requirements at the earliest time.
- D. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the data, the constituents, and the concentrations, are readily discernible. The data shall be summarized to determine compliance with waste discharge requirements, and where applicable, shall include receiving groundwater analytical data.
- E. Reports submitted to the Regional Water Board shall be signed by:
  - 1. In the case of a corporation, the principal executive officer of at least the level of vice president or his duly authorized representative, if such representative is responsible for the overall operation of the facility from which discharge originates;
  - 2. In the case of a partnership, a general partner;
  - 3. In the case of a sole proprietorship, the proprietor;

**MONITORING AND REPORTING PROGRAM NO. CI-10314**  
**Defense Fuel Support Point San Pedro**

4. In the case of a municipal, state or public facility, either a principal executive officer, ranking elected officer, or other duly authorized employee.
- F. Each report shall contain the following completed declaration:
- "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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 fine and imprisonment for knowing violations."
- G. Unless it is otherwise required by the Executive Officer, all reports required under this MRP shall be submitted to the State Water Resources Control Board (State Board) Geotracker database system, under Global ID **T10000010232**, in the form of searchable Portable Document Format (PDF) files. In addition, any groundwater monitoring data shall also be submitted to Geotracker in Electronic Deliverable Format (EDF). A hard copy of the report, including all original laboratory reports and field records that are used in preparation of the reports, shall be retained by the Discharger and be available for review by Regional Water Board staff.
- H. These records and reports are public documents and shall be made available for inspection during business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

Ordered by:

Renee Purdy  
Executive Officer

Date: April 7, 2020