

## Los Angeles Regional Water Quality Control Board

June 17, 2013

Pneuma Abex LLC  
c/o Mr. Dennis Reis  
Briggs & Morgan  
2200 IDS Center  
80 South 8<sup>th</sup> Street  
Minneapolis, Minnesota 55402

**REVISED MONITORING AND REPORTING PROGRAM NO. CI-8984 – FORMER PNEUMO ABEX FACILITY, 3151 WEST FIFTH STREET, OXNARD, CALIFORNIA (FILE NO. 02-150, ORDER NO. R4-2007-0019, SERIES NO. 136, CI-8984, GLOBAL ID. WDR100001027)**

Dear Mr. Reis:

On September 15, 2010, Los Angeles Regional Water Quality Control Board (Regional Board) enrolled you under general Waste Discharge Requirements (WDR Order No. R4-2007-0019) with a Monitoring and Reporting Program (MRP) No. CI-9714 for a pilot test to inject zero valent iron and Adventus' EHC<sup>®</sup> for groundwater remediation of volatile organic compounds.

The *Workplan to Perform Analytical Groundwater Profiling and Amendment Delivery Testing* (Workplan), dated November 12, 2012 was prepared and submitted by WSP Consulting Engineers, P.C. (WSP) on your behalf. The Workplan indicates that the pilot test results have not shown the reduction of the chemicals of concern. It was suspected that the amendment was unable to be delivered to the subsurface. The Workplan proposes an amendment delivery test to validate delivery procedures and provide data to optimize the full-scale amendment delivery approach. Approximately 377 gallons of 29% EHC<sup>®</sup> slurry and followed by 150 gallons of potable water will be injected into three injection points (PT-01 through PT-03) at depths between 15 and 20 feet below ground surface. On February 22, 2013, the Regional Board staff approved the Workplan.

The revised MRP, which reflects the modification to the injection procedures, is enclosed. The next monitoring report is due on **July 15, 2013** as required in the revised MRP. Please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100001027. ESI training video is available at: <https://waterboards.webex.com/waterboards/ldr.php?AT=pb&SP=MC&rID=44145287&rKey=7dad4352c990334b>

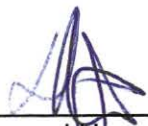
For all parties who upload electronic documents to State Database GeoTracker, it is no longer necessary to email a copy of these documents to [losangeles@waterboards.ca.gov](mailto:losangeles@waterboards.ca.gov) or submit hard copies to our office. The Regional Board will no longer accept documents (submitted 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 for further details 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 ([achang@waterboards.ca.gov](mailto:achang@waterboards.ca.gov)), or the Chief of Groundwater Permitting Unit, Dr. Eric Wu at (213) 576-6683 ([ewu@waterboards.ca.gov](mailto:ewu@waterboards.ca.gov)).

Sincerely,

  
Chief Deputy EO  
Samuel Unger, P.E. *for*  
Executive Officer

Enclosure: Revised Monitoring and Reporting Program No. CI-8984 dated June 17, 2013

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI-8984  
FOR  
FORMER PNEUMO ABEX FACILITY  
3151 WEST FIFTH STREET, OXNARD, CALIFORNIA

ENROLLMENT UNDER REGIONAL BOARD  
ORDER NO. R4-2007-0019 (SERIES NO. 136)  
FILE NO. 94-076

I. MONITORING AND REPORTING REQUIREMENTS

- A. Pneumo Abex LLC (hereinafter Discharger) shall implement this Monitoring and Reporting Program (MRP) on the effective date (June 17, 2013) under Regional Board Order No. R4-2007-0019. The next monitoring report under this program, shall be received at the Regional Board by **July 15, 2013**. 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 15
April – June	July 15
July – September	October 15
October – December	January 15

- 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 Order No. R4-2007-0019 "*Monitoring and Reporting Requirements*" in addition to the aforementioned 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 the EHC<sup>®</sup> slurry.
2. Written and tabular summary defining depth of injection points, quantity of the EHC<sup>®</sup> slurry injected at each injection point, and total amount of the EHC<sup>®</sup> slurry injected at the Site.
3. Visual inspection at each injection point shall be conducted and recorded during the injection.

## 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-14A, MW-15A, and MW-29 (Figure 1). The Discharger shall conduct a baseline sampling prior to the proposed injection, followed by specified schedules from all 3 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

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
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
Volatile Organic Compounds	µg/L	grab	Baseline and quarterly after injection

All groundwater monitoring reports must include, at minimum, the following:

- a. Well identification, date and time of sampling;
- b. Sampler identification, and laboratory identification;
- c. Quarterly 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)"


**VI. PUBLIC DOCUMENTS**

All records and reports submitted in compliance with Order No. R4-2007-0019 and Monitoring and Reporting Program No. CI-8984 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 WDR100001027.

Ordered by:






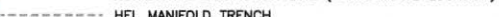

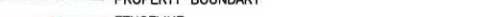
  
\_\_\_\_\_  
Samuel Unger, P.E.  
Executive Officer  
*Chief Dep-1980*  
*ES*

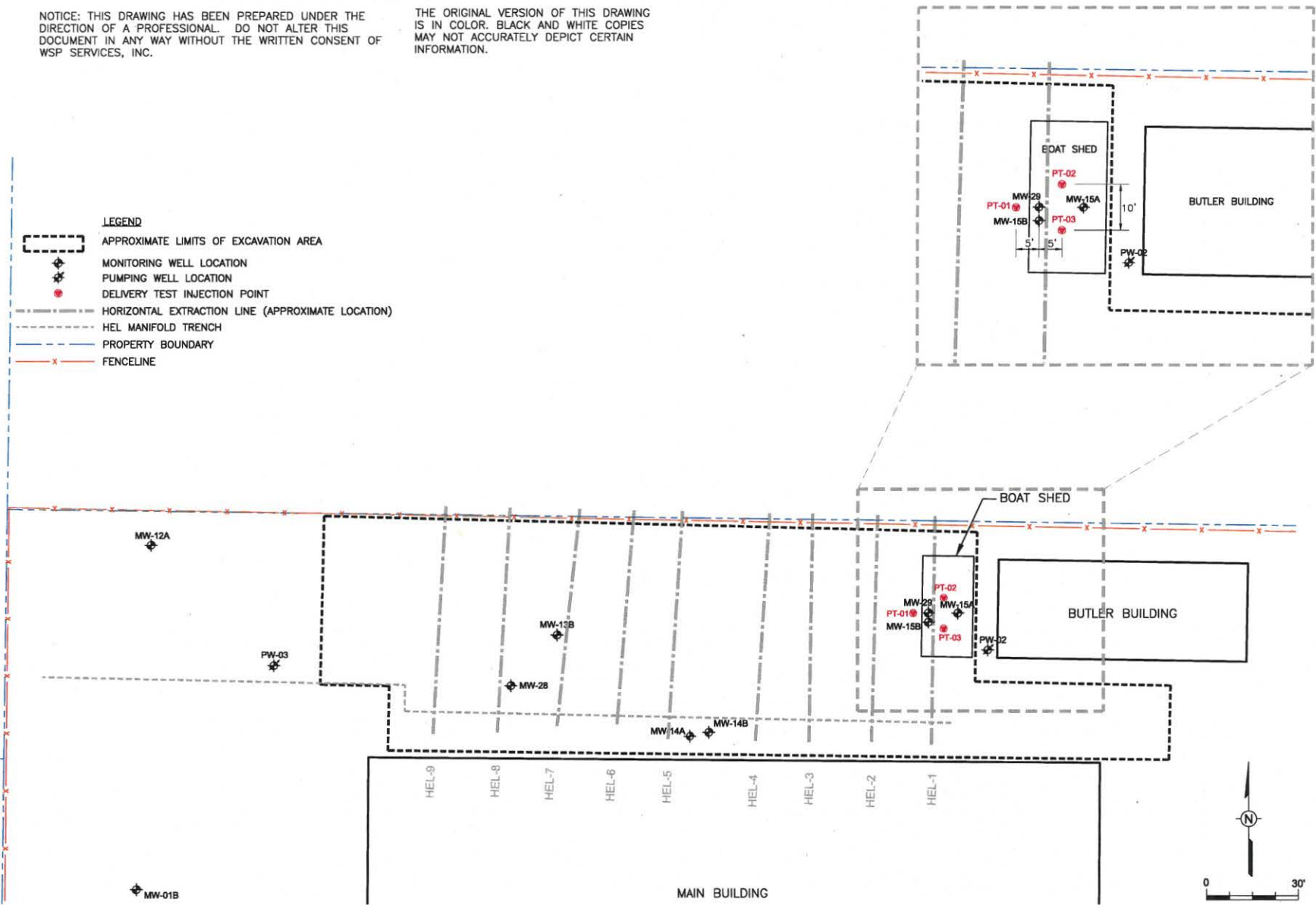
Date: June 17, 2013

NOTICE: THIS DRAWING HAS BEEN PREPARED UNDER THE DIRECTION OF A PROFESSIONAL. DO NOT ALTER THIS DOCUMENT IN ANY WAY WITHOUT THE WRITTEN CONSENT OF WSP SERVICES, INC.



THE ORIGINAL VERSION OF THIS DRAWING IS IN COLOR. BLACK AND WHITE COPIES MAY NOT ACCURATELY DEPICT CERTAIN INFORMATION.

**LEGEND**

-  APPROXIMATE LIMITS OF EXCAVATION AREA
-  MONITORING WELL LOCATION
-  PUMPING WELL LOCATION
-  DELIVERY TEST INJECTION POINT
-  HORIZONTAL EXTRACTION LINE (APPROXIMATE LOCATION)
-  HEL MANIFOLD TRENCH
-  PROPERTY BOUNDARY
-  FENCELINE



REFERENCE: SOIL EXCAVATION, TESTING, AND GRADING REPORT: HENSHAW ASSOCIATES, INC. MARCH 30, 1999.

Drawn By: EGC  
 Checked:  5/11/2019  
 Approved:   
 DWG Name: 00008152-013

FORMER PNEUMO ABEX SITE  
 OXNARD, CALIFORNIA  
 PREPARED FOR  
 PNEUMO ABEX LLC

Figure 1  
 DELIVERY TEST LOCATIONS

**WSP**  
 WSP Services, Inc.  
 2025 Gateway Place, Suite 435  
 San Jose, California 95110  
 (408) 453-6100  
 www.wspgroup.com/usa

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