



EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

January 6, 2015

Ms. Brandyn Hancocks
Golden State Water Company
3005 Gold Canal Drive
Rancho Cordova, CA 95670

Certified Mail
Return Receipt Required
Claim No. 7012 3460 0002 9485 6164

**GENERAL WASTE DISCHARGE REQUIREMENTS AND REVISED MONITORING AND REPORTING PROGRAM NO. CI-9929
GOLDEN STATE WATER COMPANY (CHADRON PLANT)
14401 SOUTH CHADRON AVENUE, HAWTHORNE, CALIFORNIA
(CASE NO. I-12808, ORDER NO. R4-2014-0187, SERIES NO. 016, CI-9929, GLOBAL ID. WDR100010874)**

Dear Ms. Hancocks:

On May 6, 2013, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board) enrolled you under General Waste Discharge Requirements (General WDRs) (Order No. R4-2007-0019) with a Monitoring and Reporting Program (MRP) No. CI-9929 for injection of activated sodium persulfate for groundwater remediation of petroleum hydrocarbons at the subject site.

On behalf of the Golden State Water Company, Aquilogic, Inc. submitted the "Work Plan for Surfactant Pilot Test (the Workplan), dated October 1, 2014 for injecting surfactant and activated sodium persulfate to determine its feasibility. The May 2014 groundwater monitoring results detected total petroleum hydrocarbon as gasoline (TPHg) up to 85,000 µg/L, benzene up to 15,000 µg/L, methyl tertiary butyl ether (MTBE) up to 18,000 µg/L, and tertiary butyl alcohol (TBA) up to 19 µg/L. On October 16, 2014, the Regional Board approved the Workplan.

Regional Board staff has determined that the proposed discharge meets the conditions specified in General WDRs Order No. R4-2014-0187, *General Waste Discharge Requirements for In-Situ Groundwater Remediation and Groundwater Re-Injection*, adopted by this Regional Board on September 11, 2014. Therefore, you are enrolled under the General WDRs Order No. R4-2014-0187 and your previous enrollment under General WDRs Order No. R4-2007-0019 is hereby terminated with the exception of enforcement under the terms of the permit.

Enclosed are your General WDRs, consisting of Regional Board Order No. R4-2014-0187 (Series No. 016), Standard Provisions Applicable to Waste Discharge Requirements, and revised MRP No. CI-9929. 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 (West Coast Basin of the Los Angeles Coastal Plain Groundwater Basin) given in Attachment B of General WDRs Order No. R4-2014-0187.

The revised MRP No. CI-9929 requires you to implement the monitoring program on the effective date of this enrollment under Regional Board Order No. R4-2014-0187. When submitting monitoring or technical reports to the Regional Board per these requirements, please do not combine other reports with your monitoring reports. Submit each type of report as a separate document.

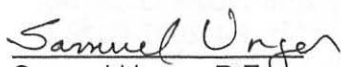
In accordance with regulations adopted by the State Board in September 2004 regarding electronic submittal of information, Golden State Water Company (the Discharger) has been electronically submitting monitoring reports to the State Board GeoTracker system under UST Global ID T0603704001. To comply with the Monitoring and Reporting Program under this WDR, the Discharger shall upload the WDR monitoring reports to the Geotracker under the two Global ID T0603704001 (continuing) and Global ID WDR100010874 (new). For more information regarding the new Global ID under WDR, please see ESI training video 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 the State GeoTracker Database, the Regional Board will no longer accept documents (submitted by either hard copy or email) that already have been 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%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 (ann.chang@waterboards.ca.gov), or the Chief of Groundwater Permitting Unit, Dr. Eric Wu at (213) 576-6683 (eric.wu@waterboards.ca.gov). Questions regarding underground storage tank issues should be forwarded to Mr. Jimmie Woo at (213) 576-6698 (jwoo@waterboards.ca.gov).

Sincerely,


Samuel Unger, P.E.
Executive Officer

Enclosures: General Waste Discharge Requirements Order No. R4-2014-0187
Standard Provisions, Applicable to Waste Discharge Requirements
Revised Monitoring and Reporting Program No CI-9929
dated January 6, 2015

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

MONITORING AND REPORTING PROGRAM NO. CI-9929

For

GOLDEN STATE WATER COMPANY (CHADRON PLANT)
14401 SOUTH CHADRON AVENUE, HAWTHORNE, CA
(SURFACTANT AND ACTIVATED SODIUM PERSULFATE
FOR GROUNDWATER CLEANUP)

ENROLLMENT UNDER REGIONAL BOARD
(ORDER NO. R4-2014-0187, SERIES NO. 016)

I. REPORTING REQUIREMENTS

- A. Golden State Water Company (hereinafter Discharger) shall implement this monitoring program on the effective date of this Monitoring and Reporting Program (MRP). The first monitoring report under this program shall be received at the Regional Board by **July 15, 2015**. Subsequent monitoring reports shall be received at the Regional Board according to the following schedule:

<u>Monitoring Period</u>	<u>Report Due</u>
January – June	July 15 th
July – December	January 15 th

The Discharger shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the MRP to the State Water Resources Control Board (SWRCB) GeoTracker database, Attention: Information Technology Unit.

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

- B. Laboratory analyses – all chemical, bacteriological, and toxicity analyses shall be conducted at a laboratory certified for such analyses by the State Water Resources Control Board (the State Board) Division of Drinking Water - 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.

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.

May 6, 2013
Revised January 6, 2015

- C. 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.
- D. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the State Board ELAP and in accordance with current United States Environmental Protection Agency 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.
- E. 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.
- F. 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.
- G. If the Discharger performs analyses on any groundwater samples more frequently than required by this MRP using approved analytical methods, the results of those analyses shall be included in the report.
- H. 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.
- I. The Discharger should not implement any changes to the MRP prior to receiving the Executive Officer's written approval.
- J. In accordance with regulations adopted by the SWRCB regarding ESI, Underground Storage Tank Program monitoring reports have been electronically submitted to the State Board GeoTracker system under UST Global ID

T0603704001. To comply with the MRP under this WDR, the Discharger shall upload the WDR monitoring reports to the Geotracker under both Global ID T0603704001 (continuing) and Global ID WDR100010874 (new).

II. DISCHARGE MONITORING REQUIREMENTS

The reports shall contain the following information regarding injection activities:

1. Location map showing application area.
2. Written summary defining:
 - Location of injection points and depth to groundwater;
 - Quantity of surfactant and activated sodium persulfate per area; and
 - Total amount of surfactant and activated sodium persulfate applied at site.
3. Groundwater monitoring wells shall not be used as surfactant and activated sodium persulfate injection points to avoid reduction of groundwater monitoring network, data bias, well screen clogging, and alteration.

III. GROUNDWATER MONITORING PROGRAM

The Discharger shall conduct groundwater monitoring at the site to monitor the effectiveness and ensure no adverse impacts associated with the surfactant and activated sodium persulfate application at treatment area. Groundwater samples shall be collected from the source wells DM-17 and DM-18, and surrounding wells DM-8, DM-10, DM-11, DM-13 and DM-15R (See Figure 1). A baseline monitoring and sampling shall be conducted prior to the proposed surfactant and activated oxidant application. Baseline monitoring will establish the initial conditions with respect to the contaminant levels. The Discharger shall conduct baseline sampling one or two weeks prior to surfactant and activated sodium persulfate application and regular sampling with the required frequencies from the monitoring wells for the following constituents:

CONSTITUENT	UNITS	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS ¹
Total petroleum hydrocarbons as gasoline (TPHg) and as diesel (TPHd)	µg/L ³	Grab	Semi-Annually
Benzene, Toluene, Ethylbenzene, Xylenes (BTEX)	µg/L	Grab	Semi-Annually
MTBE, TBA, TAME, DIPE, ETBE, Naphthalene	µg/L	Grab	Semi-Annually

Ethanol Formaldehyde Acetone	µg/L	Grab	Semi-Annually
Total dissolved solids, Arsenic, Boron, Chloride, Bromide, Sulfate, Lead, Nickel, Cadmium, Manganese	mg/L ⁴	Grab	Semi-Annually
Oxidation-reduction potential	millivolts	Grab	Semi-Annually
Dissolved Oxygen	µg/L	Grab	Semi-Annually
Dissolved ferrous iron	µg/L	Grab	Semi-Annually
Total Chromium and hexavalent chromium ²	µg/L	Grab	Semi-Annually
pH	pH units	Grab	Semi-Annually
Temperature	⁰ F/ ⁰ C	Grab	Semi-Annually
Groundwater Elevation	Feet, mean sea level, and below ground surface	In situ	Semi-Annually

- ¹ One week before injection and semi-annually thereafter.
- ² The Discharger is required to monitor for total chromium and hexavalent chromium in the baseline, second and fourth semi-annually sampling. If detected at any of these sampling events, the total chromium and chromium six must be monitored semi-annually thereafter.
- ³ µg/L = microgram per liter.
- ⁴ mg/L = milligram per liter.

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. Semi-annual observation of groundwater levels, recorded to 0.01 feet mean sea level, and groundwater flow direction.

IV. MONITORING FREQUENCIES

Specifications in the MRP are subject to periodic revisions. 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 Regional Board, upon request by interested parties.

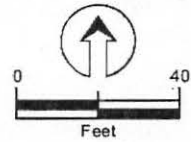
Ordered by: Samuel Unger
Samuel Unger, P.E.
Executive Officer

Date: January 6, 2015



- ◆ Monitoring Well
- ◆ Abandoned Monitoring Well
- Bioventing Well
- Approximate Former Dispenser Location

□ Approximate Location of Former 6,000-gallon Underground Storage Tank



aquilogic, Inc		Golden State Water Company
14401 S Chadron Ave, Hawthorne		
Site Plan		
Date: 9/8/2014	Project #: 013-01	Figure