

EDMUND G. BROWN JR.  
GOVERNOR

MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## Los Angeles Regional Water Quality Control Board

June 6, 2014

Mr. Owen Kupfer  
Bragg Companies  
6251 North Paramount Boulevard  
Long Beach, California 90805

Certified Mail  
Return Receipt Required  
Claim No. 7010 3090 0002 1022 1271

**REVISED MONITORING AND REPORTING PROGRAM NO. CI-9773 – BRAGG CRANE FACILITY, 6251 NORTH PARAMOUNT BOULEVARD, LONG BEACH, CALIFORNIA (FILE NO. 11-165, ORDER NO. R4-2007-0019, SERIES NO. 182, CI-9773, GLOBAL ID. WDR100001851)**

Dear Mr. Kupfer:

On January 20, 2012, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) enrolled you under general Waste Discharge Requirements (WDR Order No. R4-2007-0019) with a Monitoring and Reporting Program (MRP) No. CI-9773 for the injection of Fe(III)-EDTA-catalyzed sodium persulfate solution into the subsurface for groundwater remediation of volatile organic compounds at the subject site.

On behalf of Bragg Companies, Advanced Environmental Concepts Inc. submitted the *Revised Groundwater Remediation Work Plan* (Revised Work Plan), dated March 2014. The Revised Work Plan indicates that the use of Fe(III)-EDTA-catalyzed sodium persulfate solution would cause unacceptable levels of corrosion to the adjacent fuel transmission lines in the vicinity of the treatment area. Therefore, the Revised Work Plan proposes to use sodium hydroxide activated persulfate solution which will have less corrosion to the adjacent pipelines. It is estimated that 38,400 gallons of 50% sodium hydroxide activated persulfate solution will be injected into 16 injection points at depths approximately from 10 to 15 feet below ground surface. On May 14, 2014, the Regional Board Site Cleanup staff approved the Revised Work Plan.

The proposed injection shall not exceed 38,400 gallons of 50% sodium hydroxide activated persulfate solution at 16 injection points as indicated in the Figure 1 of the revised MRP. The injection activities are expected to take approximately one month.

The revised MRP, which incorporates injection of sodium hydroxide activated persulfate solution is enclosed. The proposed discharge shall not cause the mineral constituents of the receiving groundwater at the compliance point, downgradient outside the application area, in excess of applicable limits (Central Basin of the Los Angeles Coastal Plain Groundwater Basin) given in Attachment Table 3-10 of Order No. R4-2007-0019. The next monitoring report is due on **July 15, 2014** 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.

CHARLES STRINGER, CHAIR | SAMUEL UNGER, EXECUTIVE OFFICER

320 West 4th St., Suite 200, Los Angeles, CA 90013 | [www.waterboards.ca.gov/losangeles](http://www.waterboards.ca.gov/losangeles)

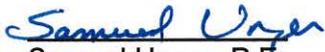
The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP, including groundwater monitoring data, discharge location data, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100001851. 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 at: <http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20GT%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,

  
Samuel Unger, P.E.  
Executive Officer

Enclosure: Revised Monitoring and Reporting Program No. CI-9773 dated June 6, 2014

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI-9773  
FOR  
BRAGG CRANE FACILITY  
6251 NORTH PARAMOUNT BOULEVARD, LONG BEACH, CALIFORNIA

ENROLLMENT UNDER REGIONAL BOARD  
ORDER NO. R4-2007-0019 (SERIES NO. 182)  
FILE NO. 11-165

I. MONITORING AND REPORTING REQUIREMENTS

- A. Bragg Companies (hereinafter Discharger) shall implement this Monitoring and Reporting Program (MRP) on the effective date (June 6, 2014) 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, 2014**. 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*".

## 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 sodium hydroxide activated persulfate solution.
2. Written and tabular summary defining depth of injection points, quantity of the sodium hydroxide activated persulfate solution injected at each injection point, and total amount of the sodium hydroxide activated persulfate solution 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 W-9, W-16, and W-H (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

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Total Dissolved Solids	mg/L	grab	Baseline and quarterly after injection
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
Total Petroleum Hydrocarbons	µg/L	grab	Baseline and quarterly after injection
Volatile Organic Compounds	µg/L	grab	Baseline and quarterly after injection
Title 22 Metals	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**

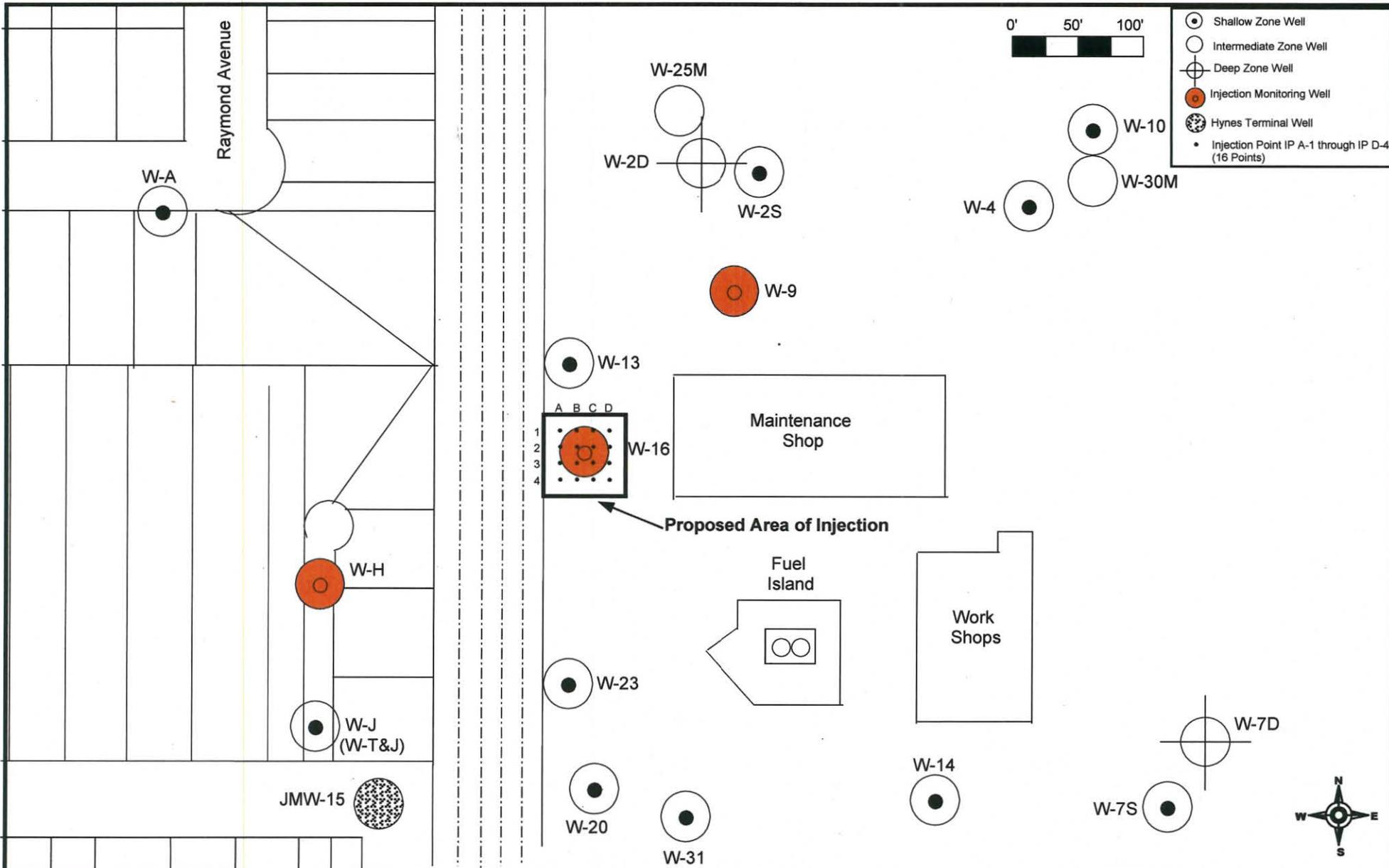
All records and reports submitted in compliance with Order No.R4-2007-0019 and Monitoring and Reporting Program No. CI-9773 are public documents and will be made available for inspection during business hours at the office of the California Regional Water Quality Control Board, Los Angeles Region, upon 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 WDR100001851.

Ordered by:   
Samuel Unger, P.E.  
Executive Officer

Date: June 6, 2014



**AEC**  
 ADVANCED ENVIRONMENTAL CONCEPTS INC.  
 ADVANCED ENVIRONMENTAL CONCEPTS  
 P.O. BOX 40872 BAKERSFIELD, CA 93384

**Proposed Injection Area**  
 Bragg Crane  
 (Former Monsanto Facility)  
 6251 Paramount Boulevard  
 Long Beach, California

**FIGURE**  
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