

California Regional Water Quality Control Board  
North Coast Region

Monitoring and Reporting Program  
Order No. R1-2021-0011

(Rescinds and Replaces Monitoring and Reporting Program No. R1-2017-0057)

for

Pacific Gas and Electric Company  
137 Santa Rosa Group Partnership  
Upway Properties

Former PG&E Manufactured Gas Plant  
111 Santa Rosa Avenue  
Santa Rosa, CA

Case Nos. 1NSR228 and 1TSR228

Sonoma 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. 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 pollutant trends at the site, necessitated by the historic discharge of waste to the subsurface and resulting threats to water quality. The information will assist the Regional Water Board in determining whether water quality meets, or will meet, objectives specified in the Regional Water Board's Basin Plan and will support beneficial uses. Therefore, 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. A cost estimate for the activities detailed in this Order is included as Table A.<sup>1</sup>

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<sup>1</sup> These estimates are based on costs provided by the environmental consultant and/or Regional Water Board staff evaluation of the property and experience in evaluating monitoring and reporting requirements and associated costs for comparable sites. PG&E is solely responsible for producing the reports that provide the necessary information to assess compliance with this order and the actual costs to comply with this order may differ from the estimates provided based on factors within PG&E's control and not the Regional Water Board's.

This Monitoring and Reporting Program rescinds and replaces Monitoring and Reporting Program Order No. R1-2017-0057

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 Dischargers, 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 Water Code section 13267, the Discharger named above is required to comply with the following:

### MONITORING

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. Groundwater samples from monitoring wells MW-9, MW-10, MW-12, MW-16, MW-21, MW-22, EBAMW-1, and EBAMW-2. shall be collected semiannually during the second and fourth calendar quarters of each year.
3. The groundwater monitoring well samples shall be analyzed for total petroleum hydrocarbons (TPH) as gasoline, TPH as diesel and TPH as motor oil (without silica gel cleanup), benzene, toluene, ethylbenzene, xylenes, and polynuclear aromatic hydrocarbons.
4. 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. The laboratory analytical methods for the analytes in Monitoring item 3 shall have reporting limits no greater than the following (for samples without interferences or other related constraints):
  - a. 50 µg/L for TPH as gasoline and TPH as diesel
  - b. 175 µg/L for TPH as motor oil
  - c. 0.5 µg/L for benzene, toluene, ethylbenzene, and xylenes (BTEX)
  - d. 0.1 µg/L for polynuclear aromatic hydrocarbons (PAHs), with detections below the reporting limits but above the method detection limits reported.
5. Annual inspection of restricted area of the property as identified in Figure 3 of the July 2017 [Soil Management and Operation and Maintenance Plan](#) for 111 Santa Rosa Avenue shall be conducted in the fall prior to the start of the rainy season (October 15). The annual visual inspection of the asphaltic cap (parking area) and

soil in the planter areas shall be assessed for integrity and indications of damage due to wear, settlement, extreme weather, or excessive vegetation. This work shall be conducted in accordance with the Soil Management and Operation and Maintenance Plan

### REPORTING

1. Semiannual monitoring reports shall be submitted to the Regional Water Board in accordance with the following schedule:

Sampling Period	Due Date
Second Quarter – April – June	August 1 of the same year
Fourth Quarter – October – December	February 1 of the next year

2. Annual inspection reporting shall be due February 1 the following year.
3. 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.
4. Monitoring reports shall be prepared by or under the supervision of a California Professional Civil Engineer or Geologist.
5. The groundwater elevation data calculated from the depth to water measurements shall be referenced to the same elevation datum used for GeoTracker.
6. Each annual monitoring report shall include the following elements:
  - a. A narrative description of the work conducted
  - b. Field notes and/or sampling logs documenting such activities as well purging, aquifer parameter testing, well recharge prior to sampling
  - c. Chain-of-custody documentation
  - d. Laboratory reports, including QA/QC data
  - e. An accurately scaled site plan showing all sampling points in relation to significant site features
  - f. Groundwater elevation contours plotted at the same scale as the site plan
  - g. Groundwater contaminant concentrations plotted at the same scale as the site plan

- 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.
- i. Data tables summarizing all current and historical analytical data for the site constituents of concern for each sampling station

Ordered by: \_\_\_\_\_  
Matthias St. John  
Executive Officer

21\_0011\_PG&E Gas Plant-Musco\_MRP

TABLE A – PG&E SANTA ROSA MANUFACTURED GAS PLANT (FORMER) COST ESTIMATE

Task	Task Total
Groundwater Monitoring (Per Event)	\$9,900
Groundwater Monitoring Report (Per Report) and Project Management	\$19,100
Site Monitoring (Per Event)	\$1,000-\$2,000
Site Monitoring Report	\$1,000-\$2,000
<b>TOTAL ESTIMATED COSTS</b>	<b>\$31,000-\$33,000</b>