OB

California Regional Water Quality Control Board
North Coast Region

MONITORING AND REPORTING PROGRAM NO. R1-2007-0043

FOR

CARRINGTON COMPANY & JIM CODDING

BENNETT VALLEY CLEANERS

2753 Yulupa Avenue

Santa Rosa, California

Sonoma County

This Monitoring and Reporting Program Order No. R1-2007-0043 (Order) is issued pursuant to California Water Code Section 13267(b) and requires monitoring of groundwater and submission of technical reports. Groundwater Monitoring Reports are required to be submitted each calendar quarter. The objective of monitoring conducted under this monitoring program is to provide the Discharger and the Regional Water Board with information concerning groundwater quality and contaminant trends at the site. This Order replaces all previous Regional Water Board monitoring and reporting directives for Bennett Valley Cleaners investigation site, located at 2753 Yulupa Avenue in Santa Rosa, California (the site).

Under the authority of the California Water Code Section 13267, the Dischargers named above are required to comply with the following:

MONITORING

1. The depth to groundwater shall be measured to the nearest 0.01-foot increment quarterly in all groundwater monitoring wells associated with the site. The results shall be reported in tabular form indicating the surveyed elevation of each well reference point, depth to groundwater from the reference point and the actual groundwater elevation. The data generated from the elevation readings shall be referenced to mean sea level. Elevation contour maps shall be included in all monitoring reports showing the direction of groundwater flow for each monitoring event.

2. Groundwater samples shall be collected quarterly from all groundwater monitoring wells. All laboratory analyses of groundwater samples shall be performed by a laboratory certified by California Department of Health Services for those analyses.

3. Groundwater samples shall be tested for the full scan of low-level volatile organic compounds analyzed by EPA Method 8260. Analytical methods shall achieve practical quantification reporting limits that are adequate for evaluating regulatory action levels for each constituent. A table of water quality objectives and common laboratory reporting limits for the constituents of concern is incorporated in this Order as Appendix A.

REPORTING

Groundwater Monitoring Reports shall be submitted quarterly, and shall include the following elements:

1. A narrative description of the work conducted;

2. An accurately scaled groundwater elevation site map displaying the following information:
   a. Groundwater elevation isograms, the direction of the groundwater, and the hydraulic gradient.
   b. The locations of monitoring wells;
   c. The locations of former and current dry cleaning facilities; and
   d. The locations of on-site structures, subsurface preferential pathways for contaminant migration, and other significant features.

3. A contaminant distribution map for the most significant pollutant or pollutants detected during the monitoring events. The map(s) should be presented at the same scale and display the same site features as the groundwater elevation map described in Item 2 above.

4. A table presenting the current and historical groundwater analytical results for each monitoring well that presents the following information:
   a. Sample locations;
   b. Date of sample collection;
   c. Constituents analyzed and analytical results; and
   d. Quantification limits employed for non-detect analytical results.

5. Copies of supporting documents such as the following:
   a. Signed well purging and sampling field logs;
   b. Chain of custody documents showing the time and date of sample collection and person collecting the samples; and
   c. Laboratory analytical reports presenting quality control data and comments regarding any analytical anomalies.

6. Groundwater monitoring and sampling reports shall be submitted so that they are received by the Regional Water Board on or before the following due dates for each calendar quarter:

Quarter	Reporting Period	Submittal Date
First Quarter	January, February, March	April 30th
Second Quarter	April, May, June	July 31st
Third Quarter	July, August, September	October 31st
Fourth Quarter	October, November, December	January 31st

7. Groundwater monitoring data and reports shall also be submitted electronically to the State Water Resources Control Board's Geographic Environmental Information Management System database (GeoTracker) as required by Title 23, Division 3, Chapter 30, Article 2, Sections 3890-3895 of the California Code of Regulations).

Ordered by _____
Catherine E. Kuhlman
Executive Officer

May 21, 2007

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Table of Water Quality Objectives

Halogenated Volatile Organic Compounds

CHEMICAL	Common Minimum Detection Level	WATER QUALITY OBJECTIVE [1]	WATER QUALITY OBJECTIVE CITATION
1,1-Dichloroethane	**<0.5 µg/l**	**3 µg/l**	**California Public Health Goal (Cal/EPA, OEHHA)**
1,2-Dichloroethane	**<0.5 µg/l**	**0.4 µg/l**	**California Public Health Goal (Cal/EPA, OEHHA)**
1,1-Dichloroethene	**<0.5 µg/l**	**0.06 µg/l**	**USEPA Health Advisory**
cis-1,2-Dichloroethene	**<0.5 µg/l**	**6 µg/l**	**Primary MCL** California Dept of Health Services
trans-1,2-Dichloroethene	**<0.5 µg/l**	**10 µg/l**	**Primary MCL** California Dept of Health Services
1,1,1-Trichloroethane	**<0.5 µg/l**	**17 µg/l**	**National Academy of Sciences Health Advisory**
1,1,2-Trichloroethane	**<0.5 µg/l**	**0.5 µg/l**	Cal/EPA Cancer Potency Factor
Trichloroethene	**<0.5 µg/l**	**0.8 µg/l**	**California Public Health Goal** (Cal/EPA, OEHHA)
Tetrachloroethene	**<0.5 µg/l**	**0.06 µg/l**	**California Public Health Goal** (Cal/EPA, OEHHA)
Vinyl Chloride	**<0.5 µg/l**	**0.05 µg/l**	**California Public Health Goal** (Cal/EPA, OEHHA)

[1] The California Water Code, and regulations and policies developed thereunder require cleanup and abatement of discharges and threatened discharges of waste to the extent feasible. Cleanup and abatement activities are to provide attainment of background levels of water quality or the highest water quality that is reasonable if background levels of water quality cannot be restored. **Alternative cleanup levels less stringent than background concentration shall be permitted only if the discharger demonstrates that: it is not feasible to attain background levels**; the alternative cleanup levels are consistent with the maximum benefit to the people of the State; alternative cleanup levels will not unreasonably affect present and anticipated beneficial uses of such water; and they will not result in water quality lower than prescribed in the Basin Plan and Policies adopted by the State and Regional Water Boards.