STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION
MONITORING AND REPORTING PROGRAM NO. CI-9440
for
FORMER CRENSHAW COLLISION CENTER
6530 CRENSHAW BOULEWARD, LOS ANGELES, CA
(ORC™ INJECTION FOR GROUNDWATER CLEANUP)
(ORDER NO. R4-2007-0019, SERIES NO. 074)

I. REPORTING REQUIREMENTS

A. Mr. Leslie Wilson and Mr. James Han Kim (hereinafter Discharger) shall implement this monitoring program on the effective date of Regional Board Order No. R4-2007-0019. The first monitoring report under this program, for January - March 2009, shall be received at the Regional Board by **April 15, 2009**. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

Monitoring Period	Report Due
January – March	April 15
April – June	July 15
July – September	October 15
October – December	January 15

Monitoring reports must be addressed to the regional Board, Attention: Information Technology Unit.

B. If there is no discharge or injection during any reporting period, the report shall so state.

C. By January 30 of each year, beginning January 30, 2009, 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 explain 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 (WDRs).

D. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the California Department of Health Services Environmental Laboratory Accreditation Program (ELAP). A copy of the laboratory certification shall be provided each time a new and/or renewal certification is obtained from ELAP.

E. The method limits (MLs) employed for effluent analyses shall be lower than the permit limits established for a given parameter, unless the Discharger can demonstrate that a particular ML is not attainable and obtains approval for a higher ML from the Regional Board Executive Officer (Executive Officer). The Discharger shall submit a list of the analytical methods employed for each test and the associated laboratory quality assurance/quality control (QA/QC) procedures upon request by the Regional Board.

November 18, 2008

F. Groundwater samples must be analyzed within allowable holding time limits as specified in 40 CFR Part 136. All QA/QC samples must be run on the same dates when samples were actually analyzed. The Discharger shall make available for inspection and/or submit the QA/QC documentation upon request by Regional Board staff.

G. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the California Department of Health Services, and in accordance with current United States Environmental Protection Agency (USEPA) guideline procedures or as specified in this Monitoring Program." Proper chain of custody procedures must be followed and a copy of the completed chain of custody form shall be submitted with the report.

H. Each monitoring report shall contain a separate section titled "Summary of Non-Compliance" which discusses the compliance record and the corrective actions taken or planned that may be needed to bring the discharge into full compliance with WDRs. This section shall be located at the front of the report and shall clearly list all non-compliance with WDRs, as well as all excursions of effluent limitations.

I. The Discharger shall maintain all sampling and analytical results: date, exact place, and time of sampling; dates analyses were performed; analyst's name; analytical techniques used; and results of all analyses. Such records 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 Board.

J. If the Discharger performs analyses on any groundwater samples more frequently than required by this Order using approved analytical methods, the results of those analyses shall be included in the report.

K. In reporting the monitoring data, the Discharger shall arrange the data in tabular form so that the date, the constituents, and the concentrations are readily discernible. The data shall be summarized to demonstrate compliance with the requirements and, where applicable, shall include results of receiving water observations.

II. ORC™ INJECTION MONITORING REQUIREMENTS

The quarterly reports shall contain the following information regarding injection activities:

1. Location map showing injection points used for the ORC™ injection.

2. Written and tabular summary defining the quantity of ORC™ injected per month to the groundwater and a summary describing the days on which the injection system was in operation.

3. Quarterly visual inspection at each injection point shall be conducted to evaluate the well casing integrity for a period of three month after each injection. The quarterly report shall include a summary of the visual inspection.

4. To avoid groundwater monitoring network reduction, data bias, and well screen clogging or alteration, no groundwater monitoring wells shall be used as injection points during the proposed ORC™ injection. Separate injection points/wells must be installed at the site for the injection.

5. ORC™ injection should not commence until the downgradient well MW-6 is installed.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site.

You must install a downgradient well MW-6 in the location of proposed HP-2 area. Groundwater samples shall be collected from up-gradient groundwater monitoring well MW-2, source wells MW-1, and MW-5, and the proposed down-gradient well MW-6 to monitor the effectiveness of the in-situ groundwater remediation (refer to attached Figure 3).

Groundwater shall be monitored for the duration of the remediation in accordance with the following discharge monitoring program:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS[1]
Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd)	µg/L	Grab	• Quarterly
Benzene, Toluene, Ehylbenzene, Xylenes (BTEX)	µg/L	Grab	• Quarterly
Methyl tertiary butyl ether (MTBE), Tertiary butyl alcohol (TBA), Tertiary amyl methyl ether (TAME), Di-isopropyl ether (DIPE), ether (ETBE)	µg/L	Grab	• Quarterly
Ethanol Formaldehyde Acetone	µg/L	Grab	• Quarterly
Total dissolved solids, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L	Grab	• Quarterly
Oxidation-reduction potential	milivolts		• Quarterly
Dissolved Oxygen	mg/L	Grab	• Quarterly
Dissolved ferrous iron Arsenic	µg/L	Grab	• Quarterly
Total Chromium and chromium six [2]	µg/L	Grab	• Quarterly

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS[1]
PH	pH units	Grab	• Quarterly
Temperature	$^0F/^0C$	Grab	• Quarterly
Groundwater Elevation	Feet, above mean sea level and below ground surface	In situ	• Quarterly

[1] One week before injection and quarterly thereafter.
[2] The Discharger is required to monitor for total chromium and chromium six in the baseline, second and fourth quarterly sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored quarterly thereafter.

All groundwater monitoring reports must include, at a 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

Monitoring frequencies may be adjusted to a less frequent basis or parameters dropped by the Executive Officer if the Discharger makes a request and the Executive Officer determines that the request is adequately supported by statistical trends of monitoring data submitted.

V. CERTIFICATION STATEMENT

Each report shall contain the following 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

These records and reports are public documents and shall be made available for inspection during normal business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region.

Ordered by: _____ Date: November 18, 2008
Tracy J. Egoscue
Executive Officer

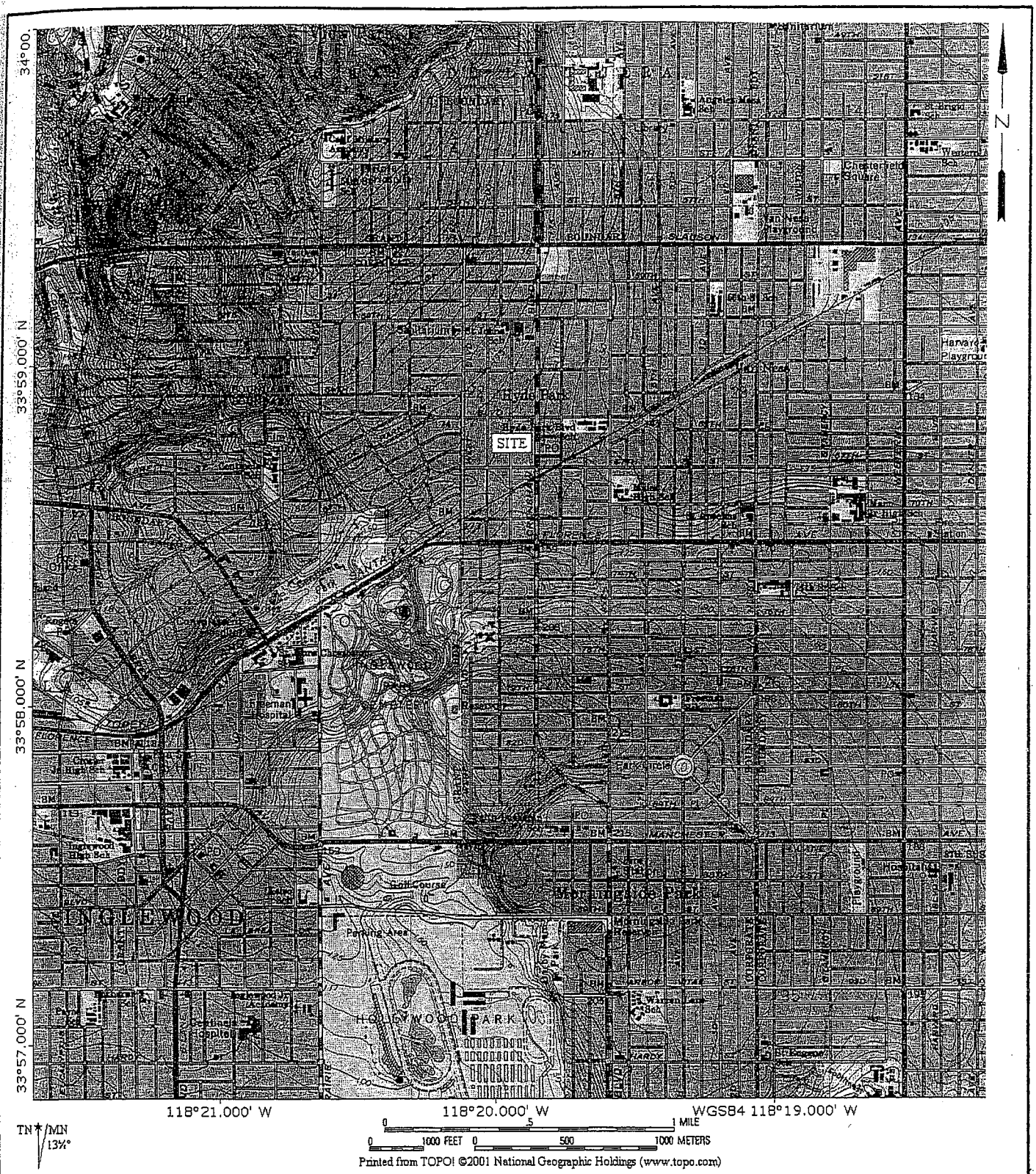

Figure 1

ENVIRON STRATEGY CONSULTANTS, INC. 30 Hughes, Suite 209 Irvine, California 92618	FIGURE 1 SITE LOCATION MAP CRENSHAW COLLISION CENTER 6530 CRENSHAW BLVD. LOS ANGELES, CALIFORNIA	DATE: 10/07/04 PROJECT NO. 291-B FILE NO. 291bFig1

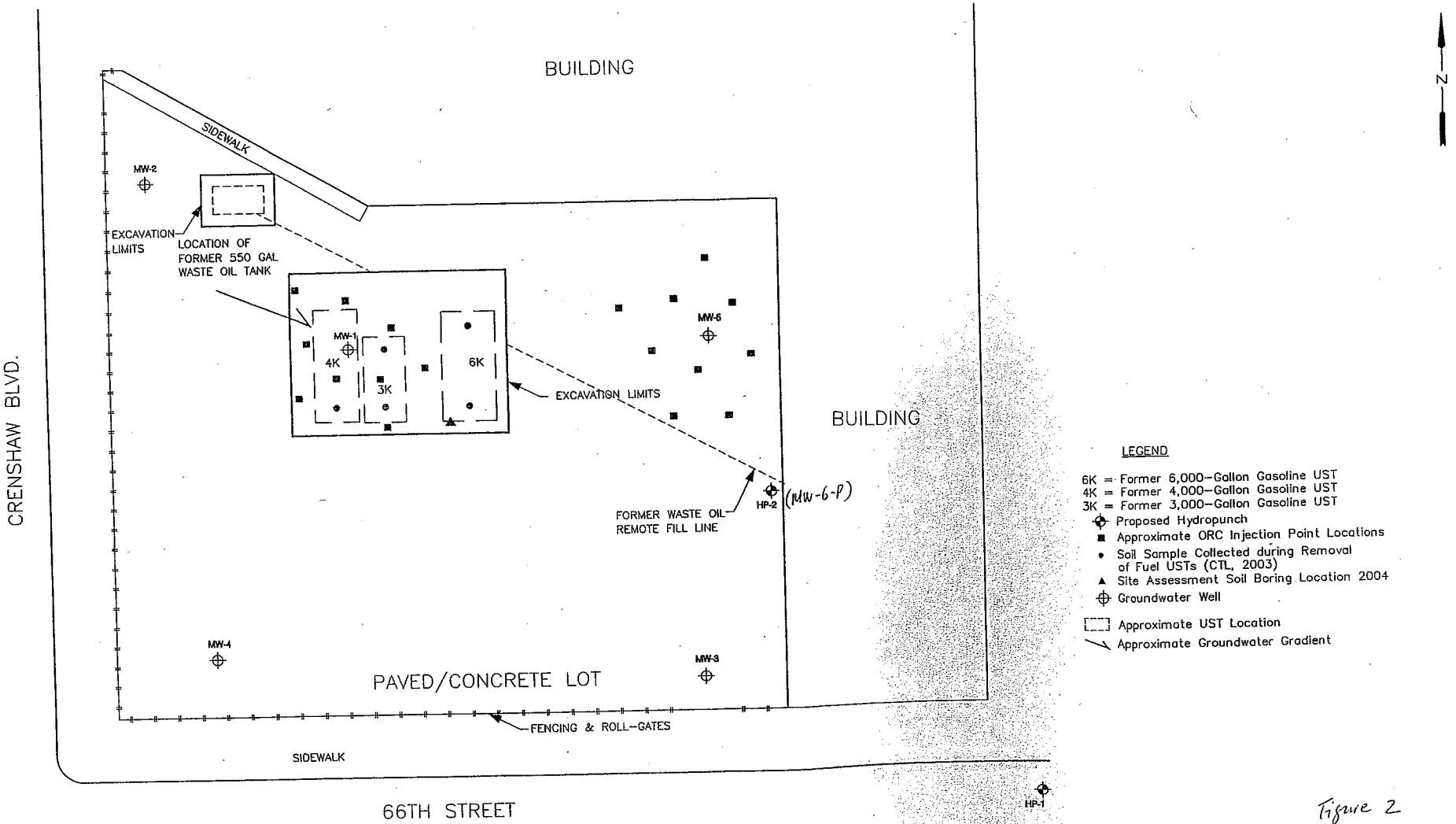

Figure 2

environ strategy consultants, inc. es

One Technology Drive, Suite B-123
Irvine, California 92618

FIGURE 6
SITE PLAN SHOWING PROPOSED INJECTION POINTS & OBSERVATION WELLS

CRENSHAW COLLISION CENTER
6530 CRENSHAW BLVD.
LOS ANGELES, CALIFORNIA

DATE: 4/9/08
PROJECT. NO. 291-D
FILE NO. 291eRAPfig6

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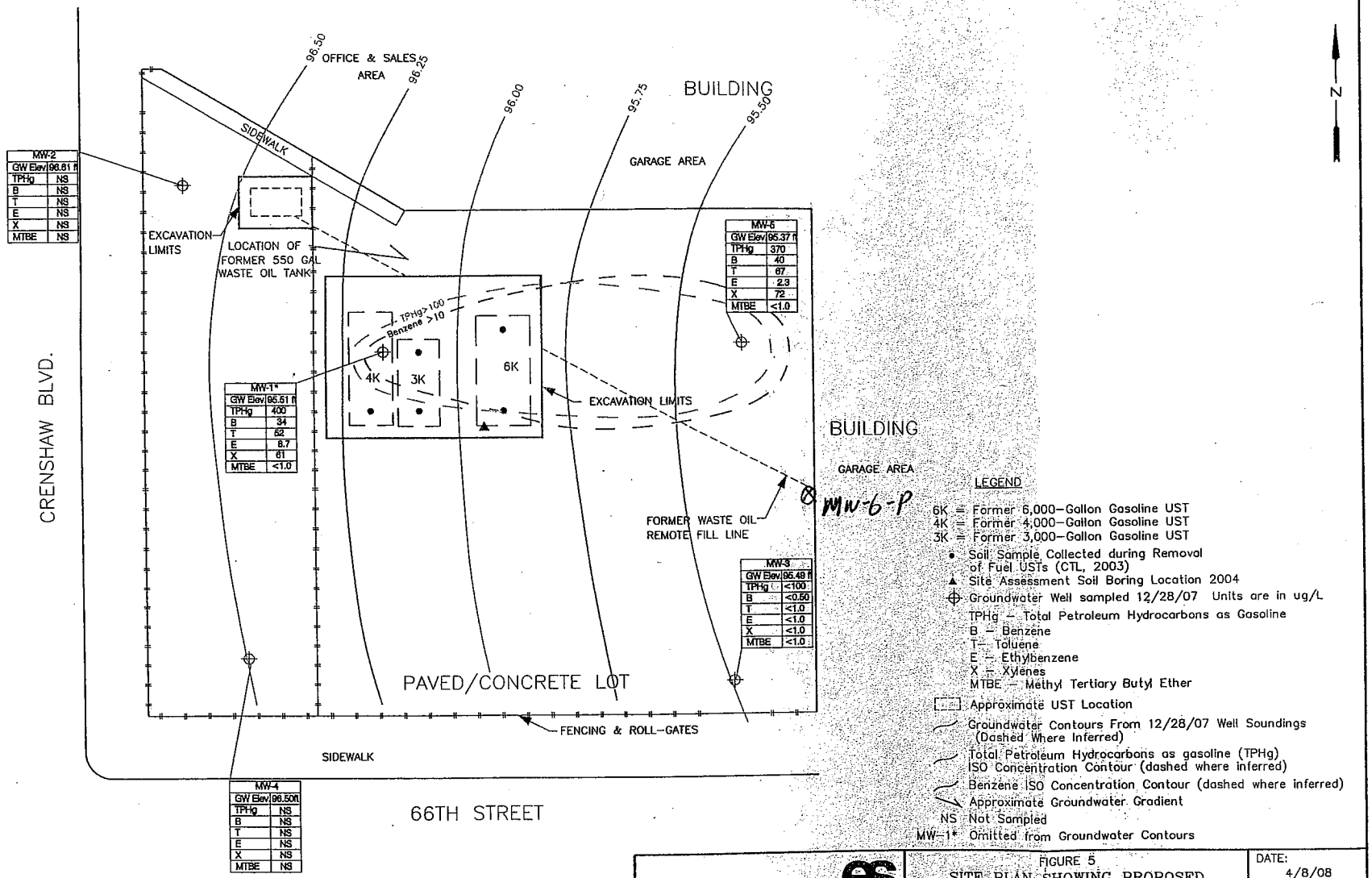

LEGEND

6K = Former 6,000-Gallon Gasoline UST
4K = Former 4,000-Gallon Gasoline UST
3K = Former 3,000-Gallon Gasoline UST
• Soil Sample Collected during Removal of Fuel USTs (CTL, 2003)
▲ Site Assessment Soil Boring Location 2004
⊕ Groundwater Well sampled 12/28/07 Units are in ug/L
TPHg = Total Petroleum Hydrocarbons as Gasoline
B = Benzene
T = Toluene
E = Ethylbenzene
X = Xylenes
MTBE = Methyl Tertiary Butyl Ether
Approximate UST Location
Groundwater Contours From 12/28/07 Well Soundings (Dashed Where Inferred)
Total Petroleum Hydrocarbons as gasoline (TPHg) ISO Concentration Contour (dashed where inferred)
Benzene ISO Concentration Contour (dashed where inferred)
Approximate Groundwater Gradient
NS Not Sampled
MW-1* Omitted from Groundwater Contours

environ strategy consultants, inc.
One Technology Drive, Suite B-123
Irvine, California 92618

FIGURE 5
SITE PLAN SHOWING PROPOSED INJECTION POINTS AND OBSERVATION WELLS
CRENSHAW COLLISION CENTER
6530 CRENSHAW BLVD.
LOS ANGELES, CALIFORNIA

DATE: 4/8/08
PROJECT NO. 291-E
FILE NO. 291eRAP408fig5

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Figure 3