

California Regional Water Quality Control Board
North Coast Region

Monitoring and Reporting Program No. R1-2021-0049

(Rescinds and Replaces Monitoring and Reporting Program Order No.
R1-2019-0049)

for

Willits Environmental Remediation Trust

Abex Corporation - Remco Hydraulics
934 South Main Street
Willits, CA

Case No. 1NMC256
WDID No. 1B83011OMEN

Mendocino County

This Monitoring and Reporting Program Order is issued pursuant to California Water Code (Water Code) Section 13267(b) and requires monitoring of groundwater and submission of technical reports. Reports are required on an annual basis. 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. Monitoring and Reporting Program Order No. R1-2010-0004 exists for the dechlorination of volatile organic compounds in groundwater and monitoring for the Hexavalent Chromium Interim Remedial Action, and remains in effect. The burden, including costs, of these reports bears a reasonable relationship to the need for the reports and the benefits to be obtained from the reports.

This Monitoring and Reporting Program rescinds and replaces Monitoring and Reporting Program Order No. R1-2019-0049.

The failure to furnish any of the required reports, or the submittal of substantially incomplete reports or false information, is a misdemeanor, and may result in additional enforcement actions being taken against the Discharger, including issuance of an Administrative Civil Liability (ACL) Complaint pursuant to Water Code section 13268. Liability may be imposed pursuant to Water Code section 13268 in an amount not to exceed one thousand dollars (\$1,000) for each day in which the violation occurs.

Under the authority of the Water Code Section 13267, the Discharger named above is required to comply with the following:

MONITORING

Groundwater

1. Prior to purging, the depth to groundwater shall be determined to at least 0.01-foot increments in all groundwater monitoring wells associated with this case during each monitoring event.
2. Prior to sampling, the wells shall be properly purged.
3. Groundwater samples shall be collected from each monitoring well specified in Appendix 1 (attached). Appendix 1 lists the frequency of sampling, and the constituents to be analyzed.

Maintenance

4. The discharger shall conduct facility inspections and maintenance as specified in the September 1, "1998 Maintenance, Inspection and Discharge Contingency Plan," or modifications thereof. Records of inspection and maintenance shall be included with the monitoring reports.

Groundwater Treatment System Monitoring and Reporting

5. The groundwater treatment system shall be monitored and sampled in accordance with the "Revised Monitoring Plan for the Interim Remedial Action Groundwater Extraction and Treatment System at the Former Remco Hydraulics Facility" (Farr Associates, May 28, 2010), or approved revisions thereof.

General

6. Per Water Code section 13176, all laboratory analyses shall be performed at a California certified laboratory. Analytical methods for sample analyses shall achieve practical quantitation limits that are adequate for evaluating regulatory action levels for each constituent.

REPORTING

1. Annual comprehensive groundwater monitoring reports shall be submitted to the Regional Water Board on or before February 15 of each year.
2. Monitoring data and reports shall be submitted to the Regional Water Board via the State Water Resources Control Board's Geographic Environmental Information Management System database (GeoTracker) as specified in Title 23, Division 3, Chapter 30, Article 2, Sections 3890-3895 of the California Code of Regulations.
3. The groundwater elevation data calculated from the depth to water measurements shall be referenced to the same elevation datum used for GeoTracker.
4. Monitoring reports shall be prepared by or under the supervision of a California Professional Civil Engineer or Geologist.

5. The groundwater monitoring report shall contain all the information requested under the headings Groundwater Monitoring, Maintenance, Interim Remedial Actions (IRAs), and Groundwater Treatment System Monitoring and Reporting. The annual report shall contain isoconcentration maps, groundwater elevation contour maps, depths to groundwater from each sampling event, laboratory results, and interpretation of the data. Reports shall present the data in tabular format, and contain any information from monitoring performed more frequently than required, or at locations not required by this program and shall present the data collected or sampled pursuant to IRAs conducted at the facility.
6. Each annual monitoring report shall include the following elements:
 - a. A narrative description of the work conducted and interpretation of the data.
 - b. A narrative of remediation system operation, maintenance, performance, estimates of contaminant mass removed, and an evaluation of system performance.
 - c. Field notes and/or sampling logs documenting such activities as well purging, aquifer parameter testing, well recharge prior to sampling.
 - d. Chain-of-custody documentation.
 - e. Laboratory reports, including QA/QC data.
 - f. Well purging, sampling and decontamination protocols.
 - g. Field sampling logs, including equilibrium measurements, pumping rates, and other pertinent information.
 - h. Tabular results of the depth to groundwater measurements indicating the surveyed elevations of each reference point, depth to groundwater from the reference point, and the actual groundwater elevation. Vertical gradients shall be calculated and presented.
 - i. Damage or water intrusion into the well head vaults shall be reported and corrected.
 - j. Any information from monitoring performed more frequently than required, or at locations not required by this program.
 - k. Groundwater elevation contour maps and isoconcentration maps for the A zone and B zone, with all concentrations on the map and included in the contouring of the data. The following is a list of the isoconcentration maps required as part of this Order:
 - i. A Zone:
 - Total Summed VOCs
 - Dissolved Arsenic
 - Vinyl Chloride
 - 1,4 Dioxane

- ii. B Zone
1,4 Dioxane
- I. Regarding the on-going groundwater extraction and treatment activities: a summary of time on line and off line; influent, midpoint and effluent concentrations for hexavalent and total chromium, volatile organic compounds, and arsenic; total flows and flow rates discharged to the sanitary sewer on a weekly basis; and summary of carbon change outs.

Ordered by _____
Matthias St. John
Executive Officer

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Appendix 1

Table of groundwater sample points and constituent analyses

Aquifer Zone	Well ID	VOCs	1,4-Dioxane	Dissolved Arsenic
A	EW1A		Bi	Bi
A	EW2A		A	Bi
A	EW3A		A	
A	EW4A		A	
A	EW5A	A	A	
A	EW6A	A	A	
A	IMW-01		A	Bi
A	IMW-08			Bi
A	IMW-14			Bi
A	GMX-1A		Bi	Bi
A	GMX-2A	A		Bi
A	GMX-7A	A	Bi	Bi
A	MLW-12U	Bi		
A	MLW-14L	Bi		
A	MLW-15L	Bi	Bi	
A	TW-5		A	Bi
A	W12A	A	A	
A	W14A			Bi
A	W17A	A	Bi	
A	W18A	A	Bi	
A	W19A		Bi	
A	W21A	A	A	
A	W22A		A	Bi
A	W24A		A	
A	W28A	A	A	
A	W29A1	A	Bi	
A	W38A		A	
A	W41A	A		
A	W52A	Bi	Bi	
A	W53A	Bi		
A	W54A		A	
B	EW1B		A	
B	EW2B		Bi	
B	EW3B		Bi	
B	W8B		Bi	
B	W12B		A	

Aquifer Zone	Well ID	VOCs	1,4-Dioxane	Dissolved Arsenic
B	W28B		A	
B	W29B1		A	
B	W47B		Bi	
B	W55B		A	
B	W56B		A	

Newly installed wells are sampled quarterly for one year and semi-annually or annually thereafter.

A = Annual

Bi = Biennial (occurring during even-numbered years, 2022, 2024 etc.)