CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Los Angeles Regional Water Quality Control Board

June 15, 2018

Mr. Larry Goodman
Saugus Industrial Center, LLC
26000 Springbrook Avenue
Santa Clarita, CA 91350

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. 7017 1450 0002 1559 0713

REVISED MONITORING AND REPORTING PROGRAM – SAUGUS INDUSTRIAL CENTER, 26000 SPRINGBROOK AVENUE, SANTA CLARITA, CALIFORNIA (FILE NO. 15-022, ORDER NO. R4-2014-0187, SERIES NO. 084, CI-10273, GLOBAL ID WDR100022165)

Dear Mr. Goodman:

The Regional Water Quality Control Board, Los Angeles Region (Regional Board), is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses of water within major portions of Los Angeles and Ventura Counties, including the facility mentioned above.

The Saugus Industrial Center (Site) is at 26000 Springbrook Avenue, in Santa Clarita, California. On September 30, 2016, the California Regional Water Quality Control Board, Los Angeles Region (Regional Board), enrolled the Saugus Industrial Center, LLC (Discharger) under General Waste Discharge Requirements (WDR) Order No. R4-2014-0187, Series 084, and Monitoring and Reporting Program (MRP) CI-10273. General WDR Order No. R4-2014-0187 was adopted by this Regional Board on September 11, 2014.

Under General WDR Order No. R4-2014-0187 the Discharger injected approximately 12,060 gallons of an emulsified vegetable oil (EVO) and *Dehalococcoides* mixture into wells VE-1, VE-2, VE-3, and VE-4, from January 9 to January 12, 2017. The wells are screened from approximately 90 to 120 feet below grade (bg). The injection was part of Site groundwater and saturated soil remedial actions. The Discharger is conducting remedial actions under a Voluntary Cleanup Agreement with the Department of Toxic Substances Control (DTSC). The remedial actions were conditionally approved by DTSC in a December 17, 2014 letter. The conditions in the DTSC letter were incorporated in a final Remedial Action Plan dated January 15, 2015.

On April 11, 2018, a representative of the Discharger uploaded the *Submittal of an Application (Form 200) to Modify Report of Waste Discharge Permit and Associated Monitoring and Reporting Program, Saugus Industrial Center, LLC,* (Request) to GeoTracker. The Request was dated February 26, 2018. The Request proposed additional injections of EVO, *Dehalococcoides sp.,* and *Dehalobacter sp.* to promote anaerobic biodegradation of volatile organic compounds in saturated soils and groundwater. The additional injections are covered by the DTSC December 17, 2014, conditional approval letter.

The additional injection will use the following seven wells and screen intervals (in feet bg): VE-5 (90-120); VE-6 (85-120); VE-7 (85-125); VE-8 (95-135); VE-9 (85-125); VE-10 (85-125); and VE-11 (85-125). The injection techniques will be similar to those used in January 2017. The duration of the initial injection event, at all seven locations, is expected to be less than 2 weeks. An injection event will consist of the injection of less than 4,500 gallons of material at a given injection location. Some locations may require multiple injection events. There will be no more than five injection events at any one location. Maximum peak injection pressure will be no more than 10 pounds per square inch (psi). Maximum flow rates will be no more than 10 gallons per minute. The maximum total injection volume, for all injection events, at all seven locations is expected to be less than 157,200 gallons. The injection locations are shown on figure 2 of the MRP.

Regional Board staff have reviewed the Request and information in our files and have determined that the proposed discharge modification meets the conditions specified in General WDR Order No. R4-2014-0187. You shall implement revised MRP No. CI-10273 (attached), with a maximum discharge (injection volume) of 157,200 gallons. Should changes to the discharge be needed, revised engineering drawings showing the changes must be filed with the Regional Board a minimum of 30 days prior to the changes. The Discharger must receive approval from the Regional Board for such changes prior to implementation.

The Dischargers shall comply with the Electronic Submittal of Information (ESI) requirements by submitting all reports required under the CDO and MRP, including groundwater monitoring data, discharge location data, pdf monitoring reports, and progress reports on the status of the construction, installation, and expansion upgrades to the State Water Resources Control Board GeoTracker database under Global ID **WDR100022165**.

Please see Electronic Submittal for GeoTracker Users, dated December 12, 2011, at:
http://www.waterboards.ca.gov/losangeles/resources/Paperless/Paperless%20Office%20for%20GT%20Users.pdf

If you have any questions, please call the Project Manager, Mr. Peter Raftery at (213) 620-6156 (Peter.Raftery@Waterboards.ca.gov) or the Groundwater Permitting Unit Chief, Dr. Eric Wu, at (213) 576-6683 (Eric.Wu@Waterboards.ca.gov) regarding this matter.

Sincerely,

Deborah J. Smith
Executive Officer

Enclosure: Revised Monitoring and Reporting Program No. CI-10273 (June 15, 2018)

cc (via email): Mr. Jose Diaz Department of Toxic Substances Control
Mr. Dan Grasmick, Apex Group
Mr. Craig Snider, Environmental Management

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

REVISED MONITORING AND REPORTING PROGRAM NO. CI-10273
FOR
SAUGUS INDUSTRIAL CENTER, LLC
26000 SPRINGBROOK AVENUE, SANTA CLARITA, CA

ENROLLMENT UNDER REGIONAL BOARD
ORDER NO. R4-2014-0187 (SERIES NO. 084)
FILE NO. 15-022

I. REPORTING REQUIREMENTS

A. Saugus Industrial Center, LLC (SIC), hereinafter Discharger, shall implement this revised Monitoring and Reporting Program (MRP) at the Saugus Industrial Center facility located at 26000 Springbrook Avenue, Santa Clarita, California, which is shown on Figures 1 and 2, on the effective date of this enrollment (June 15, 2018) under Regional Board Order No. R4-2014-0187. The first monitoring report under this monitoring program is due July 30, 2018.

The subsequent monitoring reports shall be received by the dates in the following schedule:

Reporting Period	Report Due
January – March	April 30
April – June	July 30
July – September	October 30
October – December	January 30

B. If there is no discharge of emulsified vegetable oil (EVO) or *Dehalococcoides/Dehalobacter* during any reporting period, the report shall so state.

C. By March 30th of each year, beginning March 30, 2017, 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.

D. Laboratory analyses – all chemical, bacteriological, and/or toxicity analyses shall be conducted at a laboratory certified for such analyses by the State Water Resources Control Board, Division of Drinking Water (SWRCB-DDW) Environmental Laboratory Accreditation Program (ELAP).

E. The method limits (MLs) employed for 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

Executive Officer. At least once a year, 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.

F. 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. Proper chain of custody procedures must be followed and a copy of the chain of custody documentation shall be submitted with the report.

G. Each monitoring report must affirm in writing that "All analyses were conducted at a laboratory certified for such analyses by the SWRCB-DDW ELAP, and in accordance with current United States Environmental Protection Agency (USEPA) 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.

H. For every item where the requirements are not met, the Discharger shall submit a statement of the cause(s), and actions undertaken or proposed which will bring the discharge into full compliance with waste discharge requirements at the earliest possible time, including a timetable for implementation of those actions.

I. The Discharger shall maintain all sampling and analytical results, including strip charts, 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.

J. 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.

K. Any mitigation/remedial activity including any pre-discharge treatment conducted at the site must be reported in the quarterly monitoring report.

L. 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 Waste Discharge Requirements (WDRs). This section shall be located at the front of the report and shall clearly list all non-compliance with discharge requirements, as well as all excursions of effluent limitations.

M. The Discharger shall comply with requirements contained in Section G of Order No. R4-2014-0187 "*Monitoring and Reporting Requirements*" in addition to the aforementioned requirements.

II. INJECTION MONITORING REQUIREMENTS

EVO and *Dehalococcoides* microbial suspension shall be injected into wells: VE-5; VE-6; VE-7; VE-8; VE-9; VE-10; and VE-11. Their locations are shown on Figure 2. Injection monitoring will be conducted prior to, during and at the end of the EVO and *Dehalococcoides/Dehalobacter* suspension injection. Field parameters such as the injection volume, flow rate, and injection period shall be reported.

The quarterly reports shall contain the following regarding the quarterly injection activities:

1. Location map showing injection points.

2. Written summary providing:
   - Depth of injection at each location;
   - Volume injected at each injection location;
   - Total volume injected;
   - Injection flow rates; and
   - Injection pressures.

3. During injection, daily visual inspections at each injection point shall be conducted. The quarterly report shall include a summary of the visual inspections.

III. GROUNDWATER MONITORING PROGRAM FOR THE REMEDIATION PROJECT

A groundwater monitoring program shall be designed to detect and evaluate impacts associated with the EVO, *Dehalococcoides*, and *Dehalobacter* mixture injection activity. Table 1 below identifies the constituents that will be analyzed during a baseline sampling event, 30 days, 60 days, 90 days after the injection has begun, and subsequent quarterly groundwater monitoring events during the monitoring period for the purpose of evaluating the effectiveness of the suspension injection.

The objectives of this MRP are to detect and evaluate impacts associated with the injection activities. The following wells shall constitute the Monitoring and Reporting Program:

Upgradient of the injection area:	GW-1B
Within the injection area:	VE-3, VE-5, VE-6, VE-7
Downgradient of the injection area:	GW-3, GW-7, GW-14, GW-15

The locations of the monitoring wells are shown on Figure 2 (attached). The monitoring locations shall not be changed and any proposed changes of monitoring locations shall be identified and approved by the Regional Board Executive Officer (Executive Officer) prior to their use.

TABLE 1 – GROUNDWATER MONITORING CONSTITUENTS

CONSTITUENT	UNITS [1]	TYPE OF SAMPLE	MINIMUM FREQUENCY OF ANALYSIS
Water Temperature [2]	°C	Grab	Baseline and quarterly thereafter
Specific Conductance [2]	µS/cm	Grab	Baseline and quarterly thereafter
Dissolved Oxygen [2]	mg/L	Grab	Baseline and quarterly thereafter
pH [2]	pH units	Grab	Baseline and quarterly thereafter
Oxidation-Reduction Potential [2]	mV	Grab	Baseline and quarterly thereafter
Volatile Organic Compounds (VOCs) – complete suite (EPA Method 8260B)	µg/L	Grab	Baseline and quarterly thereafter
Dissolved Gases (ethene, ethane, methane) (Method RSK175M)	µg/L	Grab	Baseline and quarterly thereafter
Sulfate (EPA Method 300)	mg/L	Grab	Baseline and quarterly thereafter
Chloride (EPA Method 300)	mg/L	Grab	Baseline and quarterly thereafter
Total Dissolved Solids (Standard Method 2540C)	mg/L	Grab	Baseline and quarterly thereafter
Boron (EPA Method 200.7)	mg/L	Grab	Baseline and quarterly thereafter
Nitrate (EPA Method 300.0)	mg/L	Grab	Baseline and quarterly thereafter
Alkalinity	mg/L	Grab	Baseline and quarterly thereafter
Total Organic Carbon	mg/L	Grab	Baseline and quarterly thereafter
Dehalococcoides species	cells/ml	Grab	Baseline and quarterly thereafter

[1] mg/L: milligrams per liter; µg/L: micrograms per liter; µS/cm: microsiemens per centimeter; mV: millivolts; °C: degree Celsius; ml: milliliter.
[2] Field instrument can be used to test for this constituent.

All groundwater monitoring reports must include, at minimum, the following:

a. Well identification, and sampling dates and times;
b. Sampler identification and laboratory identification;
c. Observation of groundwater levels, recorded to 0.01 feet mean sea level, and groundwater flow direction posted on a site map.

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)"

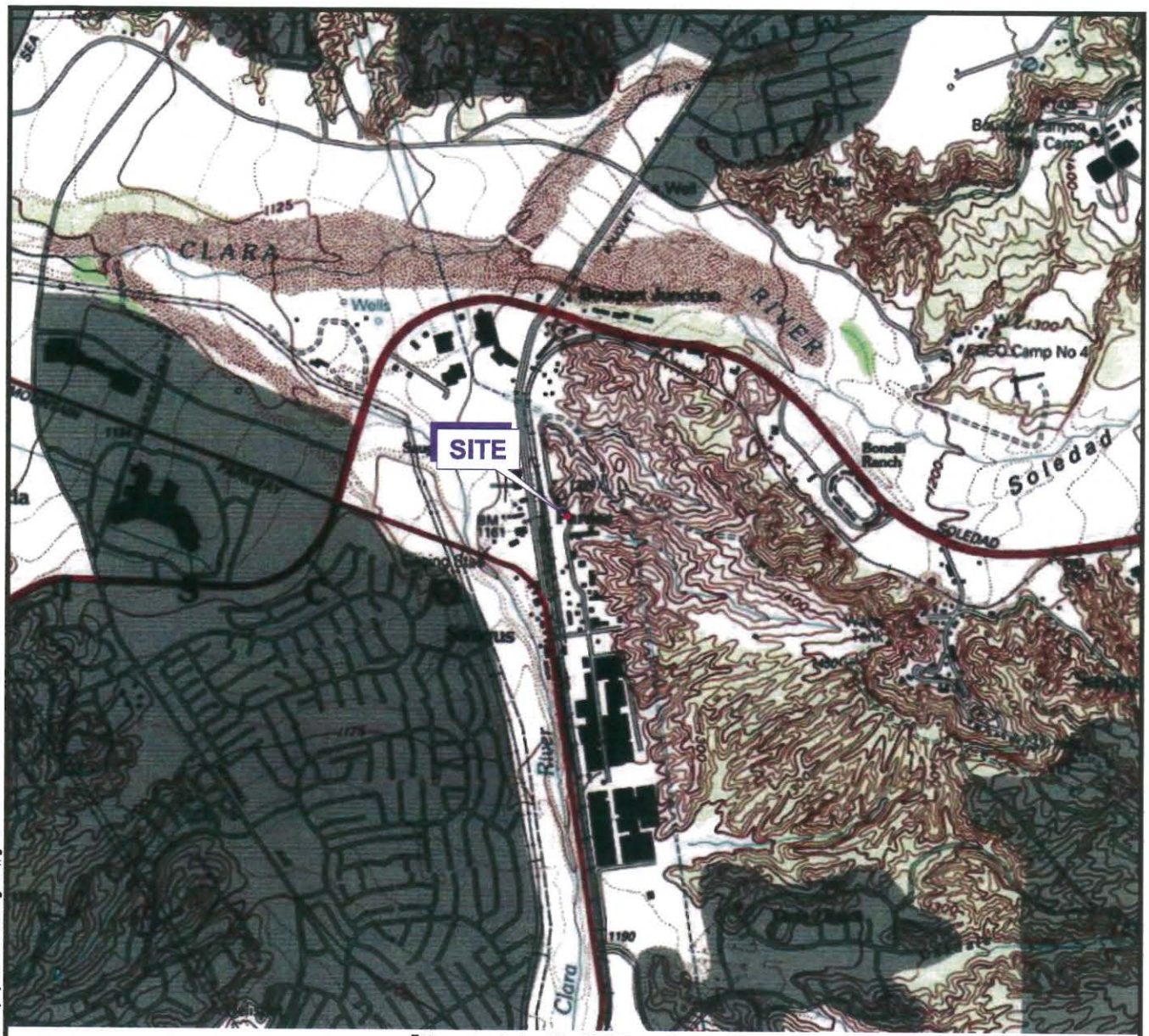
VI. ELECTRONIC SUBMITTAL OF INFORMATION (ESI) TO GEOTRACKER

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, correspondence, and pdf monitoring reports to the State Water Resources Control Board GeoTracker database under Global ID WDR100022165.

All records and reports submitted in compliance with this Order 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.

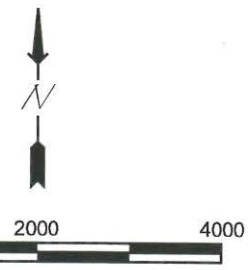
Ordered by: _____
Deborah J. Smith
Executive Officer

Date: June 15, 2018



"Map created with TOPO! and used with permission © 2004 National Geographic"

QUADRANGLE LOCATION



APPROXIMATE SCALE (FEET)

Reference: U.S.G.S., 1995, Newhall, California Quadrangle, 7.5-Minute Topographic Map.

FILENAME: C:\Users\ScopM\Desktop\Temp\Saugus Industrial Center\SLMap\SIC-SLM_Fig1.dwg

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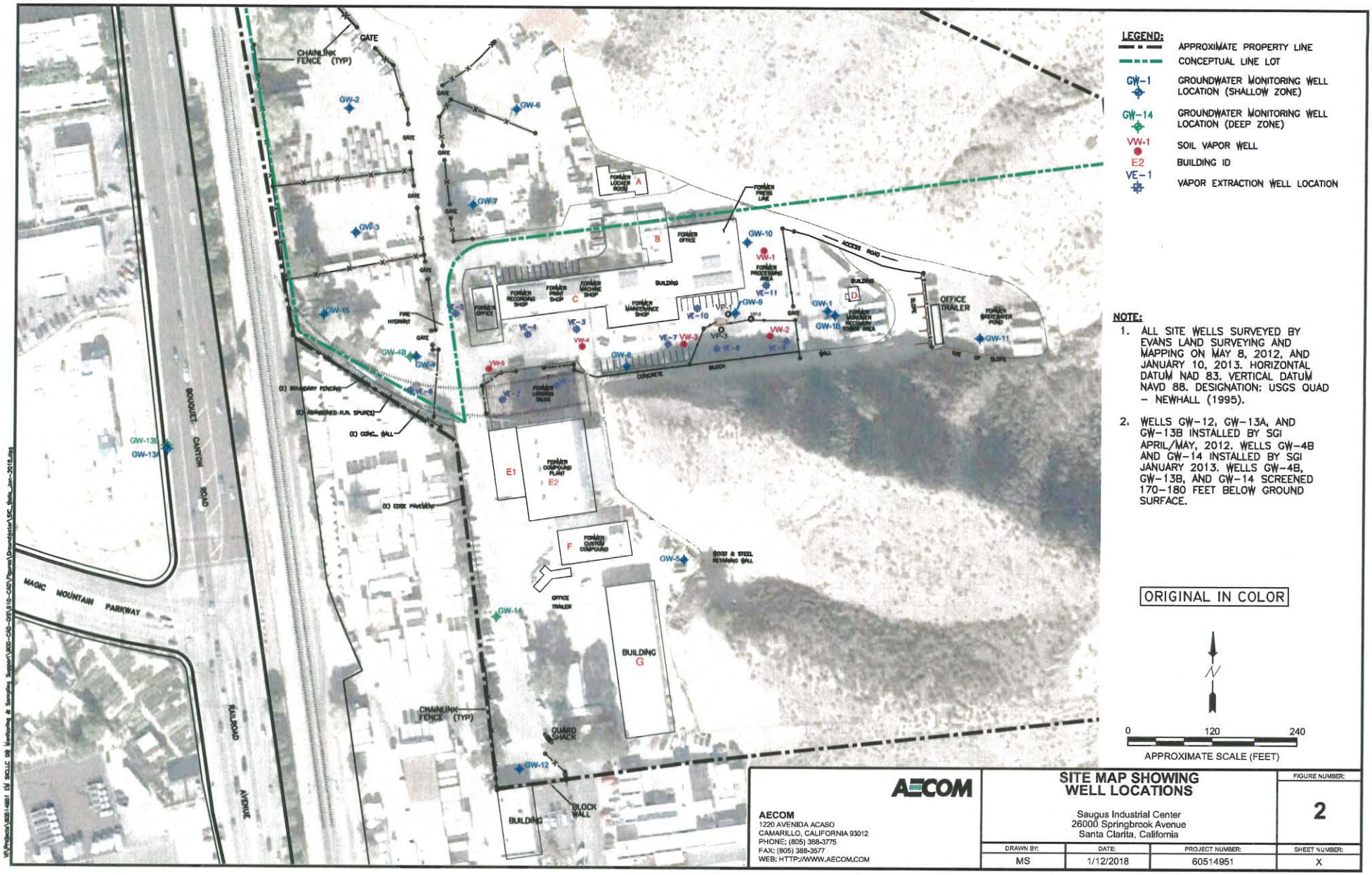
SITE LOCATION MAP

Saugus Industrial Center
26000 Springbrook Avenue
Santa Clarita, California

FIGURE NUMBER: 1

DRAWN BY:	DATE:	PROJECT NUMBER:	SHEET NUMBER:
MS	7/19/2016	60512656	X



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SITE MAP SHOWING WELL LOCATIONS

Saugus Industrial Center
26000 Springbrook Avenue
Santa Clarita, California

FIGURE NUMBER: 2

DRAWN BY:	DATE:	PROJECT NUMBER:	SHEET NUMBER:
MS	1/12/2018	60514951	X